

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



**Belfast
City Council**

3rd June, 2021

REMOTE MEETING OF PEOPLE AND COMMUNITIES COMMITTEE

Dear Alderman/Councillor,

The above-named Committee will meet remotely via Microsoft Teams on Tuesday, 8th June, 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) Chief Executive's decisions taken under Delegated Authority
- (c) Declarations of Interest

2. **Presentations**

- (a) Public Health Agency
- (b) Waste as a resource, changing landscape - presentation from Tim Walker, Arc 21 Acting Chief Executive
- (c) DfC Affordable Warmth update

3. **Restricted**

- (a) Request for The Hire of Boucher Road Playing Fields (Pages 1 - 4)
- (b) Rosario Youth Club - Funding Request (Pages 5 - 10)
- (c) Requests for the use of Parks for Summer Events report (Pages 11 - 16)

4. **Operational Issues**

- (a) Extended Producer Responsibility / Deposit Return Scheme - consultation update (Pages 17 - 96)
- (b) Proposal for naming new streets (Pages 97 - 98)
- (c) Pest control update (Pages 99 - 102)

5. **Committee/Strategic Issues**

- (a) Update on Community Planning and work of Living Here Board (Pages 103 - 160)
- (b) Belfast Open Spaces Strategy - Delivery Plan (Pages 161 - 224)
- (c) Belfast Healthy Cities (Pages 225 - 228)
- (d) Naming of New Park at Colin (Pages 229 - 232)

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

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Subject:	Consultations on Extended Producer Responsibility (EPR) for Packaging and Deposit Return Scheme (DRS)
Date:	8 June 2021
Reporting Officer:	Siobhan Toland, Director of City Services
Contact Officers:	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 checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	As agreed at the May 2021 People and Communities Committee, this update is to provide Committee with a copy of the relevant responses from the Council and arc21 to recent consultations on EPR and DRS relating to packaging waste. Both consultations opened on 24 March 2021 and closed on 04 June 2021.
2.0	Recommendations
2.1	<p>The Members of the Committee are asked to recommend that, in accordance with the Council decision of 4th May 2021, the Chief Executive exercise her delegated authority to:</p> <ul style="list-style-type: none"> Retrospectively (as noted as last month's Committee meeting, the consultations formally closed on 4th June) adopt the consultation responses to Extended Producer

	Responsibility for Packaging and Introducing a Deposit Return Scheme in England, Wales & Northern Ireland.
3.0	Main report
3.1	Members may recall a series of consultations in 2019, relating to packaging. This consultation process was the beginning of an approach to reform the arrangements for producer responsibility for packaging waste, which has been in place since 1997. The responses, to the original consultations, from both Belfast City Council and arc21, were presented to Committee in June 2019.
3.2	These consultations collectively represent possibly the biggest change in UK Waste Management practices in a generation. These will have profound implications upon BCC' waste activities and particularly on the financing of collection arrangements and revenue arising from the sale of recyclables.
3.3	The premise of the EPR consultation is to ensure “ <i>producers pay the full costs of dealing with the waste packaging they produce</i> ”. The original producer responsibility scheme in its current guise has flaws and does not support the principles of producers paying for the full costs, nor that the benefits should be spread across all stakeholders in the supply chain. This new EPR scheme is focusing more clearly on addressing this shortfall to ensure that it is fairer for all stakeholders.
3.4	The EPR consultation has much to commend it in progressing the development of a Circular Economy and should be viewed as an opportunity, subject to the actual implementation of the detail to be contained within the legislation. The aim of placing the cost burden on producers with the expectation that this will cause them to question whether their packaging is necessary, could be reduced, or not used at all, is a positive change and should reduce the overall financial burden placed on councils in dealing with packaging waste.
3.5	Following strong support from the 2019 consultations, Northern Ireland, England and Wales committed to introduce a Deposit Return Scheme (DRS) for drinks containers subject to further consultation. This second consultation is seeking views from across the industry, on how the scheme will function to ensure it achieves the desired outcomes. Responses to this consultation will help inform final policy decisions on key aspects of the scheme, such as governance, targets and implementation timelines.

3.6	At its meeting on 11 May 2021, Committee agreed to support an “All-in Scheme” in relation to the size of drinks containers to be included within the Deposit Return Scheme and this has been reflected in the Belfast City Council response.
3.7	Both consultations opened on 24 March 2021 and closed on 04 June 2021. The responses to both consultations are contained in Appendices 1 and 2 . In preparing the Council's response, officers have also taken on board the views of regional organisations such as NILGA, arc21 and LARAC, in order to recognise the regional and national importance of this consultation.
	Background
3.8	To help the move towards a more Circular Economy, the UK Government for England (DEFRA), the Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland have all made commitments to develop policy which works towards achieving the aims of resource efficiency and resource productivity, through the development of producer responsibility proposals.
3.9	Government highlights that, in 2019, approximately 11.7 million tonnes of packaging was placed on the UK market and that every year across the UK, consumers go through an estimated 14 billion plastic drinks bottles, nine billion drinks cans and five billion glass bottles.
3.10	In March 2021, Government launched these Consultations to overhaul the waste and resources sector, in an attempt to boost recycling, tackle plastic pollution and reduce litter.
3.11	The proposals within the Consultations are underpinned by powers in the new Environment Bill, to make manufacturers more responsible for the packaging they produce and incentivise consumers to recycle more.
3.12	The new proposals include Extended Producer Responsibility for packaging where manufacturers will pay the full costs of managing and recycling their packaging waste, with higher fees being levied if packaging is harder to reuse or recycle. The scheme is being developed on a UK-wide basis.

3.13	<p>Also included is a Deposit Return Scheme for drinks containers, where consumers will be incentivised to take their empty drinks containers to return points hosted by retailers. The scheme would cover England, Wales and Northern Ireland, with a separate scheme already under development in Scotland.</p> <p><u>Extended Producer Responsibility for Packaging (EPR)</u></p>
3.14	<p>The current producer responsibility system for packaging has been in place since 1997 and predates the introduction of devolved government in Scotland and Wales in 1999. It operates UK-wide under GB and parallel Northern Ireland regulations. In response to commitments made by the four governments to reform the existing regime and to incentivise producers to take more responsibility for the materials and products they place on the market, the UK Government, the Scottish Government, the Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland published a joint consultation in February 2019 setting out proposals to reform the producer responsibility system for packaging.</p>
3.15	<p>Extended Producer Responsibility is an established policy approach adopted by many countries around the world, across a broad range of products and materials. It gives 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.</p>
3.16	<p>This second consultation sets out proposals for the introduction of EPR for Packaging. Views are sought from across the industry, as well as members of the public, on how the scheme will function to ensure it achieves the desired outcomes. Responses to this consultation will help inform final policy decisions on key aspects of the scheme, such as governance, recycling targets and implementation timelines to help ensure an effective system is put in place and inform the regulatory framework required to deliver this change. A synopsis of the EPR scheme is outlined in the following sections.</p> <p>Targets</p>
3.17	<p>Under the Packaging Waste Regulations 2007, obligated producers are required to meet annual recycling targets, with UK packaging waste recycling rates reported annually by</p>

	Defra. Government will separately report overall packaging waste recycling rates for England, Northern Ireland, Scotland, and Wales.
3.18	The consultation proposes minimum recycling targets for six packaging materials. These equate to an overall recycling rate for EPR packaging of 73% by 2030. It also proposes the introduction of a recycling target for fibre-based composite packaging such as food and drink cartons and single use paper cups.
	Full Net Costs
3.19	<p>Following strong support in the 2019 consultation, subsequent evidence development and stakeholder engagement, Government intends to progress with the broad scope of full net costs of managing packaging waste as set out in the response to the first consultation. This includes:</p> <ul style="list-style-type: none"> • The collecting, sorting, and recycling of packaging waste from households and businesses • The collecting and disposing of packaging in the residual waste stream from households only • Litter and refuse management costs, including bin and ground litter
	Obligated Producers
3.20	Government proposes the introduction of a single point of obligation (i.e., a single producer is responsible for the cost of managing a piece of packaging). This will focus the obligations onto those who are best placed to reduce and/or increase the recyclability of the packaging they use. The consultation details the proposed obligations for reporting and payment of costs for the different types of obligated producer. In the current system, the obligation for a single item of packaging is shared across multiple businesses.
3.21	The consultation proposes lowering current “de-minimis” levels so that more producers are obligated and also obligating online retailers for any imported packaging.
	Disposable Cups
3.22	The consultation seeks views on whether a mandatory cup takeback and recycling requirement should be placed on businesses selling filled disposable paper cups to provide for the separate collection of used cups (either generated in-store or consumed ‘on-the-go’). Currently there are some voluntary schemes being operated by retailers in relation to disposable cups.

	<p>Modulated Fees</p>
3.33	<p>The consultation proposes that the fees producers will pay to cover the disposal costs of their packaging should be varied to reflect criteria such as recyclability. For instance, producers whose packaging contributes positively to scheme outcomes (e.g., easily recyclable) will pay lower fee rates, while fee rates for packaging which does not contribute positively to scheme outcomes will be increased (e.g., unrecyclable).</p>
	<p>Labelling</p>
3.34	<p>The consultation proposes that mandatory recyclability labelling should be introduced on packaging as soon as is feasible and by end of 2026/27 at the latest. The expectation is that labelling is introduced on different packaging types in line with requirements for their separate collection by local authorities (so along the lines that the OPRL is designed). It is proposed that the broad requirements for labelling are set out in legislation, including a requirement to use a label approved by Government (or the Regulator).</p>
	<p>Plastic Film and Flexible Packaging</p>
3.35	<p>It is proposed that plastic films and flexibles should be required to be collected for recycling as soon as is practical, and the costs of achieving this are paid by producers. It is assumed this will be possible by end of financial year 2026/27 but views are sought in the consultation.</p>
	<p>Bio-degradable Packaging</p>
3.36	<p>This type of packaging will fall under EPR proposals. The consultation suggests that until such time as the state of evidence, collections and infrastructure for this packaging can be improved on this type of packaging, it is unlikely to be considered recyclable under packaging EPR and will therefore attract higher fee rates than packaging that contributes positively to scheme outcomes.</p>
	<p>Payments for Household Waste to Local Authorities</p>
3.37	<p>The consultation sets broad principles underpinning the implementation of payment mechanisms. These include the scope of “necessary costs” and that costs paid by producers should be for the delivery of ‘efficient and effective’ services.</p>
3.38	<p>It proposes that payments should be based on both the tonnages and quality of packaging waste collected and recycled, with these requirements being phased in and a Scheme</p>

	Administrator encouraged to support local authorities to improve and meet performance benchmarks, to obtain their full payments.
3.39	Only local authorities which operate efficient and effective systems will have their full net costs recovered via a modelled approach based on the tonnage collected.
	Payments for Business Waste
3.40	The consultation seeks views on three different approaches to facilitate payments from packaging producers to businesses generating packaging wastes. Two of these approaches foresee a clear role for compliance schemes, whilst one foresees full responsibility for payment, and therefore achievement of targets, placed on a Scheme Administrator.
	Data and reporting required
3.41	To support the payment mechanisms proposed, Local Authorities will need to report data to the Scheme Administrator. This will include data on their collection and disposal services and facilities, the types of households and businesses they service, the tonnages collected through their systems and local communications activities.
3.42	It is proposed that producers pay according to the tonnage of packaging they place on the market in the previous calendar year as they currently do, and that Local Authorities are paid on a financial year basis, based on previous years tonnage data, quarterly in arrears.
	Payments for Littered Waste
3.43	The consultation proposes that producers of commonly littered packaging items be made responsible for the costs that are directly attributable to their management, both as bin and ground litter. This includes costs incurred by Local Authorities, other duty bodies, litter authorities and statutory undertakers.
	Scheme Administrator and Governance
3.44	The consultation seeks views on two broad approaches:

	<ul style="list-style-type: none"> • A single administrator / management organisation: responsible for administering and managing delivery of the packaging waste management cost requirements and producer compliance with packaging waste recycling targets. • Multiple compliance schemes with certain functions undertaken by a Scheme Administrator: A Scheme Administrator would take on functions that are better delivered UK-wide such as developing the approach to determining packaging waste management costs for household waste, setting the fee modulation mechanism, and administering payments to local authorities; with compliance schemes primarily responsible for managing compliance with obligations in respect of non-household packaging waste.
3.45	<p>Monitoring and Enforcement</p> <p>It proposes that the environmental regulators in England, Northern Ireland, Scotland, and Wales will be the primary regulators and have the powers to monitor, audit, and use civil and criminal penalties to drive compliance and address non-compliance. There are no proposals for local authority involvement in aspects of regulation relating to the EPR system.</p>
3.46	<p>Implementation Timetable</p> <p>The governments intend to have the first phase of EPR established in 2023 which would enable payments to local authorities to commence from October 2023. Full cost recovery is anticipated to be achievable in Phase 2 from April 2024.</p>
3.47	<p><u>Deposit Return Scheme</u></p> <p>This consultation focuses on specific policy proposals for the introduction of a deposit return scheme, including the scope of materials, scheme governance, return points, and collection targets. The proposals set out in the consultation work together to create a scheme that incentivises consumers to change their behaviour, leading to higher recycling rates and lower levels of littering. The consultation refers solely to deposit return schemes for drinks containers.</p>
3.48	<p>Following the first consultation on a Deposit Return Scheme, in 2019, Government indicated the intention was to introduce a deposit return scheme for drinks containers in England, Wales, and Northern Ireland from 2023 and that the introduction of a deposit</p>

	return scheme would be subject to receiving additional evidence and carrying out further analysis on the costs and benefits of such a scheme.
3.49	Government remains committed to delivering on its commitments to introduce a deposit return scheme, but it also recognises that the Covid-19 pandemic has disrupted the economy and society in unimaginable ways. On this basis, the second consultation builds on the first consultation, offering a chance to explore further what the continued appetite is for a deposit return scheme in a 'post-Covid' context.
3.50	Government have reassessed what a realistic timeline for implementation of a deposit return scheme looks like, ensuring that sufficient time is given for a successful roll-out of the scheme. They anticipate that the introduction of a deposit return scheme in England, Wales and Northern Ireland would be in late 2024 at the earliest. Updated information on the implementation timeline is provided in the consultation.
3.51	Views are being sought on how a deposit return scheme will operate, for example, scheme design, scheme governance, implementation timelines and enforcement. DEFRA is seeking views from across the industry, as well as members of the public, on how the scheme will function to ensure it achieves the desired outcomes.
3.52	The Consultation document covers ten major areas relating to a deposit return scheme. Of particular relevance to local authorities are the chapters covering the scope of the scheme, the scheme governance, return points and local authorities. Other areas covered include the collection targets, financial flows, labelling, monitoring and enforcement, the implementation timeline and the impact assessment.
3.53	<p>Scope</p> <p>The Consultation sets out the scheme participants who will take on obligations under the deposit return scheme – namely producers, retailers, and the Scheme Administrator (Deposit Management Organisation or DMO). These obligations include requiring producers to sign up to the DMO and carry out reporting obligations, paying a producer registration fee to the DMO to fund the deposit return scheme, and placing a redeemable deposit on in-scope drinks containers they place on the market. Retailers will be required to accept all deposit return scheme containers returned to their store and ensure the deposit price is added to the purchase price of an in-scope drink at the point of purchase.</p>

3.54	<p>It sets out what materials will be within the scope of a DRS. This will be based on materials and not the type of product and it is proposed that the scheme will include PET bottles, glass bottles and steel and aluminium cans. These will either be drinks containers up to 3 litres for the “all in” scheme or drinks containers under 750ml for the “on the go” scheme.</p> <p>Four options are proposed:</p> <ol style="list-style-type: none"> 1. Do Nothing 2. All in (drinks containers up to 3 litres) 3. On the go (drinks containers under 750ml) 4. All in without glass <p>Welsh Government have stated a preference for an “all in” system.</p>
3.55	<p>As noted, at its meeting on 11 May 2021, Committee agreed to support an “All-in Scheme” in relation to the size of drinks containers to be included within the Deposit Return Scheme. Within the Consultation response, although we support the inclusion of all proposed materials, we highlight the fact that the Republic of Ireland is developing a deposit return scheme excluding glass, and that this has the potential to cause confusion and even fraudulent cross-border activity. We also suggest that consideration could be given to additional materials, for example cartons.</p>
3.56	<p>Targets</p> <p>There are proposals that legislation will set out targets for a proportion of drinks containers placed on the market to be collected for recycling. It is proposed that there should be an obligation placed on the DMO to achieve a 90% collection rate after three years from introduction. It will be the responsibility of the reprocessor to provide evidence how much has been recycled. The point at which material will be counted towards recycling targets will be when it reaches end of waste criteria.</p>
3.57	<p>To ensure that all material collected through a deposit return scheme will be recycled, the governments propose that there should be a legal obligation on the Deposit Management Organisation to ensure that the material that is collected via a deposit return scheme is passed on to a reprocessor and evidence is provided of this.</p>
3.58	<p>Within our response, we agree that in order to make the DRS system worthwhile it should achieve a high capture rate. However we highlight that consideration may need to be given</p>

	<p>to defer the scheme, until the outcomes of EPR and the plastics tax are realised before making additional investment for a DRS. We also stress that equality issues should be considered, to ensure that no one is disadvantaged or discriminated against, in order to achieve high capture and collection rates for all materials.</p> <p>Scheme Governance</p>
3.59	<p>The consultation outlines the role of the Deposit Management Organisation (DMO) whose role is to manage the operation of the deposit return scheme. The DMO will own the material returned by the consumers and be responsible for meeting the high collection targets set out in legislation and will be appointed via a competitive tender process. The consultation elaborates on how the DMO will be held accountable for the success of the scheme. The DMO will have to ensure that financial provisions are made available to make payments to local authorities and/or the Extended Producer Responsibility scheme administrator to fund the collection of deposit return scheme containers that are collected through local authority waste streams.</p>
3.60	<p>Within our response, we stress the importance of including local authorities within the conversations and overall process. We also make reference to the digital trial which was recently conducted in Northern Ireland.</p> <p>Financial Flows</p>
3.61	<p>The consultation sets out proposals for the DMO to be funded via three revenue streams: material revenue, producer registration fees, and unredeemed deposits.</p>
3.62	<p>It also discusses the approach to setting the deposit level (i.e., a maximum and minimum deposit level is set in secondary legislation with the DMO having flexibility to set the level within this threshold and may lead to variable deposit levels depending on the product), proposing that a fixed deposit level is not set in legislation but rather set out a minimum, and possibly maximum, deposit within the secondary legislation. This in theory will allow the DMO flexibility to set or change the deposit level in a way that influences behaviour change and increased recycling by consumers.</p>
3.63	<p>Within our response, we reference Equality issues and stress the importance in designing a system that is accessible to everyone. We also highlight the annual Northern Ireland cost of</p>

	cleaning up litter and illegal dumping and we suggest that a detailed Northern Ireland specific cost-benefit analysis would be vitally important in examining potential savings associated with litter reduction.
3.64	<p>With regards to the question on the minimum deposit level set in legislation, we propose 10p and highlight that the deposit should be sufficient to engage consumers but not be too much of a financial penalty for those unable to return the container.</p> <p>We would recommend that Government conduct further research on the issue of multipacks but suggest that a variable deposit scheme could be implemented in order to minimise the multipack impact on consumers, especially those on lower incomes.</p>
	Return Points
3.65	The Consultation sets out further details of the retailer options in the deposit return scheme, proposing that all retailers who sell in-scope drinks containers will be obligated to accept returns of in-scope material by hosting a return point. This will likely be via reverse vending machine or manual return points, but the regulations will be broad in nature to ensure alternative methods of return are not ruled out. Requiring online retailers to be included in the scheme is discussed.
3.66	The Consultation also discusses the potential for innovation in technology to be deployed in a deposit return scheme system and provides further detail on how this might support the return points provisions using smart phone applications allowing the electronic redemption of a deposit. This could mean that residents could continue to use their kerbside collection systems and reclaim their deposit and so cut out the need to take containers back to the shops with them.
3.67	Within our response we highlight the importance of making the scheme as user friendly as possible, with minimal inconvenience involved for everyone participating. The concept of a digital scheme is interesting and could be further explored through larger scale trials.
	Labelling
3.68	The Consultation proposes mandatory labelling be legislated for as part of a DRS. We support this proposal as a means of minimising the potential for fraud.

	<p>Local Authorities and Local Councils</p>
3.69	<p>The Consultation explores the impact a deposit return scheme will have on local authorities and the way in which containers in scope of the scheme will be treated when these containers still end up in local authority waste streams. It seeks views on three options for financially reimbursing local authorities for any DRS items they must deal with, in recycling, residual or litter.</p>
3.70	<p>In our response, we highlight the need for a solution that maximises the potential return of DRS material and offers a fair system of payment to cover all the DRS material that councils collect (recycling, litter, and residual). However, under current circumstances, there will probably be a reliance on MRFs to provide accurate data to councils.</p>
	<p>Compliance, Monitoring and Enforcement</p>
3.71	<p>The Consultation provides an overview of how the deposit return scheme will be monitored and enforced. Whilst some functions will fall to the environmental regulators in England, Wales and Northern Ireland, the governments consider there is a role for local authorities/Trading Standards to regulate the consumer-facing obligations that are placed on retailers. This is likened to functions undertaken in relation to the carrier bag tax.</p>
3.72	<p>Within our response, we highlight the additional obligations placed on local council staff and note that this could be quite significant, particularly in the short term as the scheme is set up.</p>
	<p>Implementation timetable</p>
3.73	<p>The Consultation lists several activities required in advance of a DRS going live including:</p> <ul style="list-style-type: none"> • 2021 - Carrying out this second consultation, analysing the responses and publishing a Government response • 2021 - Finalising the Impact Assessment • 2021 - Securing the primary powers in the Environment Bill • 2022 - Securing the secondary legislation required • 2023 Appoint the DMO • 2023 – 2024 Rollout of infrastructure and other mobilisation activities

3.74	The governments currently anticipate that a DRS could launch in late 2024, subject to the outcome of this consultation and parliamentary passage of the Environment Bill.
3.75	<p>Within our response, we note that timeline seems very ambitious, and will need to take into account the lead-in times required by scheme participants, particularly where production or contracting changes are required. We also note that a number of key policy pieces are not in place in Northern Ireland, such as decisions on the future of recycling, 'TEEP' policy and a MRF code of practice; these will need to be agreed and published as soon as possible. We suggest that the introduction of the 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.</p> <p>Approach to Impact Assessment</p>
3.76	<p>Four options are included in the impact assessments:</p> <ul style="list-style-type: none"> • Baseline - do nothing • An "All In" system • An "On the Go" system • An "All In" system that does not include glass
3.77	<p>We note in our response that in the associated Impact Assessment, only limited data is available from the devolved administration.</p> <p>Also, if the digital solution is to be incorporated into the scheme design, this option should be fully evaluated as it is likely to substantially change the impacts/costs.</p> <p>.</p>
3.78	<p>We do not necessarily agree with the analysis presented on littering as there is unlikely to be a cost saving related to operational aspects of litter collection. The impact assessment makes a direct correlation between the reduction in litter and cost savings in terms of manual sweeping and picking and emptying bins. We do not believe this is an accurate reflection 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.</p> <p><u>Financial & Resource Implications</u></p>
3.79	<p>Whilst there are no current financial or resource implications associated in responding to these consultations. As stated above in terms of full net cost recovery under EPR, there are likely to be considerable financial implications upon implementation of these schemes in</p>

	<p>due course and the impacts for district councils will need to be clearly defined and recoverable in terms of net impact on ratepayers .</p> <p><u>Equality or Good Relations Implications</u></p>
3.80	There are no equality or good relations implications in responding to the consultations
4.0	Appendices – Documents Attached
	<p>Appendix I: Belfast City Council response to the EPR consultation</p> <p>Appendix II: Belfast City Council response to the DRS consultation</p>

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Belfast City Council response to the UK Government (Defra via DAERA) consultation on Extended Producer Responsibility for packaging (June 2021)

1.0 INTRODUCTION

Belfast City Council (BCC) in terms of population (334,000) is the largest Council within N.Ireland. It is comprised of 10 District Electoral Areas, represented by 60 councillors.

The Corporate Plan 2020-24 incorporates the priorities of the Belfast Agenda, the community plan for Belfast which was developed by the Belfast Community Planning Partnership. It sets out a shared vision and associated outcomes for the city. The corporate plan focuses on five key pillars plus several cross-cutting priorities;

- Growing an inclusive economy
- City development
- Working and learning
- Living here
- Resilience and sustainability

Resources and waste management have a significant role to play in achieving a number of these aims through the potential for job creation, combined with a positive environmental impact. The Council is pleased to have an opportunity to comment on the proposals on Extended Producer Responsibility for Packaging (EPR) and we trust that our comments will be taken into account when developing the final proposals.

2.0 GENERAL COMMENTS

BCC welcomes this consultation on an Extended Producer Responsibility scheme for Packaging. This is one of two consultations¹, which collectively represent the biggest change in UK Waste Management practices in a generation. This will have profound implications upon BCC' waste activities and particularly on the financing of collection arrangements and revenue arising from the sale of recyclables.

We welcome the premise of this consultation which is to ensure “*producers pay the full costs of dealing with the waste packaging they produce*”. The original producer responsibility scheme had flaws and did not support the principles of producer paying for the full costs, and that the benefits should be spread across all stakeholders. We are pleased to note that this new EPR scheme is focusing more clearly on addressing this shortfall to ensure that it is fairer for all stakeholders.

The consultation has much to commend it in progressing the development of a Circular Economy and should be viewed as an opportunity. The aim of placing the cost burden on producers with the expectation that this will cause them to question whether their packaging is necessary, could be reduced, or not used at all is sound.

Indeed, adopting a Circular Economy lens, we would suggest that DEFRA/DAERA should consider adopting an EPR approach to all items placed on the market. In this manner, all

¹ The other consultation is called “*Introduction of a Deposit Return Scheme in England, Wales & Northern Ireland*”

producers, retailers etc. would be encouraged to explore new models to ensure that items were (i) less polluting, less disposable (ii) lasted longer, were more easily recoverable, repairable, and recyclable. It would also reduce the burden that councils face in treating and disposing of residual waste.

BCC notes that the position in Northern Ireland continues to be different from the situation prevailing in England in a number of regards (e.g. market conditions, base costs, adjacency with another jurisdiction and EU member state, council functions &c.) Given that the EPR, Deposit Return Scheme (DRS) and “Consistency” consultations are likely to have a considerable bearing on the evolution of household and business recycling collections in England and by default the supply chain economics applied by the supermarket chains, there may be unintended consequences which impact on Northern Ireland. Taking the above into consideration, it may be necessary for further amendments to be made to the EPR scheme to ensure it best delivers for NI.

Given the devolved administration’s role and responsibility in this matter it would be helpful if the Scheme Administrator’s economic impact assessment contained costs pertinent to each devolved administration area.

At the outset it should be noted that several pieces of policy are referenced in or are otherwise pertinent to the consultation document which have not been finalised within the context of Northern Ireland waste strategy or legislation including:

- The NI Waste Management Strategy “*Delivering Resource Efficiency*” (2013) has not yet been updated
- The Materials Recycling Facility – Code of Practice was consulted upon (2015) but an outcome has not yet been finalised
- The draft Industrial Strategy for Northern Ireland was consulted upon (2017) but an outcome has not yet been finalised
- The Waste Management Plan (2019) has been completed but is expected to be overhauled as part of the Northern Ireland Environment Strategy
- The Northern Ireland Environment Strategy consultation has been completed (Feb 2020) but an outcome has not yet been finalised
- The Discussion on the “*Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland*” has been completed (Oct 2020) but the next step has not been announced²

We trust that DAERA and other Departmental colleagues are using their good offices to ensure that the outstanding policies and strategies stated above are finalised as soon as possible.

Although we acknowledge that COVID -19 and Brexit has required a government focus and has resulted in delays in policy delivery, the lack of clarity arising locally from this policy vacuum presents difficulty in fully replying to the current consultation.

² It is recognised that many items in this discussion document parallel the recently released “*Consultation on Consistency in Household & Business Recycling Collections in England*”. It is further recognised that the next stage of consultation by DAERA on this subject is likely to have to determine what constitutes a “*Technically, Economically & Environmentally Practicable*” (TEEP) assessment for the purposes of future planning for waste collection purposes.

3.0 BCC POSITION ON AN EXTENDED PACKAGING PRODUCER RESPONSIBILITY SCHEME

BCC welcomes the opportunity to respond to this consultation piece on EPR. The Council is fully committed to delivering its statutory duty and over the years has introduced new recycling arrangements, improved its services to the public and is using waste materials and recycling services as a springboard to extending the Circular Economy locally. The introduction of EPR funding should assist this agenda. In 2019/20, the Council recorded its highest ever household recycling rate figure of 45%.

BCC is open to adjusting and restructuring its waste services in light of legislative changes, but this needs to be a two-way conversation, shaping both existing waste services and an EPR scheme in light of what is feasible, effective and desirable. The wider regional context will need to be considered in shaping this policy including the regional infrastructural requirements and the specific circumstances surrounding decision-making within the devolved administration of Stormont.

As a council, a key player in the operation of a successful EPR scheme, it is imperative that we are afforded our fair share of resources arising from any proposed changes, and that we do not fall foul of a shift in practice which may extract high value recyclables from the system, leaving councils to collect only lower value or difficult to recycle or non-recyclable items. Direct lines of communication and financial mechanisms must be set up directly between the Scheme Administrator and BCC in the event of these proposals being taken forward.

BCC is broadly in agreement with the governing principles and outcomes of the EPR scheme as set out on pages 26 -28 of the consultation document. We particularly welcome the intent to develop a more coherent system, to incentivise businesses and to have the full net cost of managing packaging borne by producers.

On councils discharging their statutory duty regarding the requirements of the Circular Economy Package (CEP), BCC would welcome guidance on how the EPR regulations will align with the CEP requirements and timetable to collect additional materials at the kerbside (textiles, hazardous waste).

In terms of the consultation document specifically, the summary indicates that those placing unrecyclable packaging on the market will pay for the privilege through modulated fees to encourage them to make the packaging more recyclable, or to encourage them to invest in infrastructure to treat this packaging. It is preferable that greater emphasis is given to delivering the former objective rather than continue to produce unrecyclable or difficult to recycle packaging. Ultimately, following this course may have to result in some packaging types being subject to new taxes (as per the soon-to-be-introduced Plastic Packaging Tax), threatened with a ban, or banned outright. This would ultimately support Section 1.13 – *“it is important that quality does not reduce but is enhanced”* – thereby encouraging opportunities for greater levels of domestic reprocessing and reducing the reliance on export markets.

Section 1.14 identifies that producers should self-assess the recyclability of their own packaging, which sounds less than ideal but it is proposed later in the consultation document that the Scheme Administrator will determine the criteria for self-assessment. BCC would

highlight that monitoring and reporting on this activity must be delivered with appropriate sanctions as recent examples on similar activity from the UK enforcement agencies highlight where objectives have not been met, or indeed have faltered and fallen back.

BCC supports the proposal that producers of commonly littered packaging should be responsible for its management. It can be anticipated that some producers will argue that they do not litter and should not be responsible for the activities of their customers. Producers paying for the communications/education campaigns required to bring about the desired behavioural change will assist in this regard.

The 2023 target date is ambitious and masks a considerable workload but is a positive intention but slippage is a distinct possibility.

Plastic film & flexible packaging and how it is treated in future are an important aspect of the EPR consultation. Ultimately, this packaging should not be placed on the market if it is unrecyclable and those producers that place it on the market should be fully responsible for funding the sorting and reprocessing infrastructure in advance of the proposed 2026/7 date. Similarly, bio-degradable, bio-based & compostable plastic packaging is not considered recyclable because of the continued difficulties in recovery and reprocessing. This makes sense as it is confusing for consumers, detrimental to the environment when disposed of inappropriately, as well as being potentially harmful to existing recycling and composting infrastructure.

Payment for the management of packaging waste from households is long overdue and BCC welcomes the intention that councils will be appropriately financially compensated by producers for collecting packaging waste within their waste streams including littering waste and residual waste.

BCC recognises the important reference to “*system outcomes*” and the need for additional local reprocessing capacity where feasible to drive the circular economy and negate the associated costs of shipping waste across the water to alternative treatment points.

4.0 RESPONSES TO CONSULTATION QUESTIONS

IMPORTANT - Question numbers

The questions are numbered as appear in the written consultation document and not as they are numbered in the consultation software.

Questions 1-5 are administrative (pages 19&20)

Q1. Your name?

Brendan Murray

Q2. Your email address?

wasteadmin@belfastcity.gov.uk

Q3. Which best describes you?

Belfast City Council – Local Government

Q4. Would you like your response to be confidential?

No

Q5. Would you like your contact details to be added to a user panel for EPR so that we can invite you to participate in user research or to test digital services as they are designed and built?

Yes

Principles, Outcomes and Targets

Q6: Do you agree or disagree with the proposed framework for setting packaging targets? (P30)

BCC broadly supports the proposed framework, but would draw attention to a number of points. Firstly, in terms of the scope of materials included in the EPR scheme, should the DRS scheme be deferred the government should give serious consideration to including these DRS materials within the scope of the EPR scheme until DRS launch.

Secondly, the discussion document on the future collections systems for Northern Ireland (2020) has not yet concluded. This is impacting on BCC contracts and it would assist the transition in a timely and controlled manner if this could be progressed as a matter of urgency.

Thirdly, the absence of a Materials Recycling Facility (MRF) code of conduct for Northern Ireland adds to the lack of clarity regarding operation of the EPR scheme here.

Finally, the consultation document suggests that closed loop recycling targets should be material specific. Given that there is a lack of infrastructure for some materials (namely plastic), this should be addressed appropriately in order to introduce circularity for this material stream. The incentives and disincentives in this consultation should drive producers

to invest in the infrastructure to meet the targets but this will need to be monitored to ensure that material collected is not being unnecessarily junked.

Q7: Do you agree or disagree that the business packaging waste recycling targets set for 2022 should be rolled over to the calendar year 2023? (P32)

Agree - This approach would appear to give the businesses impacted some level of consistency during the change from the current producer responsibility system to the new extended producer responsibility system.

Q8: Do you agree that the recycling target to be met by 2030 for aluminium could be higher than the rate in Table 3? (P36)

Agree. Once the outcome of discussions on the future collections for Northern Ireland is published, and contracts amended accordingly, there should be scope to increase the aluminium recycling rate.

Q9: Do you agree or disagree with the proposed minimum target to be met by 2030 for glass set out in Table 3? (P36)

Unsure as the impact of the two DRS schemes being introduced in the UK is unknown at present. The manner in which councils collect glass (bottles and jars) is likely to be influenced by the introduction of EPR and DRS which propose different payment mechanisms for their capture of these items as separate streams.

A specific point of note for DAERA to consider is the potential impact of fraudulent activity arising from differences in the proposed DRS for Northern Ireland versus that drafted for the Republic of Ireland (ROI). The ROI scheme is not proposing to include glass, which could see glass migrating from south to north, potentially for financial gain. It will be vital to ensure that packaging producers are supported by Government in both jurisdictions to prevent fraudulent glass “returns” being made.

Q10: What should the glass re-melt target for 2030 for non-bottle packaging be set at? (P37)

BCC recommends that incentives be explored, such as the plastic packaging tax, aimed at encouraging closed loop glass recycling, however the re-melt target is best advised in consultation with the industry sector.

Q11: Do you agree or disagree with the proposed minimum target to be met by 2030 for plastic set out in Table 3? (P37)

Agree. BCC considers that work will be needed to improve the collection and recycling of film and flexible plastic packaging – not least encouraging investment in infrastructure and new collection services as part of the “Consistency” approach. Additionally, clear labelling and communication/education campaigns will be required to highlight to consumers the different types of plastic and how to recycle these materials.

Q12: Do you think a higher recycling target should be set for wood in 2030 than the minimum rate shown in Table 3? (P38)

Unsure - Although a 1% increase in the target seems to be unambitious, the potential for unintended consequences of drawing material away from other markets and potentially having a negative impact on reuse, in this area of work is accepted.

Further work should be undertaken to understand how feasible higher recycling rates might be, and then maybe then higher targets might be able to be set.

Q13: If higher recycling targets are to be set for 2030, should a sub-target be set that encourages long term end markets for recycled wood? (P38)

Unsure –BCC agrees that wood packaging waste should be sent to the most environmentally beneficial use, including longer term applications. We suggest that the cross-sector working group explore this option of sub-targets.

Q14: Do you agree or disagree with the proposed minimum target to be met by 2030 for steel set out in Table 3? (P39)

Agree - Once clarity is attained on the outworking of the EPR and the Future of Recycling in NI consultations, and contracts awarded accordingly, it should be possible to increase the recycling figure for steel when aligned with a targeted and ongoing communication campaign at more intensive levels than previously encountered.

Q15: Do you agree or disagree with the proposed minimum target to be met by 2030 for paper/card set out in Table 3? (P39)

Agree. BCC recognises that work will need to be undertaken to review the mixed grade protocols which monitor changes in the mix of packaging and non-packaging paper. Given that services for paper are already mature any increase in paper recycling will require targeted and ongoing communications at levels much higher than there has been previously

Q16: Do you agree or disagree with the proposal to set recycling targets for fibre based composites? (P41)

Agree. If Government considers that further to finalising the report (Section 4.40) and that the data gathered for 2022 and 2023 supports such an approach, BCC would consider that fibre-based composites would need to be subject to targets. Targets should be set at a level that drives investment in the development of UK-wide reprocessing infrastructure.

Q17: Do you agree or disagree that there may be a need for ‘closed loop’ recycling targets for plastics, in addition to the plastics packaging tax? (P43)

Agree. BCC believes that adopting a closed loop approach, where feasible, best supports development of a Circular Economy, ensures best environmental outcomes and aligns with the NetZero Carbon Reduction targets. This is predicated on ensuring that “*quality*” is clarified, with agreed materials standards, particularly given the link to payments to waste management services providers. It is a sensible approach for Government to assess the impact of the introduction of these new measures before additional targets are introduced.

Q18: Please indicate other packaging material that may benefit from closed loop targets. (P43)

BCC is of the view that the list of such materials may develop over time, as technology and infrastructure develops; as such it will be necessary to keep this area under review.

Producer Obligations for Full Net Cost Payments and Reporting

Q19: Do you agree or disagree that Brand Owners are best placed to respond effectively and quickly to incentives that are provided through the scheme?

Agree. BCC believes that this is the most suitable place in the supply chain to apply compliance. We believe the seller may be in less of a position to drive better product design than the brand owner.

Q20: Are there any situations where the proposed approach to imports would result in packaging being imported into the UK which does not pick up an obligation (except if the importer or first-owner is below the de minimis, or if the packaging is subsequently exported?

BCC is not aware of situations that the proposed approach would not cover.

Q21: Of options 2 and 3, which do you think would be most effective at both capturing more packaging in the system and ensuring the smallest businesses are protected from excessive burden?

Option 3. This option appears to be the least complex most easily understood system. In the face of such drastic change to the resource management and recycling arrangements in the UK, this would be preferable as a 'starter' system. Should it become evident further down the line (further to review), that a more complex system would be more effective and/or better protect small businesses, then the Scheme Administrator should be permitted to make amendments to the system.

Q22. If either Option 2 or Option 3 is implemented, do you consider there to be a strong case to also reduce the de-minimis threshold as set out in Option 1.

No. BCC considers that the additional complexity, and resulting administration/enforcement accompanying a lowering of the de-minimis threshold would suggest the case for reduction is fairly weak. Again however, once the new system becomes established, and as the UK ambitions towards the Circular Economy and zero waste advance, this could be reviewed.

Q23. Do you think that Online Marketplaces should be obligated for unfilled packaging in addition to filled packaging?

Yes. This material should be within the scope of the EPR system. It will be collected and treated/disposed of in the UK and therefore UK local authorities are currently bearing the waste management cost associated with this packaging. Therefore, to follow through on the polluter pays principle and the concept of full net cost recovery, operators of online marketplaces must be obligated in the EPR system.

Q24. Do you foresee any issues with Online Marketplaces not being obligated for packaging sold through their platforms by UK-based businesses?

Unsure

Q25: This proposal will require Online Marketplaces to assess what packaging data they can collate and then, where there are gaps to work together to create a methodology for how they will fill those gaps. Do you think there are any barriers to Inline Marketplaces developing a methodology by the start of the 2022 reporting year (January 2022)?

