

COUNCIL RESPONSE

INFRASTRUCTURE 2050

DRAFT INVESTMENT STRATEGY FOR NORTHERN IRELAND

CONSULTATION

Question	Y/N	Comment
1	Do you agree with our vision for infrastructure? If not, what would you change?	<p data-bbox="703 691 2033 791">The Vision for Belfast under the City's Community Plan, The Belfast Agenda is that Belfast will be a city re-imagined and resurgent. A great place to live and work for everyone. This includes enabling access to opportunity, underpinned by inclusive growth for Belfast to be a city:</p> <ul data-bbox="752 836 1630 975" style="list-style-type: none">• where everyone benefits from a thriving and prosperous economy• that is vibrant, attractive, connected and environmentally sustainable• where everyone experiences good health and wellbeing• where everyone fulfils their potential <p data-bbox="703 1023 2033 1337">The Vision for Belfast and the Executive's vision for infrastructure both align, however Council would highlight the pressing need to address infrastructure deficiencies which are currently impacting on the regeneration, development and investment of Belfast and which if not urgently addressed will further impact on the City's and Region's growth ambitions. Current development in the planning system and the regeneration of the city centre is being impacted. The Belfast Agenda's growth ambition around increasing the residential population cannot be met without significant and immediate investment in Water Infrastructure. The Strategy's vision refers to "Future Development" its not simply development in the future but development and regeneration now that is being affected for example delays and issues with city centre planned redevelopment and the knock on effect this is having on perceptions of particular areas of the city centre which are battling already difficult trading conditions.</p>

			<p>We would also recommend the inclusion of the adjective ‘environmentally sustainable’ or climate resilient infrastructure. An amended Vision would, therefore, read:</p> <p>We have environmentally sustainable infrastructure that enables everyone to lead a healthy, productive and fulfilling life; that supports sustainable economic development and protects our environment.</p>
2	Do you agree with our assessment of the challenges that we will face with our infrastructure over the next 30 years? If you disagree, why? And what do you think are the challenges and why?	Y	<p>The challenges identified include:</p> <ul style="list-style-type: none"> • the immediate need to respond to the climate emergency and achieve net zero • the changing requirements of an ageing population • our evolving trading relationships with our neighbours in Europe and elsewhere • the speed of technological innovation and the increasing risks to cyber-security • the need to invest both capital and resource funding to address historic underinvestment in our current infrastructure • the need to innovate at pace and develop our approach to delivery. <p>We believe that the challenges are accurately articulated and reflect the need to move at pace to address the backlog of infrastructure investment over the last 3 decades but would have concern that the scale of the problems seems to have been seriously downplayed.</p> <p>We would also like to take the opportunity to reiterate the points we made around challenges and opportunities in the Call for Evidence process (Feb 2021):</p> <ul style="list-style-type: none"> • Challenge - limited public finances. Current infrastructure investment estimates for the last 10 years exceed the projected spend for the next 10 years. The NI public sector faces significant challenges delivering against its major capital projects portfolio. • Challenge – Transitioning to net-zero requires design considerations which will increase the overall capital costs. • Opportunity – the council is keen to explore and identify potentially new financial mechanisms and vehicles which could be utilised to deliver critical city infrastructure projects. • Challenge - A lack of joined up thinking around infrastructure investment and the need for consensus/planning on how one part of infrastructure investment ‘fits’ with other parts of the economy.

- Challenge – the NI Planning system does not allow for a streamlined process which in turn puts off development and means we are not competitive as a place to invest in, compared to the remainder of the UK.
- Challenge – An OECD report suggests that short-term considerations can exert too great an influence on infrastructure investment decisions which can lead to an over-reliance on narrow, sectoral plans at the expense of cross-network integration.
- Opportunity - Northern Ireland has emerged as a world-leading cyber security, data analytics and FinTech hub; and Belfast is Europe’s leading FDI destination for new software development. (fDi Markets FT 2020) Prioritising digital infrastructure presents an opportunity to solidify Belfast’s position as a world leader in these fields attracting increased levels of FDI.
- Opportunity - Continued investment in transport infrastructure provides an opportunity to change travel behaviours and reduce the dependency on cars; reducing congestion; improving public health and improving air quality.

