

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

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

Background

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

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

Question Responses

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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