Yes. BCC considers that the timeline is challenging and is only likely to be achieved if it receives accelerated legislative passage and significant support from the likes of the Scheme Administrator which is unlikely to be available given that they will only just have been appointed (assuming procurement and appointment proceeds as planned). It is possible that Online Marketplaces are already collaborating but proposed date provides no room for slippage.

Q26: Is there any packaging that would not be reported by the obligation as proposed? (except for packaging that is manufactured and sold by businesses who sit below the de-minimis)

Unsure. We are aware that in the course of the normal manufacture of certain products (i.e. food, dairy, drink) there would be cross border movement between N.I and ROI and, given that Northern Ireland is still operating within the context of EU legislation as well, this situation may also be subject to consideration within the NI Protocol.

Q27: Do you agree or disagree that the allocation method should be removed?

Agree. This is in line with the polluter pays principle. However, caution should be exercised to ensure that there is not an unsustainable administrative burden placed on small businesses, particularly during the present post-COVID recovery. BCC welcomes that the government will explore with producers, different ways of facilitating actual weights and how this could be streamlined.

Producer Disposable Cups Takeback Obligation

Q28: Do you agree or disagree that a mandatory, producer led takeback obligation should be placed on sellers of filled disposable paper cups?

Agree. BCC supports a mandatory take back scheme for disposable cups.

There has been limited progress on the recycling of disposable cups on a voluntary basis. It would be at odds with producer responsibility being implemented thoroughly in other areas of packaging not to include disposable cups.

To significantly increase the pace of change on cup take back and to ease the burden on local authority litter operations, EPR should be applied to disposable cups. Given that disposable cups are often consumed on-the-go they can easily end up as litter and so are a cost burden on local authorities. Therefore, they should be brought into the formal EPR system otherwise local authorities are receiving full cost recovery for some types of packaging, but not others. Given that the DRS consultation has stated that cups will not be included in that system it makes sense that producer obligations relating to cups are captured under the EPR system.

Q29: Do you agree or disagree with the proposed phased approach to introducing any takeback obligation, with larger businesses/sellers of filled disposable paper cups obligated by the end of 2023, and the obligation extended to all sellers of filled disposable paper cups by the end of 2025?

Agree.

Modulated Fees and Labelling

Q30: Do you think that the proposed strategic frameworks will result in a fair and effective system to modulate producer fees being established?

Yes. The proposed strategic framework provides an indication of where the fees will be levied which will encourage more recycled content, increase recycling, reuse and refillable containers and fund recycling, sorting and reprocessing infrastructure. Where we are less sure is that the fees will encourage additional investment in recycling infrastructure rather than disposal and would recommend that the Scheme Administrator pays close attention to performance in this area.

The precise nature of these fees should be determined in conjunction with the packaging supply chain.

Q31: Do you agree or disagree that the Scheme Administrator should decide what measures should be taken to adjust fees if a producer has been unable to self-assess, or provides inaccurate information? This is in addition to any enforcement action that might be taken by the regulators.

Agree.

Q32: Do you agree or disagree with our preferred approach (Option 1) to implementing mandatory labelling?

Disagree

BCC supports the mandated use of labelling indicating if packaging is recyclable or not. We would also want to see other “recycling labels” removed from packaging as much as possible as these are often misleading and in some instances no more than green-washing from a consumer recycling advice point of view.

Research by OPRL demonstrates that consumers misunderstand the wide range of other “recycling” labels that currently appear on packaging and this can lead to them taking an incorrect action when disposing of it.

Option One

Even if labels had to be approved this could still lead to considerable differences in the look and design of labels. These differences would dilute the impact and “brand awareness” of the labels and lessen their potential impact and usefulness. If the approval process would seek to limit the differences in label design, look and feel, then you are already close to having a single labelling system anyway so it would make sense to adopt that.

It is worth noting that OPRL have moved to a binary labelling system in an effort to aid consumer communications and reduce potential confusion. If one label set is doing this then having multiple labels is only going to lessen the impact of the communications message.

Consistent label designs using the Recycle Now iconography and clear and concise calls to action score highest in consumer confidence in understanding and actual understanding of the message. We therefore believe that without a single clear and consistent label for both “Recycle” and for “Don’t Recycle” consumer confusion will continue and the aspirations for increased quality and quantity of recycling will not be realised.

For the above reasons, BCC preference is for Option 2.

Q33: Do you agree or disagree with the proposal that all producers could be required to use the same ‘do not recycle’ label?

Agree.

BCC strongly supports this concept. There needs to be details around the design of this label in that it needs to be clear and eye catching.

We support the work of OPRL labels design in this regard. It is already familiar to consumers and has a depth of research behind it that supports how it is designed and used on packaging. Its use would also cause minimal change to producers using it already through their membership of OPRL. The membership of OPRL is such that this would cover a large number of producers and packaging that is already on the market.

Q34: Do you think that the timescales proposed provide sufficient time to implement the new labelling requirements?

Unsure. It is noted that Option 1 requires the Scheme Administrator to undertake the assessment, monitoring and compliance activity which will be a sizeable task and no doubt will take some time to establish and to come into operation.

In addition, once the labelling appears on the packaging, consumers will understandably consider these items to be recyclable and will place them into their kerbside bins/containers for collection, irrespective of their councils’ collection or contracting arrangements. In that regard, councils will have to adapt and/or revise their collection infrastructure within the same timescale which will be challenging.

Q35: Do you agree or disagree that the labelling requirement should be placed on businesses who sell unfilled packaging directly to small businesses?

c. Neither agree nor disagree

The requirement to label packaging should be placed at the point in the supply chain where it will be most effective and efficient to do so. Where this is needs to be clearly defined and the rules and regulations regarding the type of labelling adhered to.

Q36: Do you think it would be useful to have enhancements on labels, such as including ‘in the UK’ and making them digitally enabled?

c. Unsure

The messaging OPRL has built up over the years is successful and well recognised and acted upon by consumers because of its simplicity. Whilst there may be benefit from promoting other messages on packaging, they must be done in such a way so as not to detract from the recycle/don't recycle message to the consumer.

OPRL labels do not currently have "in the UK" to differentiate from other labels and research shows the OPRL label is well understood, well recognised, and well used. Therefore, we do not believe that "in the UK" will materially enhance consumer understanding and increase recycling.

BCC would support digitally enabled labelling which would allow further product information to be communicated to the consumer.

Q37: Do you agree or disagree that local authorities across the UK who do not currently collect plastic films in their collection services should adopt the collection of this material no later than the end of financial year 2026/27?

Neither agree nor disagree.

As stated earlier, once the outcome of discussion on future collections for Northern Ireland is published, there should be scope to consider increasing the range of materials (plastic film) collected. Currently, BCC does not have arrangements in place to process plastic film and therefore sourcing suitable contractors, undertaking procurement exercises/ amending contracts, investing in MRF infrastructure, &c would need to be undertaken before this could be delivered. Any such increased costs through investment or gate fee must be fully recoverable through the EPR scheme.

March 2027 provides a reasonable lead-in period, but the Scheme Administrator would need to monitor the evolving infrastructure to ensure that it is adequate and appropriate for the likely tonnages arising and that it is geographically distributed. There would also need to be an appraisal of any new technologies which are emerging and which may be considered appropriate (will chemical recycling be eligible under the EPR scheme? And will it have sufficient capacity to deliver?)

If collection of plastic films was introduced from April 2027 and materials were labelled as recyclable, it is probable that contamination levels would increase – in many instances, these materials have been presented for collection with food residues, &c on their surface. This may compromise collections and could limit the achievement of targets. Given the nature of this material and where it originates from, perhaps it would be better served on a take-back approach at stores and possibly within the DRS?

Q38: Do you agree or disagree that collections of plastic films and flexibles from business premises across the UK could be achieved by the end of financial year 2024/25?

Neither agree nor disagree.

The points made in response to question 37 are also applicable here. If there are concerns that the infrastructure is going to be in place for the household stream by 2026/27 then it is hard to understand how it will be in place for the business stream any earlier.

Q39: Do you think there should be an exemption from the ‘do not recycle’ label for biodegradable / compostable packaging that is filled and consumed (and collected and taken to composting/anaerobic digestion facilities that accept it), in closed situations where reuse or recycling options are unavailable?

Disagree. BCC has concerns that unless the biodegradable/compostable packaging can be guaranteed to only be used in closed loop situations, it would be easier to label as “*do not recycle*”. This would limit the prospect of this packaging being mis-identified and misdirected by consumers into their household recycling containers, thereby causing an uncontrolled release of microplastics to the environment. We struggle to see how an absolute guarantee could be provided on a closed loop situation.

Furthermore, in Northern Ireland, there are only a limited number of facilities available and the volume of material arising could overwhelm the infrastructure. The Scheme Administrator would need to monitor the level of investment in appropriate infrastructure to ensure that this gap was plugged as otherwise there could be a requirement to transport this packaging to other facilities outside of the region.

Q40. Do you consider that any unintended consequences may arise as a result of the proposed approach to modulated fees for compostable and biodegradable packaging?

Unsure

Payments for Managing Packaging Waste

Q41. Do you agree or disagree with the proposed definition and scope of necessary costs?

Agree, with a number of caveats outlined below.

The proposed scope of the necessary costs is broad and seemingly comprehensive, which is encouraging. It includes covers services that are already in place (i.e. not just newly introduced services) and support/staff costs associated with running and improving the services, including communications with residents.

It is noted that transitional costs to efficient and effective systems will also be covered. It is also highlighted that councils may be investing in necessary changes now (depending on contract cycles), and we would be keen to see Government note this and work with producers and the eventual Scheme Administrator to ensure that councils in this position are adequately recompensed. Councils which act as early adopters should not be discouraged in this regard, and to counter the risk of inertia due to councils delaying until EPR payments are confirmed service changes.

BCC has some concerns in relation to the additional officer time that will be required for contract management, data (WasteDataFlow returns), compliance, procurement, transition for contracts/facilities and need to ensure that these costs will be included

We would also urge the Government to consider the following and provide clarification:

- Development of greater clarity in relation to optimisation and calculation of support/staff costs, and the mechanism used.
- Cost of contract change: how will this be calculated? When a contract change is deemed necessary and would be paid? How will Government or the Scheme Administrator differentiate between costs that an LA would incur anyway and those incurred as a result of the change mandated?
- Consequential costs associated with the removal of recyclables from disposal/recovery: calorific value, tonnages, and trust that service change costs necessary to implement efficiencies, such as modelling, route optimisation, will be appropriately taken into account by Government
- Additional disposal contract costs related to failure to achieve guaranteed minimum tonnages (assuming significant waste decreases) and changes in calorific value
- Infrastructure changes as a result of EPR implementation will need to be funded. This could be one off capital costs as well as ongoing revenue costs.
- Necessary costs may be inflated if many Councils implement service changes at the same time as result of the market reaction to being in strong supply position. These costs must be included.
- Relevant enforcement and associated IT and software costs will need to form part of necessary costs if local authorities are going to try and ensure residents place the correct materials into the system.

Payments for managing packaging waste from households

Q42: Do you agree or disagree that payments should be based on good practice, efficient and effective system costs and relevant peer benchmarks?

c. Neither agree nor disagree

There are potential issues regarding what is defined as “a cost effective and efficient” service and it could be a means by which producers will not have to pay full net costs. BCC would argue strongly against any such concept. We would have concerns about how “efficient and effective” is determined and by whom. If this is down to the Scheme Administrator what plans have been developed for any sort of appeals process where local authorities have good cause to dispute the decision that has been made?

There may be value in establishing a modelled cost for each individual local authority as a benchmark but a model will never truly be able to calculate real world costs so there should be no financial penalties for an authority that is not achieving a predicted cost profile for very valid reasons. In such circumstances support and assistance should be offered to understand why that might be the case and if measures can be introduced to improve it.

BCC would raise concerns over an insufficient number of family groupings and if these groupings are wide enough to allow for legitimate differences that impact on cost. For example, there could be regional variations across the devolved nations within the UK and the often-higher costs of disposal in these areas due to a lack of reprocessing infrastructure, should be factored into any benchmarking analysis too.

We understand the concept of a modelled approach to costs but there must be a sufficient number of groups to reflect the diverse environments within which Councils operate. There will also need to be a suitable appeals process for local authorities who believe they have been placed in an incorrect grouping.

BCC also has concerns as to how local authorities in Northern Ireland will be assessed when they are not currently subject to the consistent collection policy that English local authorities will be placed under.

A further issue to be considered is that the methodology developed by Government/WRAP is advisory and the Scheme Administrator will determine what system should be deployed. We would recommend that Government provide clear direction and determine what approach would apply from the outset of EPR and permit the Scheme Administrator to review this within an appropriate period post commencement.

Councils preferred approach to improvement is through continuous self-improvement. For many councils, the most useful benchmark is their own performance due to the difficulty in matching a range of socio-demographic factors between council “*families*”. We would encourage the Government to consider monitoring system performance (i.e. pre/post-EPR performance) as opposed to scheme benchmark in order to avoid unintended consequences.

The consultation document proposes linking EPR payments to outcomes will reward those councils with efficient systems who are performing well against targets and against their benchmark group. Those who are not performing well, and below their relevant benchmark, will receive less than full net cost. There is an argument to say that this approach may be overly-simplistic and that these are the very councils that need targeted financial support to improve performance (Section 8.40).

The consultation document recognises that it will be challenging to establish a common UK-wide payment approach when there are different arrangements, policies and drivers across the devolved administrations. Paragraphs 8.24-8.26 explain those challenges and a suggested way forward that will result in the Scheme Administrator making judgement calls where there are disparities between parts of the UK. BCC has already raised the prospect of the recently released “*Consultation on Consistency in Household & Business Recycling Collections in England*” ultimately proving a material factor in how the EPR scheme develops nationally and would request that local circumstances are properly quantified and considered so that this does not emerge as the default position without being tested or until similar Consistency arrangements are introduced into NI.

Q43. Do you agree or disagree that the per tonne payment to local authorities for packaging materials collected and sorted for recycling should be net of an average price per tonne for each material collected?

c. Neither agree nor disagree

The consultation document considers that the most appropriate approach for handling material value to packaging waste from households would be to “*net off*” material value from a local authority’s payment. While this in principle is correct in that Councils are not seeking to profit from the arrangements but rather ensure full costs are met, this has implications for material ownership and existing MRF contracts. It will be necessary for Government to be aware of the nuances to existing council MRF contracts, in terms of fixed value, rebates, differing risk share and income received.

In the event that Local Authorities keep responsibility for material income, it should be based on actual values and not any reference/model values. The use of reference values further erodes the concept of full net cost recovery within the system.

In terms of Northern Ireland, we consider that the Scheme Administrator will have a key role to play here. It is likely that different market conditions (and prices) will prevail and there may need to be intervention by the Scheme Administrator to ensure fair payment mechanism.

Q44. Do you agree or disagree that the Scheme Administrator should have the ability to apply incentive adjustments to local authority payments to drive performance and quality in the system?

Agree. BCC believes that the Scheme Administrator should have the ability to provide incentive payments but how this is carried out needs to be carefully crafted. As stated above while there may well be a scheme to incentivise higher performers, consideration needs to be given to financial assistance to those areas which are lower performing but have greater potential to contribute in terms of capturing these packaging materials i.e. there needs to be a levelling up rather than just an incentive scheme for higher flyers. It may be useful to consider how this incentive scheme would be calculated, capped and perhaps linked to an improvement plan.

These payments need to be seen as genuine incentives and not placed almost as penalties on those authorities that collect in a manner which is effective and efficient for their areas and circumstances.

The incentives will also need to be made at a level that makes it worthwhile to the local authority to provide additional services. If the costs are not covered then there would be little reason for doing anything different.

Q45. Do you agree or disagree that local authorities should be given reasonable time and support to move to efficient and effective systems and improve their performance before incentive adjustments to payments are applied?

Agree. There are potentially some significant changes that Councils will have to make to implement EPR policies. There may well be capacity issues/blockages within the waste industry and associated sectors such as collection vehicle and container supply.

Each local authority will have a set of circumstances that will influence their ability to change and the speed at which that change can take place. This must be taken into account in terms of the support and time they are given to make the required changes.

Q46. Should individual local authorities be guaranteed a minimum proportion of their waste management cost regardless of performance?

Yes. Governments cannot claim to be implementing producer responsibility or the polluter pays principle if the full net costs of collection are being withheld. If a local authority is making the efforts to increase performance to the desired level, then they should receive a guaranteed minimum payment. These guaranteed levels would also greatly assist local authority in their budget planning and setting.

In the absence of legislation which allows robust enforcement of recycling, local authorities are limited in what they can achieve through education and public engagement. They should not therefore be penalised if residents and businesses in their area do not comply and hence they cannot achieve expected performance.

Q47. Do you agree or disagree that there should be incentive adjustments or rewards to encourage local authorities to exceed their modelled recycling benchmarks?

Neither agree nor disagree

The Scheme Administrator should perhaps be granted powers to incentivise where appropriate. This could be targeted at Local Authorities to exceed their recycling benchmarks, although this would have to be their modelled packaging recycling benchmarks as other activities can drive LA recycling performance unconnected to EPR system e.g. organics collections

As stated above however, the Scheme Administrator should also be granted powers to incentivise those LAs that for legitimate reasons are not achieving the desired level of performance.

This incentive funding element must not be taken from other authorities' full net cost payments.

There is also likely to be a role for funding or incentives that promotes innovation and allows collection trials and experiments to take place that could lead to increases in recycling or efficiencies in collection.

Q48. Do you agree or disagree that unallocated payments should be used to help local authorities meet their recycling performance benchmarks, and contribute to Extended Producer Responsibility outcomes through wider investment and innovation, where it provides value for money?

Agree. BCC agrees in principle with this aim but it is unclear as to why there would be unallocated payments within the system which is designed to provide full net cost recovery.

If such a system did exist where producer funds are available after full net costs have been met, then these funds should be used to help local authorities try and achieve performance benchmarks in the first instance.

Q49. Do you agree or disagree that residual payments should be calculated using modelled costs of efficient and effective systems based on the average composition of packaging waste within the residual stream?

Disagree. Residual waste composition does (and is likely to continue to) vary considerably between councils. Introducing the EPR scheme provides an opportunity to understand these differences far better by funding regular composition analyses for each council. This needs to be fully funded using EPR funding. This should lead to waste compositional analysis becoming more efficient through economies of scale and technological advancement (AI) and help inform the changes being spurred by both EPR and DRS.

The results from the compositional analyses could be combined to create a reasonable waste compositional analysis for each council grouping, upon which payments could be based. Modelled costs would only ever be a snapshot and will not reflect the “*real world*” experiences which many councils face.

In terms of using a waste compositional analysis, it will be highly dependent upon a number of factors, such as use of a common protocol and how a “*representative*” sample is chosen from each relevant waste load, along with identifying the appropriate facilities where these WCSs would be conducted (first point of deposit?) – there may be space restrictions and other planning constraints at these points which will need to be addressed. The obvious location is within the first MRF receiving these materials but the Scheme Administrator will need to be made aware of any infrastructural investment and funding requirements needed to facilitate this development. There may also be issues regarding ensuring that the sample chosen has not become “*contaminated*” in the transport/unloading process.

In terms of modelled costs, we would question the rationale for introducing financial penalties for an authority that has failed to achieve a predicted cost profile without valid reasons. We have concerns around applying this arbitrarily as previous examples of “excellence” used for best value sparked widespread uncertainty and resistance. Rather, the Scheme Administrator should consider the underlying factors and provide support and assistance to determine how the situation could be improved.

Q50. Do you agree or disagree that a disposal authority within a two-tier authority area (England only) should receive the disposal element of the residual waste payment directly?

No views on this aspect of the scheme as this arrangement does not apply in Northern Ireland.

Payments for managing packaging waste from businesses

Q51. Do you agree or disagree that there remains a strong rationale for making producers responsible for the costs of managing packaging waste produced by businesses?

Agree. BCC considers this proposal to be consistent with the polluter pays principle.

Q52. Do you agree or disagree that all commercial and industrial packaging should be in scope of the producer payment requirements except where a producer has the necessary evidence that they have paid for its management directly?

Agree. However, BCC believes more detail is required on what is considered “necessary evidence”. There needs to be suitable processes in place to prevent creating a loophole that allows a producer to avoid the “polluter pays” principle and their obligations under the EPR regime.

Q53. Which approach do you believe is most suited to deliver the outcomes being sought in paragraph 8.84?

e. Do not know enough to provide a view

Option 3 could be open to abuse but given that a sprint group is looking at all the options while the consultation is under way demonstrates that this aspect of EPR policy is not yet detailed enough to make an informed opinion on and fully consider all the relevant aspects. This is concerning given the role that local authorities have in collecting business waste. In addition, as a Council collecting business waste we do not charge on a per tonne basis but rather on the type and number of bins provided and the frequency of collections.

Q54. Do you disagree strongly with any of the options listed in the previous question?

a. Yes. BCC would not be supportive of Option 3 in its current guise.

It must be remembered that when added together local authority trade waste services have a large market share, but that it is made up of a large number of small businesses. This means lots of business customers and the associated invoicing and customer services that are needed to back the collections up.

Q55. Do you think there will be any issues with not having either Packaging Recovery Notes/Packaging Export Recovery Notes or the business payment mechanism (and as a result recycling targets) in place for a short period of time?

Unsure.

Payments for managing packaging waste: data and reporting requirements

Q56. Do you agree or disagree with the proposal to introduce a sampling regime for packaging as an amendment to the MF Regulations in England, Wales and Scotland

Agree.

BCC considers that building on and improving the existing legislation seems logical but would highlight that the draft local MRF Code of Practice (2015) was never finalised in NI and, as such, this needs rectified to place Northern Ireland on a par with the approach adopted elsewhere.

Consideration will also need to be given to the design of the sampling protocol which needs designed in a way that is fair to both collectors and reprocessors. This will mean there needs to be clear definitions for non-targeted material. The protocol should not be designed in a way that leaves loopholes that will reduce or remove justifiable payments to councils and other waste collectors.

Q57. Do you agree or disagree with the proposal to require all First Points of Consolidation to be responsible for sampling and reporting in accordance with a new packaging waste sampling and reporting regime?

Agree.

The consultation document proposes that the First Point of Consolidation (FPoC) **of packaging** is accredited by a regulator. This could mean a council MRF or Transfer Station could become this facility. As there are proposals to remove the de-minimis threshold of 1000 tonnes the requirement for sampling and reporting could place an additional burden on Local Authorities in terms of staffing which we assume would be supported by EPR funding. As stated above, there may be space or other restrictions on some of the councils' facilities in Northern Ireland which means that a downstream MRF may have to be designated as the FPoC for practical purposes. By permitting this first point sampling to be carried out at the MRF it allows councils to share costs of technology, equipment and labour required.

Q58. Do you agree or disagree that the existing MF Regulations' de-minimis threshold of facilities that receive 1000 tonnes or more per annum of mixed waste material would need to be removed or changed to capture all First Points of Consolidation?

Agree. BCC presumes that increased requirement to undertake any sampling or waste compositional analysis will be fully funded under the EPR scheme, we would highlight that the costs of sampling of smaller facilities will be proportionally bigger than for large MRFs. In support of the principle of quantity and quality arc21 would recommend that minimum output material quality standards should be set for sorted packaging materials at a MRF which would be subject to Scheme Administrator scrutiny.

Q59. Do you think the following list of materials and packaging formats should form the basis for a manual sampling protocol?

No. The current list appears simplistic and we would suggest to Government that it may be advantageous to include materials that may fall within EPR in the future, such as film and flexibles as it could help develop a baseline for the quantities of these materials contained within the waste stream. Similarly, it would also be beneficial to include disposal paper cups as well to determine the quantity and amounts can be assessed that should inform in store takeback arrangements. The sampling protocol needs to be flexible to changes in producers' behaviour that stimulates changes to the packaging materials in use.

Whilst we understand the desire to have accurate data relating to each packaging type, we think further consideration needs to be given to the frequency and detail of input sampling and whether this represents value for money. Perhaps in-depth sampling could be required in the first year, to set a baseline, but a reduced amount following that. Occasional in-depth samples could be required to verify that composition has not changed.

Also, 'manual' should be removed from the wording of the protocol, to ensure technological sampling solutions are not excluded going forward.

Q60. Do you think it is feasible to implement more rigorous sampling arrangements within 6-12 months of the regulations being in place?

Unsure. Ultimately, this is likely to be up to the Scheme Administrator to determine but BCC would highlight that while it is feasible within 12 months, it is likely to depend on the sampling levels required. Also, there may be changes needed at sorting sites to accommodate the new regime (such as amendments to planning, operational practices, procurement of new technology, staff recruitment, training, &c). Sampling regime at 25 tonnes is challenging but at 8 tonnes extremely so and additional costs associated with these proposals must be met by the EPR scheme.

Q61. Do you think visual detection technology should be introduced from 2025 to further enhance the sampling regime?

c. Unsure

BCC believes this would be feasible but clearly more work is needed to assess if the technology would prove reliable and accurate, that the cost to develop, implement, maintain and operate are legitimate under the EPR payment scheme and that the using this approach for sampling did not restrict or limit the sorting capacity and capability

Q62. Do you think existing packaging proportion protocols used by reprocessors would provide a robust and proportionate system to estimate the packaging content of source segregated materials?

b. Yes, with refinement

Source segregated material in this instance would need clearer definition. For example, nearly all source segregation collections have mixed cans and plastics which need further sorting and so will probably need to undergo some sort of sampling as well. A system using existing packaging proportion, supported by occasional sampling, would provide a cost-effective method of accurately estimating packaging content of source segregated materials

Q63. Do you agree or disagree that minimum output material quality standards should be set for sorted packaging materials at a material facility?

a. Agree.

Minimum output material quality standards should apply but the markets will determine if the material from a MRF is of satisfactory quality. This is reflected in the cost/income from the sale of these items that should work their way through the system. While there is an emphasis on achieving closed loop recycling, this may not be applicable in every instance given the quality of materials available. The aim should be for the Scheme Administrator to incrementally increase the minimum standard thresholds over time as packaging changes.

The Scheme Administrator should maintain close oversight of MRFs to ensure that the quantity/quality balance is being struck and that the appropriate materials were being supplied to the market to support delivery of the Circular Economy. There may be occasion when support or another form of intervention is needed to avoid geographical difficulties or market distortions.

Q64. Do you agree or disagree that material facilities that undertake sorting prior to sending the material to a reprocessor or exporter should have to meet those minimum standards in addition to just assessing and reporting against them?

Agree. See above.

Q65. Do you think any existing industry grades and standards could be used as minimal output material quality standards?

Yes. The ReQIP standards could be used as a basis, updating them regularly with reprocessors current quality specifications.

Payments for managing packaging waste: reporting and payment cycles

Q66. Do you agree or disagree that local authority payments should be made quarterly, on a financial year basis?

Agree. This schedule would align with other reporting cycles and an annual reconciliation exercise may also be required. This approach would allow in-year assessment of the likelihood of targets being met and adjustments to be made by the Scheme Administrator to improve performance, if required.

Q67. Do you agree or disagree that household and business packaging waste management payments should be based on previous year's data?

Agree. BCC considers that this approach is suitable provided that the previous year's data includes all the relevant costs to ensure that producers bear the full financial responsibility for the packaging they place on the market. Given the seasonal variation in the nature of packaging placed on the market, Government may wish to consider a rolling 12-month period as this would better reflect these variations. It is only if this cannot be achieved should a "static" previous year's figures be used. In this case, there should be an annual reconciliation to account for any in-year (seasonal) changes.

Litter payments

Q68. Do you agree or disagree that the costs of litter management should be borne by the producers of commonly littered items based on their prevalence in the litter waste stream as determined by a composition analysis which is described in option 2?

Agree.

BCC considers that on the face of it, this proposal is fair and in-line with the producer pays principle; the producer of frequently littered products will be incentivised to find ways to reduce littering, and should become more aware of and involved in litter prevention.

Regarding monitoring littering, BCC would welcome details of how EPR funding could be used to undertake waste compositional analysis as well as the frequency of these. We would highlight that any such compositional analysis will need take account of season variations and variations in daytime/night-time economies in certain areas. Keep Northern Ireland Beautiful has recently undertaken a comprehensive analysis of street litter and the method adopted could serve as a template to develop a consistent approach for how to undertake such research elsewhere.

BCC is aware that the parallel consultation on DRS is also considering many of these litter items and there is a possibility of “cannibalisation” of the kerbside collection schemes. We would suggest that Government may wish to review the DRS start date in order to determine the impact of EPR in the first instance and perhaps include the DRS materials in the EPR scheme until the DRS is formally launched.

There are additional issues that we would encourage the Government to consider, including how this is linked to costs associated with fly tipping, which costs the UK tens of millions per annum, as well as litter clean-up. We believe it will be important to ensure that consumers are held responsible for their actions as part of the new system, and the Scheme Administrator should consider how to use the system to increase the recoverability of these discarded materials. We note that funding streams are available, and producers should be required to fund enforcement, help local volunteer groups, and communication/education campaigns stressing anti-litter behaviour. We would ask that clarity is provided regarding the degree of support towards enforcement costs.

Q69. In addition to local authorities, which of the following duty bodies do you agree should also receive full net cost payments for managing littered packaging? Please select all that apply.

- ☒ Other duty bodies
- ☒ Litter authorities
- ☒ Statutory undertakers
- ☐ None of the above
- ☒ Any other(s) - please specify

All duty bound organisations that incur costs from managing litter should receive full net cost payments for managing littered packaging, including voluntary and community sector organisations, schools and landowners. The scheme may be more effective with input from councils, in relation to demonstration of support for community groups via litter picking kits, collecting litter etc.

Q70. Do you agree or disagree that producers should contribute to the costs of litter prevention and management activities on other land?

Agree. This is in line with the “*Producer Pays*” principle although it may be hard to measure and could be open to interpretation. Again, as above, consideration will need to be given to how this incorporates fly tipped materials.

Q71. Do you agree or disagree that local authority litter payments should be linked to improved data reporting?

c. Neither agree nor disagree

BCC supports the use of improved data, but the process for collecting that data must be efficient and be able to be applied consistently across all local authority areas. It also needs to be designed in such a way that does not disadvantage or advantage any particular type of local authority or certain attributes.

Therefore, more detail is need on the level of reporting, the systems involved and the process for collating data before a more informed view can be taken on this aspect of EPR policy.

That said, given that any changes in data reporting would come about as a result of the EPR policy, any costs associated with changes in data reporting must fall within the remit of the litter payments.

Q72. Do you agree or disagree that payments should be linked to standards of local cleanliness over time?

b. Disagree

Some local authorities, or areas within local authorities, can experience higher levels of litter that the local authority only has so much power to influence. Any system of payments linked to cleanliness would need to take this sort of situation into account and this might make it overly complex as a result.

Local authorities have control over what they clear up, when and how they clear up litter but little to no control in whether an item is littered in the first place. This requires a big change in public behaviour. There are some very good communications and behaviour change campaigns and groups that have been working on this for a number of years, yet littering is still a problem. To then expect local authorities to change citizen behaviour is unrealistic without potentially radical new measures and policies in place, over and above those outlined in EPR.

In the past, as part of the Best Value Performance Indicator (BVPI) system local authorities used to monitor and report on cleanliness standards (BVPI 199). This was timely to do and also contained a large element of subjectivity. Whilst this might have been acceptable for performance standards, when there are payments linked to this there would need to be a much more robust process in place and LARAC has concerns that such a system can be implemented.

Scheme administration and governance

Q73. Do you agree or disagree that the functions relating to the management of producer obligations in respect of household packaging waste and litter including the distribution of payments to local authorities are managed by a single organisation?

Agree. BCC considers this to be the simplest and most efficient way to manage payments to all councils across the UK. The appointment and governance of the Scheme Administrator is critical to delivering the EPR scheme. The Scheme Administrator should be a not-for-profit organisation and the governance structure therefore needs to reflect the stakeholders involved in the system. In this situation, it is crucial that councils are represented on the Governance Board as they play such a key role in the delivery of the EPR scheme.

There is limited detail provided around governance arrangements and it is not clear how managing the Scheme Administrator through a contractual arrangement with Government allows for stakeholder engagement and feedback to both producers and councils. The process for award is to be competitive but it is not clear how bids will be assessed and what criteria will be used for awarding the contract. Also there is little detail around performance management of the Scheme Administrator and KPIs. Scheme Administrators are expected to outline how stakeholders will be represented as part of the scheme management but it is unclear how much of a role councils will have on the overall scheme administration, or indeed in developing the ITT documentation such that their interests are truly represented

Q74. Overall which governance and administrative option do you prefer?

a. Option 1

This has a level of simplicity and clarity that would be very beneficial. The fact that this model reduces the need to issue evidence and so cuts out the market aspect and trading is again a move to a simpler system that should be a benefit to producers and others.

Requiring all exporters and reprocessors of packaging waste to seek accreditation and to report centrally all tonnage data, will ensure transparency across the supply chain and ensure that accurate data is used to inform service updates, target setting and overall compliance.

Option 1 also ensures that local authorities who collect trade waste will have certainty that they will receive payments from one organisation. A concern for local authorities regarding option 2 is that they will receive payments for household waste from the single body but payments for household like (trade) from a variety of compliance schemes.

Q75. How do you think in-year cost uncertainty to producers could be managed?

d. No preference

Q76. Under Option 1, does the proposed initial contract period of 8-10 years (2023 to 2030/32) provide the necessary certainty for the Scheme Administrator to adopt a strategic approach to the management and delivery of its functions and make the investments necessary to deliver targets and outcomes?

Yes. This time period is long enough to give stability to all parties in the scheme, allowing confidence in the necessary investment without being so long that it will not have the flexibility to grow & adapt with the changing landscape.

Q77. Under Option 2, does the proposed initial contract period of 8-10 years (2023 to 2030/32) provide the necessary certainty for the Scheme Administrator to adopt a strategic approach to the management and delivery of its functions and make the investments necessary to deliver targets and outcomes?

Yes. This time period is long enough to give stability to all parties in the scheme, allowing confidence in the necessary investment without being so long that it will not have the flexibility to grow & adapt with the changing landscape.

Q78. Do you agree or disagree with the timeline proposed for the appointment of the Scheme Administrator?

Neither agree nor disagree. The timeline for launching the procurement process to appoint the Scheme Administrator seems ambitious given the complexity involved and delays to the legislative process. It is not clear how much float has been built into the programme to allow for unforeseen hiccups or even a potential challenge to the bidding process.

Q79. If the Scheme Administrator is appointed in January 2023 as proposed, would it have sufficient time to mobilise in order to make payments to local authorities from October 2023?

Unsure. There is a considerable amount of work the Scheme Administrator has to undertake from Jan 2023 to be able to make any payments to councils in Oct 2023. Prospective bidders should be asked to submit their own programmes to demonstrate how this timeline could be met recognising the number of councils and producers involved, and the systems needing to be established in realistic timescales.

Q80. Do you agree or disagree with the approval criteria proposed for compliance schemes?

a. Agree

Q81. Should Government consider introducing a Compliance Scheme Code of Practice and/or a 'fit and proper person' test?

c. Both

In order to give confidence in the established compliance schemes, the Scheme Administrator needs to ensure that there is a Code of Practice which includes a "*fit and proper person*" test to be an operator of a compliance scheme.

Q82. Do you agree or disagree with the proposed reporting requirements for Option 1?

a. Agree

Q83. Do you agree or disagree with the proposed reporting requirements for Option 2?

a. Agree

Reprocessors and exporters

Q84. Do you agree or disagree with the proposal that all reprocessors and exporters handling packaging waste will be required to register with a regulator?

Agree. This is essential such that the scheme is managed and monitored effectively and all packaging is accounted for.

Q85. Do you agree or disagree that all reprocessors and exporters should report on the quality and quantity, of packaging waste received?

Agree. This is essential such that the scheme is managed and monitored effectively and all packaging is accounted for. The measurement of quality needs to take into account the variety of end markets and applications accessible to packaging materials.

Q86. What challenges would there be in reporting on the quality and quantity of packaging waste received at the point of reprocessing and/or export?

Reporting accurately on quality and quantity of packaging is key to ensuring the success of the scheme and flow of payments. Robust systems will need to be put in place in order that this is achieved. There is already concern around the current PERN system in that packaging of poor quality is being classed as recycled, but may not be in reality, either totally or large proportions of it.

Q87. Do you think contractual arrangements between reprocessors and material facilities or with waste collectors and carriers are a suitable means for facilitating the apportionment and flow of recycling data back through the system to support Extended Producer Responsibility payment mechanisms, incentives and targets?

Unsure. The supply of accurate and timely data is key to having confidence in the EPR system and trying to eliminate fraud. Contractual arrangements set out the obligations of the parties but it is recognised that there are likely to be different data needs and systems in place under the EPR scheme than there are now. Therefore, current contact arrangements may not provide the levels of reporting expected. Any data systems that are brought in to meet EPR requirements will need to have their costs, implementation and ongoing, covered by the EPR scheme.

Q88. Do you agree or disagree that exporters should be required to provide evidence that exported waste has been received and processed by an overseas reprocessor?

Agree. Having accurate data for all packaging waste that has genuinely been recycled is a core principle behind the success of the EPR scheme

Q89. Do you agree or disagree that only packaging waste that has achieved end of waste status should be able to be exported and count towards the achievement of recycling targets?

Neither agree nor disagree. It is not clear how this would work in practice – “*end of waste*” classification is usually obtained by the material going through a treatment process. Hence it is unclear how waste that has yet to be actually recycled could be classified as “*end of waste*” prior to export. It could also potentially be open to abuse.

Q90. Do you agree or disagree that there should be a mandatory requirement for exporters to submit fully completed Annex VII forms, contracts and other audit documentation as part of the supporting information when reporting on the export of packaging waste?

Agree.

Q91. Do you agree or disagree that regulators seek to undertake additional inspections of receiving sites, via 3rd party operators?

Agree. This would help give confidence in the recycling of materials as well as verifying data to be accurate

Compliance and enforcement

Q92. Do you agree or disagree with the proposed approach to regulating the packaging Extended Producer Responsibility system?

Agree. The Regulator will need to have sufficient resources and funding to be able to undertake this role effectively. There is a concern that the regulators will not have the resources needed to undertake these new inspection and enforcement duties. Thought needs to be given as to how the right level of resources can be provided to ensure the system is suitably regulated.

Q93. Do you have further suggestions on what environmental regulators should include in their monitoring and inspection plans that they do not at present?

BCC has nothing further to add in this respect.

Q94. In principle, what are your views if the regulator fees and charges were used for enforcement?

It seems appropriate that enforcement should be covered by the EPR scheme. However, it is noted that in the experience of local government in Northern Ireland, costs of enforcement are rarely covered by the fees and charges in place – particularly over time. For an effective system with fit for purpose regulation, all enforcement costs should be covered and this issue subject to regular review.

Q95. Would you prefer to see an instant monetary penalty for a non-compliance, or another sanction as listed below, such as prosecution?

The level of penalty should be proportionate to the level of non-compliance set at a level that acts as a deterrent. Regulators should have a suite of sanctions at their disposal within the EPR system.

Implementation timeline

Q96. Do you agree or disagree with the activities that the Scheme Administrator would need to undertake in order to make initial payments to local authorities in 2023 (as described above under Phase 1)?

a. Agree

The activities highlighted appear to all be required in order to make payments to councils from 2023, it is not clear however if this a comprehensive list and whether other activities will be required.

As part of the ITT submission, bidders should be asked to set out all of the activities that are required along with a realistic timeline such that this can be assessed.

Q97. Do you think a phased approach to the implementation of packaging Extended Producer Responsibility, starting in 2023 is feasible and practical?

Unsure. The timeline is tight and relies on the necessary legislation being in place and the Scheme Administrator being appointed. It would be preferable if full net costs could be met in 2023 but realistically, this would be difficult. Hence a prudent approach needs to be taken.

Q98. Do you prefer a phased approach to implementing Extended Producer Responsibility starting in 2023 with partial recovery of the costs of managing packaging waste from households or later implementation, which could enable full cost recovery for household packaging waste from the start?

Phased approach starting in 2023. The flow of funding to support the cost of managing packaging in the waste stream by producers should be starting in 2023. This will be challenging BCC would want to see producer payments being made at the earliest opportunity.

Q99. Of the options presented for reporting of packaging data for 2022 which do you prefer?

b. Option 2

Option 2 is the most complete reporting method, there is a concern that by doing this there could be over reporting of self-managed waste in order to reduce producer payment levels. BCC would want assurances that a rigorous compliance and review process was in place that mitigated against this risk and ensured accurate reporting of packaging data.

