



Subject:	Update on City protection Role in Planning.
Date:	13 th January 2026
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Is this report restricted?

Yes

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No

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1.0	Purpose of Report or Summary of main Issues
1.1	At its meeting on the 4 th November 2025, the People and Communities Committee agreed that an update report outlining the current staffing and capacity levels relating to Environmental Health Officers, particularly regarding roles associated with responding to planning consultations, and that the report would include reference to the role of Building Control in enforcement matters.
1.2	This report examines the role, resources and capacity of the Environmental Protection and Scientific Unit Teams within City Services in providing expert technical environmental advice to planning applications for new development. This support assists the Council's Planning Service in meeting its statutory responsibilities for the delivery of planning services and aids the Department for Infrastructure (DfI) in carrying out its responsibilities for regionally strategic planning services.
2.0	Recommendations
2.1	The Committee is asked to note the report.
3.0	Key Findings
3.1	<p><u>Background</u></p> <p>The Environmental Protection and the Scientific Teams primary role is to respond to requests for service and carry out wide range of investigations related to pollution, noise and air, and contaminated land as well as carry out assessments of air quality of the city and pollution permitting for business including monitoring at the North foreshore site. We also have statutory consultation responsibility with the Department for Infrastructure (DfI) in relation to assessing planning applications of strategic development. In relation to the internal advice to colleagues in Planning, this input to the planning process can be beneficial in assessing impacts to human health and reduces the potential for statutory nuisance complaints, as the necessary controls/mitigation are applied through planning conditions at the developmental stage.</p>

3.2	The Council's Planning Service aims to provide a planning decision, on average, within 15 weeks for local plans and within 30 weeks for major plans, in accordance with statutory targets set by DfI. When the Planning Service publicises planning applications and issues consultations to statutory and non-statutory consultees, there is a 21 day (3 week) target in which to respond. Meeting consultation targets is fundamental to meeting the overall determination timescales.
3.3	When determining an application for planning permission, a range of material planning considerations must be taken into account; the full list can be found at https://www.belfastcity.gov.uk/Documents/Planning-application-process-guide#material
3.4	The Planning Service will internally consult with the Environmental Protection (EP)/Scientific Teams where they seek our advice on the applicants/or their appointed specialist consultants own assessment of the impact of the development.
3.5	Planning colleagues then send the consultants reports to EP for comment. The EP/Scientific Teams will review the reports and make advisory comments back to colleagues. Where a risk to human health or amenity has been identified by the consultants, the Environmental Protection Unit/Scientific Officers will advise on the suitability of controls proposed by the developer to prevent adverse impact and subsequently provide the Planning Service with suggested planning conditions based on those controls.
	<p><u>Main report</u></p> <p><u>Current planning resource within the Environmental Protection and the Scientific Team/s</u></p>
3.6	The EP Team is first and foremost responsible for responding to all statutory nuisance complaints/requests for service related to Environmental Protection legislation and investigating noise complaints arising from commercial and industrial premises. The team are also required to provide formal responses to DfI for strategic planning consultations. The team then has a long-established role to assist and provide an internal advisory service to Planning colleagues. In 2022, following an assessment of workflows and patterns and resources, it was concluded that planning matters would be more effectively managed within a team of officers assigned to focus on this work. In the previous model, all officers within the Public Health & Housing Team and the EP Team, were assigned planning cases. However, differing levels of expertise often affected their core responsibilities, leading to delays in the overall delivery of our Core Statutory Responsibilities.
3.7	<p>The new approach allows both teams to concentrate on defined functions, enabling the EP Team to build on the specialist knowledge required for planning consultations and responses. At its inception, the team comprised of two Senior Environmental Health Officers (SEHOs) and four Environmental Health Officers (EHOs). However, in response to increasing workload demands, the volume of consultations in the system and the complexity of cases, 2 x posts have since been reallocated from the Public Health & Housing Unit, in addition a 4th SEHO was recruited in 2025, supported through growth in the 2025/26 rate setting. The team structure is currently:</p> <ul style="list-style-type: none"> • 4 Senior Environmental Health Officers (SEHOs) and • 5 Environmental Health Officers (EHOs)
3.8	The Scientific Team also provide expert guidance on the environmental acceptability of proposed planning applications, including considerations of noise, land contamination and ambient air quality using the following resources:

