

**BELFAST CITY COUNCIL**

**REVIEW & EVALUATION OF BONFIRE  
MANAGEMENT PROGRAMME 2014**

**DRAFT EXECUTIVE SUMMARY**

**PRESENTED TO GOODRELATIONS  
PARTNERSHIP 9<sup>th</sup> March 2015**

**Draft**

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## INTRODUCTION

Lindsay Advisory, on behalf of Belfast City Council, has undertaken a review of the 2014 Bonfire Management Programme (BMP). The review provides, among other things, an overview of the programme since its inception; with due consideration of the statistical data available to demonstrate its impact. In addition, the report sets out a comprehensive assessment of the 2014 programme; with recommendations for the future, taking account of the strategic context of the programme and the imminent local government reform.

The following executive summary gives an overview of the findings of this review and proposes a recommended option on the way forward for any future programme. Briefly this report will outline;

- The background to bonfires
- The history of the BMP
- Out-turns of the 2014 programme
- Continuing rationale for the programme
- Recommendations
- Future Delivery options

In preparing this report, the evaluation team consulted with a broad representation of over 50 stakeholders; namely members of the Good Relations Partnership; members of the Inter Agency Working Group, which included representatives of the NIEA, NIHE, DSD, NIFRS, PSNI, Community Sector and various services within Council i.e. Parks and Leisure, Good Relations and community safety / PCSP; a selection of participant groups and a selection of representatives from Castlereagh Community Culture Forum.

## BACKGROUND TO BONFIRES

Bonfires, have played a part in the culture of both communities in Northern Ireland for a number of years but in very differing contexts. An awareness, and recognition, of the differing origins and roles of bonfires is key to informing any programme that seeks to achieve outcomes related to them.

In determining the future shape of any bonfire management programme, Council and other decision makers need to be cognizant of the legislation around bonfires including related powers of enforcement. The following provides an overview of the legislative mechanisms available, though it must be pointed at an early stage that there are limitations with regards to legislation available regarding bonfires.

There are no specific laws that prohibit bonfires; provided the landowner's consent has been granted. However, there are laws governing the nuisance bonfires have the potential to create. The referred "nuisance" element encapsulates a plethora of social and environmental issues, with the key focus of media attention being on the burning of tyres, flags and emblems; with adverse press also arising from the practice of fly tipping on traditional bonfire sites.

Some of the key pieces of legislation that relate to bonfires include the following;

- **Belfast City Council** - Action regarding smoke from bonfires is governed by Statutory Nuisance procedures under the Clean Neighbourhoods and Environment (NI) Act 2011.
- **Northern Ireland Environment Agency** - Article 4 of the Waste and Contaminated Land (NI) Order 1997 governs the offences of:
  - Depositing controlled waste without a licence; and

Treating, keeping or disposing (burning is considered a treating/ disposing activity) of controlled waste in a manner likely to cause environmental pollution or harm to human health

- **PSNI** - Undesirable behaviour typically associated with bonfires is generally captured under the guise of anti-social legislation.

In addition, undesirable behaviour relates to the burning of flags and/or posters of persons. Existing legislation and ACPO guidance defines any incident or crime which is perceived by anyone as having a hate motivation to be a hate crime or incident. Consultation with the PSNI indicates that the most applicable criminal legislation to address this kind of behaviour sits within existing public order legislation under Article 9 of the Public Order (Northern Ireland) Order; To use this legislation there is a need to prove that there was an intention to stir up hatred or arouse fear.

- **Transport NI** - There is also legislation relating specifically to roads, such as provisions under the Roads (NI) Order 1993 which encompasses causing damage to roads, obstruction of roads, lighting fires on roads, depositing things on roads, etc.

The key point of note in relation to the enforcement of cited legislation is that bonfires are intrinsically related to, and expressions of, cultural identity in Northern Ireland; which impacts on the relevant statutory body's approach to enforcement of legislation. This is due to the very real fear of public order issues and the safety of staff tasked with, for example, removing bonfire materials.

#### **HISTORY OF BONFIRE MANAGEMENT PROGRAMME (2005 TO 2013)**

The BMP was initially developed primarily to address environmental issues around bonfires i.e. early collection of materials, fly tipping and widespread burning of tyres; with a secondary focus on addressing the anti-social and cross community issues that sometimes arise as a result of bonfires including the burning of flags and emblems. At the time of inception there were only eight bonfires, all of which were in the Protestant Unionist Loyalist (PUL) community, on the programme; which represented less than 10% of all Belfast-based bonfires at the time (111).