Q100. Are there other datasets required to be reported by producers in order for the Scheme Administrator to determine the costs to be paid by them in 2023?

c. Unsure

Questions from Annex 1 to Consultation Document

Q101. Which of the definitions listed below most accurately defines reusable packaging that could be applied to possible future reuse/refill targets or obligations in regulations?

Further information to help answer this question (and the 4 that follow) can be found in Annex 1 of the consultation document.

☒ Definition adopted by The UK Plastic Pact/The Ellen MacArthur Foundation

Q102. Do you have any views on any of the listed approaches, or any alternative approaches, for setting reuse and refill targets and obligations? Please provide evidence where possible to support your views.

There are difficulties associated with monitoring and measuring waste prevention and huge disparities in practice from consumer to consumer. It is likely that an element of 'business ownership' will enhance the system and encourage consumers to increase reuse, but it will be extremely important to communicate well, the key messages to the public required to effect substantive change.

Q103. Do you agree or disagree that the Scheme Administrator should proactively fund the development and commercialisation of reuse systems?

a. Agree

With reuse standing above recycling in the waste hierarchy, it is appropriate that reuse systems are explored and expanded. This must be done on the basis that they create environmental benefits and embrace the underlying principles of the circular economy.

Q104. Do you agree or disagree that the Scheme Administrator should look to use modulated fees to incentivise the adoption of reuse and refill packaging systems?

Agree. The Resource & Waste Strategy (2018) for England promotes the movement of waste up the waste hierarchy therefore the modulated fee structure should support this aim and drive producers to use packaging that can be refilled/reused ahead of any single use packaging. In Northern Ireland, "*Delivering Resource Efficiency*" (2013) encourages the same course of action – this should be refreshed to take into consideration the EPR (and DRS) scheme and reinforced in the soon-to-be published Environment Strategy (NI) and expanded upon in any refreshment of the Waste Strategy (NI).

In terms of modulated fees, if designed well these will drive better environmental performance of packaging and the EPR funds should be used actively to communicate the benefits of reusable/refillable packaging to the consumer to drive behaviour change and increase demand.

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RESPONSES TO CONSULTATION QUESTIONS

Introduction

Q1 What is your name?

Jennifer Stephens

Q2 What is your email address?

stephensj@belfastcity.gov.uk

Q3 Which best describes you?

Local Authority

Q4 If you are responding on behalf of an organisation, what is its name?

Belfast City Council

Q5 Would you like your response to be confidential?

No

A Deposit Return Scheme in a post-COVID context

Q6. Given the context of the COVID-19 pandemic we are currently experiencing, do you support or oppose our proposals to implement a deposit return scheme for drinks containers in 2024?

Whilst we support the principle of a DRS as part of a wider EPR regime, we have concerns around the proposed timings of its introduction. We suggest that implementation of a DRS scheme should be deferred until a later date than 2024, post introduction of the EPR scheme and the plastics tax in order to allow time to assess the impacts of these policy instruments, and determine if they are delivering increases in recycling.

People's working and shopping habits have changed substantially during the pandemic and it is unclear how behaviours will change long term, even after lockdown restrictions and social distancing are eased. The move to greater online shopping, home delivery of groceries and working from home may continue. This means that the traditional system of a DRS might be less applicable to a post Covid-19 world and could be more inconvenient for many. The modelling in the impact assessment on recycling levels and returns could therefore be overestimated if behaviours in a post Covid-19 world are different to pre Covid-19.

The impact of lockdowns and peoples changes in behaviours has also put significant financial pressures on many businesses, especially SMEs. Placing additional burdens of a DRS may be premature before the economy has settled.

Furthermore, the research being undertaken in Wales and Northern Ireland that utilises digital technology to allow residents to claim back a deposit when recycled through their kerbside collection adds a new dimension to the scheme design. The potential to claim deposits via the kerbside is a very interesting and important development.

The outcomes of the digital trials, EPR, and further work around people's likely behaviour in a post Covid-19 situation are key to the scheme design. This provides a strong justification for decisions to be deferred until these results and considerations can be included in the assessment to inform the scheme design.

Q7. Do you believe the introduction of a deposit return scheme will have an impact on your everyday life?

Yes : A large impact but still manageable.

Whilst overall, the introduction of a DRS should have a positive social and environmental impact on everyday life, as a result of the likely reduction in littering and increase in recycling, there may be negative impacts on certain sections of society (e.g. older people and lower socio-economic groups without access to a car). Consideration will need to be given to how these issues could be addressed.

Depending on the final scheme design, (i.e. if it includes RVMs only or incorporates in-scope kerbside containers) additional storage requirements may prove problematic for many residents (e.g. those living in flats, apartments and HMOs), where space is limited.

Any lessened ability to engage with a DRS cannot be ignored, and solutions must be developed to assist engagement under these circumstances.

Q8. Have your views towards implementation of a deposit return scheme been affected following the economic and social impacts of the COVID-19 pandemic?

Yes – because of both economic and social impacts

It is recognised that Covid-19 has had a negative impact on some socio-economic groups more than others. There could be a risk, if the DRS is implemented too soon after the pandemic, that some people may not have had a chance to recover from the social and economic impacts of Covid-19 and could be hit with a further burden during what are already challenging and unpredictable times. We consider that deferring the implementation timeframe, as proposed by Government, a step in the right direction. We would encourage Government to seriously consider how long an appropriately extended timeframe should be and to ensure it is one which would allow many of the social and economic impacts of the pandemic to be realised and addressed before planning the introduction of a DRS.

In addition, there will be lessons to learn in how society and public services responded to the Covid-19 pandemic and the lasting impacts it may have on services and on public behaviour. Reviews about this will take time to be completed but could have useful insights in relation into how a future DRS might need to be designed to take account of changes and lessons learned.

For example, during the pandemic the tax on carrier bags was rescinded. If a DRS had been in operation it is very likely that calls for that to be withdrawn would have been made as people would not have been able to visit a RVM to redeem the deposit. Under a digital DRS they may have been able to continue to redeem the deposit and the whole system may well have been more resilient.

1. Scope of the Deposit Return Scheme

In-scope containers

Q9. Do you agree that the cap should be included as part of the deposit item in a deposit return scheme for

- a) Plastic bottle caps on plastic bottles – Yes**
- b) Aluminium bottle caps on glass bottles - Yes**
- c) Corks in glass bottles – Yes**
- d) Foil on the top of a can/bottle or used to preserve some drinks – Yes**

These answers are provided on the basis that redeeming the deposit is NOT necessarily dependant on the cap etc. being included as part of the deposit item.

We consider that all items associated with single-use drinks containers should be included within the collection scheme in order to increase recycling and to reduce confusion for consumers.

Additionally, it could reduce the prospect of littering in general as well as the potential problem of having to deal with discarded items, such as caps and corks in and around collection points like RVMs and recycling banks. Given their small nature, such items could perhaps end up in drains and waterways more easily, when detached from containers and could result in detrimental effects on wildlife and the environment.

We recommend that industry is engaged with, in how best to incorporate these items within the DRS collection, sorting and recycling process. And also that the systems should be designed to enable containers to be taken back, regardless of whether the cap is on or off.

Whilst it would be best practice for all caps etc. to be accepted in the return scheme, we would stress that the deposit should be paid back to the consumer regardless of whether or not such items are present.

Size of Container

For questions 10, 11, 12, 13, 14, 15 respondents should note that these questions are only applicable to the outstanding decision on the final scope of a deposit return scheme to be made in England and Northern Ireland, since the Welsh Government have already presented a preference for an all-in deposit return scheme.

Q10. Do you believe we have identified the correct pros and cons for the all-in and on-the-go schemes described above?

Whilst Belfast City Council is in support of the concept of an “all in scheme”, we propose that there is more investigatory research to be conducted and appropriate timing to be considered to fully inform the design of the scheme. We welcome the acknowledgement, in the consultation document that consideration will need to be given of the impact of a new scheme on local authorities (regardless of whether the all-in or on-the-go system is the eventual decision).

The introduction of a DRS in 2024 may be too premature, to allow for the EPR reforms. It could inhibit Government’s ability to establish which policy instruments are best at influencing and improving recycling performance and consumer behaviour change. Rushing the introduction of the DRS scheme risks confusing its design and undermining its measures of success. Unlike the EPR proposals, a DRS only concentrates on the collection of material and no incentive is provided for waste hierarchy principles to be encouraged for producers to design packaging to reduce resource

use or for consumers to change behaviours to reduce and reuse. Other measures would therefore be required in addition to DRS to reduce overall material use.

The scheme could have the unintended consequence of increased littering where some people may leave items in easily accessible and visible locations enabling others to collect and redeem the deposit. There could be an increase in 'bin diving' where bins are partly emptied in search of redeemable containers, which again can lead to littering.

One of the key objectives of the scheme is to reduce littering. Whilst it is recognised that the in-scope items are regularly littered, other items such as takeaway cups and food packaging and film plastics are also commonly littered. These items will require to be cleared and the costs to local authorities of reduced litter does not directly correlate with a reduction in cost as crew have to make the same number of journeys and cover the same area to collect the litter.

It is unclear how the carbon savings have been calculated: there is reference to calculations being based on landfill and energy from waste. If the landfill proportion has been overestimated this will significantly reduce the emission savings. Similarly, savings have been based on closed loop recycling, it is not clear if the material displaced from kerbside collections has been factored into this calculation or if it is assumed all has been diverted from the residual.

The potential for schemes to be different across nations and varying costs of deposits, such as multipacks could be confusing for residents. Whilst the DMO will have responsibility for communications local authorities will inevitably receive direct liaison from residents for complaints and queries which will be an additional burden.

We would also question if a full equalities impact assessment has been undertaken for a DRS based on RVMs. There are likely to be accessibility concerns for some members of the public and it could be that people with access difficulties, for whatever reason, are unduly impacted by a DRS based on RVM. People will be unable to avoid the deposit but might not then be able to reclaim their money.

Q11. Do you foresee any issues if the final scope of a deposit return scheme in England and Northern Ireland does not match the all-in decision taken in Wales? E.g. an on-the-go scheme in England and an all-in scheme in Wales.

a) Yes

With both Scotland and Wales opting for an all-in scheme, the potential for consumer confusion and other dis-benefits would be greater than desired, particularly if England should opt for an on-the-go scheme. Although geographically removed from the other UK jurisdictions, we recognise the advantages to producers and retailers if a common approach is taken.

A mix of schemes would add another layer of complexity to managing the system. Communications could be challenging and could lead to confusion especially for areas where there is regular movement across boundaries. The system would be less efficient and could lead to additional costs as multiple systems are managed.

We are aware of the high levels of cross border activity that occur within the agri-food industry on the island of Ireland and that a number of our larger producers (e.g. Coca-Cola) operate on an all-island basis. This poses some practical challenges, and a NI-only DRS on the island of Ireland could create some unmanageable complexities for producers, limit packaging innovation and choice for NI consumers and potentially encourage cross-border fraud. It could also fail to incentivise packaging weight reduction and further place NI at competitive disadvantage in relation to the Republic of

Ireland (which is particularly problematic when NI is endeavouring to maintain industry confidence during a time of great societal and economic uncertainty).

We are also aware of growing concerns regarding the potential for cross-border fraud arising from the difference between the scheme proposed for Republic of Ireland (no glass) and that for Northern Ireland (including glass). It may be the case that areas close to boundaries between GB jurisdictions, similar issues could be experienced; a lot will depend on effective labelling and management of the systems throughout all jurisdictions.

Q12. Having read the rationale for either an all-in or on-the-go scheme, which do you consider to be the best option for our deposit return scheme?

a) All-in

Belfast City Council, at its People and Communities Committee meeting in May 2021 agreed to support an all-in scheme. Such an approach would provide more consistency and less complexity across jurisdictions. Less consumer confusion should result in higher engagement in the system and drive higher recycling rates for in-scope drinks containers. In our response to the 2019 DEFRA consultation we did consider the merit of an incremental model of implementation, starting with an on-the-go scheme and working towards an all-in scheme. Such an approach might allow for the new EPR and DRS systems and administrators to 'bed-in' before expanding the scheme. However, given the approach being taken in both Scotland and Wales, we would acknowledge that it would now be more consistent to develop an all-in scheme from the start.

Q13. Given the impact Covid-19 has had on the economy, on businesses and consumers, and on everyday life, do you believe an on-the-go scheme would be less disruptive to consumers?

b) No

The introduction of any new scheme will be disruptive to consumers, but if a new scheme is to be implemented then it would be preferable that it is easily understood, easy to participate in and resulting in the greatest benefit to society.

An on-the-go scheme might cause unnecessary confusion for consumers, as to what is in and what is out of the DRS. Additionally, not all in-scope products may be consumed on-the go and might have to be stored at home, where for many residents such as those living in flats and HMOs, storage capacity may be limited. Consideration would also need to be given to those households with limited access to transport who would have to bring their items to return points in order to redeem their deposits.

An additional knock on effect of an on-the-go scheme could be a shift in consumer behaviour patterns towards purchasing larger drinks containers (in order to avoid the associated deposit charge) which could result in longer term health implications for society as a whole.

Q14. Do you agree with our proposed definition of an on-the-go scheme (restricting the drinks containers in-scope to less than 750 ml in size and excluding multi-pack containers)?

b) No

Including multi-packs in-scope provides consistency throughout the scheme and a clear message to consumers. Whilst we agree that multipack containers should remain in scope (due to these items being regularly consumed away from the home and littered), we would stress that no household, (e.g. in particular, those from certain socio-economic backgrounds) should not be discriminated against with higher deposits to pay as a result of purchasing multipacks in order to provide for their families. The DRS should be designed in such a way to take this consideration into account.

If reduction in litter remains one of the aims of the DRS scheme, larger drinks containers should also be included. *On-the-go* plastic drinks bottles can be larger than 750ml (e.g. 1 litre sports-type bottles) and manufacturers may seek to replace 750ml containers with larger 1 litre plus plastic bottles, in order to avoid paying the deposit.

Q15. Do you agree that the size of containers suggested to be included under an on-the-go scheme are more commonly consumed out of the home than in it?

c) Difficult to say

Research would be needed to analyse people's behaviours to show if this is more commonly the case. The size of containers proposed for 'on the go' are items which are regularly littered, although larger plastic bottles are also commonly littered.

As per our answer to Q 14, it might be appropriate to include containers up to 1 litres as products, such as 1 litre sports drinks are regularly consumed 'on the go'.

Q16. Please provide any information on the capability of reverse vending machines to compact glass?

We have no relevant information in relation to this issue and would advise Government to engage with the glass industry to explore this option further. (e.g. if the glass gets too compacted within the RCM, this might affect its ability to be re-smelted)

Q17. Do you agree that the scope of a deposit return scheme should be based on container material rather than product?

Yes, although clear labelling will be required to ensure that good communication of what is included is easily understood by the consumer. The scheme needs to be easy to use as, if consumers have a poor understanding of materials in scope and regularly have products rejected, this could lead to disengagement and increased complaints to councils. This highlights the importance of ensuring that the labelling is simple, easy to understand and consistent in order to minimise potential confusion. If consumers do not understand the label, including those whose first language is not English, could lead to the unintended consequence of out of scope containers being returned/rejected at RVMs or return points. This may then be littered rather than returned to the home for correct disposal/recycling.

The DRS scheme should align with EPR and consistent collections policies to be clear which products are covered under each respective programme. If the consistent collections requirements and EPR are based on products rather than material type, there could be confusion and duplication. An approach based on materials, combined with an ability to keep the scope under review, makes it easier for the DMO to administer the DRS and for communications/education campaigns to be developed to drive behaviour changes.

Furthermore, concerns about producers changing packaging in order to avoid an item being in the scope could be addressed by modulated fees as part of any EPR scheme. This highlights the need for an EPR System Administrator (SA) to have the ability to review and modulate fees quickly and the potential for complementary interaction between the DRS and EPR schemes.

Q18. Do you agree with the proposed list of materials to be included in scope?

Yes, although consideration could be given to additional materials, for example cartons.

Also, it is highlighted that there may be confusion and in all likelihood fraudulent activity, arising from the fact that Northern Ireland shares a land border with the Republic of Ireland. The Republic is developing a DRS excluding glass, and this could result in cross-border consumers attempting to dispose of glass containers (many of which are currently identical north and south, distributed on an island-wide basis) in return facilities in Northern Ireland.

Q19. Do you consider there will be any material switching as a result of the proposed scope?

This is certainly possible, and it would be useful to examine the operation of schemes in other places, to assess the likelihood of this being an issue in the UK. Some producers could product switch to materials out of scope of a DRS for the drinks packaging and similarly consumers may seek out of scope packaging to avoid paying a deposit fee. A similar example is where supermarkets have shifted to bioplastics due to customer demand for alternatives to plastic. This has contaminated kerbside recycling systems where it is not compatible in either the organic or the dry recycling collections. Likewise, consumers may choose to buy larger containers to avoid paying a deposit fee. For less healthy options such as carbonated drinks, this could have unintended health consequences as more of the product would be consumed than normally would have been through purchasing the smaller bottle. There is also the likelihood that more product could be wasted as a result of buying more than is needed.

2. Targets

Q20. Which of the following approaches do you consider should be taken to phase in a 90% collection target?

b) 75% in year 1, 80% in year 2, 90% in year three and thereafter

We would consider option b) as it concurs with the findings of the DEFRA Impact Assessment, to guard against optimism bias during and immediately following pandemic recovery, to give time for the economy to stabilise and to assist councils in reconfiguration of services.

Sufficient feedback loops (targets or financial instruments/measures) will be required to ensure individual producers have every incentive to improve their own environmental performance. Also, the ongoing statutory role for councils (both collection & disposal functions) needs to be taken into account to prevent unintended consequences of different bodies “chasing target materials” such that the costs to society are not minimised.

Q21. What collection rate do you consider should be achieved as a minimum for all materials after 3 years?

c) 90% collection rate should be achieved for all materials

In order to make the DRS system worthwhile it should achieve a high capture rate. However consideration may need to be given to defer the scheme, until the outcomes of EPR and the plastics tax are realised before making additional investment for a DRS. Again, as outlined in other responses to questions, equality issues should be considered, to ensure that no one is disadvantaged or discriminated against, in order to achieve high capture and collection rates for all materials.

Q22. Is it reasonable to assume that the same collection targets could be met with an on-the-go scheme as those proposed for an all-in scheme for in-scope materials?

Yes, provided the scheme is well-communicated to consumers, and support to participate provided where necessary. For the DRS scheme to be effective and financially viable a very high return rate is necessary for either option. Further research would be required to establish people's behaviours and likely capture from both proposed schemes.

Targets by England, Wales and Northern Ireland

Q23. Who should report on the volumes of deposit return scheme material placed on the market in each part of the United Kingdom (England, Wales and Northern Ireland) for the proposed deposit return scheme, and what would be the implications of these obligations?

The producer/importer

The producer/importer should be responsible for reporting volumes placed on the market in order to provide a reliable annual figure. Such an approach would align the design of the DRS more closely with the EPR scheme and consequently permit easier interaction between both schemes.

Placing this responsibility on the retailer (especially small retailers) would be an additional burden and a considerable administrative addition for the DMO.

Q24. What evidence will be required to ensure that all material collected is passed to a reprocessor for the purpose of calculating the rate of recycling of deposit return scheme material?

We are aware of monitoring difficulties associated with multiple changes of ownership of recyclate (particularly when export is involved). We also note that this issue forms part of a wider policy conversation, including in the EPR consultation exercise. It will be for Government, the DMO, producers and reprocessors, to develop and agree an appropriate system for calculating the rate of recycling from DRS material.

As the waste Duty of Care applies to all materials within this system, it is essential to track that all material is issued to an authorised reprocessor and it will undergo the correct processes until end of waste status is achieved. Reporting requirements could be similar to those required for local authorities for Waste Data Flow.

Given the scale, scope and geographical spread of infrastructure needed under the DRS scheme (and the EPR) we would request that the national reprocessing capacity (including that in Northern Ireland) is given greater prominence and discussed openly in the consultation document along with future requirements.

3. Scheme Governance

Q25. What length of contract do you think would be most appropriate for the successful bidder to operate as the Deposit Management Organisation

(d) 10 years +

A contract of this magnitude needs long term security to make the initial required investments for the scheme to operate successfully. After the first contract period consideration should be given to making the contracts 8 to 10 years in length to mirror the planned contract lengths of the EPR Scheme Administrator.

Q26. Do you agree that the above issues should be covered by the tender process?

Please list any other issues you believe should be covered as part of the tender process.

The potential implications to local authorities of a DRS scheme could be significant. If local authorities are not represented on the DMO, then it is essential for the tender process to refer to the need to liaise with local authorities and have a formalised dispute resolution process.

The tender process might also consider an outline of how the DMO will work with local councils, and their planning offices, in relation to provision and siting of infrastructure, for example, for on street receptacles – front of house shops etc.

The digital option for kerbside collections should not be left to the discretion of the DMO. If the trials in Wales and Northern Ireland are proven successful this should be integrated into the scheme design and not be left as an option.

Contract Management

Q27. Do you agree that the above issues should be monitored as Key Performance Indicators?

Yes.

Please list any further issues you believe should be covered by Key Performance Indicators.

Examine everything that is measurable within the system, under the remit of the contract, and consider what is appropriate to include as a key performance indicator.

The contract for the DMO needs to be operated and assessed in a transparent and effective manner. KPIs and other measurements should be designed with this in mind.

Included within a suite of KPIs should be ones that encompass issues related to contamination and littering, including around RVMs. We would like to see KPIs that measure the availability of RVMs and how much time they are available for use and not full etc. This sort of measure would indicate how well the system is performing and also indicate how accessible it is for people to redeem their deposit easily.

Other measures could look at any sub-contracting from the DMO and how these arrangements are monitored. Also, consideration could be given to levels of in-scope items within retail waste streams (RCMs), household kerbside streams and litter bins etc.

Digital Infrastructure for the Deposit Return Scheme

Q28. Do you agree that Government should design, develop and own the digital infrastructure required to register, and receive evidence on containers placed on the market on behalf of the Deposit Management Organisation and regulators?

Yes

Please elaborate on your answer

If the arrangements for the DMO are to be timebound, i.e. with a tender for a specified period, there is potential for the successful bidder to change over time. It is vital that the intellectual property and digital operating systems developed can be maintained, irrespective of who wins the tender at any given time. (One example where lessons learned could be utilised is from the National Lottery, when it changed its contract management from Camelot). This would indicate that government should be the owner of the digital infrastructure required. The designer and developer are also likely to be appointed from the private sector, through a separate tender process, at the behest of government.

Also, there needs to be consistency with other data reporting systems such as Waste Data Flow, so it makes sense for Government to initially control the digital infrastructure for reporting. This is also key to the potential digital infrastructure for local authority kerbside collections, as referred to in Q26, this should not be at the discretion of the DMO.

Q29. Government will need to understand the needs of users to build digital services for deposit return scheme. Would you like your contact details to be added to a user panel for deposit return scheme so that we can invite you to participate in user research (e.g. surveys, workshops interviews) or to test digital services as they are designed and built?

Yes

4. Financial Flows

Producer Registration Fees

Q30. What is an appropriate measure of small producers for the purposes of determining the payment of registration fees?

Consider measuring both taxable turnover and drinks containers placed on the market as a way of ensuring transparency and fairness.

Unredeemed Deposits

Q31. Is a high level of unredeemed deposits funding the scheme problematic?

Yes

Please explain your answer.

A high level of unredeemed deposits for any DRS would be problematic, as it means that the scheme is not working as envisaged. This would mean the scheme is not achieving high recycling rates, operating inefficiently and costing producers more than anticipated.

It is vitally important that the deposit return scheme is viewed in the context of the size of the investment required (by the public and private sector, and individual citizens), compared to the contribution it is likely to make towards national targets. If there is a high level of unredeemed deposits, producers could argue that their fees are unfair and unnecessary. The biggest financial contributors to the scheme would be citizens, 'paying' for the scheme through unrecovered deposits. We cannot assume that it is only wealthier people who are prepared to lose their deposit. The elderly, disabled or disadvantaged people and those with little access to relevant transport might have to forego redeeming their deposits. This must be avoided, as noted in the consultation document.

The consultation indicates the importance of producers paying costs proportionate to the types of materials they place on the market to reflect the different costs involved in collecting, separating, and treating different material types. Producing materials which can be easily captured and recycled would therefore be incentivised. This is contrary to producer fees being set around unredeemed deposits where a poor capture rate is rewarded to producers by lower fees.

Councils in Northern Ireland currently spend more than £31m p.a. on clear up of litter and illegal dumping activity, but have 'built-in' reliance on the revenue streams associated with recyclates that may negate any savings associated with litter reduction as a result of a DRS. A detailed Northern Ireland specific cost-benefit analysis would be vitally important prior to unpicking the current system – particularly in relation to the proposed 'all in' system.

Q32. Which option to treatment of unredeemed deposits do you support?

Option 2 – unredeemed deposits part fund the system but there is a minimum producer fee per annum and excess funds are asked about during tender

Option 2 seems the more sensible approach. Producers should not benefit from low capture rates by having lower fees. The proposal that a floor on producer fees is supported, with any surpluses being fed directly back into the scheme to improve the capture rate. Such a system could provide more potential for innovation.

Q33. With option 2, do you foresee any unintended consequences of setting a minimum percentage of the net costs of the deposit return scheme that must be met through the producer fee?

If, e.g. due to a rapidly changing business environment, producers fall in number, there is potential for a greater burden to fall on a smaller number of producers. This falls back on managing how fees are apportioned out. Also, having producer fees set at a certain minimum percentage of net costs could lead to stakeholders trying to drive down the cost of a system to reduce their exposure, but if appropriate performance measures are a feature for a DMO, then that commercial tension may be effective in driving efficient processes and elevating accountability for the DMO.

Q34. If a floor is set do you consider that this should be set at:

c) 50% of net costs

Limited information is provided within the consultation and we would welcome more detailed evidence to support various options.

Q35. Do you agree that any excess funds should be reinvested in the scheme or spent on other environmental causes?

If there is the possibility of investing in both, then we would support this option. Given the quantum of finance that should be available, it would appear likely that both will be possible.

Depending on monies available, the allocation of funds should be kept under review.

In terms of the environmental causes that the excess funds could support, this could be relating to increasing the recycling rate or other positive environmental outcomes such as providing support to local authorities to improve kerbside collections, reduce littering or support producers to reduce carbon emissions or make the processes more efficient. The DRS only considers the waste aspect but in line with waste hierarchy and circular economy principles, producers should also be encouraged to consider package design and reduction. Unredeemed deposits could be used to provide such incentives.

Start-up Costs and Operational Costs

Q36. What should be the minimum deposit level set in legislation?

a.)10p

The deposit should be sufficient to engage consumers but not be too much of a financial penalty for those unable to return the container. The level of the deposit should be set by the DMO, so that it can be varied in light of experience. Having local authority representation either as part of the DMO or very close links as a key stakeholder would be important when it comes to agreeing and setting deposit levels.

The findings of the Kantar research are noted as indicating a 15p minimum would be acceptable, with the 20p 'round' figure preferred. However, the DRS system should not disadvantage any social group, if the level is set too high those on lower incomes would be impacted the most. Although the deposit can be redeemed, there may be situations where the packaging cannot be redeemed immediately, or it makes the initial purchase price too high for some.

Q37. Do you agree that there should be a maximum deposit level set in legislation?

Yes. We welcome that these levels will be articulated in secondary legislation, and that they will require review in line with inflation.

If yes, what should be the maximum deposit level set in legislation?

Unsure

Whilst we understand the issues around allowing for either variable deposit levels or a deposit level to be set within stated parameters, there are concerns where this means it would vary from deposit levels in Scotland. Any differences will raise questions in the eyes of consumers and may lead to a drop in public confidence in DRS as a policy and therefore in the use of the DRS systems.

If deposit levels do differ from Scotland, then very careful consideration will be needed to be given to how this is communicated, the reasons behind it etc.

As outlined in Q36, consideration must be given to Equality issues and measures taken so as not to disadvantage any social group.

It should be noted that, if a variable deposit level is introduced, to take into account multipacks and larger beverage packaging so the charge is in proportion to the volume purchased, there is the potential for the maximum deposit level to be much higher than if a single rate is applied.

Q38. Recognising the potentially significant deposit costs consumers could pay on a multipack purchase, how best can we minimise the impact of the scheme on consumers buying multipacks?

We would encourage Government to research the solutions to this issue employed in other countries with a DRS, which could be put in place in the UK.

We would support the introduction of a variable deposit to minimise the multipack impact. A variable deposit level could be introduced to help ensure that the deposit charge is in proportion to the volume purchased. This could help to minimise the impact of the deposit cost of multipacks and larger beverage packaging.

To assist in this there may then need to be consideration given to restricting “offers” on multipacks that could then skew the deposit level. This may require further thought and proposals but should not be seen as reason for not introducing variable deposits.

Variable deposit levels might assist in stopping the unintended consequence of material shift in beverage containers, from those that are currently easy to recycle to those that are less easy to recycle or not recyclable now.

39. Do you agree with our approach to letting the Deposit Management Organisation decide on whether to adopt a fixed or variable deposit level, particularly with regards to multipacks?

As per our answer to Q38, we would recommend that Government conduct further research on this topic as multipacks appear to be an obstacle within the proposed system.

We would support a variable deposit, in order to minimise the multipack impact on consumers, especially those on lower incomes. A variable deposit level on multipacks could help to minimise the

deposit cost of multipacks and larger beverage packaging. The deposit level still needs to be set at a level that will bring about behaviour change and mean that people do return the container for recycling.

The end point of the material would be a key consideration in a DRS and it is unrealistic to expect that all items in a multipack would be returned together.

5. Return Points

Q40. Do you agree that all retailers selling in-scope drinks containers should be obligated to host a return point, whether it is an all-in or on-the-go deposit return scheme? Please provide any evidence to further explain your answer.

Yes, however retailers would be better placed to answer on how they could be impacted upon.

It is essential to ensure that return of in-scope containers is as easy as possible for the consumer. All retailers selling in-scope drinks containers should be obligated to participate in provision of a return point, with a de minimis in place to exempt smaller retailers, however 'hosting' implies provision on the retail premises, which may not always be possible, for example in small-scale stores of large chain retailers/cafes.

Discussions will be required with local planning authorities, and with disability organisations in relation to the potential addition of more 'street furniture' to an already crowded landscape. We welcome the recognition that technological innovations may come into play, providing additional return points for consumers to use, and recognise that the DMO may enable collaborative approaches to provision of return points e.g. between neighbouring businesses in local high streets. Local Business Improvement Districts may be helpful stakeholders in this regard.

If kerbside collections are included such an extensive network may not be needed (see Q53).

The consultation outlines that the third sector could host voluntary return points and provides the example in NSW where over AU\$1 billion has been raised. The criteria outlined for return points for retailers covers costs only, it is therefore unclear and inconsistent how RVMs operated by the voluntary sector could raise funds. If the third sector may be required to provide an extensive collection network greater clarity on the payment mechanism is needed.

Q41. Given the proposed extensive distribution and availability of return points for consumers to return bottles to, do you think customers would be likely to experience delays / inconveniences in returning drinks containers? If so, how long or how frequently would such delays be likely to arise for?

Provided consumers are not required to return containers to the place of purchase, inconvenience may be kept to a minimum. However, it is almost inevitable there will be delays at some point for high demand return points such as supermarkets, especially during busy periods. The delays will also largely be determined by the number of items being returned. As it is unknown what consumer behaviour is likely to be, i.e. will larger number of items be stored before being returned or more regularly it is unknown what delays may be incurred. We would recommend that these behaviours

and scheme design be better examined and understood before finalising the DRS scheme and number of collection points required.

Long term Covid-19 measures will need have to be considered. For example, the practicalities around social distancing, queuing and avoidance of crowds may need to be addressed.

Online purchases of in-scope drinks containers

Q42. Do you have a preference, based on the 3 options described above, on what the schemes approach to online takeback obligations should be? We welcome views from stakeholders on who this obligation should apply to, including if there should be an exception for smaller retailers or low volume sales. Please explain your answer

Option 2: Use a 'de minimis' based approach to obligate qualifying retailers selling in-scope containers to offer a takeback service

We view option 2 as being the most practical, with added considerations taken into account. For example, careful thought will need to be given regarding the carbon footprint of material movements.

Option 2 could be considered with the additional provision of a centralised takeback service or collaborative agreements and partnerships to facilitate the collection of containers purchased online.

Another exemption from the takeback obligations should be considered, in relation to those retailers selling bulk quantities directly to consumers e.g. wine merchants or breweries, which are operating nationally via direct online sales. The practical and environmental costs of these companies attempting a takeback scheme would be considerable, in contrast to national supermarkets who are operating local delivery systems.

Thought will need to be given in relation to how a takeback scheme would operate for local supermarket delivery services as it may be extremely difficult from a hygiene point of view to take back used drinks containers in the same vehicle in which fresh food is being delivered to multiple households.

Regular compositional analysis will be required to ensure appropriate knowledge is developed of how much of this packaging is disposed of via household collections. This analysis should be funded via the DMO.

Option 3 outlines the potential for extra journeys being required by the retailer to take-back in scope material, which could have negative environmental consequences. There is however also the potential that residents may have to make additional journeys to redeem the deposit if an online takeback solution is not an option. Option 2 therefore provides a reasonable and fair solution requiring all retailers over the de minimis threshold including online retailers to have responsibility to take back containers.

Handling Fee

Q43. Do you agree with the proposed criteria for the calculation of the handling fee?

Yes to a degree. We assume that if a council chose to host a return point they too could benefit from a handling fee?

Would you propose any additional criteria are included for the calculation of the handling fee?

We would highlight that there are other costs which should be covered, for example building control, planning permission fees.

Exemptions to hosting a Return Point

Q44. Please tick which exemptions you agree should be included under the scheme:

- Close proximity **No**

Whilst the rationale for this proposal is clear, an exemption on the basis of close proximity to a nearby return point could encourage free riders to the detriment of early adopters. For example, if there are two neighbouring retailers and one installs equipment early in the scheme mobilisation there is little incentive for the second retailer to follow suit if an exemption is available. The criteria that would be applied in determining the exemption and the robustness of any subsequent monitoring to ensure it's ongoing validity would need to mitigate these sort of free rider circumstances.

We would welcome a clear definition on what "close proximity" means.

- Breach of safety **Yes**

However, we would not want to see this reason for exemption used to circumvent retailer compliance and obligations. As above there needs to be in place a robust set of criteria that must be met in order for an exemption to be granted. This would need to include regular review and monitoring.

Any further comments you wish to make

It is noted that the UK is 'a nation of shopkeepers', many of which are small and micro-sized. Assessing exemptions will be a mammoth task and difficult to achieve without sufficient local knowledge. We are therefore concerned that the DMO (or indeed retailers) may turn to councils for assistance in relation to this exercise, and we are keen to ensure that suitable arrangements are put in place to cover any administrative or inspection costs incurred by councils in this regard.

It is also noted that at the outset of the scheme, the 'close proximity' information required by small retailers will not be available, as the location of 'alternative return points' is likely to be unknown. The provision and development of communal facilities should be explored for areas with large numbers of small retailers, potentially in liaison with e.g. town centre or Business Improvement District managers, and council planning offices.

The exemptions regime is a key aspect of DRS and Capacity also has to be considered in terms of an exemption. In light of Proximity and Capacity, a methodology will need to be developed to ensure that enough units are available in an area for a DRS to be viable. There is also the issue of allowing an inefficient host retailer to install RVMs which, when they reach capacity are not emptied and they simply claim not to be able to accept any further in scope items for deposit.

Q45. Please can you provide any evidence on how many small and micro sized retail businesses we might likely expect to apply for an exemption to hosting a return point, on the grounds of either close proximity to another return point or on the compromise of safety considerations?

We do not have access to such data and other sectors may be in a position to provide a more detailed response. Such information may be available from trade organisations such as the Federation of Small Businesses, NI Hospitality Federation, the Chamber of Commerce, Retail NI and Hospitality Ulster, or could be collated from local authorities and Department of Finance (NI) LPS on the basis of rates payments and economic development data. Government could also look at data available on retailers registered under the single use carrier bag levy (whilst taking into account GDPR issues).

Obligations on exempted retailers

Q46. Do you think obligations should be placed on retailers exempted from hosting a return point to display specific information informing consumers of their exemption?

Yes

If yes, please tick what information retailers should be required to display:

- a.) Signage to demonstrate they don't host a return point; X Yes**
- b.) Signage to signpost consumers to the nearest return point; X Yes**

c.) Anything else?

Yes - Information on in-scope containers

The branding of the signage should be consistent for ease of consumer recognition, and the DMO should develop a methodology to ensure they were checked for validity, kept up to date and amended in the case where nearest points change or are out of action.

Digital technology could be used for this, for example, through an App with scan codes. This would remove the obligation on the retailer and place it on the DMO to ensure directions given via signage is maintained and accurate. This model could also be used to help consumers know the location of their nearest return point whilst "on-the-go".

Q47. Do you agree with our rationale for not requiring retailers exempted on the basis of a breach of safety not to be required to signpost to another retailer?

Yes

Please explain your answer.

Any retailer with an exemption it is still participating in a DRS and signage requirements should be a pre-requisite of an exemption application. It is recognised however that small retailers should not be required to identify the nearest return point because it may be disadvantageous to them in terms of trade. This exemption should be reviewed regularly, and may be overcome through the provision of e.g. local/communal/community owned facilities, charity points and BID (Business Improvement District) solutions, which could overcome the issue of one retailer having to "advertise" another and would further support the development of an App as outlined above (Q46).

Revoking an Exemption

Q48. How long do you think exemptions should be granted for until a review date is required to ensure the exemption is still required?

a.) 1 year

b.) 3 years

c.) 5 years or longer

We consider that three years (or on change of ownership of the premises/return point host premises) is a reasonable period. This would allow sufficient time for data to inform potential changes to be gathered. Any longer and the system may suffer from a lack of agility and any shorter may prove too burdensome from an administrative viewpoint.

Three years would provide retailers with some degree of certainty for business planning. Consideration should also be given to the response time for where an exemption is removed and the time for any appeals process that might ensue where an exemption is required

For a DRS to remain effective in an area where a strategic return point has allowed a number of exemptions, the DMO should have the ability to end exemptions early when appropriate notice is given. This has to be considered for a scenario where that strategic return point may be closed (e.g. if a supermarket is closed or an area is redeveloped) and would support the development of an App as outlined above (Q46).

Using Technology in a Deposit Return Scheme

Q49. Do you think the scheme could benefit from technological solutions being incorporated as a method of return, alongside reverse vending machines and manual return points?

Yes, however industry may be better placed to advise as to how such technological solutions may work.

As stated on page 53 of the consultation “The fundamental principle underpinning the proposed deposit return scheme is that returning an in-scope drinks container should be as easy as purchasing one in the first place”. Allowing residents to use the kerbside collection for in scope DRS material provides an opportunity to maximise capture rate as it requires the least amount of effort to redeem the deposit. In scope DRS materials consumed in the home is therefore likely to be redeemed via the kerbside collection as the easiest option.

Carbon emissions could also be potentially reduced if residents would otherwise choose to make trips solely to redeem deposits. This also represents a useful option for remote and rural areas where access to return locations will be limited and more costly to service, providing a fairer less discriminatory system.

Allowing DRS material to be deposited in the kerbside also provides an easy and fair way to return online purchases and therefore mitigating many of the potential disadvantages and difficulties of incorporating online returns.

By incentivising residents to use the kerbside collections for DRS materials could also have the knock-on positive benefit of increased recycling of other packaging items.

The material which is most likely not be captured via the kerbside includes those items purchased on the go which currently end up as litter or in public bins. Return points/RVMs to maximise the capture of 'on the go' materials would be required to ensure a comprehensive return system is provided. Having RVMs for just 'on the go' materials however would significantly reduce the number of return points required and therefore the running cost of the system.

If a digital DRS were to be taken forward, then there may need to be a review of how payments to local authorities worked under the DRS and EPR system. There could be merit in the DRS DMO, rather than being stand alone, is part of the EPR SA. A digital DRS would lend itself to option two of the DRS payments to local authorities, the option based on compositional analysis.

An added benefit of technological solutions could be the incorporation of waste tracking mechanisms and assurances around the end destinations of materials. This could potentially link into waste data flow and electronic monitoring of waste movements.