- 1 Contaminated Land Officer
- 1 Environmental Noise Officer and
- 1 Air Quality Officer

Environmental Protection Team Resourcing and Challenges

- 3.9 Over the past three years, the EP Team has faced significant resourcing challenges due to the departure of experienced staff to other roles, as well as absences related to career breaks, maternity leave, parental leave, and sickness. Temporary vacancies have been difficult to fill, primarily due to a shortage of EHOs and the complex nature of the work allowing the officers to focus only on this as a specialist area.
- 3.10 These staffing issues have directly impacted the team's ability to respond to planning consultations in a timely manner. This was particularly evident during the summer of 2024, when the team experienced a 43% vacancy rate. At that time, there were 160 planning consultations in the system, with a backlog of 94 unallocated plans resulting in a 16 week backlog, based on the available resources.
- 3.11 Assessing planning applications requires officers to possess substantial technical knowledge and competence, which can only be developed through ongoing training and mentorship from senior staff. The loss of experienced officers due to normal turnover e.g. maternity or career leave combined with unfilled vacancies, has hindered the team's ability to build capacity across key technical areas such as noise, contaminated land, odour, lighting, and air quality. This has further delayed the turnaround of planning consultation responses.
- 3.12 Additionally, securing temporary cover for posts vacated due to maternity or career breaks has proven difficult. Once appointed, most new officers require at least a year of training before they are equipped to assess and respond to planning consultations, which further extends response times.
- 3.13 The reduction in skilled staff has placed additional pressures on SEHOs and the Scientific Team Officer, who are also responsible for reviewing and assessing the DfI's regionally significant planning applications. These planning applications are often complex and require a high level of scrutiny and technical expertise to determine appropriate control measures to protect local amenity. This alongside our EP response and investigation to complaints remain our core priority area.
- 3.14 The nature of development sites under consideration within the Council area has also increased the demand for specialist knowledge. Many are brownfield sites or involve mixed residential and commercial developments in close proximity, necessitating robust controls to protect future occupants from potential environmental impacts.
- 3.15 Assessing planning applications usually requires the review of multiple technical reports, relating to noise, contaminated land, odour, lighting, and ambient air quality. These reports can be highly complex and lengthy, some extending to thousands of pages which may contribute to delays, particularly when the accuracy and adequacy of the information are lacking. Poor quality submissions can occur and these significantly increase workloads, as officers often need to liaise with consultants to resolve technical issues. This process can lead to multiple rounds of re-consultation before a final response and recommended conditions can be issued to the Planning Service.
- 3.16 In addition, officers support additional work streams associated with planning work such as preparing for planning appeals, contributing towards the development of planning policy or guidance documents, Local Development Plan and requests to attend the planning committee for certain planning applications under consideration.

Service Improvement Measures

- 3.17 Since Covid there has been an ongoing challenge internally with a backlog of plans in the EH system at one point reaching 125 unallocated cases and it was recognised that the creation of a new team alone would not resolve the issue. Consequently, a service process review was undertaken in collaboration with colleagues from the Planning Service to develop a programme of interventions designed to streamline processes, improve response times and reduce the backlog of plans within the system.
- 3.18 In 2021, the City Services and Planning Service management teams began working collaboratively to reduce the number of planning consultations referred to the EP Team. At that time, the Planning Service was issuing approximately 60–70 plans per month to City Services (total of 878 plans) for review and assessment, in fact more than we have capacity to support. Adopting a risk-based approach, it was agreed that the Planning Service would consult only on specific categories of plans where potential environmental impacts required assessment and the application of conditions to mitigate the effects of new development.
- 3.19 Since the implementation of a range of service improvements in 2023, the number of unallocated plans has fallen from on average of 125 to 40. This reduction equates to a backlog of approximately eight weeks, compared with the previous 16 weeks backlog. Whilst this is a significant improvement, taking eight weeks to allocate a case to an EHO will exceed the 3 weeks consultation response target. Members are also advised that a CNS Department growth bid in 2026/27 for additional resources of 2 EHO's within the departmental establishment has been suggested. This has the potential to further reduce the backlog and improve turnaround times.
- 3.20 The following collaborative service improvements and interventions have been implemented and include for example;
- Workload Prioritisation – clearer separation of planning and noise complaint responsibilities, ensuring resources are directed efficiently.
 - Performance Monitoring – regular management reviews to track consultation response rates, backlog levels, and service delivery outcomes.
 - Strengthened Management Structure – SEHOs assigned supervisory and mentoring responsibilities for EHOs.
 - Onboarding and Training – structured induction process for officers new to the role.
 - Guidance Development for Officers– creation of a comprehensive document to assist officers in understanding environmental elements within the planning process.
 - Guidance Development for Consultants – to improve the quality of technical noise reports submitted by consultants which allows officers to makes timely assessments and decisions, guidance is available on the Council's [Environmental Protection Advice Note 1 \(EPAN 1\)](#).
 - Application Streamlining – specific categories of planning applications have been streamlined (e.g. hot food takeaways, housing developments) by reducing the requirement for technical reports and applying model conditions.
 - Model Conditions – developed for noise, odour, and artificial lighting, complementing existing contaminated land and air quality conditions.
 - Concise Consultation Responses – streamlined consultation responses to improve clarity and efficiency.
 - Regular Technical Team Meetings – for training, support and consistency.
 - Targeted Allocation – improved allocation to reduce the backlog of unassigned plans and shorten response times by assigning consultations based on case complexity, officer competency, and the Planning Service's priorities.
 - Application Sifting – closer review to identify consultations that can be withdrawn.
 - Quarterly Meetings – with the Planning Service to review and improve overall provision.