Since this pilot programme, over the past ten years, the programme has been expanded to include CNR communities (where there is a risk of a bonfire and community consensus to remove); with the number of participatory groups on the programme rising to 51 in 2013; a level that was achieved progressively from a value of 15 (2008) following the introduction of PEACE III funding. In the timeframe that the level of participatory groups increased, the corresponding number of total bonfires dropped from 111 in 2004 to 68 in 2013.

There is no direct evidence to suggest that the BMP has a direct correlation on the reduction in the number of bonfires, there are many other factors which may contribute to this such as ongoing cross community work, regeneration of open spaces and less support for bonfires in some areas (in both communities). However, it is worth noting that the work of the BMP, though not setting out to reduce the number of bonfires as a key objective, has had a positive role to play in the reduction of the size and number of bonfires through offering communities an alternative to celebrating their culture.

Year	Estimated Belfast Bonfires	PUL Participatory Bonfires/ Groups	CNR Participatory Groups
2004	111	8	0
2005	108	6	0
2006	95	11	1
2007	92	14	1
2008	84	25	4
2009	84	33	2
2010	77	42	5
2011	79	42	7
2012	72	42 (of which 38 held bonfire or beacon)	8
2013	68	43 (of which 37 held bonfire or beacon)	8

Following the pilot in 2005 (when a grant of £2,500 was available) funding to groups has consistently been between £1,500 and £1,600. In addition grants of between £500 and £700 were issued to “developmental groups”.

The format of the programme, in terms of its focus on facilitated engagement and capacity building/ training, has varied throughout the history e.g. Participants Forum between 2006 and 2008 and Cultural Networks between 2010 and 2013.

The programme has consistently had positive evaluations with respect to its positive influence in the key areas of:

- *Environment* – where there have been “significant improvements” with regard to the widespread reduction in the practice of keeping cleaner bonfires, as evidenced by reduced fly tipping and shorter collection periods.
- *Capacity Building & Community Development* – where effective peer support and mentoring has helped address low social capital, particularly amongst the grassroots PUL communities.
- *Good Relations* – as well as fewer bonfires burning flags and emblems, there has been a reduction in anti-social behaviour and interface issues related to bonfires.
- *Cultural Traditions* – in addition to the development of smaller, cleaner bonfires, there has been more inclusive celebrations that are considered to be “family friendly” and openly attended by local ethnic minorities.

#### OUTTURNS FOR 2014 BMP

- It is not entirely clear how many bonfires took place across Belfast in 2014. Best estimates suggest that there were 73 bonfires in Belfast; consisting of 67 and six in PUL and CNR areas respectively.
- In total the programme funded 46 groups, of which five were within the CNR community and 41 within the PUL community. There were 28 PUL bonfires, four beacons and 14 alternative celebrations.

Community	Geographic Location					Format of Celebration/ Alternative Activity			
	North	South	East	West	Total	Bonfire	Beacon	None	Total
PUL	9	7	13	12	41	28	4	9	41
CNR	1	2	1	1	5	0	0	5	5
<b>Total</b>	<b>10</b>	<b>9</b>	<b>14</b>	<b>13</b>	<b>46</b>	<b>28</b>	<b>4</b>	<b>14</b>	<b>46</b>

## Compliance

- Of those PUL groups that had a bonfire and participated on the programme, 91% of bonfires and beacons (29 of 32) were compliant with Council guidelines with respect to burning tyres;
- Similarly, of those groups that had a bonfire and participated on the programme, 79% of bonfires<sup>1</sup> were compliant with Council guidelines with respect to burning flags and emblems. This breach of 21% consisted of six bonfires that burned flags and / or election posters. As the following table shows, this is the best outturn on this indicator to date, which in 2009 was at its lowest 18%.

BMP 2008 TO 2013 KEY PERFORMANCE DATA – NO BURNING OF FLAGS			
Year	Compliance	Year	Compliance
2008	20% compliance	2011	37% compliance
2009	18% compliance	2012	43% compliance
2010	33% compliance	2013	54% compliance

- In 2014 a larger proportion of PUL areas chose not to have a bonfire, with nine groups instead having an alternative celebration such as a community festival that did not involve a fire.
- The key outcomes in PUL communities centred on reduced anti-social behaviour, reduced flag burning, enhanced community development, reduction in fly-tipping and burning of tyres as well as more inclusive celebrations such as community fun days.
- The CNR activities funded directly by the programme (along with wider efforts by the DPCSP North and West Teams and the Lower Falls Divis Intervention) were in relation to supporting elected members, local communities and partners to proactively reduce the likelihood of bonfires happening in CNR communities. This had a positive impact in reducing the number of bonfires across Belfast with six taking place in total. The majority of bonfires that did take place in these communities were smaller and with less antisocial behaviour, which was deemed a success in terms of the longer term aim of replacing bonfires in CNR communities with other alternative activities.