Q50. How could a digital deposit return scheme solution be integrated into existing waste collection infrastructure? Please explain your answer.

Improved provision of separate collection for in-scope containers will be necessary, with emphasis on cleaning the containers beforehand. It should be noted that not all householders have smartphones, and so an alternative return provision would need to continue unless another form of scanner is provided. Good communication of change will be required.

It is highlighted that the withdrawal of in-scope materials from household collections for a period of time, followed by resuming (an albeit altered) collection, will have significant impacts on council costs and contract arrangements. Suitable lead-in times will be required for changes of this nature, and provision should be made for councils to access the deposits lost from containers placed in household collection without householder redemption.

Each household would require a unique bar code to be provided (preferable on the recycling bin/box) to allow the deposit to be redeemed. Providing that the labelling allows for deposits to be redeemed digitally there would be no further adaption needed to the collection infrastructure (unless the material is required to be collected separately, which would require a significant investment).

The digital system would need a mechanism for dealing with faulty or damaged bar codes or would the only option to redeem these products be to return to a store? This could create a number of complaints which local authorities will be required to respond to.

There may be other challenges with a digital DRS that would need to be overcome. Bar codes on containers would need to be reproduced when residents request an additional/replacement bin (if theirs is damaged or lost) There could be issues associated with blocks of flats/housing estates requiring to be issued with bar codes and ensuring that the correct bin is allocated to the correct household.

These challenges can be met and are highlighted so that the additional administrative and operational burden on local authorities is taken account of when designing and implementing a digital DRS.

Given all of the potential issues, the DMO would need to consider how they could be addressed, with councils before a DRS became operable, meaning that lead in times for implementing a DRS could be well beyond those currently projected.

Q51. What are the potential fraud control measures a digital deposit return scheme could bring?

It is important that any DRS system is protected against fraud as much as possible.

A digital system could assist in managing the risk associated with bin-raiding by people seeking to claim the deposits from other people's discarded drinks containers (from litter bins or recycling bins left out for collection). It is essential that any additional costs falling to Councils from such fraudulent activity (particularly in the short term) should be included in the calculations so that producers do indeed pay the full cost of managing their wastes.

It is also noted that digital controls would assist in reducing the risk of cross-border fraud, but this would be further safeguarded by collaborative working between the government of the Republic of Ireland, DAERA and Defra, and the relevant DMO arrangements.

Systems would also be required to confirm that the product once scanned ends up in the correct recycling collection box/bin and not placed in the residual waste. Similarly, there would need to be controls that prevents items being scanned in the shop, but not purchased and then the deposit requested via the kerbside system.

Any enforcement over these elements should not be for local authorities to resolve and should fall to the DMO to manage.

We are aware that the trials that have been undertaken so far on a digital DRS have been small scale. Further trials will need to be undertaken at much larger scale to test and review the safeguards, systems and technology needed to minimise the potential of fraud in a digital DRS.

A deferral of a DRS would allow for these tests and trials to be undertaken and a digital DRS designed that will minimise fraud to levels below those seen in other RVM based DRS systems in other countries.

Q52. Do you think a digital deposit return scheme could ensure the same level of material quality in the returns compared to a tradition return to retail model, given containers may not be returned via a reverse vending machine or manual return point where there is likely to be a greater scrutiny on quality of the container before being accepted?

No

Please explain your answer.

This is unlikely in the short term - and will require good communication with householders in relation to their new collection arrangements. In Northern Ireland, for example, when separate food waste collections began, an uncompromising public messaging campaign was instigated. Some councils also found it useful to place large warning stickers on the bins of those residents who continued to placing food in the residual waste bin, to deter this and encourage take up of the new system. Suitable receptacles were provided for each household. New systems take time to bed in, and the DMO would need to factor in and allow for at least an initial dip in quality.

Q53. If the digital deposit return scheme system can be integrated into the existing waste collection infrastructure would its implementation and running costs be lower? Please provide evidence to support your answer.

Local authorities have mature collecting systems in place which are very efficient due to several years of austerity, providing an acceptable quality recyclate to reprocessors. Including a digital solution to the DRS system to incorporate kerbside collections would significantly reduce the running costs of the scheme as most of the infrastructure is already in place to collect this material (along with other non-DRS packaging). This is likely to result in fewer return points being required, reducing the potential burden especially smaller retailers which may have limited capacity to host a return point and online retailers which will require new processors to allow for returns.

There will be costs that need to be fully covered, such as those raised on the response to question 50. There is still a belief that the overall costs of a digital DRS will be lower than the cost of an 'all in' system based on RVMs.

If a network of external RVMs is installed, these will be at risk of anti-social behaviour (theft, vandalism and littering due to broken RVMs etc). It is unclear if this has been included in the running costs of the scheme and associated remedial work and the complaints local authorities would have to deal with associated to this.

Even though local authorities may not host many sites it is likely that they will end up dealing with queries and questions from the public relating to them. We see this now as people regard their local council as the place to go for advice on waste and recycling issues, regardless of whether the council provide the actual service the query is about. (A current example of in this in Belfast is the amount of queries received in relation to rogue textile banks throughout the city). This is an additional cost of a DRS based on RVMs that is not factored in anywhere as far as we can see. In a digital DRS utilising kerbside schemes these costs will be marginal on top of the existing costs associated with customer queries.

Planning Permission for hosting a reverse vending machine

Q54. Do you support the proposal to introduce a new permitted development right for reverse vending machines, to support the ease of implementation for the scheme?

Yes

If RVMs require planning permission this will place significant burden on local authorities to process applications in a very short period, which potentially may not be achievable in the required timeframes. Providing that strict criteria for size, location and design for installation is developed LARAC would support new permitted development rights being introduced.

Within any permitted development needs to be proper consideration of the possible impacts of RVMs on the general street scene. RVMs must be sited in such a way that do not block sight lines of traffic or put pedestrians at risk through their location. There must also be thought into how they impact on the cleansing operations of local authorities and any disruption to this, including mechanical sweeping equipment.

There also needs to be thought given to the disruption causes during the installation of any RVM, impacts of pavement surfaces etc.

Do you have any amendments or additional parameters you would propose are reflected in the permitted development right?

It should be noted that planning legislation in Northern Ireland is completely separate from that in England, and will require liaison with the Department for Infrastructure (NI) for change to be effected. The relevant legislation would be the *Planning (General Permitted Development) Order (Northern Ireland) 2015*.

6. Labelling

Q55. Do you agree that the following should be part of a mandatory label for deposit return scheme products?

a) an identification marker that can be read by reverse vending machines and manual handling scanners. Yes

b) a mark to identify the product as part of a deposit return scheme. Yes

c) the deposit price.

Yes, although it should be noted that any changes to the deposit price will require a lead in time for producers to alter labels appropriately.

The labelling serves two purposes, consumer information and then audit trail/repayment. OPRL (On Pack Recycling Label) can fulfil the consumer information aspect which provides essential public information that the product is in scope of the DRS and the price. Scanning capability on the labelling is also essential to minimise the potential for fraud and for audit trails.

Consideration may be required for dealing with circumstances where drinks containers get crushed and then stored before being passed on for collection and how robust and effective the label would remain throughout this process. (For example “can crusher” tools are quite popular with uniformed groups who collect and crush aluminium cans before storing them and passing on to recycling merchants as a means to raise funds for their groups).

Q56. Are you aware of further measures that can be taken to reduce the incidence and likelihood of fraud in the system?

It should be ensured that the labelling system is difficult/at least next to impossible to counterfeit.

UK Internal Market Act – Mutual Recognition of Goods

Q57. Do you agree with our proposals to introduce mandatory labelling, considering the above risk with regards to containers placed on the market in Scotland?

Yes, Mandatory labelling should minimise the potential for fraud. However, we would defer to colleagues in Scotland on this issue, and the views of e.g. Scottish Whisky producers should be sought. The all-island agri-food market in Ireland, although a separate issue, must also be given careful consideration.

If there was any conflict, arising from the movement of in-scope items across different systems in Scotland, the rest of the UK and the Republic of Ireland, this could lead to an element of confusion. However, without the mandatory labelling in place the consequences could be greater with more widespread inconsistent messaging.

For very small businesses the option of a manually placed sticker where small amounts of DRS packaging are sold, could be explored.

Q58. Do you consider the risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland via Scotland to be a significant risk?

As per Q57, mandatory labelling should minimise the potential for fraud. It is recognised this could potentially conflict with Scotland and lead to an element of confusion if there is cross nation movement of in scope packaging. However, without the mandatory labelling in place the consequences could be greater with more widespread inconsistent messaging. Research from OPRL has shown how well recognised and understood their labels are compared to other labels.

Please provide any evidence to support your answer.

Whilst we have no quantitative or qualitative evidence in this regard, but cross-border customer numbers may be available from relevant trade bodies.

Q59. Do you consider leaving any labelling requirements to industry to be a better option than legislating for mandatory labelling requirements?

No.

For the system to work effectively, labelling needs to be clear and consistent and it should not be left to industry alone to manage. Providing ad hoc labelling by industry could provide conflicting messages which may result in local authorities having to manage queries and complaints resulting from confusing packaging labels.

OPRL is a good example of labelling that is user friendly, clear and consistent and this could be considered for mandating.

Please explain your answer.

Mandatory labelling provides more clarity for all in the system and is less open to interpretation of requirements/style variations.

Impact on Small Producers

Q60. Are you aware of any other solutions for smaller producers who may not currently label their products? Please explain your answer.

Stickers provided by DMO seems to be an appropriate solution, which would allow for any digital solutions to be easily adopted. However, if easily removable, these may prove problematic.

Views should be sought on this matter from smaller producers and via appropriate trade bodies, e.g. NI Food and Drink www.nifda.co.uk.

Lead-in Times

61. We believe 18 months is a sufficient period of time for necessary labelling changes to be made. Do you agree?

a.) Yes/ No

N/A – This matter would be up to industry to advise on.

Can you provide any evidence to support your answer?

We do not have sufficient information to enable an answer to be given to this question. It is noted that the industry previously indicated that 2-3 years was necessary.

Producer/Retailer processes

62. Will your processes change as a result of mandatory labelling? Yes/ No/ Don't know. Please explain your answer.

N/A

Future proofing

63. Do you agree that our proposed approach to labelling will be able to accommodate any future changes and innovation? Yes / No / Don't know
Don't know

Are you aware of any upcoming technology in the field of labelling?
No.

7. Local Authorities and Local Councils

Q64. Do you agree that local authorities will be able to separate deposit return scheme containers either themselves or via agreements with material recovery facilities to regain the deposit value?
- No

Please explain your answer

The cost to local authorities of source segregating DRS material at the kerbside would require significant investment in additional infrastructure to allow for the material to be kept separate and require more staff resources. This could become more difficult for co-mingled collections because householders themselves have no room for separate containers, such as in flats and communal premises.

It is likely that agreements with the MRF could also be difficult. Some MRFs accept multiple local authorities to one site, it would therefore not be possible to determine specific compositions for each local authority and would rely on averages or regular compositional analysis which are expensive and not a long-term viable solution for regular monitoring. Similarly, it would not be possible to establish in and out of scope containers, for example all PET would be sorted together regardless of the size of the bottle. Likewise, glass would not be distinguished between jars and in and out of scope bottles. If in scope items are required to have the caps on to be eligible for the deposit this is not something a MRF would necessarily be able to check for.

Litter and residual DRS material is excluded from Option 1, to align with EPR principles and full net cost recovery these elements need to be covered (see also Q10 regarding the costs to local authorities for litter collection).

It should be highlighted that the infrastructure deficit in Northern Ireland is likely to cause issues, with much greater reliance on contractors than preferred, and difficulty in complying with the proximity principle.

It should also be noted that in Northern Ireland, there is no Materials Recycling Facility code of practice in place, and that this will need to be addressed by DAERA as a matter of urgency. We are also awaiting the outcome of a recent 'Future of Recycling' consultation, which will have a direct bearing on the outcome of this question.

Q65. Do you agree that local authorities will be able to negotiate agreements with material recovery facilities to ensure gate fees reflect the increased deposit values in waste streams or a profit sharing agreement on returned deposit return scheme containers was put in place?

- No

Please explain your answer.

These are massive systemic changes, and both councils and MRF operators need to grapple with how they adapt to resulting changes in composition. A great deal of pre-planning will be required. It must be emphasised that all material collected at kerbside does not mirror all material gathered in EPR and the proposed DRS.

If MRFs need to put in additional sorting infrastructure in place to separate out DRS materials these costs would be reflected in the gate fees and therefore could represent a cost rather than a saving, especially in the short term.

Very few local authorities operate their own sorting facilities, so the vast majority have no operational control over the material collected. This means they will be relying on waste management companies to do this on their behalf.

In terms of material value, if councils are developing a gate fee contract they may not know what benefit they are getting in terms of reduced gate fee for that recycling element, but would get something offset against costs as if 'built in'. Councils could be in a precarious position as the market value for some of the products is extremely high, with uncertainty in relation to return if these are offset and councils are paying through a gate fee mechanism. Attention needs to be paid to composition and councils will need to explore data provision with some contractors. Also recycling targets may be affected, with implications for council legal obligations. There are issues for Northern Ireland arising from the ongoing infrastructure and policy deficit, as noted at Q64.

Q66. In order to minimise the risk of double payments from the Deposit Management Organisation to local authorities, where should data be collected regarding the compositional analysis to prevent the containers then being allowed to be redeemed via return points?

The principle of Option 2 sounds reasonable if material cannot be reasonably separated out, although the payment mechanism and associated costs for an 'efficient and effective collection' and the various payment groups would require further consultation and agreement. There should also

be capacity for an appeals system if a council can demonstrate it has been inappropriately categorised or the payments do not reflect the costs incurred.

Compositional analysis would be required at the MRF, checking individual bins is a very expensive process and is likely to be less representative due to a smaller sample size. Compositional analysis at the MRF does potentially open the system up to fraud where councils may receive a relatively constant payment and the MRFs claim any excess deposits if there are any. We would seek assurance and evidence from MRFs to ensure that this does not happen. This could include for example independent auditing/verification from a third party.

With regards to the compositional analysis, it should not be the local authority having to undertake, resource or fund this process.

It is noted that an assumption has been made that that the proportion of 70% of recycling of drinks beverage packaging would continue once the DRS material has been removed. This is unlikely to remain constant as residents who currently recycle well may be more likely to use the DRS return options. The estimation for kerbside recycling may therefore not be representative if the high DRS rate of 90% is achieved, furthermore the proportion in the residual could also be higher. Further modelling and compositional once the DRS system is in place would be required to ensure council payments were representative of the materials being collected.

Q67. How difficult do you think option 2 would be to administer, given the need to have robust compositional analysis in place? Please explain your answer.

This option is only a potential approach if the majority of councils can separate DRS material which will rely on MRFs to provide the data. Having reliance on compositional analysis is expensive and would need to be carried out on a regular basis to ensure it is representative. If a variable deposit is introduced, this would be very difficult to verify in a standard compositional analysis and would require even greater monitoring.

A simpler and cheaper alternative might be to consider mass balance. If it is known what has been placed on the market, the vast majority of this will have a relatively quick turnover. It would therefore be reasonable to assume that once the deposits have been reclaimed at return points most of the remaining material will be collected by local authorities either in the kerbside recycling, residual bin or littered. Occasional compositional analysis could be completed to confirm this.

Q68. What option do you think best deals with the issue of deposit return scheme containers that continue to end up in local authority waste streams?

b. Option 2

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

We support option 2, as this maximises the potential return of DRS material and offers a fair system of payment to cover all the DRS material that councils collect (recycling, litter, and residual).

The DMO will be able to determine the weight/quantity of all in-scope material placed on the market and, through return points, determine the proportion that has been redeemed. Assuming

that the system is sufficiently effective to minimise or eradicate material ‘leakage’, and that reporting timescales account for material that may be retained by the householder with the intention of redeeming deposits in future (stockpiling) it can be reasonably stated that all remaining material will fall upon the council to deal with, through kerbside recycling, residual waste containers, HWRCs, litter (on street and in litter bins) and also illegal waste disposal (fly tipping). A council should not be financially disadvantaged for failures in the DRS that the council cannot control.

8. Compliance Monitoring and Enforcement

Q69. Are there any other producer obligations you believe the Environmental Regulators should be responsible for monitoring and enforcing?

In Northern Ireland particularly, attention will need to be paid to cross-border (North/South) producer activity, as we are aware that producers may be operating on an all-island basis. This will be important, specifically in relation to appropriate labelling. Additional complexity may arise as a result of Brexit, and enforcement/monitoring activity may be necessary to include in checks at sea and air ports. Consideration should be given to the NI protocol.

Q70. Are local authorities (through the role Trading Standards and the Primary Authority Scheme) best placed to enforce certain retailer obligations?

Yes, with appropriate resources provided. It must be highlighted that in Northern Ireland, there is a split in responsibilities. The Department for Economy is responsible for Trading Standards (e.g. weights and measures), with the 11 district councils responsible for Consumer Safety/Protection.

Given the scale of the proposed DRS, and in light of ‘Better Regulation’ principles, the regulation of retailer obligations in Northern Ireland may be best delivered by councils, aligned with other responsibilities such as environmental health, which see council officers in retail premises on a regular basis in a regulatory role. It is important for both Defra and DAERA to note that at present, the New Burdens Doctrine applicable in other parts of the UK, is not in place yet in Northern Ireland and that appropriate resources will be required to ensure regulation by councils can take place.

To what extent will local authorities be able to add monitoring and enforcement work for the deposit return scheme to existing duties they carry out with retailers?

Adequate resources, including set up charges and initial training, will be required. See response to Q70 above.

The additional obligations placed on Trading Standards and local council staff could be quite significant, particularly in the short term as the scheme is set up. The consultation refers to staff time being covered for managing return points. Further information should be provided on a payment model for this.

Q71. In addition to those in the table, are there any other types of breaches not on this list that you think should be? If so, what are they? These may include offences for participants not listed e.g. reprocessors or exporters.

Producers: adding a label to product that doesn’t meet requirements

Importers (to NI from Scotland or Republic of Ireland): Non-compliance with labelling requirements

Exporters (from Scotland): Non-compliance with labelling requirements

Retailers: Not storing returned material safely – should include hygiene and pest proofing requirements

Councils, MRF operators: Fraudulent activity

Q72. Are there any vulnerable points in the system? Please explain your answer?

Materials movements, between UK regions and between NI and ROI, could cause complexities and potential confusion for producers, particularly small producers, as well as provide opportunities for fraudulent activity.

Storage of in-scope containers could lead to fraudulent activity.

The scale of the system will cause compliance and enforcement difficulties for the DMO unless sufficient and credible staffing is provided at local level. In Northern Ireland, this will require a sufficiently resourced regulator (which we believe should be independent rather than an offshoot of DAERA), and sufficiently resourced councils (in the absence of appropriate New Burdens arrangements). Provision of a regional office of the DMO should be considered.

The independent audit function we reference in Q66 may require a regional office to deliver this service

Glass- will fill up quickly. Even with crushing, there could be capacity issues. Also, emptying glass containers/RVMs will have H&S implications, for example shards, safety, clean-up, noise etc.

Q73. Do you see a role for the Deposit Management Organisation to seek compliance before escalating to the Regulator?

Yes, for retailers, producers and councils; early attempts to resolve issues can only assist in the smooth running of the system and development of good communications/working relationships.

The Regulator should be responsible for providing strict guidance around this to minimise the risk of inconsistencies which could create difficulties for potential prosecutions if incorrect information has been given by the DMO.

Q74. Do you agree with the position set out regarding enforcement response options? If not, please expand your answer.

Further to our response to Q73, if the DMO is a provider of advice and guidance, then an initial advisory/guidance stage from the regulator could prove duplicative and unnecessarily elongate the regulatory process. A regulation 'flow' should include any initial DMO activity in this regard.

We would be keen for confirmation that the costs of enforcement are fully covered, to ensure that enforcement can be delivered effectively. It is the experience of local government in Northern Ireland that a system reliant on fixed penalty payments for cost recovery usually requires supplementary resources to cover the accompanying burden of administrative and legal costs.

9. Implementation Timeline

Q75. Do you have any comments on the delivery timeline for the deposit return scheme? Please pose any views on implementation steps missing from the above?

The timeline seems very ambitious, and will need to take into account the lead-in times required by scheme participants, particularly where production or contracting changes are required.

Additionally, a number of key policy pieces are not in place in Northern Ireland, such as decisions on the future of recycling, 'TEEP' policy and a MRF code of practice; these will need to be agreed and published as soon as possible.

NB: The current NI Assembly mandate is due to end in 2022, with an accompanying period of heightened political sensitivity around the election and consequent constraints on time available for legislative passage. This may have an impact on timings for regulations required to be passed by the NI Assembly. Additionally, implementation of the Planning Act (Northern Ireland) 2011 is under review, which may impact on timing of changes to planning legislation (e.g. PD rights) that are necessary to the implementation of the DRS.

The introduction of the 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 results of the digital trials being carried out here in Northern Ireland and in Wales to allow residents to claim back a deposit when they recycle a container through their kerbside collection system is a very important element for the scheme design. This digital option could fundamentally change how most of the material is collected, reduce costs, simplify the process and make it more convenient for the public. Deferring a DRS would allow time for the research into the digital trials to be completed on a larger scale. This would help ensure that the UK has a well informed and designed scheme that is fit for purpose does not just cannibalise existing collection systems which may not be the optimal solution for the UK.

We would also recommend keeping a watching brief on Scotland and the developments of the DRS there.

Q76. How long does the Deposit Management Organisation need from appointment to the scheme going live, taking into account the time required to set up the necessary infrastructure?

Please provide evidence to support your answer.

d.) Any other (please specify)

At least two years, if not longer.

There are so many unknowns at this point it is difficult to assess with any degree of accuracy how long it will take the DMO to set up the required infrastructure. However, given the size and scale of the task, that is intended to be undertaken as major change under EPR and consistent collections also take place, it would seem that a period of 24 months is more realistic.

Again, we would recommend looking at the lead in time it is taking for Scotland to implement the DRS system there and to gain any valuable learning from their experience.

Q77. Depending on the final decision taken on the scope of the scheme in England and Northern Ireland – all-in or on-the-go – what, if any, impact does this have on the proposed implementation period?

An all-in scheme is likely to take longer to set up and implement due to the wider variety of materials, container sizes, greater need for storage space/provision of reverse vending machines at retail outlets, more complexity in development of local circular economy jobs. There would also need to be a greater lead in time to amend contracts with MRFs to separate and report on the in-scope materials separated and issued to the DMO.

10. Summary of Approach to Impact Assessment

Q78. Do you agree with the analysis presented in our Impact Assessment?

Yes – broadly, but please see below.

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

We note that in the associated Impact Assessment, only limited data is available from the devolved administrations, and that “territorial data that will allow a bottom up compilation of estimations at that level is being sought”. Projections from England in relation to the impact assessment for Northern Ireland may or may not be useful, however we would recommend an Impact Assessment for each devolved administration.

If the digital solution is to be incorporated into the scheme design, this represents a significant change in how the scheme would be managed. This option should therefore be fully evaluated as it is likely to substantially change the impacts/costs. Without this information the impact assessment is incomplete.

We do not necessarily agree with the analysis presented on littering as there is unlikely to be a cost saving related to operational aspects of litter collection. The impact assessment makes a direct correlation between the reduction in litter and cost savings in terms of manual sweeping and picking and emptying bins. We do not believe this is an accurate reflection 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. Similarly, it is unlikely there will be a reduction in transport movement either.

We have grave concerns about the values attached to litter disamenity in the impact assessment. This is especially relevant given how much impact this then has on the cost analysis put forward as justification for a DRS.

It is not clear to what extent post-pandemic behaviours/consumption patterns and limitations to return points have been incorporated into modelling. If as expected some of the behaviours observed during 2020 and 2021, which are reflected in kerbside yields and compositions, become sustained this could have a significant bearing on the feasibility of a DRS as currently modelled. These changes could make a digital DRS more effective still as well.

It is difficult to comment fully as the scale and cost of key scheme requirements such as compositional analysis, monitoring of return points differ across the scenarios. The information presented is not of sufficient detail to determine the impact of key scheme variables presented throughout the consultation.

The current impact assessment takes no account of the changes in consumption, packaging use, and waste collection services that the pandemic has brought about. Fewer drinks containers will be bought for consumption in offices etc. More drinks containers are now placed into household recycling systems rather than office and transport node residual waste containers.

The changes that have and will continue to be brought about by the pandemic fundamentally change the model of a DRS in the UK and the assumptions that the impact assessment was based on. It is no longer fit for purpose in a post Covid-19 situation.

We would also question if a full equalities impact assessment has been undertaken for a DRS based on RVMs. There are likely to be accessibility concerns for some members of the public and it could be that people with access difficulties, for whatever reason, are unduly impacted by a DRS based on RVM. People will be unable to avoid the deposit but might not then be able to reclaim their money.

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Subject:	Proposal for naming the continuation of an existing street
Date:	8 th June, 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 application for naming the continuation of an existing street in the City.
2.0	Recommendations
2.1	<p>Based on the information presented, the Members of the Committee are asked to recommend that, in accordance with the Council decision of 4th May, the Chief Executive exercise her delegated authority to make a recommendation in respect of an application for naming a new street in the City and to either:</p> <ul style="list-style-type: none"> Grant the application, or Refuse the application and request that the applicant submits other names for consideration.

3.0	Main report						
3.1	<u>Key Issues</u> The power for the Council to name streets is contained in Article 11 of the Local Government (Miscellaneous Provisions) (NI) Order 1995.						
3.5	Members are asked to consider the following application for naming the continuation of an existing street in the City. The application particulars are in order. <table><tr><td>Proposed Continuation of Existing Street</td><td>Location</td><td>Applicant</td></tr><tr><td>Hampton Park</td><td>Off Saintfield Road, BT7</td><td>Alan Patterson Design</td></tr></table>	Proposed Continuation of Existing Street	Location	Applicant	Hampton Park	Off Saintfield Road, BT7	Alan Patterson Design
Proposed Continuation of Existing Street	Location	Applicant					
Hampton Park	Off Saintfield Road, BT7	Alan Patterson Design					
3.6	Alan Patterson Design have proposed Hampton Park for the continuation of an existing street that is being extended to accommodate the development of 46 new dwellings.						
3.7	<u>Financial & Resource Implications</u> There are no Financial, Human Resources, Assets and other implications in this report.						
3.8	<u>Equality or Good Relations Implications/Rural Needs Assessment</u> There are no direct Equality implications.						
4.0	Appendices – Documents Attached						
	None						



Subject:	Update on recovery of the Pest Control Service
Date:	8 th June 2021
Reporting Officer:	Siobhan Toland, Director of City and Neighbourhood Services
Contact Officer:	Valerie Brown, City 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"/>
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	The purpose of this report is to provide Members with an update on the ongoing recovery of our pest control service and in particular the commencement of home visits and treatments.
2.0	Recommendations
2.1	The Members of the Committee are asked to recommend that, in accordance with the Council decision of 4 th May 2021, the Chief Executive exercise her delegated authority to <ul style="list-style-type: none"> note the progress made to date on the ongoing recovery of the pest control service and the steps being taken to address the remaining challenges.
3.0	Main report
3.1	Members will be aware of the significant impact the pandemic has had on front line services such as pest control. In the early stages of last year a number of pest control officers were

	<p>furloughed as they were required to shield for various reasons. The service continued to deliver the sewer baiting programme throughout that time and residents were offered advice and information. The tenants of social housing were advised to contact their housing provider to obtain pest control services.</p>
3.2	<p>We re-introduced the pest control service in September 2020, albeit in a very limited way. Risk assessments and the various control measures meant that very few home treatments could be carried out and only for the most vulnerable and where significant public health issues were identified. Most visits were restricted to external only, with officers providing advice and information.</p>
3.3	<p>In recent months with transmission rates reducing and the easing of government restrictions the Pest Control team has been working with Corporate Health and Safety to carry out further risk assessments using the less than 2m template and to put in place additional safety measures to enable home treatments to resume at the beginning of June. The Trade Unions have been kept informed and the risk assessments have been agreed.</p>
3.4	<p>The proposed safe system of work will require more time for each visit and in between visits as officers have a list of questions to ask the householder before entering the property and they will be required to change their PPE between visits.</p>
3.5	<p>The safety measures will impact on the number of treatments that can be completed in a day and there is the potential for a long waiting list to build up very quickly. This is a concern to both staff and the Trade Unions because of the negative impact this can have on customer perception of the service and subsequently on staff morale. In order to manage the waiting list it is proposed, in the first instance, to only carryout treatments in private rented sector and owner occupied property and to continue to refer the tenants of social housing to the Housing Executive and Housing Associations. This approach will be supported by sewer baiting, external assessments and drain testing for defects as required regardless of tenure.</p>
3.6	<p>We have only recently started collecting information that enables us to breakdown service requests received by tenure and it is difficult therefore to determine the impact this approach will have on our capacity to meet demand. Also, we anticipate an initial surge in demand for treatments as we restart the service. We will keep the figures and waiting list under close review and will of course include treatments for social housing tenants as soon as there is capacity to do so. Members will be kept informed of any further changes.</p>

3.7	Home treatments are the priority; however, we are conscious the time of year for wasp nests is fast approaching and we are exploring options to recover this service, which remains suspended since last year. Members will be kept informed as this work progresses.
	Financial & Resource Implications
3.8	There are no additional financial implications associated with this report.
	Equality or Good Relations Implications/Rural Needs Assessment
3.9	There are no implications associated with this report
4.0	Appendices – Documents Attached
	None

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Subject:	Update on Community Planning and work of Living Here Board
Date:	Tuesday 8 June 2021
Reporting Officer:	Ryan Black, Director of City & Neighbourhood Services
Contact Officer:	Kevin Heaney, Programme & Portfolio Manager Karen Anderson-Gillespie, Programme & Portfolio 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	The purpose of this report is to update Committee on the work being taken forward through Community Planning with a specific focus on the Living Here Board and its recent meeting held on Monday 17 May 2021.
2.0	Recommendations
2.1	<p>The Members of the Committee are asked to recommend that, in accordance with the Council decision of 4th May, the Chief Executive exercise her delegated authority to note the:</p> <ul style="list-style-type: none"> (i) Key areas of work currently being progressed by the Living Here Board (LHB), as outlined below. (ii) Alignment and synergies between the Board and the work of the Committee. (iii) Planned process for refreshing the Belfast Agenda and the role of Elected Members in supporting this process.

3.0	Main report
3.1	<p><u>Background</u></p> <p>Members will be aware that the Community Planning Partnership (Partnership) was established in February 2018, under the auspices of the Local Government (NI) Act 2015, to improve the economic, social and environmental wellbeing by encouraging and enabling joined up planning and collaborative delivery across partners, as well as promoting and enabling innovation and sharing good practice. In order to ensure that the vision and ambitions set out within the Belfast Agenda (community plan for the city) are translated into action and to mobilise city partners to support delivery, four 'delivery focused boards' have been formed to drive collaboration (i.e. City Development, Skills, Jobs and Education, Resilience and Sustainability and Living Here Board), as illustrated below:</p>  <p>3.2 Living Here Board</p> <p>The LHB is co-Chaired by the Council's Director of Neighbourhood Services and the Health and Social Care Board's Assistant Director and Commissioning Lead for Belfast. The Board comprises Council officers and a range of its Community Planning Partners, including representation from the Statutory and VCSE sectors. The areas of collaborative focus being taken forward by the LHB, as set out below, clearly aligns with the remit of the Committee and seeks to support vulnerable people and communities as well as creating integrated approaches to improving service provision and support within the city. The LHB work programme currently focuses on the following:</p> <ul style="list-style-type: none"> (i) Addressing Health Inequalities with a specific focus on <ul style="list-style-type: none"> ▪ Drugs, Alcohol and Mental Health ▪ Avoidable winter deaths ▪ Promoting Positive Emotional Wellbeing (ii) Community Recovery and Area Planning (including Multi-Agency Support Hub)

(iii) Integrated, inter-agency approaches to early intervention including early years support and family programmes.

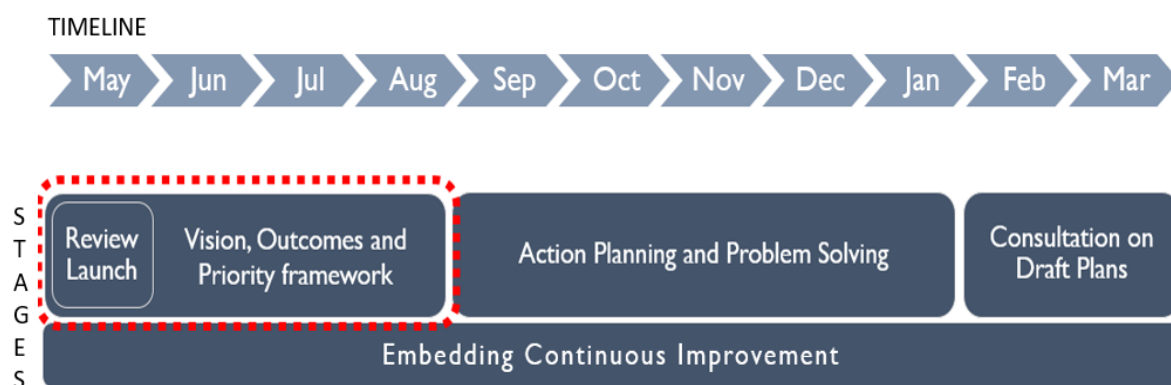
As the effects of the Covid-19 pandemic have begun to emerge, there is a need to understand how our city economy and communities are likely to be impacted, and what we need to focus on to rebuild in the coming months and years. Clearly, the pandemic is not over and there will need to be sustained efforts to protect the safety and health of our citizens, while at the same time balancing the need to stabilise and rebuild our economy and city. In this context, and as part of the review of the Belfast Agenda, there is a need to take stock and reassess the focus of Community Planning and the work of the Boards over the coming weeks and months. This is not to say that the ambitions and commitments set out within the Belfast Agenda should not remain at the core of our work. However, in order to address emerging challenges as a result of the pandemic, we may need to pivot our collective focus and seek to prioritise and accelerate key interventions and programmes.

Whilst the Committee will have previously discussed some of these areas, specifically, the intention is to move to a more standard approach to updating Members on the work programme of the respective Boards aligned to their scheduled meetings. A summary draft note and slide-deck from the recent LHB meeting (virtual) held on Monday 17 May 2021 is attached in Appendix 1 for Members information. Key points for Members to note from the discussion include:

3.3

i. Review of the Belfast Agenda and Role of the Boards

The Board received a presentation outlining the planned co-design process and timeline for refreshing the Belfast Agenda and the development of an associated 4-year action plan. The diagram below outlines this process.



It is important to note that Elected Members will be engaged at each stage of the review process through the All-Party Working Group on Community Planning. In addition, it is recommended that all Elected Members will have the opportunity to shape the priority framework and plans for the new 4-year period through Party Group briefings. Elected

	<p>Members will also be supported by our Marketing and Communications team who will provide ongoing support via a communications toolkit, to enable effective engagement with constituents, so that their voices are heard.</p> <p>While the specifics regarding engagement events will be finalised with partners, it is expected that there will be a series of thematic and/ or local-area virtual workshops. This will provide Elected Members with a leading role within their communities, to help shape the city's future plans.</p>
3.4	<p>ii. Reaffirming the focus of the Living Here Board in the short-term (6-18 months)</p> <p>Given the impact of Covid on the city, its communities and its people, the Board agreed to undertake a focused planning session to consider specific priorities which Board members could coalesce around and bring collaborative gain to, over the next 6-18 months to further support community recovery and feed into the Belfast Agenda Review process. The Board agreed to host the planning session in June 2021.</p>
3.5	<p><i>Addressing Health Inequalities</i></p> <p>iii. Complex Lives model</p> <p>The Board received a presentation on the developing Complex Lives model for Belfast including the agreement of a 'route map' for the project built, on the themes of System Leadership, Frontline Delivery and System Enablers and the pragmatic approach being taken to implement action, which utilises existing services and partnership working. Board members noted the progress to date and timeline for the implementation of the model from 1 April 2022.</p>
3.6	<p>iv. Promoting Positive Emotional Wellbeing Plan</p> <p>Board members were briefed on planned activity within Council to integrate best practice approaches to promote positive emotional wellbeing across a range of services. This will act as a test for other organisations, with the sharing of lessons learned by Council.</p>
3.7	<p>v. Belfast Warm and Well</p> <p>The Board received a presentation following the completion of year 2 of the Belfast Warm and Well scheme, along with key considerations required in supporting its transition to mainstream delivery, including the opportunity to connect with and across other related work programmes including the Resilience and Sustainability Board's ambition to eradicate fuel poverty. Board members agreed to continue supporting the promotion of the scheme with frontline staff and to consider a response to the draft Energy Strategy for Northern Ireland.</p>

3.8	<p>Area Planning and Delivery</p>
	<p>vi. Multi-Agency Support Hub</p> <p>A presentation was made to the Board on the establishment of a multi-agency support hub within south Belfast, which aims to enable collective working with statutory partners to support vulnerable individuals and reduce levels of risk and vulnerability. Members will recall approving Council's involvement within this pilot project in the Botanic DEA at the People and Communities meeting on 12 January 2021. Board members noted progress to date and highlighted the importance of linkages and synergies with the Complex Lives model project.</p>
3.9	<p>vii. Belfast Area Outcomes Group – Combined Covid Response Approach</p> <p>The Board received a presentation on behalf of the Belfast Area Outcomes Group (BAOG) which examined the approach taken to responding to the Covid-19 pandemic and the focus and nature of support provided across four critical anti-poverty priorities including support for families with children under two; digital poverty; flexible funding and healthy eating. CPP partners committed to joint planning with BAOG on the development of a specific action plan to support children and young people and their families to recover from the pandemic, with a view to adopt implementation of the plan.</p>
3.10	<p>viii. Wider University and Lower Ormeau Intervention</p> <p>Members will be aware that due to the significant and complex challenges in this area, in November 2019, the Council requested that Community Planning be used as a vehicle to bring key Statutory, Community and other partners together to develop an integrated and targeted approach and intervention(s) of scale for the wider university and Lower Ormeau area.</p> <p>History has shown that there is no straightforward or single solution to the prevalent issues in the area. However, it is incumbent upon all partners to continue to demonstrate commitment, sustained effort and leadership to find solutions to improve the quality of life for those that live in the area. In support of this work, in November 2020, the Council worked closely with the Department for Communities, Department for Finance and local stakeholders to bring forward a strategic insights programme which included a series of tailored workshops with community groups, residents, student representatives, landlords and local councillors. While the process has highlighted entrenched positions and ongoing tension between the constituent stakeholder groups, there is a general consensus amongst the majority that a reconfigured and long-term vision is required with a supporting implementation plan, alongside proactively addressing the immediate challenges.</p>

3.11	<p>Work is underway to establish a recalibrated and re-energised Inter-Agency Delivery Group with an action and outcome-based focus and supported by a strategic Ministerial Group who will consider potential policy and legislative changes which may be required. Suggested outcomes for the area include, but are not limited to:</p> <ul style="list-style-type: none"> • Reduce anti-social behaviour, • Improve community cohesion, • Improve the physical and environmental appearance of the area, • Develop new and innovative methods of engaging citizens, to identify local priorities and solutions. <p>Members will note the interconnectedness of the above priorities, which are being undertaken through the LHB and how these align to Council's efforts to lead the city recovery from Covid. Opportunities to further enhance synergies between work programmes within and across the various Board's under the Community Planning Partnership, will continue to emerge as the Board reaffirms its priorities and supports the review of the Belfast Agenda. Regular progress updates of the LHB will be brought to the Community Planning All-Party Working Group and the People and Communities Committee going forward, providing the mechanism for informing and engaging members in relation to the Living Here work programme.</p> <p><u>Financial & Resource Implications</u></p> <p>There are no direct financial implications arising from this report. Costs associated with the implementation and facilitation of the LHB are currently being met within existing council budgets.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>There are no Equality or Good Relations Implications and no Rural Needs Assessment required for the recommendations outlined above.</p>
4.0	Appendices – Documents Attached
	Appendix 1: Notes and slide deck of the Living Here Board – Monday 17 May 2021

17.05.21



The Belfast Agenda

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Living Here Board

Ryan Black

Director of Neighbourhood Services
Co-Chair Living Here Board





AGENDA

1. Introduction – Welcome/ apologies
2. Review of previous minutes
3. Update from Community Planning Partnership (CPP) meeting
4. Refresh of the Belfast Agenda
5. Focus/ action planning 6 – 18 months
6. Addressing Health Inequalities
7. Area Planning and Delivery



The Belfast Agenda

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Living Here Board

Community Planning Partnership Update

Ryan Black

Co-Chair of Living Here Board





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The Belfast Agenda

Living Here Board

Belfast Agenda Review

John Tully

Director of City and Organisational Strategy





Drivers for Change..

