

Appendix A - DAERA Environment Strategy Consultation Questions and Proposed Council Responses.

General Comment.

Belfast City Council welcomes the commitment contained within the consultation document to an all-encompassing Environment Strategy that recognises the scale and range of environment-related challenges across Northern Ireland. The council would however, strongly encourage the development of a Northern Ireland wide Climate Adaptation and Mitigation Plan, which would complement plans at a city level, and which would aim to deliver the principles set out in a future Environment Strategy.

Belfast City Council considers climate resilience (mitigation and adaptation) to be a core priority, and has declared a Climate Emergency. An All-Party Working Group of Elected Members advise and steer the council's strategic direction in relation to sustainability and climate action. Under city-wide Community Planning structures, the council has established a Resilience and Sustainability Board, which brings together community planning partners and other stakeholders from across the city to plan climate mitigation and adaptation measures. Our 'Living Here' Board, brings together agencies focused on a wide range of public facing services, which support and enable a positive environment for the city's residents, including measures on ambient air quality. Furthermore, our 'Growing the Economy and City Development' Board is taking a collaborative approach to work on sustainable transport. The council therefore has an important role in convening and enabling city-wide, cross-agency work to ensure a thriving and sustainable city, and is keen to support and help deliver the objectives in a future Environment Strategy. The comments set out in this response are therefore aimed at positively supporting the development of a future Environment Strategy.

Q1: Do you agree that the Environment Strategy should sit alongside existing Executive-endorsed strategies, such as the Sustainable Development, Public Health and Economic Strategies?

The council would consider that in order to give the environment appropriate emphasis and protection, and mindful of the data that has been presented as part of the DAERA consultation document demonstrating the direction of recent environmental performance for Northern Ireland, the Environment Strategy should sit alongside existing Executive-endorsed strategies, such as the Sustainable Development, Public Health and Economic Strategies, etc.

The relationship between a future Environment Strategy and the existing Sustainable Development Strategy is critical. It may be advisable therefore to identify key areas of complementarity early on, and the new Environment Strategy should aim to provide fresh impetus to the principles of Sustainable Development across government.

The UN Sustainable Development Goals (SDGs) are a globally recognised framework for the development of high-level cross government strategies. As a signatory to the SDGs, it is advisable for government Departments across the UK, including the Devolved Regions, to use the SDGs to inform their strategies. The council would recommend this approach for development of the Environment Strategy.

The council further considers that the Environment Strategy should be underpinned by appropriate supporting and enabling legislation. Specific consideration should be given to the introduction of an Environment Bill for Northern Ireland so as to provide the Environment Strategy with a binding and legal footing. A failure to provide an appropriate legal underpinning will likely mean that the Strategy lacks '*teeth*' and remains largely ineffective, alongside a host of other similar governmental strategies such as the Northern Ireland Sustainable Development and Biodiversity Strategies.

The council would note however, that in terms of the Strategy Scope, DAERA has identified that a number of these high-level, Executive-endorsed Strategies may themselves directly affect the environment or be influenced by it, including for example, the Sustainable Development Strategy, Public Health Strategy, draft Industrial Strategy, Economic Strategy and the Regional Development

Strategy. It is noted that a number of these Strategies were developed some time ago and the council would therefore recommend that these Strategies should be updated or augmented alongside the process of the developing an Environment Strategy in order to ensure a consistent and concurrent direction of environmental protection.

Whilst the council considers that the Environment Strategy should sit alongside the other Executive endorsed strategies, the council also considers that there is a pressing need to develop a 'Green New Deal' for Northern Ireland that can straddle environmental and economic development objectives. The council would therefore recommend that government should revisit the detailed proposals for a Green New Deal, which focussed on the retrofit of homes to an advanced low carbon standard. The Green New Deal plan was developed in partnership with a coalition of public, private and community sectors and had support from the construction sector and finance institutions.

In addition, the council would highlight that it has recently declared a climate emergency and has established an eight member All Party Working Group on Climate Crisis in order to drive a new environmental resilience framework in the city. In terms of the climate agenda, the council would emphasise that:

- The impact of climate change and environmental sustainability issues dominate the global political and business agenda. The evidence base from the IPCC confirms that we have a 12-year window to address this issue, before catastrophic climate change severely threatens the life supporting systems we rely on, bringing into stark relief the absolute necessity to act urgently.
- Nowhere is this challenge starker than in NI, a region still 90% dependant on imported fossil fuel for primary energy demand and at the 'end of the pipe' for fossil fuel supplies. If this energy security position does not change dramatically, we will find ourselves in an increasingly vulnerable position, locked into an expensive, high carbon and uncompetitive economy for years to come.