## Statistical Data and Value for Money

In practice conducting a meaningful cost benefit analysis has been a challenging task due to the lack of data that is specifically collated to inform same. Firstly, there is a lack of directly attributable cost categorisation to specifically correlate agency resources with bonfires. For example, crimes are not currently recorded on the PSNI management system as bonfire related neither does the NIEA record telephone complaints received as attributable to bonfires..

This lack of timely and robust data collection has perhaps been due to the fact that bonfires in the Northern Ireland society are considered “business as normal” and therefore the resources invested in management of them has not been necessarily considered in isolation.

The Council and statutory partners do not capture the resource input of operational staff into the better management of bonfires, either in terms of community engagement / good relations work undertaken by staff, and work undertaken in terms of estate management by staff, such as waste removal in the lead up to bonfires and reparation of Council-owned sites after the bonfire event.

In considering value for money (VfM) of a programme it is normal practice to compare the direct input costs i.e. the funded cost of the programme with the directly attributable, net output savings of the programme i.e. after taking account of displacement

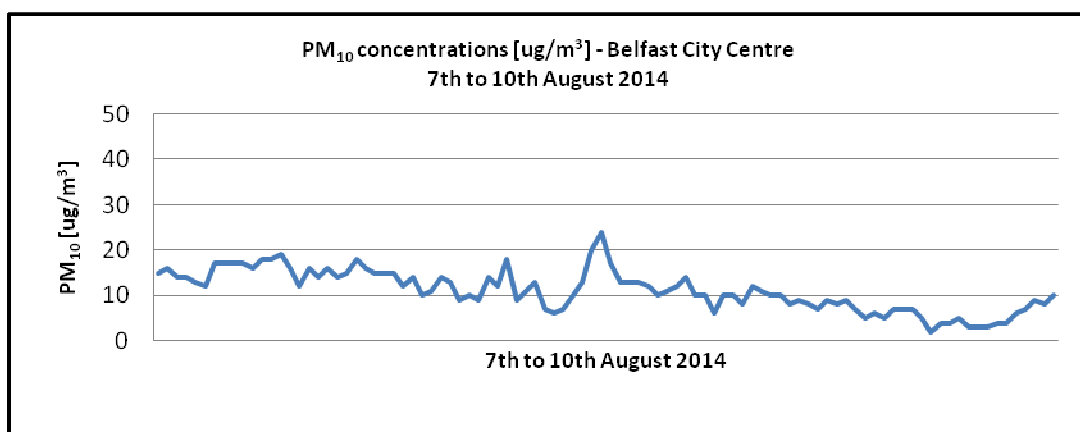
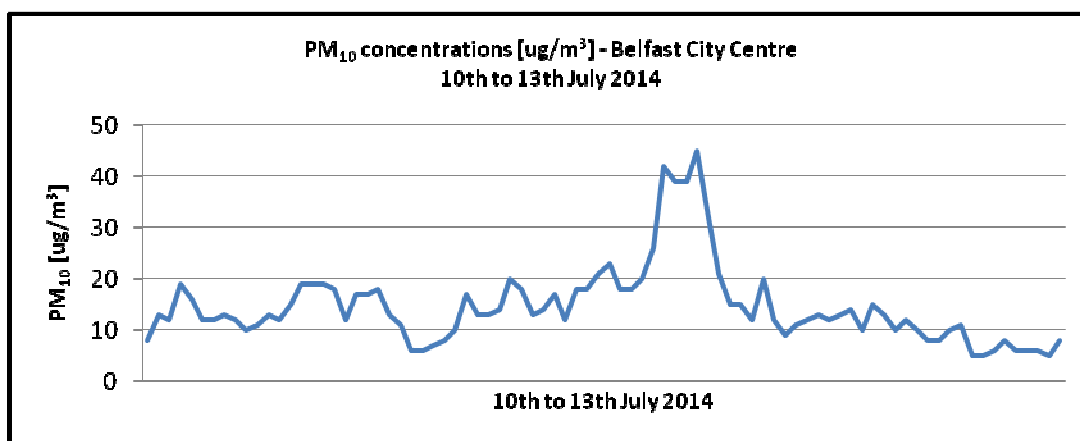
<sup>1</sup> Breaches by six groups of a total of 32 i.e. 28 bonfires and 4 beacons in the PUL community

There is a distinct lack of quantitative data from statutory agencies to enable an evidenced-based estimation of the net output savings of the programme; thereby precluding a quantitative assessment of VfM.