- **Legislation** - LG Act specifies a statutory duty for CPP to review community plan 4 years from the first community plan (by Nov 2021)
 - DfC letter (circulated to partners in advance) indicates the Department is not specifying a form the review should take, but rather they're content the review is ongoing. Requesting a more formal review by Apr 2022, to align with PfG.
- **COVID Recovery** - As the effects of the pandemic emerge, we need to ensure our city economy and communities are able to rebuild in the coming months and years.
- **Continuous Improvement** – challenging ourselves to improve how we work better together to deliver more meaningful impact (or outcomes) for all Belfast residents. What is the quality, quantity, and impact of our work?





Defining Scope of the Review

- By end March 2022, produce an updated Belfast Agenda ‘city strategy’ document underpinned by separate Delivery Action Plans.
- Page 114
- A. The city strategy document contains the long-term vision and outcomes, population indicators and 4-year priorities.
 - B. New CPP Delivery Action Plans will highlight actions to deliver the 4-year priorities and will be based on a number of criteria such as:
 - ✓ Partnership activity providing collaborative gain / not business as usual activity;
 - ✓ Designed to contribute to the Belfast Agenda outcomes; and
 - ✓ Include ‘area specific’ elements making the ‘Belfast Agenda’ more meaningful to communities



Planning Assumptions

- Our collective role is to improve outcomes for local people.
- A positive and asset based approach to action planning.
- Co-design approach to development and delivery, including a bottom-up approach, to ensure that people have more of a stake in the community planning process.
- Build upon evidence and data, using local insights and knowledge.
- Partners provide resources for the review process and align resources to the agreed Delivery Action Plans.
- Partners engage in continuous improvement.



Values and Principles – VCSE Panel

- Partnership - equal voice and influence, processes that reflect and enable this.
- Connected - to people and communities across the city.
- Continuous improvement - apply learning from our experience and that of other places to improve what we do and how we do it.
- Accountability - ensure we are all accountable for delivering what we have agreed.
- Additionality – it's not business as usual.

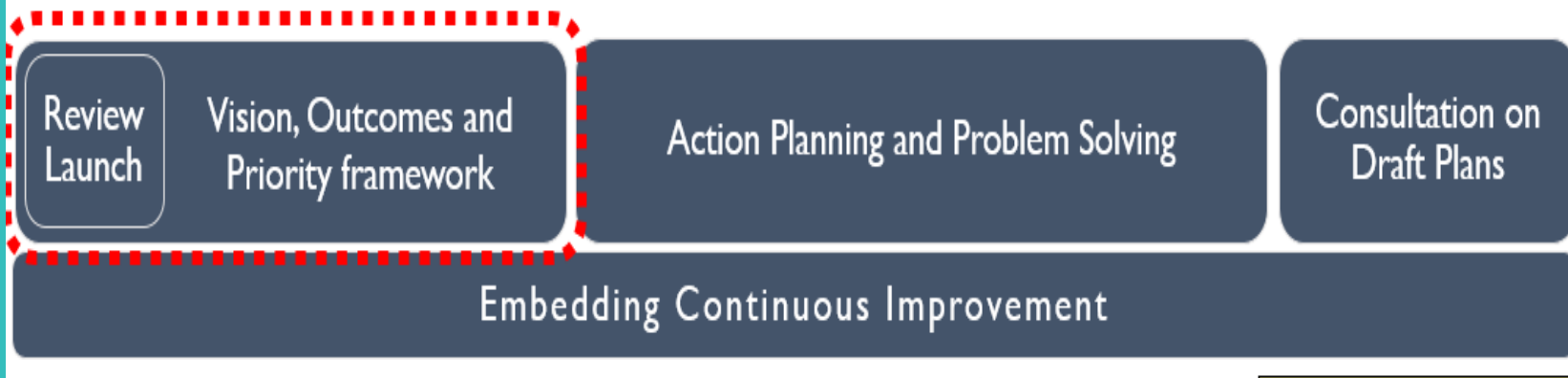


The Refresh Journey

TIMELINE



Page 117
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The Belfast Agenda

Living Here Board

Focus / Action Planning

Ryan Black

Co-Chair of Living Here Board





The Belfast Agenda

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Living Here Board

Drugs, Alcohol & Mental Health

Kelly Gilliland

Neighbourhood Services Manager, BCC





‘Complex Lives’ in a Belfast Context

- Support of Chris Marsh (Marsh Solutions) secured as critical friend
- Project Design/Steering Group has been meeting regularly with Chris – BCC, BDACT, (BHSCT), NIHE and PHA
- Presentation made to BDACT, individual meetings also held with BHSCT, NIHE and PBNi
- Meeting held with DoH 11th May (seeking CMO/Ministerial buy in)
- SLG met 22nd April – approved route map/ way forward – meeting again on 3rd June
- Project Team to be established to take forward T&F groups
- Further refining Routemap – where we are (‘as is’ position, where we want to be (long term vision), Day 1 aim (good enough to start)





Routemap for Belfast

System Leadership

Frontline Delivery

System Enablers

- Collaboration, Leadership & Governance
- Joint Investment

- Joint Outreach & Intensive Support Team
- Prevention & Demand Management
- Accommodation & Wraparound Support
- Services & Support Landscape

- Case Management System
- Workforce Development
- Outcomes Impact and Learning
- Communications



System Leadership

COLLABORATION, LEADERSHIP & GOVERNANCE

- How key partners lead, engage, support and make decisions to support the design, operation and maturity of the whole system model. How user voice is heard in decision making.

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JOINT INVESTMENT

- How commissioners and others with responsibility for shaping the map of delivery resources work together to ensure the right blend of services work as a whole system, and increasingly preventive way. How commissioners engage with the front line to directly and dynamically influence change in the system.





Frontline Delivery (1)

JOINT OUTREACH & INTENSIVE SUPPORT TEAM

- How we build a core capability to jointly identify, engage, build trust and provide intensive, relationship focused support and key work/brokerage.

Page 123

PREVENTION & DEMAND MANAGEMENT

- How we develop a preventive approach that identifies risks early, delivers effective secondary and tertiary prevention support and early intervention.



Frontline Delivery (2)

ACCOMMODATION & WRAPAROUND SUPPORT

- How people access appropriate accommodation and are supported in a multi disciplinary way to stabilise and progress at all levels of the system.

SERVICES AND SUPPORT LANDSCAPE

- How the map of services and support available is made clear to all in the system and how services connect and communicate and collaborate with each other.



The Frontline

CORE

- Drug Outreach Team (BHSCT)
- Homeless Support Hub Team (BHSCT)
- Multi-disciplinary Homeless Support Team (Extern)
- Street Injecting Support Service/Community NSES (Extern)
- Welcome Organisation Outreach (NIHE)

Working closely with:

- Housing support /Hostel providers, PSNI/Citybeat officers, Probation officers, Primary Care, NIAS, Trust addiction & mental health services

Wider prevention/demand management/recovery agenda:

- Wider drug and alcohol and mental health services as well as community services, engagement with prisons and Trust (hospital admission/discharge), etc.





System Enablers

CASE MANAGEMENT SYSTEM

- How service user information is shared & stored to support joint working.

WORKFORCE DEVELOPMENT

- How staff at all levels are supported to work in an integrated, relational, psychologically informed practice.

OUTCOMES, IMPACT AND LEARNING

- How we define what success looks like, know what is being achieved and learn to enable improvement.

COMMUNICATIONS

- How internal and external communications can support effective whole system working.





Timeframe

- Now to end of September 2021 focusing on information gathering, engagement and planning – Task & Finish Groups

Transition phase from October 2021 to March 2022 commence co-designing of systems and process changes through prototyping to inform financial and budget planning processes for 22/23 onwards.

- Full implementation of Belfast model from 1 April 2022.





The Belfast Agenda

Living Here Board

Promoting Positive Emotional Wellbeing

Kelly Gilliland

Neighbourhood Services Manager.





Promoting Positive Emotional Wellbeing Plan (BCC)

- Initial meeting in the diary for 21st May
- Involving reps from corporate & internal comms, HR, health, community, economic development, safeguarding, children and young people services within Council
- More detailed update will be available for next LHB meeting





The Belfast Agenda

Living Here Board



Belfast Warm and Well

Iain Deboys

Assistant Director for Contracting and
ECRs and Commissioning Lead, Belfast





Overview

- Impact of cold homes / fuel poverty
- Focus on:
 - Identifying people at risk
 - Single point of referral
 - Access to tailored solutions
 - Raising awareness and building capacity
- Year 2 complete – summary and next steps



Key findings

- Increase in number of households being referred (20/21 = **212**; 19/20 = **91**)
- 121 referrals received a formal assessment
- Additional to this 68 households were supported through an informal assessment
- 23 referrals did not provide contact information / respond when contacted



Year 2 – summary (full assessment)

Page 133

109 of the 121 formal assessments were for urgent responses

People aged 36-45 were the largest group of referrals (39); followed by people aged 46-55 (26)

The highest number of referrals were from BT12 (26); followed by BT13 (20) and BT10 (10)

The community sector provided the highest number of referrals (42); followed by self-referrals (37) and health (28)



Year 2 – summary (full assessment cont.)

Page 134

102 referrals had an annual income below £15k

February was the busiest month for referrals (32); followed by January (25) and December (20)

89 referrals reported having a mental health condition

75 referrals were for people living on their own



Going forward

- **Undo** – engage across other Board's to align strategic agenda's and take collective action on related fuel poverty issues
- **Prevent** – advocate for fuel poverty as a collective priority with city partners and further develop steering group
- **Mitigate** – enhance coordination and delivery in preparation for next winter





Asks of partners

- Ensure frontline staff promote the scheme and identify and refer vulnerable people to the single point of referral;
Support our ambition to eradicate fuel poverty; and
- Encourage your organisation to respond to the draft Energy Strategy for NI and help ensure there is a 'just transition' which addresses inequalities.



The Belfast Agenda

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Living Here Board

Multi-Agency Support Hub – Botanic Pilot

Superintendent Gerard Pollock
PSNI

Belfast District - Strategic Partnerships





Who are we trying to help?

Each Partner agency has their own priorities or definitions for the Hub, here is PSNI's:

Repeat Missing Persons.

Young people susceptible to paramilitary influence/attack.

Young people susceptible to influence of organised crime gangs.

Repeat victims of Anti Social Behavior.

Repeat victims of hate crime.

Older people subject to repeat incidents.

Repeat victims of crime in general.

How can this vulnerability manifest to police?



MULTI AGENCY | SUPPORT HUB

What characteristics do we generally have in common?

The individual is considered vulnerable. This vulnerability has an element of persistence.

There is an element of risk for the vulnerable individual.

Services being repeatedly engaged, which are unable to resolve or reduce the Vulnerability & Risk or...

...the wrong agency is being repeatedly engaged to help the vulnerable person.

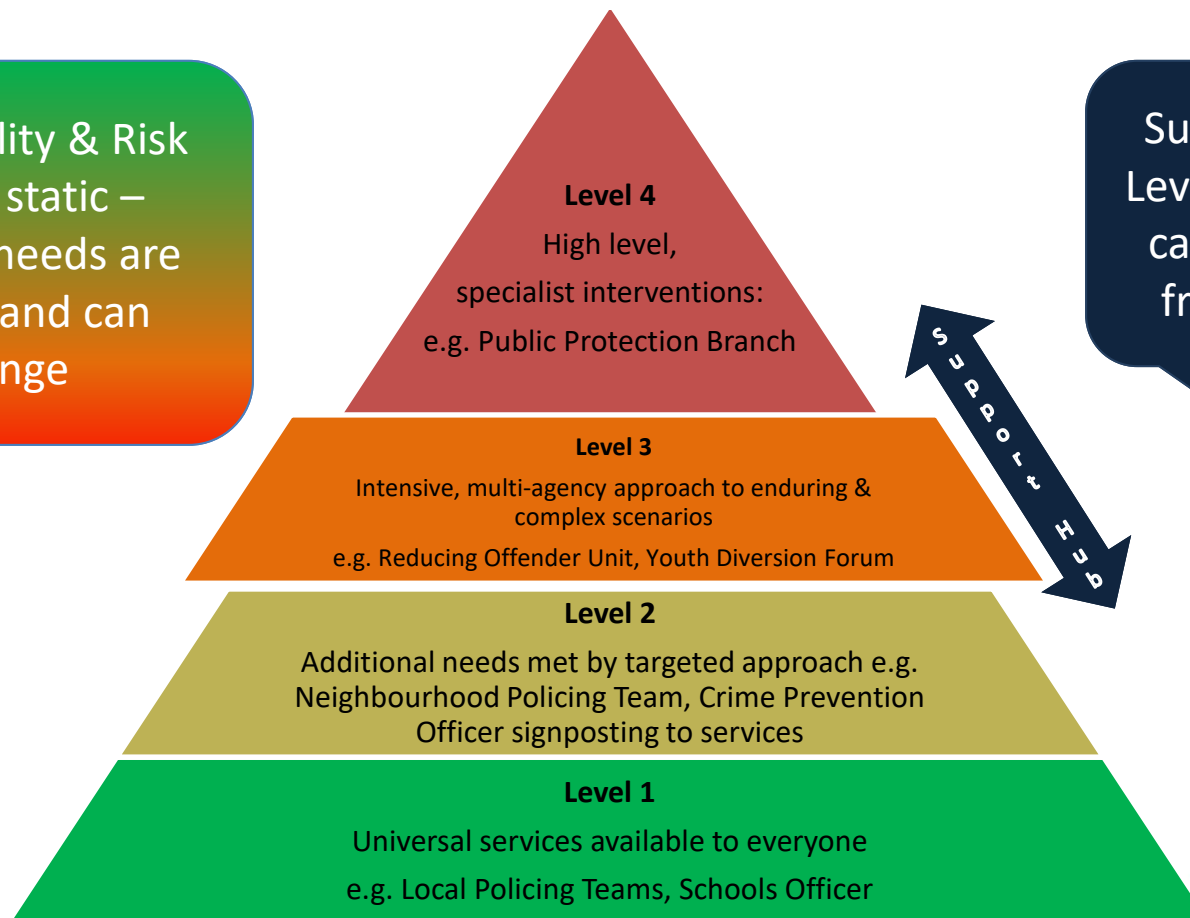
Belfast



Levels of support

Vulnerability & Risk
are not static –
people's needs are
diverse and can
change

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Support Hub is a
Level 3 service but
can be accessed
from any stage

Belfast



The Belfast Agenda

Living Here Board

Support Hub Partners



Each partner is co-equal
Any partner can refer a person

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Northern Ireland
Fire & Rescue Service



Adopting a person is a collective decision



Actions monitored by Chair



Belfast



1st Meeting – Wednesday 12th May 2021

Chair – Denise Smith

Welcome & introductions
Established ground rules
Outlined Confidentiality Agreement

Referrals proposed

1 juvenile female
1 adult male
1 adult female

Referrals accepted

All 3 known to various partners
All 3 adopted onto the Support Hub

Actions

Proposed by partners
Agreed by Chair
Updated at next meeting

Information Sharing

Regular, direct communication between partners now starts
New & emerging risks identified live-time
Earlier interventions possible

Next steps

Meetings scheduled: 2nd Wednesday of each month until August
After August meeting – assess & review



The Belfast Agenda

Living Here Board



Combined Covid Response Approach

Carol Diffin

Chair of Belfast Area Outcomes Group





Background

On November 25th a city meeting of the anti-poverty sub group chairs was convened, under the auspices of the Locality Planning structures.

The purpose of the meeting was to explore whether there were any common initial areas of activity that could usefully be progressed collaboratively via PG's.

The meeting identified 4 common initial priorities where current pandemic responses could potentially be enhanced.

Belfast Area Outcomes Group coordinated the delivery of a series of in year responses available to families in Belfast based on the needs identified



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The Belfast Agenda

Living Here Board

Early Learning





Leadership

“Change is hard at first, messy in the middle and gorgeous at the end”

Robin S. Sharma

- Each partnership member involved in the coalition felt confident in the relevance of needs identified and how addressing them met both their own organisational aims and those of BAOG.
 - A joint delivery platform was agreed as an appropriate mechanism to deliver activity
- There was understanding that the levels of partnership working needed for successful delivery required a change in the way current relationships between partners were framed.
- The mandate to develop existing partnership arrangements in new ways, was enabled from the earliest stages of the interventions, by the spend coalitions BAOG lead representatives.
 - There was confidence in the skills, competence and knowledge of the staffing resource committed to this work. The project culture created, enabled officers to feel confident in their task of delivering on an aligned spend approach.



Delivery

“No Plan survives first contact with realitywhat matters is how quickly one adapts”

Moltke the Elder (Paraphrased)

- A rapid iterative approach to complete tasks framed by different mandates, was needed by partners. With the iterative process itself building confidence in each other.
- The shared perception of needs and the commitment to make this approach work was at the heart of these relationship.
A commitment to coproduction with the community partners. Recognising their expert knowledge, considering their perceived challenges and listening proactively to their concerns; produced a virtuous circle, that created space for the effective local delivery
- Everyone involved in the process had a developed understanding of their own organisational processes and was aware of the organisational processes of their partners.
- This helped build mutual understanding of the impact of different organisational cultures in regard to financial processes and spend which in turn fostered a culture of openness about the variety of challenges linked to the different operational processes of each partner.



Learning

“Individual Learning is a necessary but insufficient condition for organizational learning”

Chris Argyris

- The approach piloted shows substantive opportunities to improve impact and outcomes for core agencies by:
- Acknowledging that however well designed and consulted upon the latticework of departmental and agency spend created in Belfast is imperfect in terms of fully realising the desired impact and outcomes for families and service users is the starting point of this approach.
- It is in fact littered with spaces between the framework of programmes. These spaces also constitute key parts of the lived experience of families and communities across Belfast.
- Working through and around these spaces to mitigate their impact, is already a key part of the fabric of the Community and Voluntary Sector experience in Belfast.





Learning

- An approach based on this reality which seeks to mobilise coalitions of agencies to respond to specific gaps which are being framed as emerging need in a responsive and timely manner is key.
- Key also in establishing dynamic partnerships with structural, feedback loops with local communities. This more cooperative approach can help close or reduce the impacts of gaps that impact upon communities.

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Need to continue building pathways that enable agencies around partnership tables in seeing worth in approaches that allow them to contribute to relevant solutions rather than owning the totality of emerging issues.

- Further developing partnership and agency mechanisms to screen out relevance so that coalitions of spend can shift in composition in an agile manner.
- Confidence to ensure that the planning needs and response loops are worked through in a manner that makes sense to everyone and avoids the risk that agencies might see this emerging platform simply as a way to outsource time limited spends





BAOG Integrative Work on Early Interventions Progress to date

Space in the agenda for the two Outcomes Group meetings held since the last Living Here Board for full discussion on an operational plan to progress this key task, has been somewhat constrained due to the impact of the third Covid surge.

There has been lively discussion on this topic at both meetings. The approach agreed via the Living Here Board meeting of has been broadly welcomed across BAOG membership .



The timeliness of this development in particular, given both the pandemic impact upon Families Young People and Children and the scale of challenge there will likely be in ensuring that whatever the new normal ends up looking like? it is effective in supporting good outcomes for children in Belfast has been affirmed.

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A formal sub group of BAOG to progress the design process to support agenda has been agreed. Initial meeting dates are out to circulation and initial formal meetings will likely be in early June. From informal engagements and feedback to date it is clear that initially twin tasks will confront the group from its establishment.



Likely Key Issues

- Firstly, the scope of the ambition across Outcomes Group member agencies and the broader stakeholder sectors they represent, will be a key influence on the vision of what an end state for both the design and any delivery process on what the Belfast Agenda commitments ends up looking like.

Secondly, the co-production and co-design processes to ensure that the process overseen by BAOG can effectively engage across the varied elements that might make up any baseline vision of what more integrated early help offerings look like, both in terms of age and stage, will of themselves be a major factor going forward.



The Belfast Agenda

Living Here Board

Wider University & Lower Ormeau

Stephen Leonard

Neighbourhood Services Manager - BCC



17.05.21



The Belfast Agenda

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Living Here Board

Ryan Black

Director of Neighbourhood Services
Co-Chair Living Here Board





NOTE OF BOARD MEETING

Date: Monday 17 May, 2021, 11am - 1pm

Venue: via MS TEAMS

Attendance:

Belfast City Council	Ryan Black (Co-Chair)
BHSCB	Iain Deboys (Co-Chair)
LORAG (VSCE Panel)	Natasha Brennan
Red Cross (VSCE Panel)	Paula Powell
BHSC Trust	Bryan Nelson
BHST Trust	Gerry Largey
BAOG	Carol Diffin
West Belfast Partnership	Kevin Bailey
Forward South Partnership	Catherine Downey
Forward South Partnership	Briege Arthurs
Greater Shankill Partnership	Nicola Verner
Eastside Partnership	Michele Bryans
PSNI	Paul McNulty
PSNI	Gerard Pollock
Sport NI	John News
PHA	Frances Dowds
Ulster University	Duncan Morrow
Belfast Met	Isaac May
NIHE	Fiona McGrath
Libraries NI	Adrienne Adair
NICVA	Seamus McAleavey

Belfast City Council	John Tully
Belfast City Council	Alison Allen
Belfast City Council	Kelly Gilliland
Belfast City Council	Cate Taggart
Belfast City Council	Karen Anderson-Gillespie
Belfast City Council	Brian Carr
Belfast City Council	Naomi Doak
Belfast City Council	Andrew Steenson
Belfast City Council	Jamie Uprichard
Belfast City Council	Denise Smith
Belfast City Council	Stephen Leonard

Apologies

West Belfast Partnership Board	Geraldine McAteer
PSNI	Simon Walls
PSNI	Brendan Green
SEHSC Trust	Naomi Dunbar
Education Authority	Jim Dunbar
Education Authority	John Unsworth
QUB	David Jones
PHA	David Tumilty
Belfast City Council	Kevin Heaney
Belfast City Council	Christine Robinson

Item	Discussion	Action & Lead(s)
1.	Introduction – Welcome & Apologies	
	Ryan Black opened the meeting and welcomed attendees. Ryan suggested that to save time if any new attendees wanted to use the chat function to introduce themselves. Apologies were noted as per above.	Noted
2.	Minutes of Previous Meeting (25 November 2020)	
	Noted that the Social & Community Recovery work has been delayed significantly due to 3 rd lockdown and when picked up again over the next few weeks, further updates will be brought to the board for consideration.	Note

3.	Update on Discussion / Decisions from CPP Meeting held on 24 March 2021	
3.1	Ryan Black provided an update with regards to the reconfiguration of the Belfast Agenda Delivery Boards agreed by the Community Planning Partnership (CPP) at its meeting in March 2021.	All
3.2	Noted that the Educational Inequalities priority is to be further discussed with the established task group on 18 June, with recommendations to be submitted for consideration of CPP at its next meeting. Consideration will be given to alignment of this priority within the BA Boards and how linkages and synergies across community planning can be maximised.	
3.3	<p>The CPP agreed to review the Programme Brief for the Living Here Board, which will guide its governance and future operations. A draft has been circulated with the papers for Board Members consideration.</p> <p>ACTION – Partners to review the programme brief and provide feedback with regards to content and appropriate membership of the Board by 31 May 2021 to communityplanning@BelfastCity.gov.uk</p>	
4.	Review of the Belfast Agenda and Role of the Boards	
4.1	<p>John Tully provided an update on the emerging approach towards the review of the Belfast Agenda. Key points covered within the presentation, included:</p> <ul style="list-style-type: none"> • Review of Belfast Agenda to be informed by - Legislation (Alignment with Programme for Government, LG Act); Recovery from Covid and Continuous Improvement (signposting partners to read up on the Carnegie Trust report). • Intention is that the refreshed Belfast Agenda will be split into two sections – vision, outcomes and 4-year priorities, as well as detailed 4-year action plans, which will be focused on additionally and collaborative gain. • Important to take a thematic and area specific view. • Will be adopting a co-design approach; highlighting that a cross-partner sub-group established to develop process - co-chaired by John Tully and Irene Sherry (VCSE Panel Chair). • Keen to take an asset-based approach towards action planning informed by evidence and data from across the city. • In terms of the refresh journey, the launch will take place at the end of this month or early next month – focus initially on vision, outcomes and priority framework, which will be followed by action planning and problem solving. <p>ACTION - Partners asked to highlight the importance of the review with their stakeholders and the need for their input. Partners to consider how existing networks can be mobilised to support the refresh of the Belfast Agenda; with feedback to Belfast City Council welcome.</p>	Note
5.	Focus / Action Planning for next 6-18 Months	
5.1	<p>Agreed to use the scheduled June Living Here Board as a focused action planning session.</p> <p>ACTION – Partners are asked to consider and feedback any specific priorities which the LH Board should consider in order to support communities with recovery over coming months and/or opportunities to deliver collaborative gain across LH Board partners.</p>	All

6.3	<ul style="list-style-type: none"> Natasha Brennan – Keen to see information/ good practice that evolves from this group to help promote positive well-being. Catherine Downey and Kelly Gilliland agreed to link in following the meeting. Bryan Nelson - BHSCT have been exploring the potential need and opportunities presented around 'Positive Psychology' model. Noted that Dr Sarah Meekin, BHSCT, is looking at a developing a framework around Promoting Positive Wellbeing within the city. ACTION – keep the LH Board updated on this work. 	C. Downey/ K. Gilliland
	<p>(iii) Belfast Warm & Well Project</p> <ul style="list-style-type: none"> Iain Deboys provided an update on the Belfast Warm & Well project which has just finished its second year of operation. Highlighted the need to consider how we mainstream this project and others that are established via this Board and community planning more generally. Noted the challenge presented for community planning in mainstreaming and sustaining interventions and programmes which deliver improved outcomes. Iain noted some key findings which are included within the presentation slides shared with partners. Going Forward there is a need to ensure that we seek to align and advocate the LH Board's strategic priorities and focus (e.g. addressing fuel poverty) with other city partners and influence emerging policies and strategies including. Noted recent community planning partners workshop held on Energy Strategy Highlighted the importance of and need to make the strategic linkages including, but not limited to, e.g. Resilience Board/Strategy, DfE Energy Strategy, DfC, Local Development Plan etc. Need to establish how this initiative could be financed going forward and how it links. <p>Discussion points:</p> <ul style="list-style-type: none"> Briege Arthurs – noted weak infrastructure in some communities causing issues based on helpline feedback during Covid response. Piece of work required around integrating/ aligning this at a community and voluntary level, to get a whole system approach ACTION - Agreed to discuss further at the action planning session in June. ACTION: Important for community planning partners to raise awareness of the Belfast Warm and Well Scheme – training is offered if required by partners. ACTION: Partners are asked to continue to help with the Warm and Well Programme and to provide a considered response to the Energy and Fuel Poverty Strategies, within this context. 	<p>Note</p> <p>Note</p> <p>All</p> <p>All</p> <p>All</p>
7.	Area Planning & Delivery	
7.1	<p>(i) Multi-Agency Support Hub</p> <p>Gerard Pollock provided a progress update in relation to the establishment of a Multi-Agency support hub pilot in South Belfast. Slides to be shared with partners. Key points raised:</p> <ul style="list-style-type: none"> Working collaboratively to establish a multi-agency support hub to support a variety of vulnerable individuals. 	BCC

	<ul style="list-style-type: none"> Key aim of the initiative is to work collectively with statutory partners to reduce the level of risk and vulnerability associated with individuals on the programme. Partners involved are co-equal and can all make referrals subject to a collective agreement – BCC (Chair) Youth Justice Agency, EA, Fire & Rescue Service, PSNI, NI Ambulance, PBNI, NIHE, BHSCT, HSC Board. 1st meeting held on 12th May with initial 3 referrals accepted and adopted into the hub. Meetings to be held fortnightly until August at which point progress will be assessed and reviewed and a report brought back into the board. Noted the clear linkages and synergies between the Multi-Agency Support Hub and Complex Lives will be important. Noted that Rosie Thompson (PSNI) has been nominated to work alongside Kelly re: Complex Lives, to ensure that the work complements and evolves in tandem going forward. <p>Discussion points:</p> <ul style="list-style-type: none"> Paula Powell – noted that there may be lower level support required for frequent callers to the NI ambulance service for example. Frances Dowds – Requested further details with respect to the information sharing element of the hub. Gerald Pollock clarified that it is the reason why the hub involves statutory partner. All information is shared on the basis that data sharing agreements are in place and consent has been given the individuals involved. Agreed that Frances/ Gerard link in following the meeting. ACTION - Consideration to be given on to how this could be rolled out further in Belfast if the model is a success – potentially an area-based hub model that aligns with wider area planning approach. 	<p>Note</p> <p>G. Pollock /F. Dowds All</p>
7.2	<p>(ii) Belfast Area Outcomes Group – Combined Covid Response Approach</p> <p>Carol Diffin provided an update in relation to emerging issues coming out following the Covid Response Approach, slides included within the slide deck.</p> <ul style="list-style-type: none"> In November 2020 a meeting of anti-poverty group agreed 4 common priorities where current pandemic responses could be enhanced – support for families with children under 2 years: digital poverty, a flexible fund and food-based intervention (healthy eating standards). Key learning showed significant opportunities to improve impact and outcomes by core agencies – particularly with respect to provision of funding and combining activity/ funding to achieve better outcomes. There is a need to develop structural feedback loops with communities and be agile in terms of responding to need supported by collaborative partnership working. Co-production and co-design of a shared action plan is an essential part of the process going forward supported by learning over the last few months and feeding into the definition of what the Belfast Agenda commitment looks like going forward. <p>Discussion points:</p> <ul style="list-style-type: none"> Nicola Verner – Grateful for work being progressed via partnership approach rather than creating new structures. Highlighted the opportunities to focus on other priorities (i.e. supporting children to fulfil their potential) and the role of the LHB and linkage to BAOG as a collaborative platform to progress these. Carol Diffin agreed that this was a key priority and children’s emotional health and education were key areas to be looked at going forward. 	<p>Note</p> <p>C. Diffin</p>

7.3	<ul style="list-style-type: none"> • ACTION – consideration to be given to identifying specific collaborative opportunities to be taken forward through LH Board and the supporting programme of work. <p>(iii) Wider University & Lower Ormeau Intervention</p> <p>Stephen Leonard provided an update in relation to the Strategic Insights Programme being undertaken in collaboration with the Dept. for Communities and Dept. of Finance linked to the Wider University & Lower Ormeau area. Key points raised:</p> <ul style="list-style-type: none"> • To date several workshops held with key stakeholders to examine key challenges and opportunities for change in the area, however, the process has been paused due to continued tensions and issues between constituent stakeholder groups. • Notwithstanding strong consensus among partners on the need for a significant intervention in this area and the potential role of community planning to bring partners and wider stakeholders together. Noted recent discussions between the Dept. for Communities and Council to explore what could be possible. • Noted that a strategic ministerial group has been established by the Minister for Communities to ensure that all government depts. are connected into the conversation. • ACTION - update to be provided to the Board at its next meeting. <p>Discussion points:</p> <ul style="list-style-type: none"> • Natasha Brennan – Noted the urgency around developing a timeline and action plan looking at short, medium and long-term actions so that the community can be updated. • Ryan Black - reiterated that there are ongoing conversations, alignment and involvement at local/ ministerial levels. We will work to bring stakeholders along with us, it will be an iterative process and we will present timelines to the next board meeting. 	<p>All</p> <p>Note</p> <p>S. Leonard</p> <p>Noted</p>
8.	Schedule of Board Meetings	
8.1	Action Planning session to take place with the Board in June 2021.	Note
9.	A.O.B	
9.1	<p>Briege Arthurs – Provided an update on facilitated discussions that took place at the Shared City Partnership with respect to the recent civil unrest.</p> <p>ACTION: Briege Arthurs to share findings with the Board via the community planning team, for partners to think about what plans/ processes and programme need to be put in place to support young people and communities.</p>	B. Arthurs

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Subject:	Belfast Open Spaces Strategy – Delivery Plan
Date:	8 June 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	The purpose of this report is to provide Members with the final version of the Belfast Open Spaces Strategy (BOSS) and to update Members on the approach to be taken to implement the strategy through the development of Delivery Plans.
2.0	Recommendations
2.1	<p>The Members of the Committee are asked to recommend that, in accordance with the Council decision of 4th May, the Chief Executive exercise her delegated authority to:</p> <ul style="list-style-type: none"> Note the final version of the Belfast Open Spaces Strategy Note the proposed approach and next steps in implementing the strategy through the development of smart outcomes based delivery plans.

3.0	Main report
3.1	The new Belfast Open Spaces Strategy (BOSS) is an update of the previous Open Spaces Strategy – ‘Your City, Your Space’ completed in 2005.
3.2	Belfast City Council appointed AECOM to help prepare a new BOSS for the council area. The BOSS, including the data collected during its preparation, forms part of the evidence base for the Local Development Plan (LDP). A public consultation was carried out on the draft BOSS in June-September 2019 and an update and proposed amendments were presented to SP&R Committee in March 2020.
3.3	Due to the pandemic there was a delay in finalising the publication of the BOSS (see Appendix 1)
3.4	<p>The vision of the BOSS is that by 2035.....</p> <p><i>Belfast will have a well-connected, accessible network of high quality, sustainable open spaces recognised for the value and benefits they provide to everyone who lives, works in and visits our city.</i></p>
3.5	The strategy outlines seven guiding strategic principles (SP), to ensure the council’s existing and new open spaces are fit for the future. They provide the roadmap and identify opportunities for achieving its vision.
3.6	<p>Strategic principles - Belfast’s open spaces will:</p> <ul style="list-style-type: none"> • SP1. Provide welcoming shared spaces • SP2. Improve connectivity • SP3. Improve health and wellbeing • SP4. Support place-making and enhance the built environment • SP5. Increase resilience to climate change • SP6. Protect and enhance the natural environment • SP7. Be celebrated and support learning

3.7	The strategy identifies a range of opportunities and headline actions aligned to the seven strategic principles above. These actions are currently underway or planned for the council's open space network across the city in the next five years. (See Appendix 2).
3.8	Over the next few months officers from the CNS Department will work collaboratively with colleagues across the council to develop more focused thematic and geographically based (N, S, E, W and city wide) open space delivery plans. These will include a review of progress to date on the headline actions currently in the BOSS and the development of smart outcomes-based proposals for future actions. An update report will be brought back to Members. <u>Financial & Resource Implications</u>
3.9	The delivery of the BOSS will rely on existing budgets, working collaboratively with partners and stakeholders and sourcing external/ partner funding over the life of the strategy. <u>Equality or Good Relations Implications/Rural Needs Assessment</u>
3.10	An equality and rural proofing screening was carried out as part of the BOSS development. Actions within the Delivery Plans will undertake their own equality screening and rural impact assessment as appropriate.
4.0	Appendices – Documents Attached
	Appendix 1 – Belfast Open Spaces Strategy Appendix 2 – BOSS SP Headline Actions

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Belfast Open Spaces Strategy

2020-2035

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Belfast
City Council

Energising
Belfast







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- Strategy delivery
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Summary – Belfast Open Spaces Strategy

Belfast benefits from a wide range of open spaces. From the beautiful Victorian setting of the Botanic Gardens, to the natural grandeur of Cave Hill Country Park, from the lawns of the City Hall Gardens, to the smallest of local play areas, they all add to the overall quality of our environment and contribute to our city's own unique identity.

Covering around a quarter of the city's total area around 2,390 hectares (ha), our open spaces are a significant resource and many have been awarded Green Flag status in recognition for their good management and active community involvement.

Belfast's residents have told us they are proud of the city's natural and built environment and that we need to take care of these natural assets. Protecting, developing and improving access to good quality open space for everyone improves people's health and wellbeing, supports urban wildlife and biodiversity and encourages investment in the city's economy.

Strategy development

To help us produce this strategy we established a Strategy Advisory Group which was made up of statutory, community and voluntary organisations. We also set up an internal Strategy Oversight Steering Group made up of officers from across the council to provide oversight and guidance. These groups created a long-term vision for the future of Belfast's open spaces, in line with the aspirations of the Belfast Agenda and Local Development Plan (LDP).

In 2018 we carried out an open space audit which assessed open space provision, accessibility and future actions based on the city's growth strategy. We used this to help set an ambitious vision for our open spaces.

To make sure that existing and new open spaces are fit for the future, we established a suite of seven guiding strategic principles, providing the roadmap for achieving the vision. Belfast's open spaces will:

- SP1. Provide welcoming shared spaces
- SP2. Improve connectivity
- SP3. Improve health and wellbeing
- SP4. Support place-making and enhance the built environment
- SP5. Increase resilience to climate change
- SP6. Protect and enhance the natural environment
- SP7. Be celebrated and support learning

Our vision, is that by 2035...

Belfast will have a well-connected, accessible network of high quality, sustainable open spaces recognised for the value and benefits they provide to everyone who lives, works in and visits our city.

Strategy delivery

We have identified a range of opportunities and headline actions to be delivered over the next five years which are aligned to the seven strategic principles above. To achieve our vision, open spaces must be managed collaboratively, as one of the city's most important assets. We will continue to work closely with our partners and stakeholders to help realise our vision for Belfast's open spaces.

Strategy review

We will manage and monitor the audit database of open spaces with our partners and stakeholders. We will regularly review progress of the delivery plan, complete a full review of the strategy in 2024 and agree the next phase of actions.



Source: Belfast City Council

Introduction

Belfast will be a city re-imagined and re-energised through our open spaces.

Open spaces provide a wide range of health, economic, social, environmental and cultural benefits that help to make Belfast more sustainable and liveable. Residents of Belfast have told us that the city's landscape setting and natural environment are some of its key strengths and that we need to work better to maximise their benefits. This strategy sets out a vision with strategic principles for protecting, connecting and enhancing existing and new open space.

Our previous strategy for open spaces – 'Your City, Your Space' 2005, led to many improvements and successes; through this strategy we:

- invested £150m in our open spaces network;
- achieved 19 Green Flag Awards;
- attracted funding from the Heritage Lottery Fund (HLF) and European streams;
- increased numbers and participation levels at local events and outreach programmes;
- constructed and developed the Connswater Community Greenway;
- increased the number of friend's groups within our open spaces; and
- delivered a range of physical improvements across our open spaces network in partnership with statutory, community and voluntary sector.

Our Community Plan, the Belfast Agenda sets out a shared vision and commitment across the public, private and community and voluntary sectors to create a better quality of life for all. Comprising over a quarter of the city, our open spaces are vital in delivering the Belfast Agenda's vision. We are responsible for land use planning in the city, including our network of open spaces. Our LDP sets out the policy framework for delivering significant growth across the city by 2035. Growth presents opportunities to improve our open spaces and their connectivity. This strategy was developed with the help of a wide range of partners and stakeholders and builds on much of the good work already completed.

We continue to rely on our open spaces to help make Belfast one of the most liveable cities in the world, a city re-imagined and re-energised.

Definition of open space

For the purposes of this strategy, open spaces are defined as '*land where the primary function is related to their community, amenity, recreation, play and sport value; whether in public or private ownership*'. This includes parks, playing fields, play areas and civic space. These open spaces may also have secondary biodiversity benefits and form part of a wider 'green infrastructure' network. Details of Belfast's green infrastructure are set out in the council's Green and Blue Infrastructure Plan (GBIP). The GBIP provides a spatial framework for a much broader range of spaces, including natural areas and water bodies, to support the effective functioning of natural processes and the ecosystem services they provide.



Policy framework

The importance of open space is enshrined in Northern Irish regional planning policy. This strategy is aligned to regional and local policies and strategies. A summary of these is outlined on the following pages.

Regional policy

The Programme for Government (PfG) is the highest-level strategy for the Northern Ireland Executive. It sets outcomes and measures to help deliver improved wellbeing for everyone; tackle inequality and drive economic growth. Open spaces provide a range of health, economic, social, environmental and cultural benefits that contribute to its delivery.