Q2: Do you agree that these broad environmental areas are appropriate for the Environment Strategy?

The council considers that at the very least, the proposed environmental areas are appropriate for the Environment Strategy. However, and specifically:

- In terms of climate change, the council would highlight that mitigation and adaptation have been considered as part of the development of the council's Local Development Plan for the city and in terms of land use planning. Furthermore, the council has commenced work to develop a comprehensive climate adaptation and mitigation plan, which will apply corporately. It is also working in partnership across the city to develop a collaborative plan at a city-wide level. In doing so, it has joined the Place Based Climate Action Network (P-CAN), working with cities elsewhere in the UK, and has commissioned a 'Mini Stern' review, to provide us with an economic analysis of decarbonisation. It is the council's view that a similar approach is necessary at a central government level, to measure the scale and nature of carbon emissions, and to understand the cost and economic benefits of reduction. This science based approach should drive future targets to decarbonise.
- The Strategy makes no reference to the June 2019 change in UK law to commit the UK to bring all greenhouse gas emissions to net zero by 2050, and in fact continues to refer to previous targets of at least 80% reduction from 1990 levels. Meeting the 2050 target will require significant investment, strategic planning and collaboration between central and local government. As such, the council believes that the Strategy should include a methodology for setting targets for decarbonisation, and that it should refer to the 2050 target as one of the six 'Draft Outcomes'.
- The council does not however agree with the statement on page 25 which advises that Northern Ireland is not formally part of the recent UK Committee on Climate Change report. The report 'Net Zero: The UK's contribution to stopping global warming', is clear on page 13, that 'Northern

Ireland does not currently have its own long-term target for emissions, but is included within UK targets.'

- The council would also highlight that the areas of climate change, environmental quality and the built environment are of particular relevance to the council's Building Control functions. Building Control have advised that although the attractiveness of neighbourhoods and the quality of the built environment, dilapidation and neglect have been included within the Environmental Quality (Air, Water and Neighbourhood) area, it would be Building Control's view that these matters may sit better within the area dealing with the Built Environment.
- With regard to the natural environment and landscapes, the council would agree that this should be included within the Strategy, given recent reports on the very significant loss of biodiversity across the UK. Moreover, the council's draft Belfast Green and Blue Infrastructure Plan and Open Spaces Strategy also recognises the importance of the natural environment in providing ecosystem services.
- The council would seek clarification however on why ecosystems and ecosystem services have been placed within the Environmental Prosperity theme, whereas biodiversity has been placed within the Environmental Quality theme, as denoted in Section 8 Strategic Themes. It is considered that this approach fails to recognise the inherent assumption that environmental quality underpins ecosystem services. The council would consider that there should be an understanding that we need to invest in the quality of our natural assets and stocks so as to protect and enhance the benefits (ecosystem services) that we receive from the environment. It is considered that this investment process should take a long term perspective and approach.
- The council would consider that ambient air quality is of the utmost importance for the city, particularly in terms of public health and the potential for inner city communities and road transport corridors to be the most severely affected. The council is aware that DAERA is presently developing a Northern Ireland Air Quality Strategy (referred to in Annex B of the Environment Strategy document) and the council would advise that it will provide detailed technical air quality comments during the consultation into that Strategy document. The council would nevertheless highlight that four Air Quality Management Areas remain across the city for modelled and monitored exceedences of the nitrogen dioxide annual mean objectives and limit values. These AQMAs have been designated along arterial transport routes and source apportionment has determined that the exceedences within the AQMAs arise principally from road transport emissions. The council would therefore emphasise the need to address nitrogen dioxide emissions across the city through a transition towards more sustainable modes of transport for the city. The council would also highlight the need for Environment and Air Quality Strategies to consider emerging pollutants of concern, including fine particulate matter (PM_{2.5}).
- The council would also consider however, that the other local / neighbourhood issues that have been identified for action are of significant importance and so they should be addressed separately so as not to diminish their importance but also so as to not undermine the strategic importance of ambient air and water quality issues. The council welcomes the inclusion of Neighbourhood Environmental Quality, under the broad Environmental Quality theme. It is considered that this fits well with the council's Community Plan, the Belfast Agenda and with the proposed outcome that Belfast will be a vibrant, attractive, connected and environmentally sustainable city through maximising the benefit of our natural and built environment.
- For the built environment, the council would consider that whilst the various topic areas represent important issues, they are more likely to be detailed matters to be addressed through local strategies; in particular Local Development Plans, etc. The council nevertheless considers that the Environment Strategy should acknowledge and highlight the importance of these matters, at a Northern Ireland wide level.