A high level summary of data available (or not) includes the following

- **Belfast City Council Air Quality** - Of relevance to the pollution created by bonfires is the measure of PM<sub>10</sub>; which according to the relevant air quality objective should not exceed a daily mean of 50 µg/m<sup>3</sup> more than 35 times in any given year.

The key feedback from the Council Air Quality Team is that “*there is short term elevated pollution levels as a result of bonfires, however concentrations detected at Belfast City Centre background monitoring station do not exceed the relevant air quality objectives.* The average level of pollution (measured as the PM<sub>10</sub> 24 hour mean in Belfast city centre) has only once over the past ten years been exceeded the EU limit in July 2005;



- **Northern Ireland Ambulance Service (NIAS)** - incidents are not recorded by location but by the nature of the casualty e.g. road traffic accident.
- **Northern Ireland Environmental Agency (NIEA)** - The following table details the Northern Ireland-wide instance of waste tyre and bonfire related incidents for 2013 and 2014 (the first time this information was collated in this format was 2013):

NIEA Regional Waste Data		
Key Data	2013	2014

Total Waste Incidents	481	708
Tyre-related Waste Incidents	47	74
Bonfire-related Waste Incidents	11	40

- There has been a significant uplift (rise of 240%) in bonfire-related incidents between 2013 and 2014 – NIEA indicated that the higher level may be due to increased public confidence in reporting bonfire-related incidents.
- **Northern Ireland Fire Rescue Service (NIFRS)**. An example of the data, from the NIFRS, is presented below:

Number of Bonfire Incident Mobilisations By Year in the Eastern Area Command			
Year	Bonfire Incidents	Year	Bonfire Incidents
2005	300	2010	201
2006	242	2011	133
2007	182	2012	122
2008	178	2013	128
2009	231	2014	116

- **Police Service Northern Ireland (PSNI)** – At the time of writing this report there is no available data available from PSNI directly related to bonfires as this is not recorded on the PSNI management system.
- **Transport NI** - Consultation with Transport NI revealed that there is negligible cost incurred in relation to clean-up of roads; on the basis that the roads are capable of withstanding damage to merit resurfacing in most instances.

#### CONTINUING RATIONALE FOR BMP

Feedback from the majority of stakeholders acknowledges that there is a continuing need for a programme on the basis that that;

- It enables communities to positively celebrate their culture and tradition; with a recognition of the positive impacts achieved in terms of the nuisance issues around bonfires including anti-social behaviour, environmental pollution, and burning of flags and emblems.
- The self-identified social outcomes for groups (as per monitoring forms) indicates that the BMP also facilitates social inclusion of ethnic minority residents; creates a sense of community; and in some areas, provides a mechanism for in-community dialogue about flags and cultural expression; and improved relationships with statutory agencies
- Evidence shows that there are improved outcomes in relation to burning of flags and emblems where the bonfire committees are pro-actively engaging with local people to challenge and change behaviours.
- The absence of a BMP will leave a significant gap in resources to support both PUL and CNR communities in dealing with any issues that the wider community want addressed in terms of bonfires. Feedback suggests that the PUL community feel supported through this programme and may disengage if it was to discontinue. Furthermore, the impact of withdrawal may lead to additional “pop-up” and/or larger existing bonfires, and significantly more environmental and social issues with no mechanism to monitor or co-ordinate efforts to address same.

- There would be a missed opportunity to further develop the work that happens with regards to reducing the number of August bonfires if the programme was discontinued.
- There would be significant reduction in the co-ordinated effort across a number of statutory agencies to address negative issues associated with bonfires which could result in a significant resource cost to council and partners to address issues at bonfires with no programme to assist.
- Without a coordinated programme there would be a missed opportunity to engage with certain hard to reach PUL communities who are not part of the programme.