The Executive's Regional Development Strategy (RDS) 2035 recognises the importance of open spaces and specifically highlights the need to 'protect and enhance the network of open spaces in the BMUA (Belfast Metropolitan Urban Area)'. The RDS is supported by the Strategic Planning Policy Statement (SPPS) which sets out regional planning policies. The SPPS must be taken into account in the preparation of all LDPs and inform decisions on individual planning applications and appeals.

The SPPS sets out the requirements for councils when developing an open spaces strategy, which states that 'there will be a policy presumption against the loss of open space to competing land uses in LDPs irrespective of its physical condition and appearance'. The SPPS also highlights the importance of integrating open spaces within new development and advises councils to 'assess provision in the plan area against the National Playing Fields Association's (NPFA) 'six-acre standard'. In 2015, the NPFA was replaced by Fields in Trust (FiT) which included additional typologies.

The SPPS is supported by a number of topic-based Planning Policy Statements (PPS) which provide more detail on how policy should be interpreted and implemented across Northern Ireland. A number of the PPS have implications for open space provision, including PPS 2 'Natural Heritage', PPS 7 'Quality Residential Environments' and PPS 21 'Sustainable Development in the Countryside', but most notably PPS 8 Open Space, Sport and Outdoor Recreation, includes a range of policies relating to protection of existing spaces and delivery of new spaces. It requires that, in general, 10% of site area should be given to open space for new residential development, rising to 15% for strategic sites over 300 units or 15hectares.

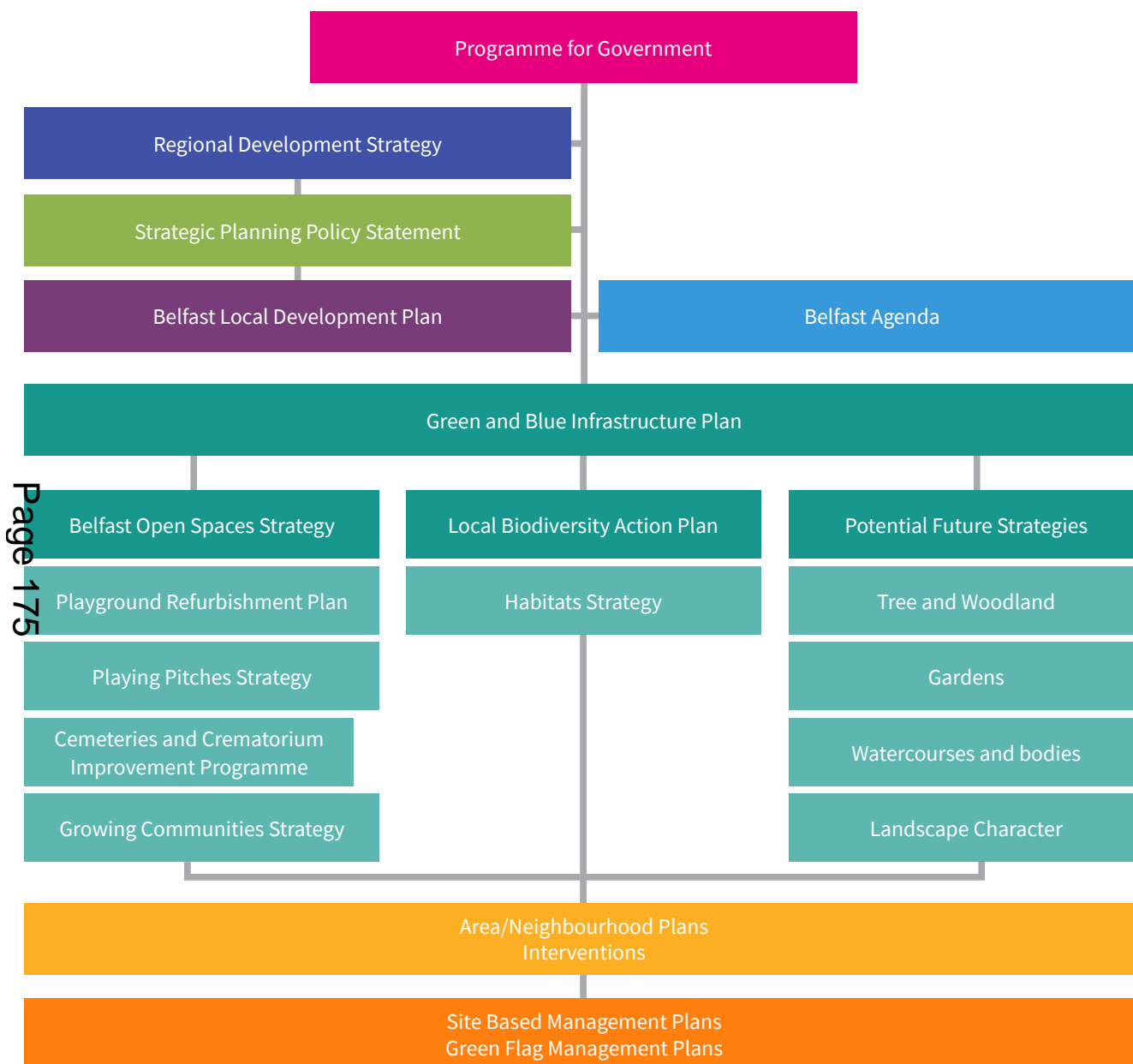
Local policy

As part of Local Government Reform (LGR), we now have a 'community planning' duty to provide a coordinated framework for public service delivery across services such as public health, education, social services and sports. The Belfast Agenda is aligned to the PfG, setting out the strategic direction for Belfast, including a vision for the future and the outcomes to be achieved.

Working within the policy framework set by the Executive's RDS, our LDP will set out policies to deliver the spatial aspects of the Belfast Agenda. This strategy provides the evidence base to support policies within the LDP. In accordance with the SPPS, our policy approach is to protect all open space, make improvements and to improve access to open space.

Using our planning powers gained through LGR, we now ensure new residential development is supported by appropriate open space infrastructure. Our Developer Contributions Framework sets out the circumstances in which new or enhanced open space should be secured through the planning applications process.

The GBIP supports the LDP and provides a framework that also includes natural areas and water bodies. At the local level, we will continue to work with stakeholders and communities to develop area-based plans and interventions to improve the provision, accessibility and quality of open spaces. These plans will align to the strategic principles, opportunities and headline actions at a local level.



Summary points

- Capitalise on the potential for open space to deliver multiple benefits.
- Planning powers provide us with the opportunity to improve open space quality and provision.
- Our existing open space network needs to be protected, improved and enhanced to meet growing demand.
- Planning policy enables us to secure developer contributions where they are necessary to mitigate the impact of new development on open space infrastructure.
- Continue to work with our partners, stakeholders and local communities to improve our open space network.

Figure 1. Policy Framework

Benefits of open space

The Belfast Agenda sets out an ambitious vision for Belfast by 2035, underpinned by five outcomes to be achieved:

1. Everyone in Belfast benefits from a **thriving and prosperous economy**;
2. Belfast is a **welcoming, safe, fair and inclusive city for all**;
3. Everyone in Belfast **fulfils their potential**;
4. Everyone in Belfast experiences **good health and wellbeing**; and

Belfast is a **vibrant, attractive, connected and environmentally sustainable city**.

The LDP provides our spatial vision and plan that will help deliver the Belfast Agenda. Evidence suggests that well-designed, high quality open spaces are vital in creating a healthy and liveable city.

1. Thriving and prosperous economy

High quality open spaces help attract and retain higher value businesses and have shown to add a premium to commercial development of around 3% across the UK (although estimates vary from 1-9%)¹. Belfast is seeking to attract 46,000 new, high quality jobs to the city by 2035. The city centre, Harbour Estate, Belfast Port, North Foreshore, Titanic Quarter and other iconic projects will remain the focus of economic investment.

Belfast is a growing tourism destination, with over 1.5 million visitors to the city per year. High quality open spaces help retain visitors for longer and in turn this increases visitor spending. It is important that we protect and enhance these spaces, particularly in the city centre. Many of our parks and open spaces such as Botanic Gardens, Lagan Valley Regional Park and the Connswater Community Greenway are tourist attractions in their own right.

2. Welcoming, safe, fair and inclusive for all

The quality of open space has a direct relationship with how people feel about a place. Where people perceive local open spaces as high quality, they are generally more satisfied with their neighbourhood, and are likely to feel safer, more secure and become more active². This reinforces a sense of place and creates opportunities for socialising and local events. With increased activity there is more natural surveillance which in turn helps to reduce levels of anti-social behaviour (ASB).

3. Fulfilling potential

We need to invest in our open spaces, so that they can fulfil their potential. It's all about valuing, enjoying and helping to manage these spaces and using them to their full potential. It is important to involve the community, groups and volunteers, to help us maintain, promote and shape the future development of our parks and open spaces. Our open spaces are also important educational resources that can support lifelong learning.

4. Good health and wellbeing

Open spaces are important for health and mental wellbeing. Most open space users are involved in passive recreation activities including walking, dog walking, cycling and running. Obesity is still one of the most important public health challenges facing Northern Ireland: 41% of those aged 65-74 were overweight, a further 29% were obese³ and estimated to cost our economy £370 million per year⁴. Although there have been improvements in recent years significant areas of health deprivation remain in Belfast. These health inequalities correlate with economic inactivity, sedentary lifestyles, drinking and smoking. Overall better health is related to access to green space regardless of socio-economic status⁵. Being physically active for 30 minutes a day can directly reduce the risk of strokes, cardiovascular disease, obesity, cancer and Type 2 diabetes. In NI, 65% of adults do not achieve the recommended levels of physical activity⁶. People who live within 500 metres of accessible green space are 24% more

likely to engage in increased physical activity and meet the 30 minute target⁷. The health and wellbeing benefits of parks and open spaces are not restricted to active recreation. Simply spending time in a green space with contact to nature has proven benefits in terms of mental health, wellbeing and happiness.

5. Vibrant, attractive, connected and environmentally sustainable

Attractive and vibrant spaces help support the economy and improve how people perceive the quality of their neighbourhood. These are important factors in creating prosperous communities and improving social activity.

As the regional centre, Belfast draws commuters from a wide catchment area, the vast majority of whom use private vehicles. Among weekday commuters, 52% of workers move through the city in private cars or vans, whereas 16% use public transport and only 3% cycle⁸. Congestion, air quality issues⁹ and the use of climate change inducing fossil fuels are already key challenges for the city to address. These are likely to increase due to the planned population growth, estimated to generate an additional 10,000 journeys per-hour during the peak period.

In relation to environmental sustainability, rain water falling on hard urban areas quickly runs off, picking up pollutants and either enters the drainage network or discharges into the natural environment. Open spaces incorporating sustainable drainage systems (SuDS) helps slow water flow, enhance water quality and improve natural habitats and amenity value.

Biodiversity is the cornerstone of robust ecosystems and the beneficial services they provide, such as pollination of crops, improvements to water, soil, air quality and climate regulation. Open spaces provide great opportunities for integrating a variety of trees and vegetation to diversify urban habitats and support a wider variety of species. Effective management can help create attractive spaces that allow sensitive species to thrive and people to have space for recreation.

Summary points

- Open spaces provide a wide range of social, economic and environmental benefits that support the outcomes of the Belfast Agenda and the LDP.
- Good design and ongoing management help engender civic and local pride, animate open space and support good community relations.
- Easy access to open space increases usage and participation in activities shown to improve health and wellbeing.
- High quality open spaces help attract investment and retain visitors, providing economic benefits for the city.
- Open spaces provide the opportunity to take a holistic approach to SuDS including providing land that slows water flow, improving Belfast's resilience to flooding.
- Creation of habitat areas within open spaces helps species move across the city, supporting biodiversity and eco-system services.

1 - Eftec and Sheffield Hallam University (2013) Green infrastructure's contribution to economic growth: a review.

2 - CABE Space and DCMS (2010) Community green

3 - Health Survey for NI (2015-2016)

4 - Safefood (2012) The cost of overweight and obesity on the island of Ireland

5 - Marmot Review (2010)

6 - Sport NI (2010) The Northern Ireland Sport and Physical Activity Survey

7 - Defra (2010) What nature can do for you

8 - Belfast City Council (2017) Smart Belfast Collaborative Challenge – Transport

9 - Belfast City Council's Belfast Air Quality Action Plan 2015-2020 designates four Air Quality Management Areas where emissions have breached EU regulations. These are, 1. M1-Westlink AQMA, 2. Cromac Street and Albertbridge Street AQMA, 3. Upper Newtownards Road AQMA, 4. Ormeau Road AQMA

Provision of open spaces

This section summarises the city's current open spaces network, describing different types of open spaces, their extent, distribution and accessibility. It also outlines how the quality of open spaces is assessed and some operational management issues. Open space provision is measured against best practice standards and the growth strategy within the Belfast Agenda and the LDP.

We have developed a comprehensive database of open spaces with a range of external partners. Where possible, we have collected information on the location, type, size and ownership of both public and private open spaces. There are, however, some limitations to this data and we will continue to work with our partners to review and update this information.



Source: Belfast City Council

Belfast today

Sitting at the head of Belfast Lough, Belfast is positioned on low lying fluvial deposits. It is situated within a bowl of upland created by the Belfast and Castlereagh Hills, divided by the River Lagan flowing down to the north through the city and into the lough. Belfast has a population of approximately 339,600¹⁰, it is a regional economic powerhouse, with a growing concentration of skilled jobs and a significant retail catchment of around 600,000 people. Belfast is fast becoming one of the UK's main tourist destinations, attracting over 1.5m visitors a year.

We are one of the youngest cities in Europe, with a third of our residents under 21. We have a growing older population, which by 2035 will grow from 15% to 20%. Despite being ranked within the top five cities in the UK for quality of life, reflecting a thriving cultural and social scene, the city has significant pockets of deprivation and health inequalities, resulting in major disparities between our communities. We are still a city with challenges and despite our progress in community relations, social and physical barriers are still visible throughout the city.

Figure 2 shows the Belfast City Council boundary urban area of Belfast.

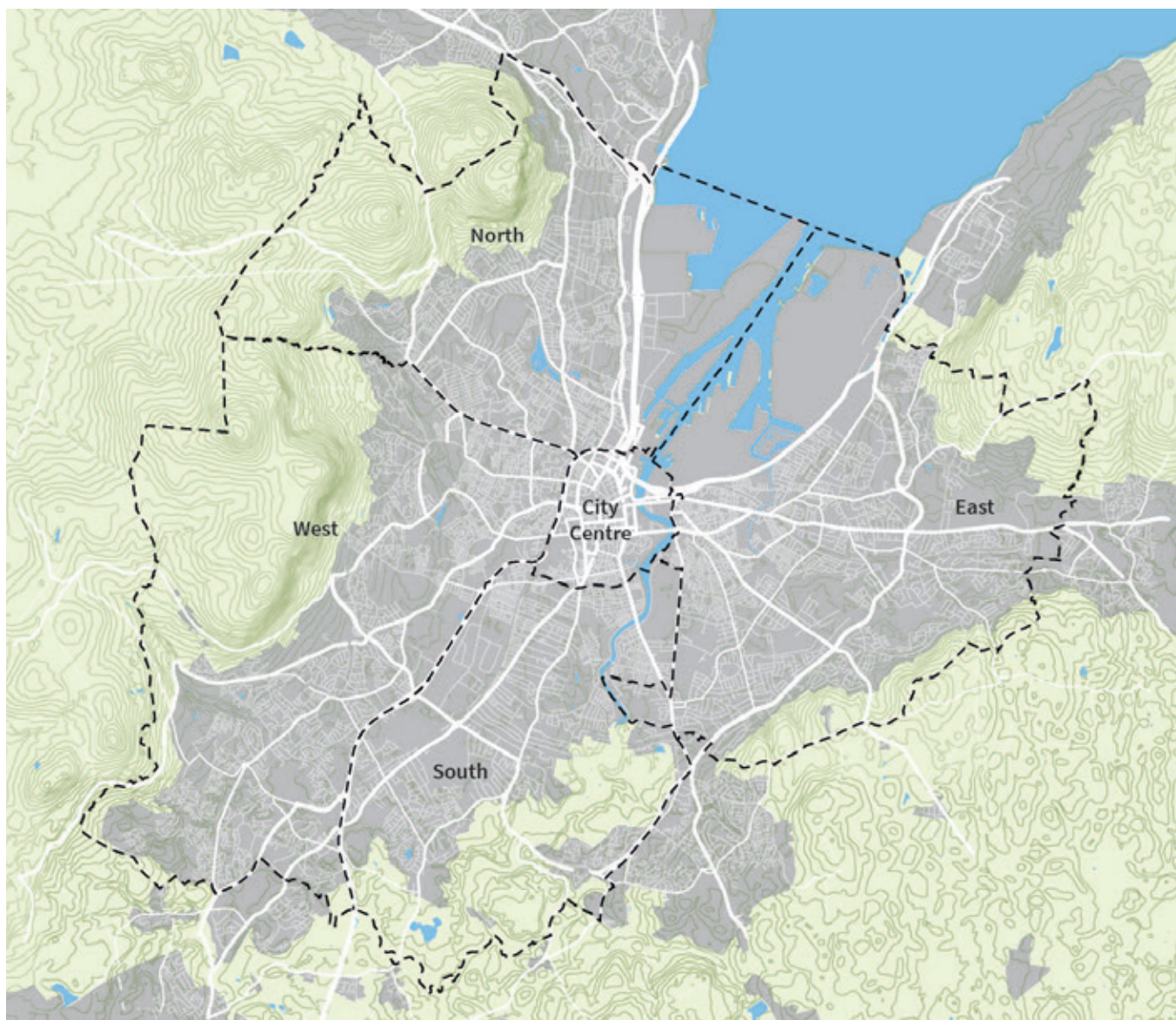
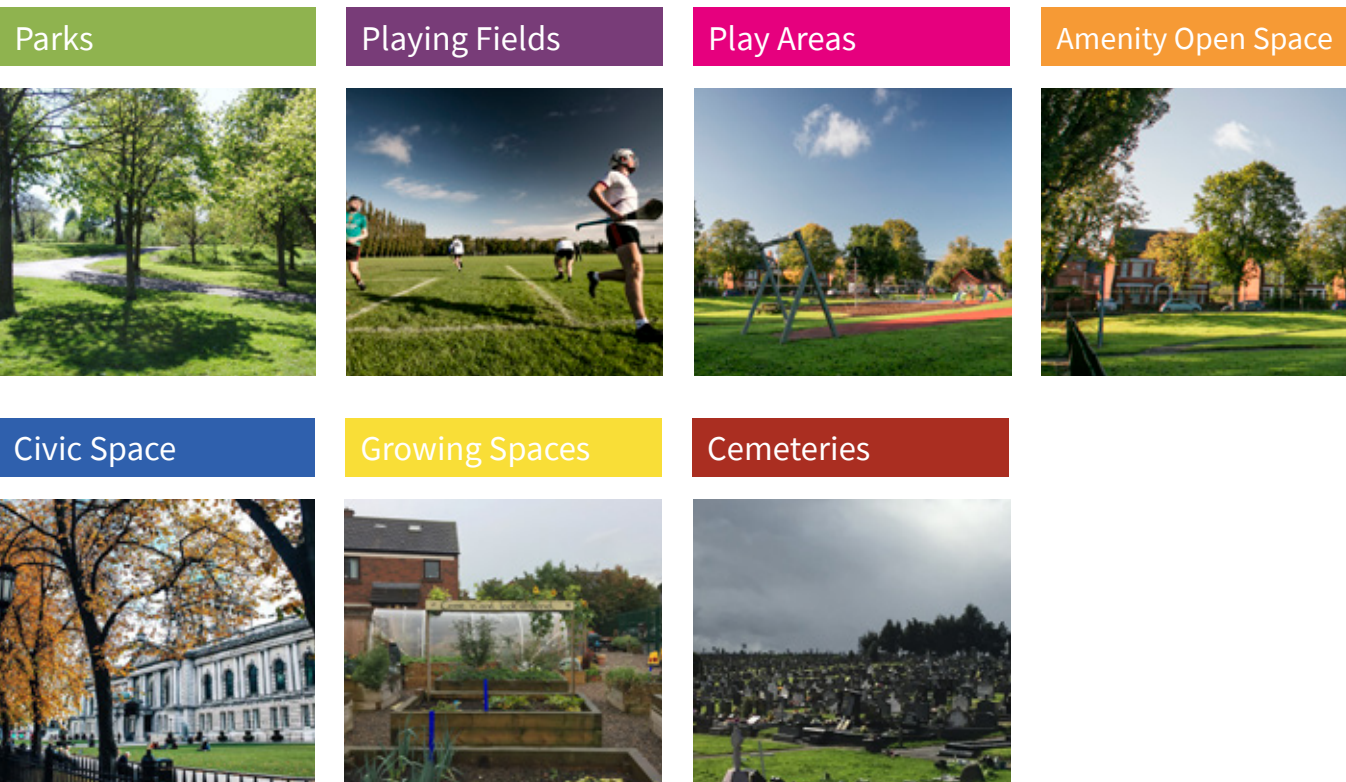


Figure 2. Belfast City Council (BCC) boundary

Types of open space

Open spaces are defined as ‘land where the primary function is related to their community/amenity value, offering opportunities for play, recreation and sport whether in public or private ownership’¹¹. These open spaces may also have secondary biodiversity benefits and form part of a wider ‘green infrastructure’ network. A total of seven open space typologies have been used, each having a variety of uses. The types of open spaces referred to throughout this strategy are summarised in Table 1. Other spaces, including water bodies, greenways, waterways and private gardens are discussed in detail in the GBIP.

The RDS 2035 also highlights the importance of ‘greenways’, which are segregated walking and cycling routes, and requires their protection and enhancement as part of the network of open spaces in the BMUA. Although primarily designed as movement corridors, these linkages are becoming important destinations in their own right for example Connswater Community Greenway. They will play an increasingly important role, allowing people to move safely between open spaces, to destinations in the city and out to the countryside and will be explored further in SP2 and as part of the GBIP.



Source: Belfast City Council

11 - PPS 8 defines open spaces as ‘all open space of public value, including not just land, but also inland bodies of water such as rivers, canals, lakes and reservoirs which offer important opportunity for sports and outdoor recreation and can act as visual amenity’. This strategy focuses on land, whereas the GBIP incorporates a broader suite of open spaces in line with PPS8.

Open Space Typologies			
Type	Sub- type	Description	Ownership / responsibility
Parks	Country parks	Significant open spaces, with large areas of natural or semi natural landscapes supporting a range of wildlife. They are publicly accessible by public transport and attract large numbers of visitors and tourists. They provide a range of facilities and heritage features offering recreational, ecological, landscape, cultural or green infrastructure benefits.	
	City parks	Parks such as Botanic Gardens and Ormeau Park; these are formal open spaces of a significant size that offer a combination of facilities and heritage features at the sub-regional level. They are among the main visitor attractions in Belfast and are popular with tourists and visitors to the city. They are accessible by public transport and have a superior quality of facilities.	Belfast City Council is responsible for the vast majority of parks. We have a dedicated team of Park Officers in each of the city's five areas who manage and maintain the parks and liaise with local communities.
	District parks 1200m walking catchment (approx. 15min walk)	Large to medium areas of open space that provide a landscape setting with a variety of natural features providing a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits, for example Falls Park and Victoria Park.	The Stormont Estate is managed by another public body.
	Local parks 400m walking catchment (approx. 5min walk)	Serve the immediate neighbourhood as accessible green spaces. They may contain courts or pitches, children's play, sitting-out areas and nature conservation areas. They are usually accessible by foot and are mainly used by the local community, for example Dr Pitt Park, Rev Robert Bradford Memorial Park, Loughside Park, Drumglass Park and Glencairn Park.	

Table 1. Open space typologies

Open Space Typologies

Type	Sub- type	Description	Ownership / responsibility
Playing fields	Public playing fields	Publicly owned natural or artificial surfaces (synthetic) used for sport and recreation. They include outdoor sports facilities pitches or playing fields.	Owned by Belfast City Council for public use.
	Private playing fields	Similar to public playing fields, but privately owned.	Privately owned with restricted public access.
	School and university playing fields	Similar to public playing fields, but owned and managed by schools and universities. For public liability and security reasons educational grounds are not accessible to the general public. Often schools allow community use of the sports facilities for a fee but this cannot be guaranteed.	Owned by the Department of Education and the universities. These spaces have restricted public access.
	Other outdoor sports provision	Natural or artificial surfaces either publicly or privately owned, used for sport and recreation. They include tennis courts, bowling greens and athletics tracks.	Public or privately owned
	Golf courses	Natural landscaped spaces either publicly or privately owned or used for golf.	Public or privately owned
Play areas (adopted in the the Belfast City Council Strategy for Equipped Playgrounds 2008).	Local equipped areas for play (LEAP) 400m walking catchment (around 5 min walk)	Accessible local playgrounds containing up to five types of equipment; may also contain small ball games areas.	Belfast City Council own most play areas. However, there are a couple of play areas that have been installed on private sites. These facilities remain publicly accessible.
	Neighbourhood equipped areas for play (NEAP) (Type 1 – 3) 1,000m catchment (around 13 min walk)	Accessible local playgrounds containing up to five types of equipment; may also contain small ball games areas.	
	Multi use games areas (MUGA) (Type 1 – 3) 700m catchment (around 9 min walk)	Non-bookable, accessible hardstanding or polymeric surfaced small pitches used informally for soccer or basketball.	
	Skatepark	Specialised concrete zone for skateboarding and other urban sports, for example rollerblading, scooters.	
	BMX Tracks	Dedicated areas or circuits for BMX sports or cycling.	

Open Space Typologies			
Type	Sub- type	Description	Ownership / responsibility
Amenity open space		Areas of landscaped green spaces that provide natural surfaces and shaded areas for informal play and passive recreation. They enhance residential and commercial areas.	There are a number of bodies responsible for amenity space including Department for Infrastructure, NI Housing Executive, Department for Communities, Belfast City Council and private landowners.
Civic space		High quality hard or soft landscaped areas that have public value and can be used for larger civic events. Generally located within or near to the city centre, for example Custom House Square, Belfast City Hall Lawns, Cathedral Gardens.	Civic space is often associated with civic buildings. Belfast's civic spaces are owned by Belfast City Council and the Department for Communities.
Growing spaces	Allotments	Secure sites providing individual plots for hire, offering opportunities for residents to grow their own produce. Important for supporting healthier lifestyles, community involvement and cohesion.	Belfast City Council owns and manages the allotments referenced in this strategy. However, there may be others run by local community groups or private ownership.
	Community gardens	Secure, free, communal areas providing opportunities for community gardening and empowering communities, enabling community cohesion, health and education. They are also important as a means of addressing wider food supply issues.	The land used for community gardens is owned by a variety of organisations including council, NI Housing Executive, local community groups or private ownership.
Cemeteries		Quiet areas for burial that also provide opportunities for wildlife conservation, cultural heritage and biodiversity.	Belfast City Council own and manage most cemeteries although some are under the control of their associated church.

Supply and distribution of open spaces

This section provides an analysis of different open space typologies across the city. It has been generated by compiling spatial data from a number of sources.

Analysis shows that over a quarter of the city's area, some 2,388.4ha, is open space. The table opposite summarises the supply of specific open space typologies across the city and Figure 3 shows how this is distributed.

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*There are 78 playing field sites totalling 61.6ha and 81 play areas (LEAPs, NEAPs and MUGAs) co-located within parks. As a result, their size has been subtracted from the total parks area. An average area for each has been applied to the relevant typology.

§ There are 98 LEAP/NEAP sites owned by Belfast City Council, two by other public bodies and three that are on private ground.

£ Includes a skate park and BMX track

% Note that area data is not available for all community gardens.

Supply and distribution of open spaces - analysis at June 2018			
Type	Sub- type	Number of sites (co-located)	Area (ha)
Parks*	Country park	6	495.2
	City park	2	44.9
	District park	9	132.9
	Local park	49	273.6
Total parks		66	946.6*
Playing fields	Public	101 (78)	171.2
	Private	40	120.4
	School or university	33	151.6
Total playing fields		174 (78)	443.2
Play areas [§]	Golf courses	11	442.6
	Other outdoor sports	36 (19)	25.0
	LEAPs	48 (16)	14.9
	NEAPs	55 (36)	33.4
	MUGAs	79 (29)	9.9
Total play areas		182 (81)	58.2
Amenity space	Other play facilities [£]	2 (2)	1.0
	Amenity space	1,460	293.7
Civic space	Civic space	13	17.7
Growing spaces	Allotments	8 (4)	6.0
	Community gardens	30 (12) [%]	1.8
Growing spaces total		38 (22)	7.8
Cemeteries		11	155.8
Total		1970 (196)	2388.4

Table 2. Supply and Distribution of Open Spaces (analysis at June 2018)

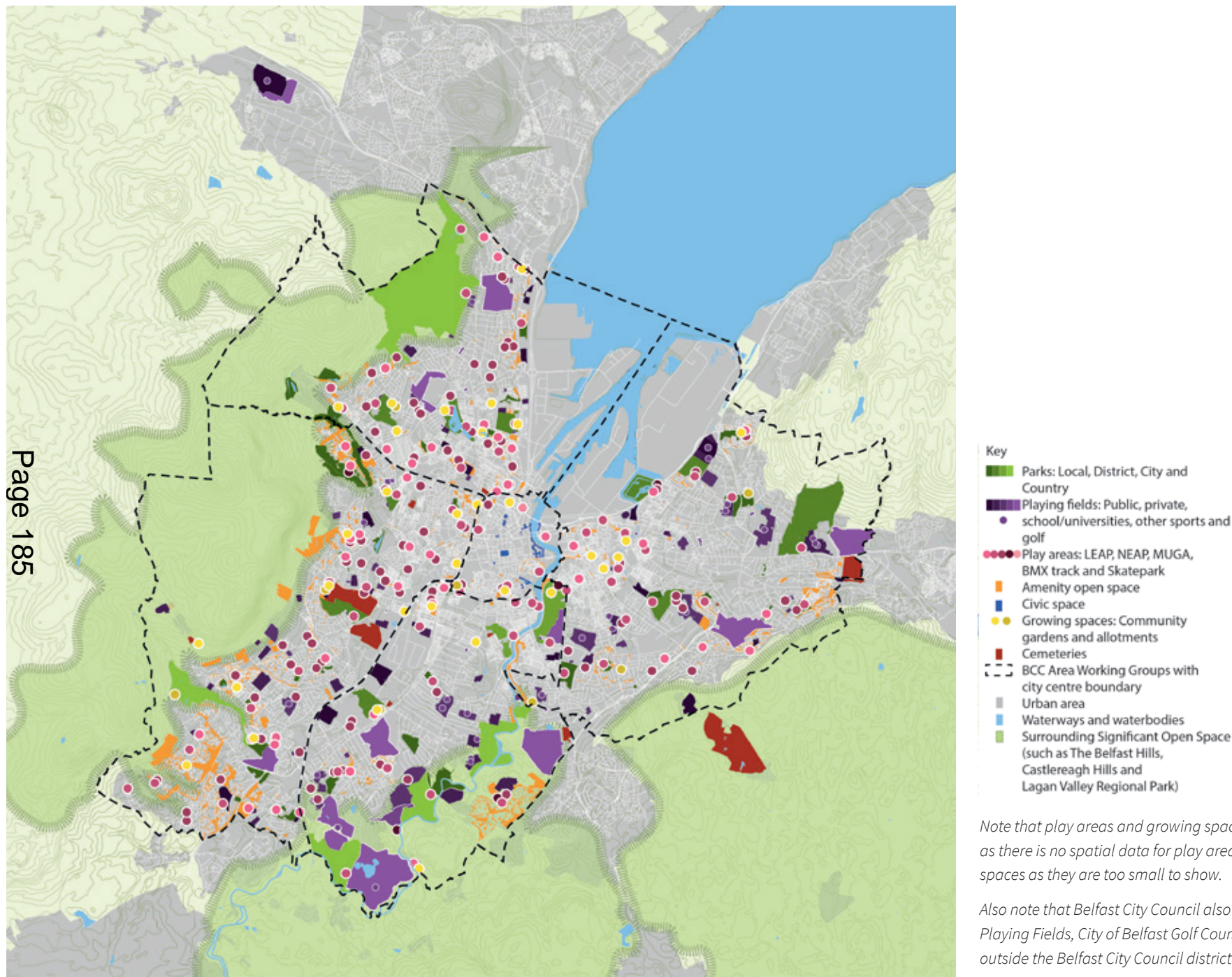


Figure 3. Belfast Open Spaces Network (analysis at June 2018)

Note that play areas and growing spaces have been shown as points as there is no spatial data for play areas within parks or growing spaces as they are too small to show.

Also note that Belfast City Council also owns public City of Belfast Playing Fields, City of Belfast Golf Course and Roselawn Cemetery, all outside the Belfast City Council district boundary.

Benchmarking provision

The SPSS sets out a policy aspiration to meet the National Playing Field Association (NPFA) ‘six-acre standard’, a **target of 2.4hectares per 1,000 people** comprising of 1.6hectares suitable for outdoor sports and recreation and 0.8hectares for children’s play space. In 2015 the NPFA was replaced by the Fields in Trust (FiT) standard. We are committed to protecting our existing open space and we will use benchmarking as a reference to help inform future investment and improvements in our open space network.

Belfast has 946.6hectares of parks (including country parks) and 171.2hectares of publicly accessible playing fields that are suitable for outdoor sport and recreation, as well as 58.2hectares of equipped children’s play areas. For Belfast’s population of 339,600 this is equivalent to 3.5hectares per 1,000 people, therefore exceeding the six-acre standard. Without the country parks, the figure for Belfast is 2hectares per 1,000 people. However, we also acknowledge that not all open spaces are accessible, which will be referred to in the next section.

* Excludes country parks

\$ Play areas only include equipped LEAPs, NEAPs. The FiT standard also includes Local areas for play (LAPs).

£ Estimated size based on average size of standalone MUGA of 0.12ha. Includes skatepark but not BMX tracks.

12 - <http://www.fieldsintrust.org>

Fields in Trust

In 2015, FiT¹² replaced the ‘six-acre standard’ with more comprehensive metrics for open space typologies. Where appropriate a comparison has been outlined on Table 3. The FiT standard also sets out provision for 1.8hectares per 1,000 people of natural and semi-natural spaces which has not been accessed as part of this strategy.

It is clear from Table 3 that Belfast’s park provision is more than the FiT benchmark. Publicly accessible playing field provision is lower than the benchmark, however when considering all playing pitches in Belfast there are a total of 1.3hectares per 1,000 people.

Play area provision, and other outdoor provision, particularly MUGAs, is lower than the FiT benchmark. However, it is important to note that this typology is not directly comparable, as the FiT benchmark also includes local areas for play (LAPs), which are accounted for in the amenity green space typology in Belfast. It is also important to highlight that although not equipped, we provide significant areas of open space for informal play within our parks.

Belfast’s amenity space provision is also higher than the FiT benchmark and is likely to be higher as it has not been possible to map all amenity space in this assessment.

Belfast’s open space provision against the FiT benchmark			
Typology	FiT standard per 1,000 people (ha)	Belfast total (ha)	Belfast (ha) per 1,000 people
Parks*	0.8ha	451.4ha	1.3ha
Parks including country parks	0.8ha	946.6ha	2.8ha
		171.2ha	0.5ha (Publicly accessible)
All playing fields	1.2ha	272ha	0.8ha (Private/ School/ Universities)
		443.2ha (total)	1.3ha (total)
Play areas ^{\$}	0.25ha	48.3ha	0.14ha
Other outdoor provision [£]	0.3ha	10.9ha	0.03ha
Amenity green space	0.6ha	293.7ha	0.9ha

Table 3. Belfast’s Open Space provision against the FiT benchmark



Park and play area accessibility

As well as providing parks and open spaces, it is important that they are accessible.

We have used Land and Property Services (LPS) 'Walking Network' dataset to measure the extent to which our parks and playgrounds are accessible. Using network analysis, catchments were identified by measuring walking distances between the access points of these spaces and the surrounding residential areas. This dataset has built on the work original developed by Queens University Belfast in 2013 as part of their walkability study in Belfast. By adopting this approach, physical impediments to walking such as motorways, railway lines, waterways and peace lines have been factored into the analysis.

Recommended catchments for park and play area typologies are listed below:

- Parks
 - Local parks – 400m (around 5min walk)
 - District (city and country parks) – 1,200m (around 15min walk)
- Play areas
 - LEAP – 400m (around 5min walk)
 - NEAP – 1,000m (around 13min walk)
 - MUGA – 700m (around 9min walk)

Park and play area accessibility – combined catchments

Figure 4 shows the catchment of parks and play areas and how this could increase if the peace lines were removed. It highlights that 77.3% of the population (262,405 people) live within recommended walking distances for either a park or play area. If peace lines were removed 1,413 more residents would have access to a park or play area, increasing access to 77.7% of the population (263,818 people). **At a city level, park and play area accessibility is indicative and can be explored in detail at a neighbourhood level to help address increasing needs in the future.**



Source: Belfast City Council

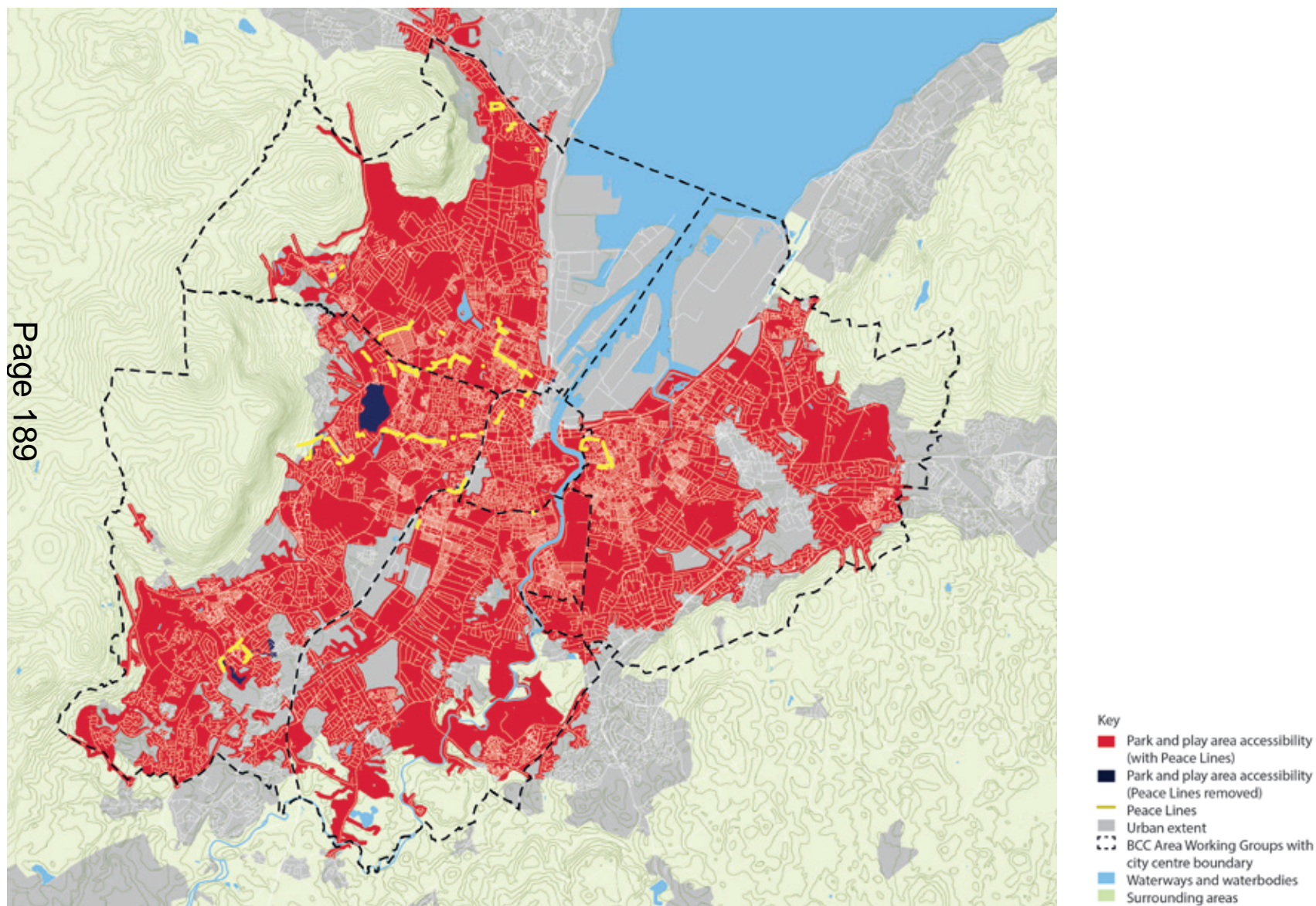


Figure 4. Park and play area accessibility – combined catchments

Quality of our open spaces

The quality of our open spaces is important for ensuring they are welcoming, safe and well-used. We are proud that many of our parks and open spaces have gained the Green Flag award – an internationally recognised standard of quality. In our Residents' Survey (2014), 73.3% of respondents felt generally satisfied with our parks and 49.3% of respondents also said they used a council park for physical activity at least once a week, and 10% daily. Also, 81.9% of respondents agreed that their local area had good quality parks and green spaces. We regularly assess the quality of our open spaces by carrying out audits and inspections.