Q3: As described below, do you agree that these are appropriate strategic themes for the Environment Strategy? If “No”, what alternative or additional themes/issues would you like to see in the strategy?

Yes

Q4: Do you have any comments on what specific issues should be included under a proposed Environmental Engagement strategic theme?

The council would highlight that environmental education and engagement is extremely important for all citizens, at all ages and for agencies so that they have greater awareness of the value of the environment and nature and of individuals' and organisations' roles in maintaining its critical life-sustaining benefits.

This has been demonstrated, for example, through our successful behavioural change Neighbourhood Quality campaigns, which reinforce the consequence of littering or failing to pick up after your dog, including raising the awareness of the £80 fixed penalty notice. External evaluation of the campaign has indicated that 93% of respondents are now aware of the fine associated with littering.

In terms of environmental engagement, the council would therefore recommend that DAERA should link the Environmental Engagement strategic theme to education and to the Department of Education's strategies and initiatives, with particular reference to Science, Technology, Engineering and Mathematics (STEM) based subjects.

Q5: Do you have any comments on what specific issues should be included under a proposed Environmental Prosperity strategic theme?

The DAERA comment that *'there is ample research evidence that most people see the natural environment as having intrinsic value'* links to the council's previous comments about ecosystem services and the concept of natural capital. Whilst a relatively new concept, the council considers that natural capital is an important means of ensuring the protection of our natural environment. The council would therefore contend that the Environment Strategy should seek to address this concept and embed it into future decision-making.

The document does not sufficiently recognise the extent of the climate threat as the biggest environmental and economic risk facing Northern Ireland. It therefore misses an opportunity to address this threat with the level of urgency required. In a region abundant in wind, wave, tidal, biomass and biogas reserves, the decarbonisation of the electricity, transport, and the heat sectors presents an enormous opportunity to avail of those technologies at scale to drive an advanced low carbon sector. The final strategy should include a bigger focus on how decarbonisation can be enabled in Northern Ireland by attracting inward investment to generate wealth, enhance the skill base and provide a pipeline of skills for the new green economy. A comprehensive economic analysis of decarbonisation should be undertaken and should drive the region's Economic Strategy, as well as its Environmental Strategy. The document requires significant strengthening in this area if Northern Ireland is to gain competitive advantage and transition to a low-carbon economy.

The council would query however, if there is a specific drive towards investing in emerging sectors of environmentally friendly technology / renewables that are not explicitly detailed within the Strategy. If not, it would be beneficial to see consideration given to these sectors, rather than to just already profitable, but not necessarily wholly conducive to environmental health sectors listed within this theme, e.g. tourism, agri-business, etc.

Q6: Do you have any comments on what specific issues should be included under a proposed Environmental Efficiency strategic theme?

The council considers that climate change must be addressed as a matter of urgency, and that addressing climate change must encompass environment efficiency and carbon reduction, etc.

In relation to 'resource efficiency', the circular economy is mentioned with a view to achieving a circular economy through the application of the waste hierarchy. It is considered however, that there is little detail on how a local authority, for example, might be incentivised to promote prevention of generation and the reuse of materials over concepts detailed further down the waste hierarchy pyramid such as recycling. Under current provisions, NIEA establishes local authority targets for the reduction of landfilling and for recycling. Whilst it is clear that local authorities will need to have a key part in helping to increase resource efficiency, the targets that have been presently set may conflict with circular economy aspirations and objectives.