### **Suggested Areas for improvement**

Notwithstanding the positive feedback, areas for improvement may include the following:

- The programme requires the development of a long term interagency strategic focus on how we work with both July and August bonfires. There is a limited strategic coordinated approach on what agencies and communities are working towards in trying to address any of the negative issues with regards to bonfires across the city including those in July and August as part of the current programme
- The programme needs to have greater clarity as to what outcomes it is seeking to achieve, with statutory partners and groups signed up to working towards a shared goal.
- Consideration needs to be given to developing further work in relation to improving how partners work with communities to reduce the number of August bonfires and work with those PUL communities who are not currently on the programme.
- A key issue encountered during this process related to the where data is held on bonfires including the number of bonfires in Belfast, details of the groups involved with the programme and those not involved, landownership details etc.
- The Evaluation team considers that the guidelines with regards to penalties should be refined to ensure that they are reasonably enforceable with reasonable resources provided to monitor compliance. It is also important that there are resources allocated to work with groups on the programme to reduce the likelihood of breaches and consider the challenges that groups face with regards to preventing breaches.
- The Evaluation Team suggests that consideration is given to developing a grant aid framework as part of the guidelines of any future programme whereby funding is pre-conditioned by compliance to certain targets with the allocation of specific penalties for non-compliance on a number of issues, and not just focused on non-compliances with burning of flags and emblems.



## RECOMMENDATIONS

1. The evaluation has found that there is a need for a strategic framework that sets out the fundamentals of how Council seeks to support communities to better manage their cultural celebration; with due regard given to community acceptance of a bonfire (or beacon) as part of that cultural celebration.

Council should consider leading on the development of a strategic framework for all bonfires across Belfast which will be informed through consultation with communities to ensure that the majority of people living in areas where there is a bonfire are supportive of the Council's (and its statutory partners) framework to work with groups to better manage bonfires in terms of fly tipping, materials burned and flags and emblems being burned. Where this consultation shows that there is not a majority support for an in-community bonfire, the community should be supported to enter into dialogue to agree an alternative format to the cultural celebration e.g. beacon, festival or diversionary activities or where there is support reducing the likelihood of a bonfire.

The strategic framework should look at the development of an interagency approach to increasing the number of beacons if communities are willing to take this approach. This needs to be carried out with a measured consideration of the associated costs e.g. capital replacement and annual maintenance vis-a-vis the benefits derived<sup>2</sup>.

2. A Multi-Agency Action Plan should be developed, and subject to commitment and resources, seek to engage with all bonfires in Belfast, with succession plans defined accordingly. This action plan should consider each bonfire on an individual basis; and group them according to an assessment of a number of factors e.g. history of engagement, capacity of group, etc with a view to exiting groups from the programme by a certain timeframe when certain outcomes are achieved e.g. beacon with no waste materials or flag burning; and moving group onto another suitable programme e.g. grants programme for cultural events. It is considered imperative that any such exit strategy is not seen as a penalty for good behaviour, so to speak and it is important that there is a clear pathway of continued engagement and support.

This action plan should also seek to further identify mechanisms for engaging with bonfires not on the programme to date and agree appropriate outcomes. Consideration should be given to the use of alternative engagement mechanisms through other departments or from best practice in other Council areas.

As part of this action plan Council should work closely with statutory partners to agree a communication strategy to ensure that any communications with respect to the BMP are consistent

3. There needs to be an Outcomes Based Accountability Framework developed for the programme. The outcomes, which are categorised between the areas of environmental, good relations and social /community, should be developed with, and co-owned by, relevant statutory bodies and local communities. It is recommended that this work is progressed through the interagency bonfire working group.
4. Council (and partners) should consider a more joined-up approach across teams (such as parks, community safety, good relations, community services, cleansing, etc.) to engaging with communities and young people on the theme of cultural celebration generally and bonfires specifically. Such an area-based approach needs to co-ordinate a multi-disciplinary team of

<sup>2</sup> Beacons have historically cost £7,500 to purchase and £3,500 per annum maintenance cost (reparation, installation and removal)

officers who have various responsibilities for engagement, community development, safety, and cleansing for that area if appropriate.

Furthermore, at an elected member level, given the positive feedback from areas where there is involvement of councillors, there is merit in having more elected member involvement, where they may be instrumental in bridging the gap between statutory partners and communities, especially in areas where there is no programme participation by bonfire groups.

5. Any future programme should consider the varying capacity of participatory groups and tailor the programme support accordingly. The “support” referred to could take the guise of facilitated meetings (peer groups and statutory agencies), tailored training, help with financial compliance etc.
6. In order to inform a robust assessment of value for money there is a recommendation for all statutory partners, and Council, working with local communities to consider how best to capture data in a manner that details monetary costs of, and savings derived from, the BMP and longer-term strategic work. Likewise, data of bonfire related ASB incidents, hate incidents, call outs by NIAS, PSNI, complaints to NIEA and Council, etc. should be specifically collated (through adjustments to systems and monitoring) and fed through to a central co-ordinator on an annual basis.