Open space quality audits and inspections

The quality and horticultural standards of our open spaces is generally high across the city. We regularly inspect the quality of our parks, buildings, trees, play areas, playing fields, memorials and burial grounds. We inspect our open spaces for invasive alien species (IAS), recording, monitoring, and putting control mechanisms in place.

All playgrounds, MUGAs and outdoor gyms are inspected independently each year. All path networks in our open spaces are also inspected monthly by our officers.

Operational management feedback

We regularly engage with our operational staff to gather important qualitative information. A number of issues were identified impacting our open space network, including:

Financing

Reduced capital revenue budgets and resources continue to be a challenge so we need to introduce more efficient management practices and better maximise the use of our existing open space network. Identifying sources of income and external funding is critical for long-term sustainability.

Safety

Anti-social behaviour (ASB) remains an issue in our open spaces. Operational managers confirmed that we need to continue to work closely with local communities to reduce ASB and understand how young people use our spaces and holding more community events and activities. Where possible, Secured by Design principles are applied to the regeneration plans for our open spaces.

Irresponsible dog ownership

Our open spaces provide an important resource for dog owners. In some of our spaces, irresponsible dog ownership remains an issue and we will continue to improve awareness of responsible dog ownership and enforce bye-laws and control orders within our open spaces.

Accessibility

Access to, within and between our open spaces is paramount; we will make sure they are inclusive to all, including people with a range of mobility, physical, sensory and cognitive impairments.

Sustainable drainage

As a result of the adverse weather conditions, drainage and severe flooding remains an issue within some of our spaces for example Victoria Park. We need to increase drainage capacity and identify land which can be dedicated to slowing down the force of water, which will not only increase the usage of spaces, but will also reduce the risk of flooding.

Invasive alien species (IAS)

The increasing threat of IAS remains a challenge, which impacts local, native biodiversity and has associated health and safety and cost implications. We will continue to inspect, monitor and control this going forward.

In summary operational managers recognise the need for open spaces, particularly parks to be flexible in the future so that they are relevant to trends, maintenance budgets and usage pressures.

Demand for new open space

This strategy will support the shared growth strategy of the Belfast Agenda and the LDP. Belfast is aiming to deliver significant inclusive growth and opportunity by 2035, this means our city is home to an additional 66,000 people; supporting 46,000 additional jobs and creating 31,600 additional homes. City growth will place additional pressure on the city's existing open space network.

This strategy and the policy approach adopted within the LDP will ensure that existing open space is protected and future provision meets the needs of the growing population. Where there are limited opportunities to create new open space within the city, we will work with developers through Section 76 of the Town Planning (Northern Ireland) 2011 Act, to find creative ways to improve provision, connectivity and accessibility to open spaces.

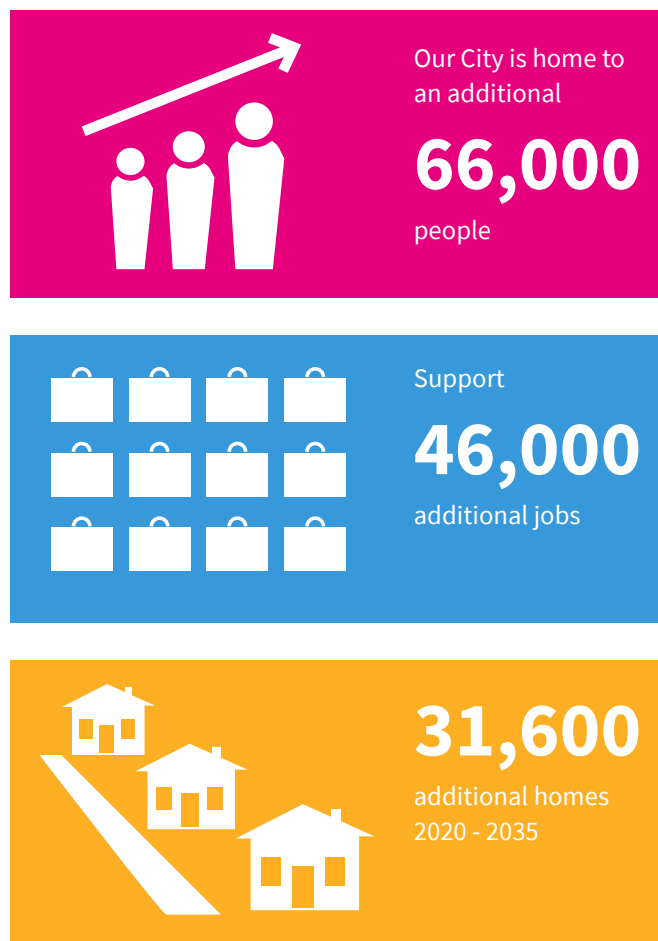


Figure 5. Belfast Agenda and LDP Growth Strategy

Summary points

- Belfast has a wide range of open space typologies, catering for a variety of different uses and functions.
- We will protect and improve existing open spaces and support new provision of open spaces to meet growing demand. New open space will help improve accessibility and connectivity.
- Around a quarter of our city's area (2,390ha) is dedicated to open space.
- Almost 77.3% of the population live within a catchment area for either a park or play area. Improving access through peace lines would increase this by 0.4%.
- We need to ensure that the quality of open space is maintained and improved where possible.
- There are significant areas of amenity space across the city. There may be opportunities to change functionality in line with local needs.
- There is limited green space in the city centre and we need to identify opportunities to increase provision in the future.
- The introduction of traffic-free routes will help improve accessibility and connectivity.
- Section 76 developer contributions will help mitigate the impact of new development on our existing open space network.

By 2035...

**...Belfast will have a well-connected,
accessible network of high quality,
sustainable open spaces recognised for the
value and benefits they provide to everyone
who lives, works in and visits our city.**

Vision, strategic principles and opportunities

Well designed, managed and accessible open spaces provide a range of health, economic, social, environmental and cultural benefits. Although Belfast has an extensive open space network, we believe there is potential to ensure these benefits reach a much wider audience. If local people value their open spaces, there is a greater sense of ownership, higher levels of usage and participation and the potential to enhance social cohesion.

The vision, strategic principles and opportunities for Belfast's open spaces were developed in conjunction with stakeholders:

By 2035...

Belfast will have a well-connected, accessible network of high quality, sustainable open spaces recognised for the value and benefits they provide to everyone who lives, works in and visits our city.

Strategic principles

Seven strategic principles (SPs) have been agreed to support the protection, improvement, creation, accessibility and connectivity of our open space network. These principles provide the foundation and framework for achieving our vision. Belfast's open spaces will:

SP1. Provide welcoming shared spaces

Our high-quality open spaces are inviting and safe for everyone to use. There will be enough space to meet the needs of our growing city and our open spaces will be used to encourage community cohesion and social interaction.

SP2. Improve connectivity

Well-connected and accessible open spaces will form a green network to support safe and sustainable movement across the city.

SP3. Improve health and wellbeing

Offering a wide range of facilities for formal sports and informal recreation, our open spaces will be the preferred option for exercise, relaxation and enjoyment.

SP4. Support place-making and enhance the built environment

Our open spaces will positively contribute to the distinct setting and character of our neighbourhoods and the built environment, helping to retain and attract investment.

SP5. Increase resilience to climate change

Our open spaces will help us to minimise the impacts of climate change, including more severe rainfall events.

SP6. Protect and enhance the natural environment

By protecting and managing a wide range of habitats, our open spaces will strengthen biodiversity and benefit from the ecosystem services a healthy natural environment provides.

SP7. Be celebrated and support learning

Ensuring that events, activities and educational opportunities within our open spaces are well promoted, well used and valued by future generations.

SP1: Provide welcoming shared spaces

Our open spaces are for everyone to use and enjoy, shared by the whole community. They need to be inclusive, safe and welcoming to both residents and visitors alike. To do this, open spaces need to be accessible, valued, frequently used and well maintained. The focus of SP1 is to ensure that spaces are welcoming to all and meet local needs. The planned growth of the city will increase demand for new open space and put pressure on our existing network.

Opportunities to provide welcoming shared spaces

Protect and improve existing open spaces - This strategy supports the policy approach of the Strategic Planning Policy Statement (SPPS) and the Local Development Plan (LDP) to protect and improve open spaces and their biodiversity value. We also realise that investing in the creation of good quality parks and open spaces which are well designed, managed and maintained is vital. Achieving national standards and awards provide useful benchmarks and help improve the standard of our open spaces. This needs to be balanced against the challenges of decreasing capital budgets and we need to look creatively at how we can secure other sources of investment funding.

Target areas of inaccessibility - We have a substantial open space network; however, the accessibility hotspots highlighted in Figure 6 are areas with the least provision of publicly accessible parks and play areas¹³. **At a city level these zones are indicative and need to be interpreted in detail at a neighbourhood level.** Where possible we will aim to provide new spaces or improve access to existing open space in and around these hotspots.

Leverage development and growth - Accommodating growth will require significant new development and regeneration to the city. The majority of the housing demand is likely to be concentrated in the city centre area, with the remainder mainly on small and infill sites. There are also strategic areas of regeneration across the city including North Foreshore, Titanic Quarter and Belfast Waterside. All new development will be expected to either provide new open space or help connect and improve the existing open spaces network through Section 76 framework of the Town Planning (NI) Act 2011. Where development places increased pressure on existing assets such as open spaces, Section 76 allows us to agree developer contributions for works to help mitigate adverse impacts.

Create temporary or meanwhile uses - We want spaces to be attractive and thriving areas of activity. We will work in partnership to encourage the introduction of 'meanwhile uses' or pocket parks where appropriate across the city.

Build stronger communities - Our parks and open spaces provide conciliatory and socially inclusive opportunities for people and groups to interact and meet new people. We will continue to build relationships across communities to increase confidence using and developing shared spaces and services. Community pride in spaces helps create cohesion in local neighbourhoods.

Improve safety and security - Access to open spaces is not just restricted by physical barriers and local concerns should also be considered. Our open spaces should be safe for everyone to use. We will apply Secured by Design principles to the management and development of our open spaces. We will also explore opportunities to reduce ASB using new technologies, to promote safety and security. The introduction of our warden service has increased the amount of staff present in our parks as an effective way to improve safety and security and provide a valuable point of contact for users.

13 - Zones of under provision may occur because they:

- Contain accessible open space not classified as a park or a play area (for example Milltown Cemetery)
- Are close to open space not accessible to the public (for example golf courses and school or private pitches);
- Have physical barriers making open space accessibility difficult; or
- Are areas of industrial, commercial and non-residential land.

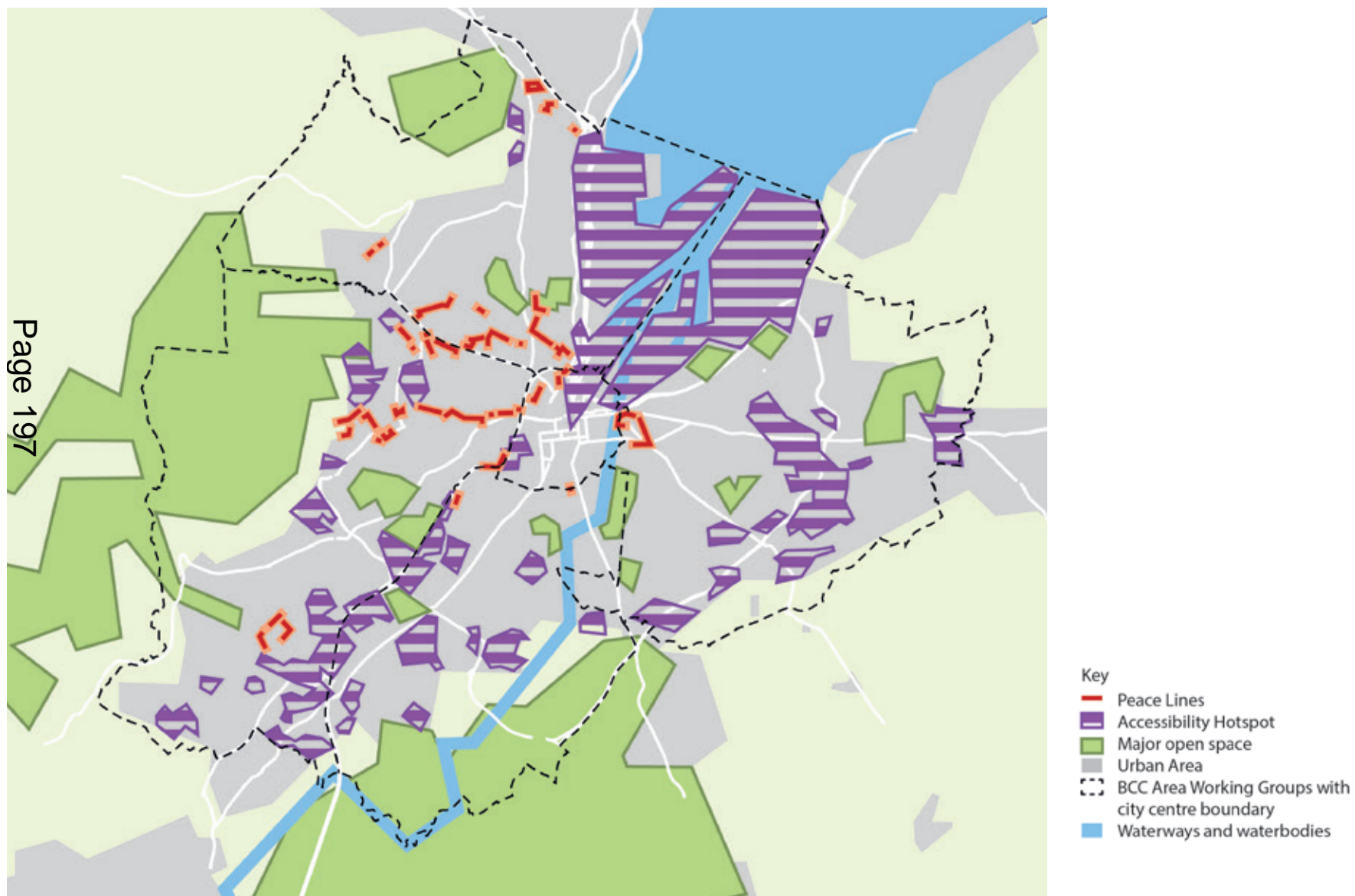


Figure 6. Opportunities for providing welcoming shared spaces

SP2: Improve connectivity

With limited opportunities to create new open space, improving access and connections to the existing green network will enable more people to enjoy the benefits they provide. We have already started to do this by providing traffic-free routes across the network (for example the Connswater Community Greenway).

As well as providing better opportunities for recreation, improved connectivity also helps promote active travel by encouraging more people to walk and cycle to their destinations through our parks and open spaces. This helps reduce vehicular traffic congestion, air pollution and climate change inducing emissions. Open spaces and the connections between them form a city-wide network. This network also extends out beyond the city boundary into the countryside. Well designed, planned and managed green networks have multiple benefits for people, the economy and wildlife.

Opportunities for improving connectivity

Better connected open spaces - There are a number of zones within Belfast that do not fall within park and play area catchments. It may not always be possible to create open spaces in these areas due to limitations of existing land uses for example commercial, industrial and non-residential. Therefore, it will be important to improve connectivity to nearby open spaces. This could include reducing barriers to access for example improving crossing points at main roads or creating new access points to existing open spaces.

14 - Northern Ireland Executive (2013) Together: Building a United Community Strategy

Reduce interface barriers - Through the Together: Building a United Community¹⁴ strategy, the Northern Ireland Executive has set a policy goal for removing interface barriers by 2023, recognising the potential to improve community relations and continuing the journey towards a more united and shared society. We will continue to work in partnership to support the removal of peace lines, to release land for open space development and improve access to existing parks and play areas, therefore creating more connected neighbourhoods.

Enhance and extend the greenway network - We are committed to creating more greenways that segregate walking and cycling routes from vehicular traffic. We will work with partners on these linear routes to link the existing open spaces network, making use of under-utilised space, improving accessibility and providing better access to the countryside. Figure 7 shows Belfast's existing greenways network and some proposed new routes. These routes have been taken from the Belfast Metropolitan Area Plan (BMAP) and the Northern Ireland Strategic Plan for Greenways (2016). Where it is not possible to create dedicated cycling and walking routes in established built up areas, we will seek to enhance the existing pathway network. Focusing on quieter roads, we will work in partnership to provide partially segregated routes that have a distinct character for example consistent street furniture and tree planting.

Improve connections to the countryside - Belfast is surrounded by diverse countryside with some internationally recognised for their landscape value for example Divis and the Black Mountain. Most visitors drive to these areas, as facilities are limited. Improving facilities and the accessibility to the countryside enables more people to make use of these valuable resources and tourist attractions.

Improve usage - Although there are around 440 hectares of playing pitches in Belfast, only 173 hectares are publicly accessible. Access to the remaining 267 hectares is restricted in some way, for example they may be restricted because they are part of school or university facilities. In addition to council capital investment in playing pitches, we will continue to work with partners to maximise community access to these spaces.

Belfast has a significant area of amenity space. These green parcels of land are designed to improve the attractiveness of housing development and infrastructure. These spaces are usually low in biodiversity value and are costly to maintain. We will continue to work with our partners to identify ways of managing these spaces more efficiently for example wildflower meadow planting or the development of natural play areas.

Improve wildlife connections - As well as providing good connectivity for people to move around, our wildlife also needs safe routes to move across the city. Careful design and management are required when creating new greenways and enhancing the community path network. SP 6 sets out more opportunities for our open space network to support biodiversity.

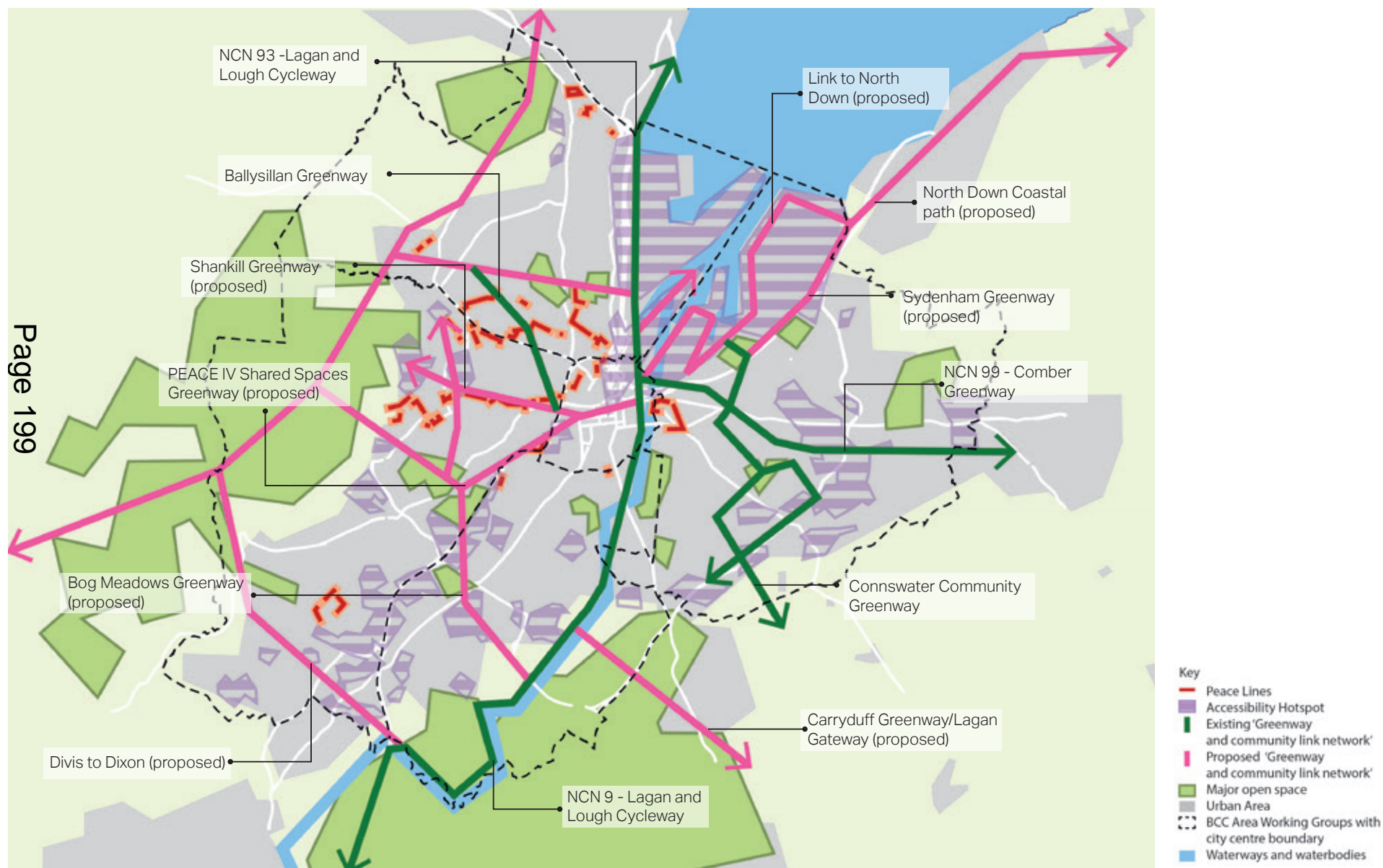


Figure 7. Opportunities for improving connectivity

SP3: Improve health and wellbeing

Our open spaces provide inspiring and pleasant places for active and passive recreation, improving physical health and mental wellbeing for today's sedentary lifestyles. The results of our City Residents' Survey revealed that approximately 50% of respondents used a council park for physical activity. Getting more people to use our open spaces, more often, encourages physical activity and improves health and wellbeing.

Although there has been progress over recent years, significant health inequalities persist in Belfast. Figure 8 shows the health deprivation and disability domain of the Northern Ireland multiple deprivation measures 2017 (NIMDM) for each 'super output area' (SOA) (approximately 2,000 residents). The measures show that many of the worst performing areas are in the west, north and the centre of Belfast (darker colour depicts worse performing areas).

Opportunities for improving health and wellbeing

Target areas of health deprivation – There is a correlation between the level of recreational open space (parks and play areas) and health deprivation. Figure 9 highlights where the areas of highest health deprivation (orange) correlate with areas of the least accessibility to parks and play areas to identify hotspots (red). These red hotspots highlight areas that would benefit from improved access to open space and prioritised health programming in existing spaces. **At a city level these zones are indicative and need to be interpreted in detail at a neighbourhood level.**

Provide and invest in outdoor sports facilities – We are the biggest provider of sports pitches in Belfast with around 130 pitches across 35 locations. These facilities offer opportunities for a variety of sports for example football, Gaelic games, cricket, tennis and bowling. Our parks and open spaces also provide opportunities for informal recreation. We need to continually invest in these facilities to keep them fit for purpose. Our Physical Investment Programme is the primary source of funding for improving these facilities. With the challenge of decreasing levels of capital investment going forward, we will continue to maximise both the use of the existing open space network and funding from other sources.

Promote our open spaces and programmes – Our open spaces and the activities organised within our open spaces (for example Parkrun) help improve health and wellbeing. We will continue to promote our open spaces as places to walk, to play, to meet friends, to sit and relax, to exercise the dog, to appreciate trees, shrubs, flowers, nature and fresh air.

Encourage partnerships – We will continue to work with the health sector and other partners to create active spaces and promote activities for 'at-risk' groups in our parks and open spaces. The Belfast Strategic Partnership (BSP) provides a collaborative approach to addressing life inequalities in Belfast; their 'Get Active Belfast' framework aims to encourage participation in physical activity outdoors.

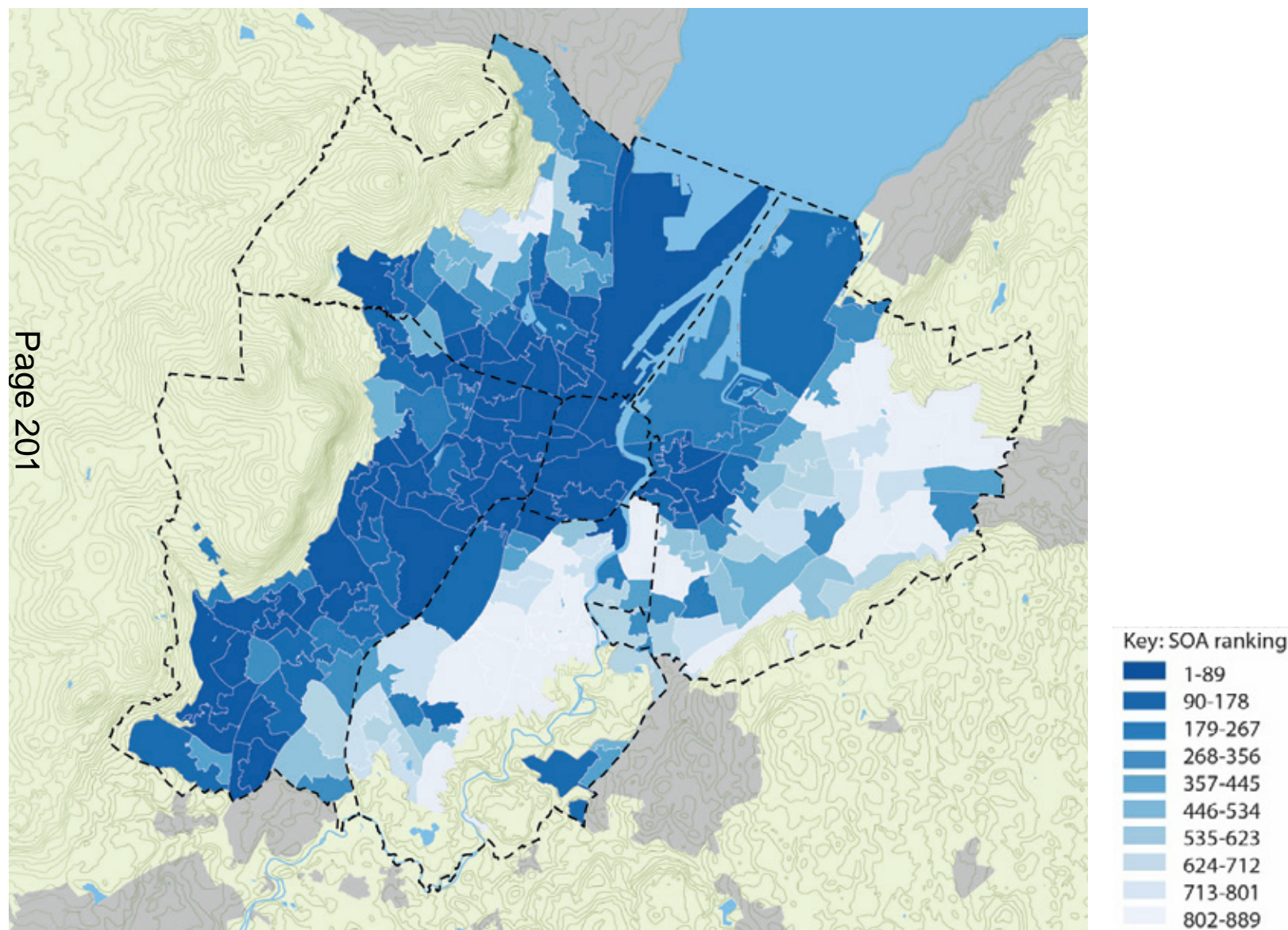


Figure 8. Health deprivation and disability domain (NIMDM 2017)

Growing in our communities – Our allotments and community gardens offer the potential for communities to grow food locally, exercise outdoors and socialise with others. We will continue to deliver our Growing Communities Strategy which aims to provide everyone in Belfast with the opportunity for improved health and wellbeing through involvement in growing activities within their local neighbourhood.

Reduce air pollution – With high concentrations of vehicles and industrial processes, air quality deteriorates in urban areas. In Belfast we have identified four areas where air quality fails to meet EU standards (purple in Figure 9). Within the air quality management areas, we will explore ways to improve air quality for example using open spaces and vegetation to help absorb pollutants.

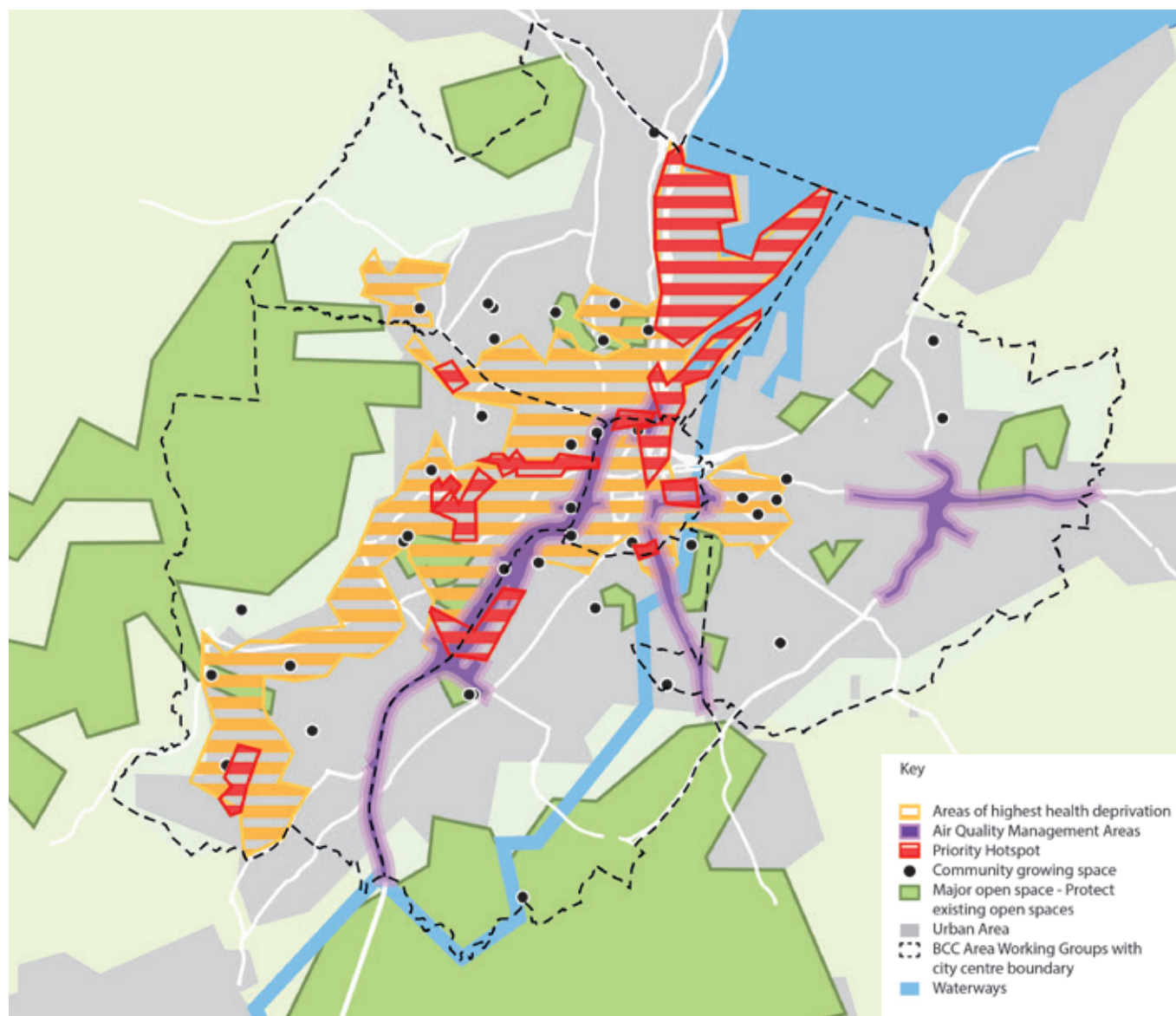


Figure 9. Opportunities for improving health and wellbeing



SP4: Support place-making and enhance the built environment

Our open spaces have an important place-making role. As well as being destinations in their own right, they complement the built environment and provide an important setting for our heritage assets such as Belfast City Hall, Belfast Castle and Malone House. The quality of these spaces can have a direct impact on how our built environment is perceived, which in turn affects our ability to attract investment. Similarly, the provision of high-quality open space is important for attracting tourists and visitors.

At a local level open spaces help to define the character of our neighbourhoods. The quality of amenity space can impact the vibrancy of the local economy and people's perceptions of place. Some of our open spaces also include buildings, which have heritage value.

Opportunities to support place-making and enhance the built environment

Greening the city centre - The Belfast City centre Regeneration and Investment Strategy (2015) recognises that the city centre has limited public green space. It highlights the potential for new green space at Cathedral Gardens. Regenerating the river corridor through the city centre and extending to the Titanic Quarter would enable active travel and animation along the river. There are also opportunities to create a tree-lined urban boulevard, along Great Victoria Street and Dunbar Link. Figure 10 illustrates some of these potential opportunities.

Three Business Improvement Districts (BIDs) have been set up across central Belfast to enhance the environment in the city centre with the aspiration to attract more potential customers. With the power to raise revenue from rates to invest in environmental improvements, they will be important partners in helping to develop a world class city centre.

Improve the image of derelict or vacant spaces - We will seek opportunities to bring derelict buildings in our open spaces back into use for community activities and to provide a better range of facilities. The city has derelict land and a number of vacant plots awaiting development. These spaces can detract from the sense of place and can appear run-down. We will support the greening of these spaces where possible and will work with developers and

partners to create uses for these sites such as pop-up gardens or pocket parks. These uses can become important destinations and help local businesses develop and thrive while wider regeneration occurs.

Activate and animate open spaces - Although there are times when we want to create quiet spaces for reflection, relaxation and biodiversity, spaces with lots of activity tend to draw people in. This can help make spaces feel more sociable, safe and offer potential revenue streams. For example events in our civic spaces can help attract visitors who will also use the local shops; having appropriate facilities and supporting concessions such as cafes and mobile vendors in our parks can help them become centres for community activities.

Value our built heritage - Belfast has a range of local landmarks and open spaces that contain a range of important architectural and historic features that help tell the story about the rich heritage of the city. We will continue to assess the long-term sustainability of buildings for restoration and continue to source funding for open space heritage schemes.

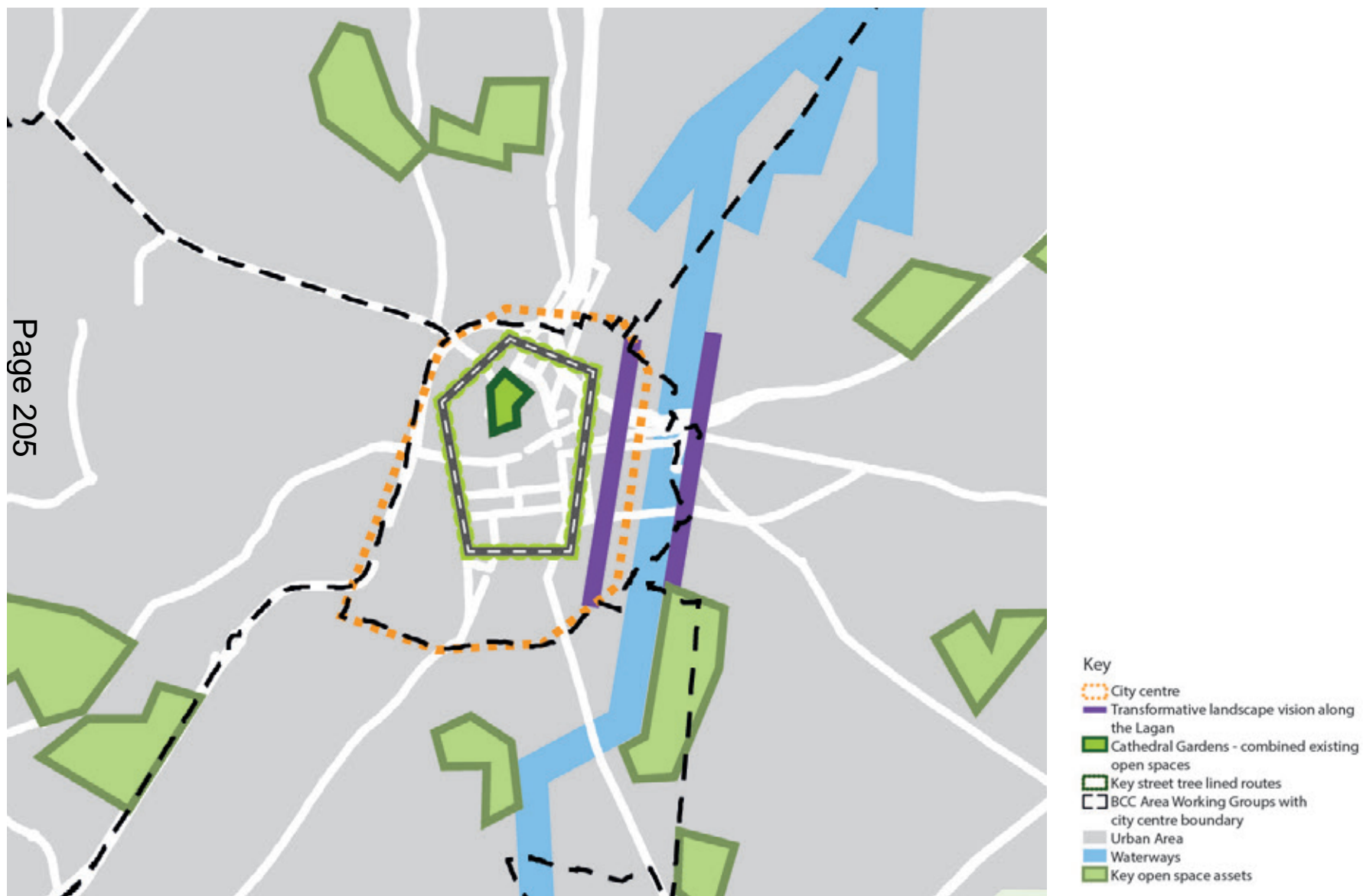


Figure 10. Opportunities to support place-making in Belfast City Centre

SP5: Increase resilience to climate change

Climate change is caused, in part, by burning fossil fuels such as petrol and diesel. Open spaces form part of a green network that encourages sustainable forms of movement, helping to reduce emissions and mitigate impacts that affect climate change. We will also have to adapt to a changing climate featuring more intense winter rainfall, drier summers and unpredictable severe weather. Our open spaces play an important role in helping increase our resilience to these changes.

Opportunities to increase resilience to climate change

Integrate drainage relief into urban design – The most significant change to Belfast's climate is predicted to be an increase in winter rainfall and heavier summer showers. As Belfast is situated on low lying, flood prone land and has a constrained surface water drainage network, the risk of flooding is likely to increase. Figure 11 highlights areas at risk from surface (rainwater) and fluvial (river) flooding and also shows areas of green space across the city.

Rainwater falling on hard urban surfaces runs off quickly and can overwhelm the existing drainage system. This results in either flooding or sewage overflows. Open space can be used to slow down surface water, reducing rates of discharge into our drainage system and reducing flooding risk. As part of the Living with Water Programme, NI Water is working to help reduce these risks and increase capacity in an aging surface water network by increasing space to deal with surges of surface water in existing open spaces. These areas would be allowed to flood safely during heavy rainfall events.

There are also opportunities to introduce sustainable drainage systems (SuDS) into the public realm. Smaller green spaces such as rain gardens and bio-retention tree pits help reduce the force of flood water and remove pollutants. They also help to improve local amenity, maximise water quality and support biodiversity.

Provide storm water storage – Climate change is likely to result in longer spells of drier weather. By collecting and storing rainwater, we have the opportunity to reuse this valuable resource in our open spaces. Through careful selection of plant species and the creation of wetland habitats within open spaces, we could create areas where water is retained longer, helping them to survive through drier summers.