The council would highlight that the Building Regulations are crucial in ensuring that new buildings are energy efficient and that the energy efficiency of existing buildings is improved whenever building works are carried out. Within Northern Ireland however, the Building Regulations are currently lagging behind those in the rest of the UK and Ireland, in terms of energy efficiency. The council would recommend that this issue should be urgently addressed.

It is considered that future construction, renovation and alteration of buildings could be regulated through amended Building Regulations to improve thermal performance and efficiency, to reduce energy consumption and carbon emissions, and to drive renewable forms of energy, in order to promote a low carbon economy and ensure the efficient use of resources. Accordingly, it is considered that the use of low or zero carbon or renewable energy sources on new buildings should be regulated, and encouraged on existing buildings, alongside thermal insulation.

Amended Building Regulations could also include additional requirements to provide resilience to climate change, e.g. increasing the sizing of rainwater goods; better consideration of over-heating due to solar-gain / shading requirements; reducing water usage through rainwater harvesting and the use of brown water and; taking account of increased wind loadings, etc. Building Regulations could also assist with flood resilience in terms of drainage, rainwater attenuation, use of permeable surfaces, etc.

It is considered that robust regulation, clear technical guidance and the demarcation of enforcement responsibilities is required to ensure measures required by any statutory agency can be appropriately designed, approved, checked and enforced. Accordingly, there should be clearly defined linkages between agencies and their policies and legislation. In addition, the increased remit and complexity of Building Regulations would require amended fees legislation in order to ensure adequate resource for robust enforcement.

In terms of the Circular Economy and Sustainable Sources, Building Control would recommend regulation of the manufacture of materials from recyclable or sustainable sources; regulation of new homes to be '*lifetime homes*', with associated design guidance, and with increased provision for cycle storage, drying rooms, electric car charging points, etc. and features from the Code for Sustainable Homes.

The document should reference the government's '*Road to Zero Strategy*', which is a comprehensive plan for the decarbonisation of the transport sector throughout the UK. This strategy accelerates the development of the local electric vehicle market and associated charging infrastructure. It also encourages the hydrogen transport sector and provision of hydrogen refuelling facilities. These new technologies will substantially drive down emissions in the sector. The fast adoption of new smart and digital technology in the transport / energy / renewable energy nexus is transforming the transport sector to a cleaner and more efficient model. The decarbonisation of the transport sector in cities will have a transformative impact on both carbon emissions and ambient air quality, and therefore should be central to any future Environment Strategy.

Q7: Do you have any comments on what specific issues should be included under a proposed Environmental Quality strategic theme?

As has been highlighted previously, there are a wide range of issues detailed under the environmental quality heading, some of which are best addressed at local level, whilst others are clearly of a Northern Ireland wide strategic importance. The council would consider that the Environment Strategy should make mention of all of the suggested issues, but maintain the strategic significance of Northern Ireland wide issues, such as water, air quality and biodiversity, etc.

With regard to biodiversity, the council would wish to highlight that the biodiversity indicator, '*percentage of protected area under favourable management*', as detailed on page 12 of the Environmental Strategy consultation document, is only a quantitative indicator and will not monitor condition and trends. In addition, it is considered that this indicator is insufficient as 'designated sites' cover only a small percentage of Northern Ireland; for example ASSIs cover only 7%. It is recommended that the Environment Strategy should develop a useful indicator to monitor biodiversity status and trends. The starting point for this is to invest in baseline biodiversity data. A current key issue is the lack of appropriate data to monitor environmental change, particularly for biodiversity.

For clarity and to emphasise the need to address biodiversity issues, the State of Nature Report 2019 key findings included that:

- By 2020 the UK will not meet most of the Convention on Biological Diversity Action Targets.
- The abundance and distribution of the UK's species has, on average, declined since 1970 and this decline has continued in the most recent decade. Prior to 1970, the UK's wildlife had already been depleted.
- Across NI, 11% of species are threatened with extinction.

As highlighted previously, Northern Ireland does not yet have a Litter Strategy, unlike the Litter Strategy for England 2017. We would welcome the introduction of a Northern Ireland Litter Strategy to ensure this issue, which impacts on all areas of our communities, is addressed. The council has adopted a three pronged approach to improving Neighbourhood Environmental Quality; behavioural change campaigns including education and outreach programmes, enhanced enforcement and an improved cleaning regime. During 2018 and 2019, the council issued over 1,800 fixed penalty notices for littering and waste. We therefore see enforcement as a key element in bringing about behavioural change and as such, it should be included as an issue within the Environmental Quality strategic theme of the Strategy. In addition, in dealing with the issue of Graffiti, which is now endemic in our towns and cities and has a profound effect on our Neighbourhood Environmental Quality, the current enforcement powers for local authorities are considered to be insufficient. We would welcome greater powers to require landowners to remove graffiti from their properties.