## FUTURE DELIVERY OPTIONS

Consultation with stakeholders, groups and Council Officers produced and tested a list of options going forward so as to shape the scoping of the operational format of future programmes. The options range from the Do Nothing through to the Application of the Unwanted Bonfire Programme Approach to all bonfires in Belfast as follows. The revised options are presented below.

- **Option One** – *Do Nothing i.e. end the programme in its entirety*  
This option would see no BMP operated within Belfast, the Council would respond / deal with queries with regards to bonfires on their land and refer residents’ queries / complaints to relevant landowners.
- **Option Two** – Status Quo  
Maintain the current approach i.e. Grant Programme (up to £1,500 due to reduction in funding) available to both PUL and CNR communities, (including those where a bonfire had previously been located). This option would see the continued use of a grant programme with guidelines including penalties for breaches. This option would not provide facilitated ongoing engagement with those groups on the programme
- **Option Three** – Revised Programme with Dedicated Support Mechanism  
Implement a revised programme with clearer focus on outcomes (environmental, social, and good relations) and how we monitor compliance, whilst taking a parallel approach to developing a long-term interagency strategy incorporating all bonfires across Belfast.
- **Option Four** – *Application of Unwanted Bonfire Programme Approach to all bonfires in Belfast*  
This option would see the enforcement of the law, particularly in relation to the burning of waste materials, fly tipping on private land, etc.

**RECOMMENDED OPTION**

Following on from findings within the review the preferred option being proposed by the evaluation team recommends option three which is detailed below:

**REVISED PROGRAMME WITH DEDICATED SUPPORT MECHANISM TARGETING ALL BONFIRES**

Implement a revised programme with clearer focus on outcomes (environmental, social, and good relations) and how we monitor compliance, whilst taking a parallel approach to developing a long-term interagency strategy incorporating all bonfires across Belfast.

This strategy will include how we engage with those communities where there are bonfires currently not on the Programme as well as working with communities who are taking a proactive approach to reducing the number of bonfires in nationalist areas

Any such strategy would detail how the partners plan to engage with those communities where there are bonfires currently not on the Programme; as well as working with communities who are taking a proactive approach to reducing the number of bonfires in nationalist areas. This should include the following:

- Development of specific, measurable, achievable, realistic, time bound targets to be agreed across key areas which will include environmental, good relations and social/ community outcomes.
- Consideration of an allocation of a dedicated staff resource to co-ordinate the programme, who would be a key contact for groups involved (as well as internal / external stakeholders) and would build a working relationship of trust; with support provided to groups in the guise of facilitated meetings (peer groups and statutory agencies) and tailored training.
- As part of this work a flexible budget should be considered to allow delivery of, for example training and education programmes throughout the year, with scope for the hosting of these events to take place across all participatory group premises or areas.
- As part of this recommendation, the development of a Multi-Agency Action Plan for all bonfires will be developed and implemented resources permitting with engagement with local communities and elected members. This Action Plan should also seek to identify mechanisms for engaging with bonfires not on the programme to date and identify key strategies and priorities to deal with specific bonfires that have significant issues.
- Working database of bonfires across Belfast both PUL / CNR e.g. name; role; contact details; nature of work to date; issues encountered by year e.g. materials burned, ASB, etc; spend profile; estimated attendance levels at events; etc. Along with details of the social capital of the group e.g. role to date in engaging with statutory bodies and/or Council on local issues, nature of the individuals / group.
- On the understanding that overall programme is likely to be financially constrained, the Evaluation Team recommends that there is a small reduction in funding, to £1,500.
- The development of a grant-aid framework around the funding should be developed which should include penalties for non-compliance on all issues, and not just focused on non-compliances with flags.
- This option recommends that Castlereagh CCF bonfire group is allowed a transition period, of one year subject to review, to migrate from existing rules to Council-wide rules that are agreed

through facilitated engagement with all groups. Grant of £1,000 per group if they wish to maintain their existing grant aid framework; or £1,500 if they sign up to the Council's guidelines.

***It should be acknowledged that all aspects of this option will not be fully realised for the 2015 programme such as the long term strategy given the challenging timescale but it is important to start to work on the development of the above to improve the delivery and coordination of work with regards to bonfires across the city.***