	<ul style="list-style-type: none"> Fortnightly Meetings – with Planning Management to review cases, expedite advice, agree priority plans, and identify further service improvements.
3.21	<p>It should also be noted that following consultation, the Planning Service has introduced a statutory Validation Checklist which is intended to improve the quality of applications and supporting information entering the Planning System. The checklist stipulates where supporting information is required and will therefore ensure that EH can be consulted as quickly in the process as possible. By stipulating what supporting information is required at submission of a planning application, the checklist should also go some way to ensure the quality of supporting information, reducing the need for further information requests, as a result of insufficient information, re-consultations and re-assessments.</p> <p><u>Internal Service Level Agreement (SLA) Development</u></p>
3.22	<p>Officers are currently developing a Service Level Agreement (SLA) to provide the Planning Service with clear guidance on the scope, minimum standards, constraints, performance expectations, and extent of services to be delivered by the Environmental Protection Unit and Scientific Teams. The SLA will define the capacity of these teams to manage a specified number of planning applications in line with available resources.</p>
3.23	<p>This agreement will specifically cover the environmental assessment of planning applications for developments within the Belfast City Council area, ensuring consistency, transparency, and accountability in service provision.</p>
3.24	<p>Following implementation of the SLA, its effectiveness will be reviewed and evaluated. Consideration will also be given to the development of additional performance indicators to help manage service demand and ensure continued alignment with emerging expectations and priorities.</p>
3.25	<p>Both City Services and the Planning Service remain committed to building on the progress achieved to date, driving forward service improvements that will underpin timely and effective planning decisions for the benefit of the city.</p> <p><u>Building Control Service - out of hours dangerous structure inspections</u></p>
3.26	<p>The Building Control (BC) Service is responsible for inspecting and taking enforcement action on dangerous structures. At times this includes requests to inspect potentially dangerous structures out of normal working hours. These requests can come from the emergency services, for example, and are mainly captured through the City and Neighbourhood Services emergency phone. The BC Service has a number of technical staff members who volunteer to be contacted by the emergency phone operator and are willing to respond on site.</p>
3.27	<p>Staff get paid overtime each time they respond, however they are not obliged to respond, and receive no remuneration for being on the call out list. In seeking a more robust approach to these out of hours inspections, a request was put to Continuous Improvement asking that this issue be considered. For example, the possibility of an on-call type allowance to be paid to technical staff who would be available to respond on a rota basis. This proposal is similar to what happens in other jurisdictions and would give greater assurance that staff will be available to respond and acknowledge the on-call nature of the duty.</p>
3.28	<p>It is understood that this issue is being considered during Stage 3 of the Pay and Grading Review.</p>
3.29	<p>The Service also plans ahead for specific storm events to seek additional volunteers to assist at these times.</p>

	<u>Financial & Resource Implications</u> 3.30 Members are also advised that a CNS Department growth bid in 2026/27 for additional resources to help further reduce the backlog and improve turnaround times has been suggested. <u>Equality or Good Relations Implications/Rural Needs Assessment</u>
3.31	N/A
4.0	Appendices
4.1	N/A