From a Building Control perspective, the council would highlight that it enforces legislation to deal with dangerous structures and tackle dilapidations. The council has however long been lobbying for more modern, robust legislation to enable more action to be taken to address these common problems. It is considered that the legislation within Northern Ireland is insufficient in relation to comprehensively dealing with dangerous structures and dilapidated buildings. Accordingly, new legislation needs to be brought forward to allow local councils to deal with these matter more easily and efficiently. It is further considered that a central government fund should be established to allow councils to draw down finances, where the council is forced to remove or make safe a dilapidated building by default. Local councils should also have the power to take ownership of vacant derelict properties and bring them back to use when no owner can be found. Legislation needs to support local councils to be proactive in this regard.

Q8: What do you see as the main environmental governance priorities for Northern Ireland?

In terms of environmental governance, the council would note DAERA's comment that this issue has generated a long-running debate which has focused to a large extent on whether Northern Ireland should have an independent Environmental Protection Agency. Whilst there is support for an independent Agency, DAERA has highlighted that responses to the most recent discussion document on environmental governance indicated a widely held view amongst stakeholders that the focus should be on environmental outcomes, rather than simply changing delivery structures. The council would agree that the emphasis should be on outcomes as they are most important. It is considered however that clear ownership and good governance are crucial in ensuring effective leadership and proper and consistent control and delivery. Whether these objectives are delivered via an independent agency or not, the environmental governance and delivery mechanisms must fulfil these roles. The Environment Strategy should establish a clear environmental vision for Northern Ireland and the subsequent policy development should flow from this vision, supported by better regulations and a clearer demarcation of enforcement responsibilities but with better co-operation between all of the organisations or agencies involved.

It is additionally considered that greater resources need to be dedicated to tracing and prosecuting waste crimes. The potential punishment for dumping or illegal landfill operations, etc. must exceed the potential profit to the individual or organisations that commit these offences.

It is noted that there is a potential 'grey area' between household and commercial waste if for example household waste is collected by a commercial operator. The council would query if a plan exists to regulate such operators so that they must apply the waste hierarchy and adhere to existing regulations such as the need to be a registered carrier of waste.

DAERA have highlighted that of particular relevance to the Environment Strategy are proposals that:

- a) The OEP's duties should include monitoring and reporting on the UK Government's progress against its 25-year plan for the environment; and that
- b) The UK Government's 25 year plan for the environment should be given a statutory footing.

The council would consider that these plans must have a statutory footing if they are to deliver real and effective outcomes. A statutory footing will also enable them to be material in decision-making.

Q9: Do you agree that these are appropriate draft outcomes for the Environment Strategy? If "No", what alternative or additional outcomes would you like to see?

No, the draft outcomes listed would be improved by a focus on targets to incentivise actions of stakeholders such as local authorities.

Specifically, the council would suggest that:

- The draft outcome for achieving zero waste and a well-developed circular economy could be expanded to include reference to the UK's 2050 target for net zero emissions
- In relation to biodiversity loss halted, ecosystems in a healthy state, and well managed landscapes, the draft outcome should be expanded to include measures to restore loss
- The draft outcome, we achieve sustainable consumption and production on land and sea could include a reference to the efficient and sustainable use of land.
- In terms of climate change, the council considers that the opportunity to draft a new Environment Strategy for Northern Ireland as a once in a generation opportunity to develop a transformative and ambitious sustainable energy and environmental strategy. The council would therefore recommend that the Strategy should also set ambitious targets for Northern Ireland to reach net zero greenhouse gas emissions by 2050 in line with the current UK government legislation and interim milestones and targets to 2030 and 2040 in line with European and Paris Agreement objectives.