Change management practices and behaviours – We need to consider climate change when managing our open spaces. Warmer winter temperatures will attract more visitors throughout the year and extend the peak season for usage. This will have an impact on lighting, management of paths and other facilities in our open spaces. The types and size of plants and warmer average temperatures are likely to increase numbers of alien and invasive species entering ecosystems. These species can threaten our native flora and fauna by aggressively taking over habitats. We need to be flexible in our management and control of parks and open spaces to make sure we adapt to these changing trends.

Using natural approaches to manage our open spaces (for example wild flower meadow planting) helps reduce fuel emissions associated with mowing. We must ensure that all elements of landscape management are carried out in an environmentally sustainable manner, for example reusing cuttings to create compost and reduce the use of fertilizers.

Protect from extreme weather events – More extreme weather events such as storms and tidal surges are likely to be a result of climate change. Our open spaces can provide protection from these events and tree planting and vegetation will help create shelterbelts.

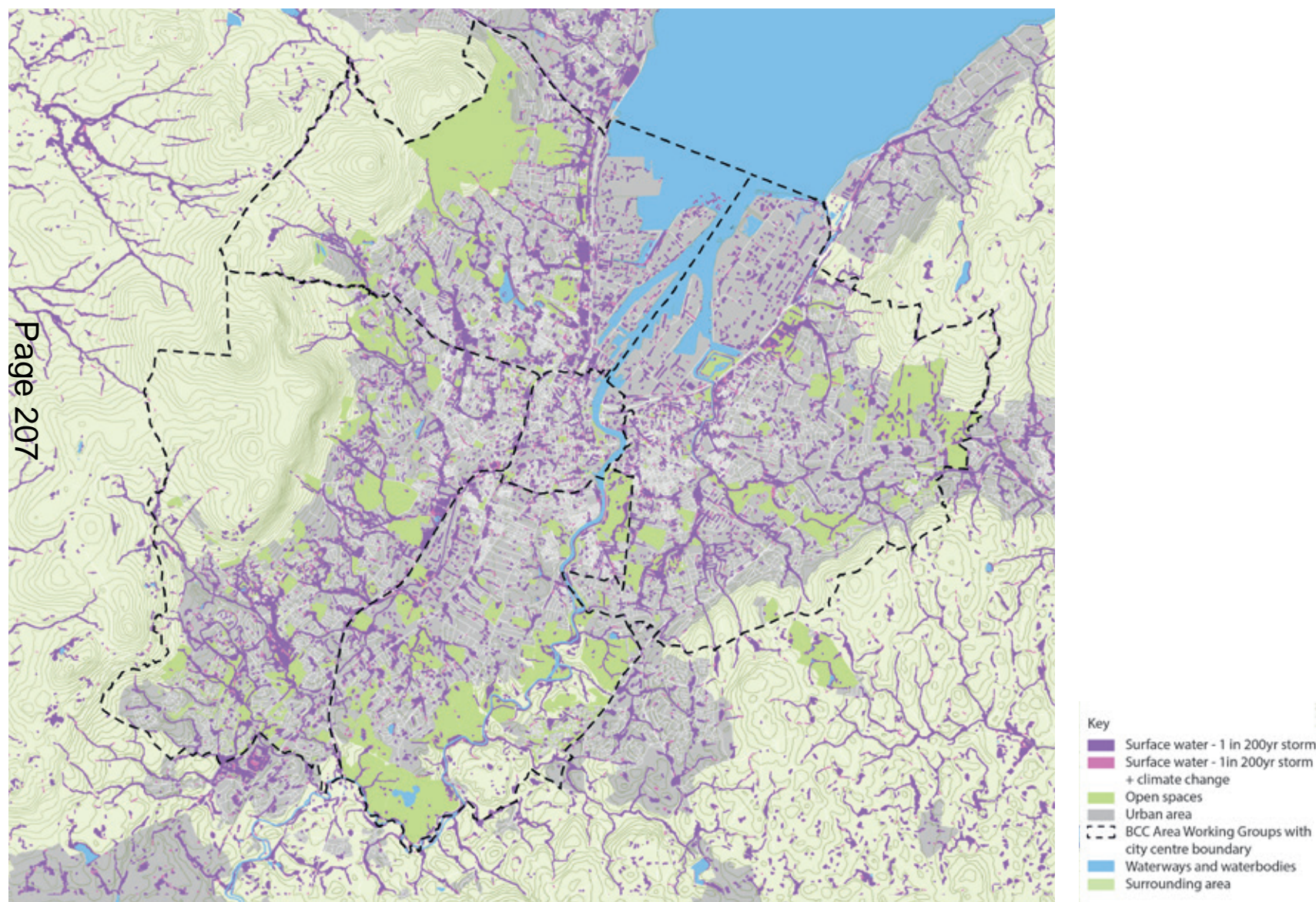


Figure 11. Flood risk and open spaces in Belfast

SP6: Protect and enhance the natural environment

Biodiversity underpins critical 'ecosystem services' which bring us many benefits for example clean air, fresh drinking water and soil. Creating new habitats in Belfast helps support a broader range of species and allows them to move more freely across the city. The Wildlife and Natural Environment (NI) Act 2011 (known as the WANE Act 2011) introduced a statutory duty on all public bodies to further the conservation of biodiversity when exercising any functions. Further information can be found in 'The Biodiversity Duty', DAERA, 2016. The Local Biodiversity Action Plan (LBAP) identifies key priority habitats and species that need protection across the city. This principle focuses on how we use our open spaces to create and enhance habitats and support biodiversity.

Opportunities to enhance the natural environment

Protect and enhance areas of ecological importance

Across Belfast there are significant areas recognised for their biodiversity rich habitats through international, national and local designations. These are illustrated in Figure 12.

International

Parts of Belfast Lough have been protected as part of the European Natura 2000 Network of sites (designated as a RAMSAR under the EU Habitats Regulations and Special Protection Area (SPA) under the EC Birds Directive) due to its high quality marine habitat and wintering bird populations.

RAMSAR and SPA designations will have implications for development and activities that could be considered to have a detrimental impact on the habitats. These areas should be treated with sensitivity and be used to guide the types of development that come forward.

National

Parts of Belfast Lough are also recognised as an Area of Special Scientific Interest (ASSI) for ecological Importance, again due to its marine habitat and importance to wintering birds. There are also ASSI sites located at Craigtlet Woods, Belvoir and Bellevue. The Lagan Valley is designated as an Area of Outstanding Natural Beauty (AONB) and is Northern Ireland's only Regional Park.

Local

Outside of Belfast's urban area there are significant areas of Countryside and Coast Sites of Local Nature Conservation Importance (SLNCl) designations across the Belfast Hills and to the east of city including geodiversity sites, as well as other local nature conservation designations across the city. There are four Local Nature Reserves, Ballyaghagan, Bog Meadows, Hazelwood and Lagan Meadows and a number of habitats including woodland, waterways and grassland that also support biodiversity. It should be noted that smaller non-designated sites and even single trees provide significant wildlife habitats, especially in urban environments where space is limited, as well as improving air quality and the overall amenity value of our urban spaces.

All areas of ecological importance will remain protected and we will continue to work to enhance them. Proposed development close to these sensitive sites should be undertaken with care, ensuring that it does not adversely affect habitats or resident species.

Enhance habitats across our open space network –

Our open spaces provide a number of habitats such as meadows, woodland, waterways, heathland and grassland. Although these habitats are in our open spaces, they do not have formal protection. We must ensure these areas are protected, managed and, where appropriate, extended. As some habitats and species are ecologically sensitive, it is important we manage use appropriately (for example applying restrictions on access or lighting) to make sure these environments are protected.

Enable urban greening – The greening of vacant land provides an opportunity to enhance biodiversity but each site needs to be carefully assessed and appropriate measures put in place. Improving connectivity between green spaces is important in helping species move through the city. By enhancing the ecological value of amenity space by species-rich meadow planting or woodland coppice, we can create a more comprehensive network of habitats. Greening vacant or derelict land and planted SuDs, will enhance and green the public realm.

Manage habitats for biodiversity value – Knowing what we have and increasing our understanding of the natural environment will generate opportunities to enhance it. Appropriate staff training enables better management regimes to be delivered across a range of habitats. We must continue to identify and mitigate risk to the natural environment but also look for opportunities to enhance biodiversity and where appropriate create semi-natural habitats.

Improve interpretation and learning – Access to greenspace and nature is important for people of all ages. Evidence suggests that children and young people have less of a connection with nature than previous generations, resulting in reduced physical and mental wellbeing such as Nature Deficit Disorder¹⁵. We will continue to educate users about responsible use of open space and the habitats and species that thrive there. We will encourage children and families to get outdoors more often to explore nature in our green spaces.

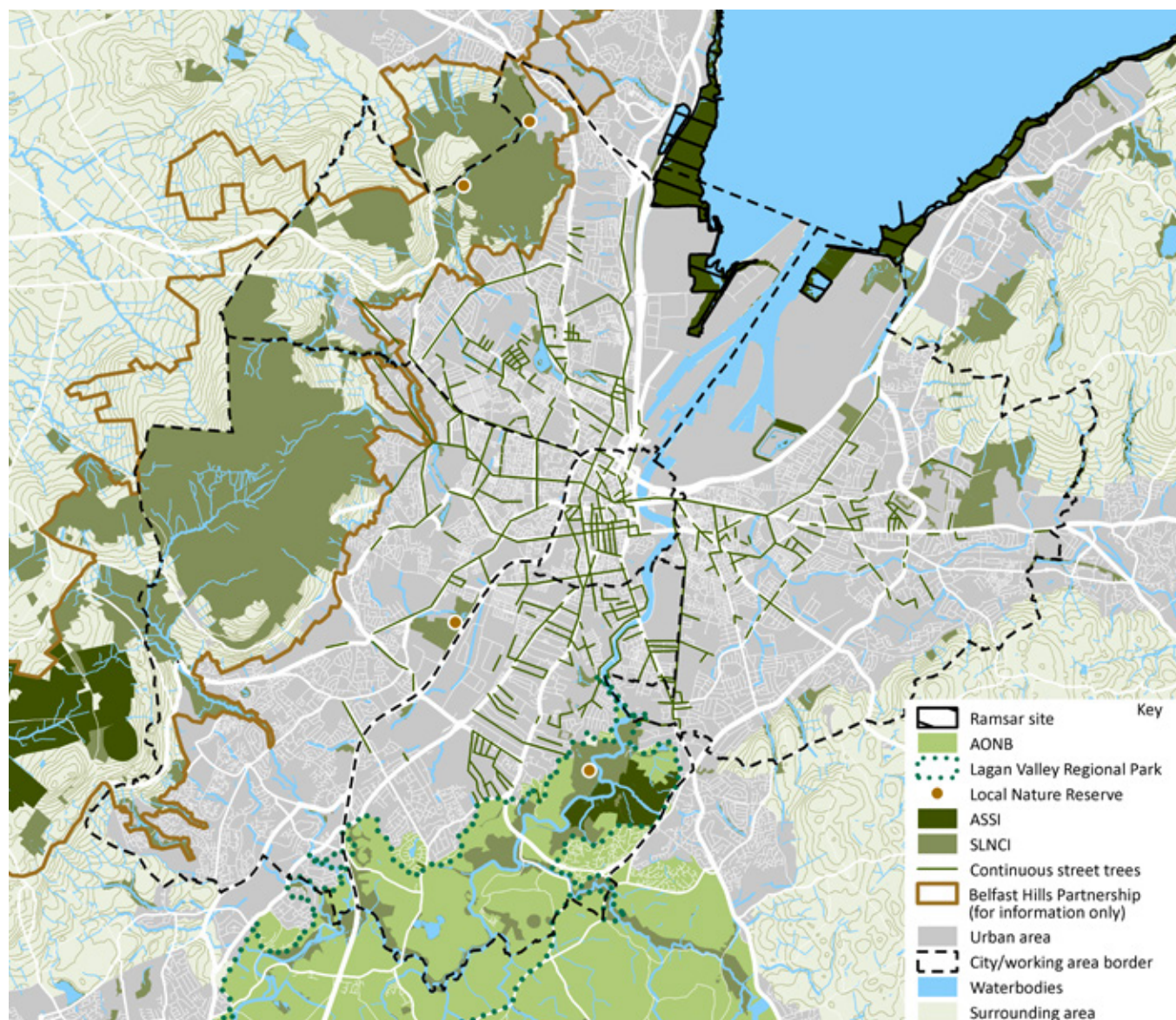


Figure 12. Environmental designations

SP7: Be celebrated and support learning

It is important that our open spaces remain well-used and valued by local communities and that we continue to source funding to enhance these natural assets. Raising awareness of the benefits of open space and educating people about sustainable use is vital, particularly for the next generation of users. Our open spaces offer multiple opportunities to learn about the environment and develop life skills. We will continue to promote the learning potential of our parks and green spaces to as many people as possible.

Opportunities to celebrate and support learning

Create smart open spaces – Technology provides options that can help us to understand how people use our open spaces. Mobile platforms with GPS and social media allow real-time interpretation and education, improving visitor experiences. This technology can also provide information on open space facilities and facilitate direct feedback from users. We will work in partnership with small and medium enterprises (SMEs) and Universities to explore innovative ways to understand usage and the needs of local people.

Support and extend community involvement – There are a significant number of groups for example friends, community groups and user groups helping to sustain the quality of our parks and open spaces. We will continue to engage with users and non-users to help co-design and shape the future of their local places, as they are vital for the continued success of our open spaces.

Encourage outdoor learning – Our parks and open spaces provide a connection to the outdoors. We will continue to work with our partners and the education sector to encourage use of our parks and open spaces as outdoor classrooms to deliver elements of the educational curriculum.

Promote local value and heritage – We provide a diverse programme of events and funding for festivals, competitions and activities across our open space network for example local community events, festivals, outdoor musical performances, guided heritage walks and talks, children's fun days, Belfast Mela, Belfast Vital, Spring Fair and Rose Week. We will continue to promote open spaces as hubs for citywide and local events and activities. Many of our open spaces have significant cultural heritage value and we will continue to promote this.

Promote lifelong learning – There are opportunities for people to help improve their local open spaces. Volunteers help us manage these places and provide opportunities for local people to improve their neighbourhoods, socialise and develop new skills. We will continue to work with our partners to develop volunteering and training programmes that promote lifelong learning.



Making it happen - delivery

Our plan

Through our work to develop this strategy, along with our partners we have agreed a set of headline actions that are currently underway or are planned for the next five years (2019 - 2023). The delivery of the plan will rely on existing budgets or sourcing external and partner funding over the life of the strategy. The headline actions under each of the strategic principles are outlined here:

Page 21 SP1: Provide welcoming shared spaces

Headline actions

- Develop planning policy to protect existing open spaces.
- Identify specific opportunities within neighbourhoods to enhance and improve access to existing open spaces.
- Identify open space creation, enhancement and access improvements to inform Section 76 developer contribution policies and agreements.
- Use the planning process to ensure open spaces are well-designed, incorporate principles of 'Secured by Design' principles and have a long-term management arrangement secured.
- Ensure that new development proposals and regeneration plans contribute to improving our open spaces network (for example North Foreshore, Sirocco Quays).

- Continue to invest in new open space provision where possible across the city to meet growing demands and local needs.
- Work in partnership to encourage the creation of temporary or meanwhile uses of open space across the city.
- Actively support the development of a sustainable approach to the management and promotion of shared spaces.
- Update our bye-laws and improve enforcement within our parks and open spaces.
- Continue to work with the Belfast Policing and Community Safety Partnership and other stakeholders to improve safety in our open spaces.
- Facilitate stronger community involvement in the management and enhancement of open spaces; for example by working in partnership with Friends' groups, volunteers, community groups and user groups.

SP2: Improve connectivity

Headline actions

- Work to improve access and connections to our existing open space network for example the creation of a pedestrian-cycle bridge at the Lagan Gateway and Ormeau Park.
- Work in partnership to help remove or improve access through peace lines (for example Navarra Place).
- Continue to work with partners to support the creation of greenways across the open space network, such as the 'PEACE IV Shared Spaces, Connecting Open Spaces project'
- Work with partners, where appropriate, to develop under-utilised spaces across the city.
- Deliver planned physical, environmental and ecological improvements to the existing greenways network for example Hollywood Arches Greenway's project.
- Develop a strategy to improve legibility of our greenways and community paths across the city, using methods such as consistent design and good signage.

- Improve linkages to the countryside from our open space network and support the creation of better pedestrian-cycle facilities within the countryside around Belfast (for example better public access to the Belfast Hills).
- Promote unique landscapes as destination open spaces, for example Belfast Lough, Lagan Valley Regional Park, Belfast and Castlereagh Hills.
- Work with partners to improve public access to restricted open spaces (dual usage of playing fields).

Identify opportunities to work with partners to improve the functionality of amenity open space.

SP3: Improve health and wellbeing

Headline actions

- Develop an ongoing programme of activity focused on using open spaces to improve health and wellbeing, prioritising efforts in areas of health deprivation with the lowest open space accessibility.
- Identify and create opportunities for natural and informal play.
- Continue to encourage passive recreation by providing appropriate facilities (such as seating areas and shelters) across the open spaces network.
- Continue to maintain, invest and source funding to keep our sports facilities well maintained and affordable, for example physical investment in 3G pitches.
- Continue to encourage active recreation in our open spaces; for example walking, running, cycling, outdoor gyms, growing food and outdoor play.
- Encourage schools to use parks for active recreation and provide greater access to their sports facilities by local communities.
- Continue to work with the health and activity sector to develop programmes in our open spaces for at-risk groups.
- Target urban greening to help improve air quality in the city.

SP4: Support place-making and enhance the built environment

Headline actions

- Work with partners to create more green open space in the city centre, for example pocket parks.
- Encourage developers and partners to create meanwhile open space for sites awaiting redevelopment.
- Work with partners to green derelict land across the city.
- Work with partners to animate our public spaces across the city.
- In partnership continue to plan and fund the restoration of heritage assets in open spaces, for example the City Cemetery.

SP5: Increase resilience to climate change

Headline actions

- Work with the 'Living With Water Programme' (LWWP), a multi-agency initiative headed by the Department for Infrastructure, to identify open spaces that will help manage drainage and reduce flood risk.

Identify ways to store rainwater for reuse in the management of our open spaces.

Develop sustainable management practices in our open spaces for example increase wild flower planting and composting and reduce the use of fertilisers and chemicals.

- Increase tree and shrub planting where appropriate to provide shelter from extreme weather.
- Incorporate an appreciation of climate change risks and opportunities within open space management planning.

SP6: Protect and enhance the natural environment

Headline actions

- Develop planning policies and management practices that protect existing and work to enhance areas of ecological importance, including priority habitats.
- In partnership, support research that prioritises ecological improvements.
- Improve and create new habitats and natural features that enhances native biodiversity, help enable species movement and meet the objectives of the LBAP.
- Identify opportunities to adopt more sustainable land management practices such as planting species rich meadow to reduce mowing or creating woodland coppice.
- Train and upskill staff on habitat management and maintenance regimes.
- Continue to work with our partners to extend and enhance vegetation along the greenway network.
- Manage and control factors affecting habitat management regimes for example invasive alien species, habitat fragmentation, lighting and disturbance.
- Educate users about habitats and species that thrive in our open spaces, for example by developing and promoting eco-trails.

SP7: Be celebrated and support learning

Headline actions

- Work with universities and SMEs to develop solutions to explore innovative ways to understand usage and the needs of local people.
- Continue to provide and fund a range of community events and programmes within our open spaces.
- Continue to work with our partners and the education sector to encourage more outdoor learning.
- Actively promote the range of activities, festivals and events taking place in our open spaces.
- Identify opportunities to increase income generation activities and funding that will help sustain our open spaces network.
- Celebrate the heritage value and culture of our open spaces through the delivery of community events, guided heritage walks and talks and civic celebrations.
- Continue to work with partners to develop volunteering and training programmes that promote lifelong learning.
- Improve engagement and communications with our open space users and non-users.

Funding

We spend around £9.5m per year managing and maintaining our open spaces across the city. Since 2012, along with our partners, we have invested approximately £150m in our open spaces.

Physical Investment Programme – We will continue to invest and regenerate open spaces in our city and neighbourhoods. Key funding streams for the delivery of this programme include our Physical Investment Programme and funding from partners including the Department for Communities (DfC), Department of Justice (DOJ) and Department of Agriculture, Environment and Rural Affairs (DAERA).

Developer Contributions Framework – ‘In accordance with PPS8 Open Space, Sport and Outdoor Recreation, we will ensure that new housing development is supported by appropriate open space infrastructure. Paragraph 5.68 of the SPPS establishes the principle that developers will be ‘...expected to pay for, or contribute to, the cost of infrastructure that would not have been necessary but for the development or which needs to be rescheduled to facilitate the development.’ Normally, developers will be expected to provide the open space on-site as part of the scheme. However, in some circumstances, it may be appropriate for the developer to pay a commuted sum to the council for improving existing open space facilities in the area. Financial contributions will be secured by a planning agreement under Section 76 of the Planning (Northern Ireland) Act 2011. Our Developer Contributions Framework provides further guidance on how and when open space infrastructure should be secured through the planning application process.

Grants and awards – We may secure funding through grant schemes, where we can show that open space initiatives support delivery of priorities set out by external organisations. We acknowledge the positive contribution which major funders have made towards capital investment projects such as the Connswater Community Greenway (Big Lottery Fund), the restoration of the Tropical Ravine in the Botanic Gardens (Heritage Lottery Fund). We have also benefited from the Urban Villages Initiative to improve existing and create new open spaces across the city and PEACE IV funding to develop the ‘Shared Spaces, Connecting Open Spaces project’.

Revenue streams – We will continue to identify more opportunities for increasing income and attracting new revenue streams to help sustain our open spaces. We will continue to facilitate events such as large-scale concerts, encourage smaller commercial concessions and pop-up initiatives and explore sponsorship opportunities.

Volunteers – Local communities provide a valuable resource; offering a wealth of expertise, enthusiasm and commitment in supporting open spaces management. Various groups, for example Friends groups, user groups and management committees have been established, which have increased the number of volunteers helping in our open spaces. Where possible, we will support community groups to source funding for open space improvements, events and programmes in line with the council’s open space strategic principles.

Monitoring and review

This strategy will be delivered with our partners and stakeholders, with the council playing a key leadership and co-ordination role. We will manage and update the database of open spaces by putting in place appropriate mechanisms and standards for collecting and categorising open space data.

Monitoring progress against the headline actions will be an ongoing process. We will review the strategy in 2024 and agree the next phase of actions to be taken forward. Although the strategy sets out what we intend to do over the next five years, some of the actions will be longer term and will be taken forward into the next delivery plan. We also recognise the importance of being flexible and adapting to new challenges and opportunities as they arise.

How we developed the strategy

We began developing the Belfast Open Spaces Strategy in early 2017 when we commissioned AECOM to support the key activities and a baseline study. This strategy was developed with our partners and stakeholders, with the council playing a key leadership and co-ordination role.

Key activities

- In 2017, we set up an internal ‘Strategy Oversight Steering Group’ (made up of inter-departmental representatives) to give oversight and guidance.
- In 2017, we established a ‘Strategy Advisory Group’, with representatives from a range of agencies and organisations across Belfast, to help shape the development of the strategy.

- We then organised a series of combined workshops with the ‘Strategy Advisory Group’ and the ‘Strategy Oversight Steering Group’ at key milestones throughout the strategy process. Information from the workshops was reviewed and agreed by participants.
- In 2019, we undertook a public consultation exercise on the draft strategy. Following analysis of the consultation findings we updated and finalised the strategy.

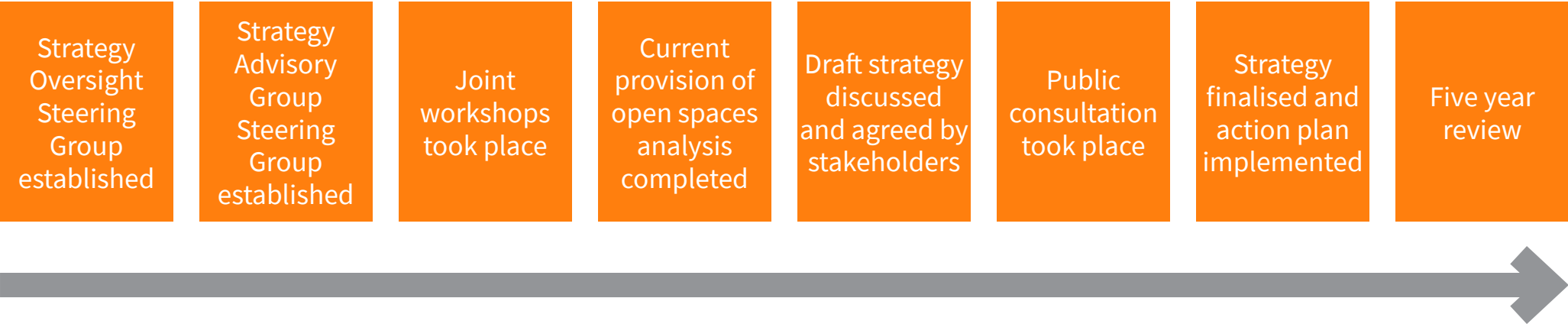
In 2018, we finalised an open space audit, which assessed open space provision, accessibility and future action based on the city’s growth strategy.

We used the Belfast Metropolitan Area Plan (BMAP) open space dataset as a starting point and worked closely with

our partners and stakeholders including the Department for Infrastructure (DfI), Department for Communities (DfC) and NI Housing Executive (NIHE) and the Education Authority to source external open space data sets. We now have a comprehensive database of private and public open spaces across the city that has been categorised using our open space typology.

Where do we go from here?

We will use the open spaces audit to inform area-based working, prioritisation and planning. The diagram below shows the stage we are currently at and summarises the next steps in the process.



Glossary of terms

Anti-social behaviour (ASB)

Area of Special Scientific Interest (ASSI)

Belfast Metropolitan Area Plan (BMAP)

Belfast Metropolitan Urban Area (BMUA)

Belfast Open Spaces Strategy (BOSS)

Business Improvement Districts (BIDs)

Fields in Trust (FiT)

Green and Blue Infrastructure Plan (GBIP)

Invasive alien species (IAS)

Living with Water Programme (LwWP)

Local areas for play (LAPs)

Local Biodiversity Action Plan (LBAP)

Local Development Plan (LDP)

Local equipped areas for play (LEAP)

Local Government Reform (LGR)

Local Nature Reserves (LNR)

Multi use games areas (MUGA)

National Playing Fields Association (NPFA)

Neighbourhood equipped areas for play (NEAP)

Northern Ireland multiple deprivation measures (NIMDM)

Planning Policy Statement (PPS)

Programme for Government (PFG)

Regional Development Strategy (RDS)

Sites of Local Nature Conservation Importance (SLNCI)

Strategic Planning Policy Statement (SPPS)

Super output area (SOA)

Sustainable drainage systems (SuDS)










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City and Neighbourhood Services Department

Belfast City Council
Cecil Ward Building
4-10 Linenhall Street
Belfast
BT2 8BP

-  www.belfastcity.gov.uk/parks
-  parksandleisure@belfastcity.gov.uk
-  028 9032 0202
-  @belfastcc
-  @belfastcitycouncil
-  Belfast City Council



Belfast
City Council

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APPENDIX 2 – BOSS SP HEADLINE ACTIONS

SP1: Provide welcoming shared spaces

Headline actions

- Develop planning policy to protect existing open spaces.
- Identify specific opportunities within neighbourhoods to enhance and improve access to existing open spaces.
- Identify open space creation, enhancement and access improvements to inform Section 76 developer contribution policies and agreements.
- Use the planning process to ensure open spaces are well-designed, incorporate principles of 'Secured by Design' principles and have a long-term management arrangement secured.
- Ensure that new development proposals and regeneration plans contribute to improving our open spaces network (for example North Foreshore, Sirocco Quays).
- Continue to invest in new open space provision where possible across the city to meet growing demands and local needs.
- Work in partnership to encourage the creation of temporary or meanwhile uses of open space across the city.
- Actively support the development of a sustainable approach to the management and promotion of shared spaces.
- Update our bye-laws and improve enforcement within our parks and open spaces.
- Continue to work with the Belfast Policing and Community Safety Partnership and other stakeholders to improve safety in our open spaces.
- Facilitate stronger community involvement in the management and enhancement of open spaces; for example by working in partnership with Friends' groups, volunteers, community groups and user groups.

SP2: Improve connectivity

Headline actions

- Work to improve access and connections to our existing open space network for example the creation of a pedestrian-cycle bridge at the Lagan Gateway and Ormeau Park.
- Work in partnership to help remove or improve access through peace lines (for example Navarra Place).
- Continue to work with partners to support the creation of greenways across the open space network, such as the 'PEACE IV Shared Spaces, Connecting Open Spaces project'
- Work with partners, where appropriate, to develop under-utilised spaces across the city.
- Deliver planned physical, environmental and ecological improvements to the existing greenways network for example Holywood Arches Greenway's project.
- Develop a strategy to improve legibility of our greenways and community paths across the city, using methods such as consistent design and good signage.
- Improve linkages to the countryside from our open space network and support the creation of better pedestrian-cycle facilities within the countryside around Belfast (for example better public access to the Belfast Hills).
- Promote unique landscapes as destination open spaces for example Belfast Lough, Lagan Valley Regional Park, Belfast and Castlereagh Hills.
- Work with partners to improve public access to restricted open spaces (dual usage of playing fields).
- Identify opportunities to work with partners to improve the functionality of amenity open space.

SP3: Improve health and wellbeing

Headline actions

- Develop an ongoing programme of activity focused on using open spaces to improve health and wellbeing, prioritising efforts in areas of health deprivation with the lowest open space accessibility.
- Identify and create opportunities for natural and informal play.
- Continue to encourage passive recreation by providing appropriate facilities (such as seating areas and shelters) across the open spaces network.
- Continue to maintain, invest and source funding to keep our sports facilities well maintained and affordable, for example physical investment in 3G pitches.
- Continue to encourage active recreation in our open spaces; for example walking, running, cycling, outdoor gyms, growing food and outdoor play.
- Encourage schools to use parks for active recreation and provide greater access to their sports facilities by local communities.
- Continue to work with the health and activity sector to develop programmes in our open spaces for at-risk groups.
- Target urban greening to help improve air quality in the city.

SP4: Support place-making and enhance the built environment

Headline actions

- Work with partners to create more green open space in the city centre, for example pocket parks.
- Encourage developers and partners to create meanwhile open space for sites awaiting redevelopment.
- Work with partners to green derelict land across the city.
- Work with partners to animate our public spaces across the city.
- In partnership continue to plan and fund the restoration of heritage assets in open spaces, for example the City Cemetery.

SP5: Increase resilience to climate change

Headline actions

- Work with Northern Ireland Water's 'Living with Water Programme' (LwWP) to identify open spaces that will help manage drainage and reduce flood risk.
- Identify ways to store rainwater for reuse in the management of our open spaces.
- Develop sustainable management practices in our open spaces for example increase wild flower planting and composting and reduce the use of fertilisers and chemicals.
- Increase tree and shrub planting where appropriate to provide shelter from extreme weather.
- Incorporate an appreciation of climate change risks and opportunities within open space management planning.

SP6: Protect and enhance the natural environment

Headline actions

- Develop planning policies and management practices that protect existing and work to enhance areas of ecological importance, including priority habitats.
- In partnership, support research that prioritises ecological improvements.
- Improve and create new habitats and natural features that enhances native biodiversity, help enable species movement and meet the objectives of the LBAP.
- Identify opportunities to adopt more sustainable land management practices such as planting species rich meadow to reduce mowing or creating woodland coppice.
- Train and upskill staff on habitat management and maintenance regimes.
- Continue to work with our partners to extend and enhance vegetation along the greenway network.
- Manage and control factors affecting habitat management regimes for example invasive alien species, habitat fragmentation, lighting and disturbance.
- Educate users about habitats and species that thrive in our open spaces, for example by developing and promoting eco-trails.

SP7: Be celebrated and support learning

Headline actions

- Work with universities and SMEs to develop solutions to explore innovative ways to understand usage and the needs of local people.
- Continue to provide and fund a range of community events and programmes within our open spaces.
- Continue to work with our partners and the education sector to encourage more outdoor learning.
- Actively promote the range of activities, festivals and events taking place in our open spaces.
- Identify opportunities to increase income generation activities and funding that will help sustain our open spaces network.
- Celebrate the heritage value and culture of our open spaces through the delivery of community events, guided heritage walks and talks and civic celebrations.
- Continue to work with partners to develop volunteering and training programmes that promote lifelong learning.
- Improve engagement and communications with our open space users and non-users.



Subject:	Belfast Healthy Cities
Date:	Tuesday 8 th June 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Kelly Gilliland, 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	At the meeting of the People and Communities Committee on 9 th March 2021, Members agreed to extend the current partnership agreement with Belfast Healthy Cities, until 30 th September 2021 to allow for the submission of the application for Phase VII of the WHO European Healthy Cities Network and the completion of a value for money review of partnership arrangements with Belfast Healthy Cities, who facilitate the city's membership of the WHO European Healthy Cities Network.
1.2	On 21 st May BHC notified us that the City of Belfast has been designated in Phase VII thereby extended to April 2026. Council Officers will work with BHC to ensure that the certificate is formally signed off by the incoming Lord Mayor over the coming weeks.

1.3	Belfast City Council are one of four core funders of Belfast Healthy Cities along with the Public Health Agency, Belfast Health and Social Care Trust and Northern Ireland Housing Executive. Belfast's membership to the WHO European Healthy Cities Network is facilitated by Belfast Healthy Cities. The CEOs of each of the four funding bodies will receive a copy of the final designation letter.
1.4	The value for money review draft report has now been issued, on 6 th May 2021, to the core funding partners of Belfast Healthy Cities for review and comment. Overall, the findings outlined in the initial draft report do indicate that the collective investment in Belfast Healthy Cities represents 'good value for money' based on the returns the city receives in both profile and practice.
1.5	Further engagement within, and across, each of the core funding partners is now required to collectively examine the content of the draft report. As such, and to ensure continuity of delivery during this period, it is recommended the current partnership agreement with Belfast Healthy Cities is extended until 31 st March 2022.
2.0	Recommendations
2.1	<p>The Members of the Committee are asked to recommend that, in accordance with the Council decision of 4th May 2021, the Chief Executive exercise her delegated authority to:</p> <ul style="list-style-type: none"> • Note the content of the report • Agree to extend the current partnership agreement with Belfast Healthy Cities to 31st March 2022 • Agree to a further report being brought to committee in the Autumn which will detail both the findings and recommendations from the final version of the value for money review as well as the four core funding partners plans for acting on/responding to the findings/recommendations.
3.0	Main report
	<u>Key Issues</u>
3.1	At the meeting of the People and Communities Committee on 4 th June 2019, Members agreed that a review be undertaken of the Department's ongoing partnership agreements with a focus on alignment with the Belfast Agenda and value for money. Included within this review was the partnership agreement with Belfast Healthy Cities.
3.2	Further to this, at the meeting of the People and Communities Committee on 9 th March 2021, Members approved an extension of the current partnership agreement with Belfast

	<p>Healthy Cities, until 30th September 2021 to allow for the completion of both the value for money review of partnership arrangements with Belfast Healthy Cities and to facilitate the application process for Phase VII of the WHO European Healthy Cities Network.</p>
3.3	<p>Belfast's membership to the WHO European Healthy Cities Network is facilitated by Belfast Healthy Cities, who are an independent partnership organisation, recognised as having charitable status by The Charity Commission for Northern Ireland. BHC is governed by a Board of Directors, elected annually and representing the public, university, voluntary and community sectors and funded by a range of partners including Council, Public Health Agency (PHA), Belfast Health and Social Care Trust (BHSCT) and the Northern Ireland Housing Executive (NIHE).</p>
3.4	<p>Independent consultancy support, working on behalf of the funders collectively, has led on the value for money review process. The timeframe for the review has been negatively impacted by the Covid-19 pandemic, particularly given the high levels of engagement required to undertake such work. As such, the timescale for the completion of the review was extended to allow for full involvement from key stakeholders.</p>
3.5	<p>A draft report has recently been submitted to the core funding partners. The draft report indicates the current level of collective funding to Belfast Healthy Cities represents good value for money based on the existing work programme and the return received to the city in both profile (regionally and internationally) and practice (partnership and action). Further engagement is now required within each of the core funding organisations, across the funding partnership, and with Belfast Healthy Cities.</p>
3.6	<p>A report will be brought back to committee in Autumn 2021, providing greater detail on the review findings and recommendations, as well as the core funding partners collective response in terms of how these should/could be addressed going forward for members consideration and approval.</p>
3.7	<p>In the interim, members are asked to approve an extension of the current partnership agreement with Belfast Healthy Cities, until 31st March 2022, to allow for further discussion and engagement to take place and to ensure continuity of service during this time.</p>

3.8	<p><u>Financial & Resource Implications</u></p> <p>Extending the current partnership agreement with Belfast Healthy Cities as recommended, would have a financial implication of £40,647. This has been included within the revenue estimates for 2021/22 and does not represent any growth.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p>
3.9	<p>There are no Equality or Good Relations Implications and no Rural Needs Assessment required for the recommendations outlined above.</p>
4.0	<p>Appendices – Documents Attached</p>
	<p>None</p>



Subject:	Naming of New Park at Colin
Date:	Tuesday 8 th June 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Alice McGlone, Neighbourhood Integration Manager, West Belfast Alistair Charles, Project Sponsor

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 checked="" type="checkbox"/>

1.0	Purpose of Report
1.1	The purpose of the report is to update Members on the outcome of the naming process for the new park at Colin, which was previously reported to People and Communities Committee on 13 th April 2021.
2.0	Recommendations
2.1	<p>The Members of the Committee are asked to recommend that, in accordance with the Council decision of 4th May 2021, the Chief Executive exercise her delegated authority to:</p> <ul style="list-style-type: none"> Note the findings of the public consultation exercise on the name of the new park at Colin;

	<ul style="list-style-type: none"> • Approve the name of the new park in Colin as Páirc Nua Chollann
3.0	Main Report
	<u>Background</u>
3.1	The Council are currently working in partnership with the Urban Villages Initiative to develop a large scale 'destination' park in the Colin area of the city. The new park, which represents an investment of over £4m in the area, will include a new play park, pump track, education zone and extensive new pathways.
3.2	<p>Work on the park is currently well underway and completion is currently planned for early July this year. An initial engagement exercise was carried out with key local stakeholders to develop several options for a name for the new park. The initial, agreed options were:</p> <ul style="list-style-type: none"> • Páirc Nua Colin • Leap of Faith Park • Sherwood Park • Colin New Park
3.3	<p>Following some additional discussion with the Council's Irish Language Officer and other key stakeholders, it was agreed to look at adding a further option to this list:</p> <ul style="list-style-type: none"> • Páirc Nua Chollann
3.4	This option represents the 'full' Irish translation of the name 'Colin New Park', rather than the English/Irish hybrid version represented by option 1 above. The addition of this fifth option received support from all the key stakeholders initially engaged to develop the original four options. The addition of this fifth option was subsequently endorsed at last month's P&C Committee meeting.
3.5	<p>The Council used its new online consultation platform, "Your Say" to consult on the five options above between 10th May and 31st May 2021. Hard copy questionnaires were also distributed to key community stakeholders. The consultation received a very strong uptake with over 900 responses received, the vast majority of which came from respondents within the BT17 postcode area. The results of the consultation are set out below:</p> <ul style="list-style-type: none"> • Páirc Nua Chollann- 42.4% (317 responses) • Leap of Faith Park- 23.8% (208) • Páirc Nua Colin- 15.7% (137)

	<ul style="list-style-type: none"> • Sherwood Park- 12.7% (111) • Colin New Park- 5.4% (47)
3.6	In line with the Council's naming policy, Committee approval is now being sought to select 'Páirc Nua Chollann' as the name for the new park in Colin.
3.7	<p>Financial & Resource Implications</p> <p>All costs associated with the naming / signage requirements will be picked up as part of the overall capital costs associated with each site.</p>
3.9	<p>Equality or Good Relations Implications/Rural Needs Assessment</p> <p>The naming process followed was be in line with the Council's naming policy and the chosen name will be screened in line with the Council's equality process.</p>
4.0	Appendices – Documents Attached
	None

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