- By setting ambitious carbon budgets, in all sectors, including particularly the public, transport and agricultural sectors, we will ensure that the Northern Ireland environment is protected and enhanced, whilst we continue to benefit from clean, green sustainable and smart economic growth, whilst avoiding catastrophic climate change.
- It is disappointing to note that this consultation document fails to recognise climate change as the biggest environmental threat facing Northern Ireland, and similarly that it fails to address it with the urgency required. In a region abundant in wind, wave, tidal, biomass and biogas reserves, the decarbonisation of the electricity, transport, and heat sectors represents an enormous opportunity to avail of these technologies, at a scale which could enable and drive an advanced low carbon sector.
- Moreover, the current Environmental Strategy document contains little reference as to how this can be enabled for Northern Ireland and the council therefore considers that the Strategy document, in its current form has failed to recognise the significant opportunity to attract inward investment generate wealth, enhance the skill base and provide a pipeline of skills for a new green economy.
- In relation to the transport sector, the council considers that the Strategy document also fails to reference the UK Road to Zero Strategy, a comprehensive plan for the decarbonisation of the transport sector throughout the UK. This UK Strategy is designed to accelerate the development of the local electric vehicle market and associated charging infrastructure. It also encourages development of the hydrogen transport sector and the provision of hydrogen refuelling facilities. The council considers that these new technologies will substantially drive down emissions in the Transport sector.
- The council considers that decarbonisation of the transport sector in cities will have a transformative beneficial impact on carbon emissions and air quality and should therefore be central to any future Environment Strategy. It is estimated that transport makes up at least 30% of carbon emissions in cities like Belfast and 23% regionally. The fast adoption of new smart and digital technologies in the transport / energy and renewable energy sectors is already transforming the transport sector into a cleaner and more efficient model.
- The council would highlight that there is little reference to the contents of the NI Sustainable Development Strategy, the associated Statutory Duty and the guidance issued to local Authorities and other public bodies on their compliance with the duty. The sustainable development guidance issued by the Northern Ireland government in 2014 emphasises the need to prioritise the carbon issue. It also recommends that public bodies put in place appropriate governance and administrative mechanisms to ensure the environmental sustainability issues are addressed.

Q10: What are your big ideas for the future protection and enhancement of the environment?

- The council would strongly encourage the development of specific program and targets to enhance and support the circular economy by creating an environment that is supportive of emerging technologies which increase the efficient use of resources.
- The council is keen to pursue a programme of work, which delivers a more resourceful Belfast and shows how resource management can contribute to the Circular Economy. In this regard, the creation of support schemes to develop this embryonic market and support for those organisations that can deliver social and economic benefits alongside positive environmental outcomes would be welcome.
- The proposed Environmental Strategy should also seek to integrate with other resource management policy initiatives such as; Deposit Return Scheme, Extended Producer Responsibility and the Plastics Tax proposed by HMRC.

- From a waste perspective, the council would also support the introduction of a mandatory electronic waste tracking system along with greater enforcement of existing waste legislation to increase the chances of 'bad actors' being caught. Punishments should fit the crime in terms of financial or other penalties, in terms of the potential profits versus environmental harm.
- The council considers that there should be a focus on transitioning from single-occupancy vehicles by developing infrastructure for a robust, well connected country-wide public transport system; ideally powered with sustainable fuel sources. The council would contend that there needs to be an increasing availability of renewable energy sources for homes (e.g. wind, solar).
- The council also considers that there needs to be a greater focus on conservation, including legislating to protect the existing natural environment from unchecked development, and working with conservationists to rehabilitate damaged habitats and ecosystem services.
- From a Building Control perspective, the council would recommend a greater incentive for increasing the energy efficiency of existing buildings. It is considered that the present Energy Performance of Buildings legislation is limited as there is no established acceptable lower threshold energy rating for a property. Moreover, Northern Ireland should consider a lower limit for properties that are for rental.
- It is also considered that more funding should be put into schemes that tackle fuel poverty, such as the Affordable Warmth Scheme, and that deep-retrofit energy efficiency schemes should be encouraged.
- It is finally considered that a government wide climate adaptation and mitigation plan is urgently needed to prepare and protect the region from the impacts of climate change and to bring together partners from central and local government and from other sectors to work together to decarbonise by 2050 at the latest. Furthermore the Strategy should include a reference for the need for it to be placed on a statutory footing, through the passage of appropriate environmental legislation.

Q11: Do you have any other comments or contributions

None.