We have included specific comments below relating to key areas including the lack of waste infrastructure, mitigating and adapting to global climate change and the historic underinvestment.

Waste

We believe that addressing the lack of waste infrastructure within Northern Ireland would have the benefit, to varying degrees, of addressing each of these challenges and also the requirements as outlined on p 10 of the draft document.

We understand that the DAERA Environment Minister has expressed his opinion on the matter of waste infrastructure and had advised that there is currently a lack of waste infrastructure within Northern Ireland.

Again, (on Page 16) there is a stark omission of reference to how much investment has been made in waste infrastructure to date. It is our view that this area needs significant investment to enable the players in this market to deliver sustainable solutions and green jobs. By way of comparison the Welsh government has provided significant funding in this regard to deliver these benefits.

Page 18, notes our “Changing Population”. More housing, smaller sized households, an increase in population size and people living for longer will all have a significant impact on the amount of waste produced. The bigger the impact, the greater the need for appropriate waste infrastructure to meet the increasing demands. More

waste produced will also require more waste collections and transport of materials to treatment facilities, resulting in more vehicles on our roads.

Our changing population will potentially result in a greater environmental impact and a larger carbon footprint. We need to rethink how we use resources and to keep products in circulation for longer.

On the section on technology (page 18), we note the current DEFRA/DAERA consultation on the digital tracking of waste and we would highlight the need for the appropriate infrastructure in place to support the new technology, staff, sites and vehicles to meet the requirements of a mandatory digital tracking system for waste.

Climate

Mitigating and adapting to global climate change will be defining challenge over the 30year period of the Investment Strategy. But priority must be given to acting quickly and decisively in the next decade to decarbonise the heat, power and transport networks.

Since launching this infrastructure consultation, the NI Government has launched a new Energy Strategy the Path to Net Zero Energy which has set a long- term vision of a net zero carbon and affordable energy. It is imperative that these 2 strategies are integrated and overlap.

Within the Energy strategy 3 new efficiency targets have been set by 2030. These targets set a powerful base for developing a net zero carbon infrastructure and must guide the low carbon investment They are:

- (1) Energy efficiency – deliver 25% energy savings from buildings
- (2) Renewables – 70% electricity consumed must come from renewables by 2030
- (3) Green Economy – Double the size of the low carbon and renewable business sector from £1billion to £2billion

Since the consultation has been launched, the NI Government has also indicated that Climate Change Act will have a net zero greenhouse gas target by 2050, this is a more ambitious target than proposed previously and provides the springboard to scale up the mass decarbonisation of the power heat and transport sectors.

While recognition of the environmental crisis is welcome and in line with the Council’s commitment to become carbon neutral (<https://www.belfastcity.gov.uk/climate-change#:~:text=build%20resilience%20to%20flooding%20and,to%20reduce%20their%20carbon%20footprints>); the paper does not seem to fully appreciate the link to other issues, and hence how significant they are.

		<p>In particular:</p> <ul style="list-style-type: none"> Water processing: we know that DFI are working hard to address issues with water processing through their 'Living with Water' programme, and aware of the problems in Belfast, having presented to our City Growth Committee. However, the report appears to contain a single line on the significance of this: "[lack of water treatment] is now acting as a brake on the planned development of the new homes and businesses we need." None of the Executive's plans for expanding the economy or improving residents' quality of life can be achieved without substantial efforts to improve water treatment. <p>Energy provision: concerns over the closure of NI Powerplants, the ongoing issues with Russian gas, unexpectedly low wind generation and the all-island need to consider purchasing emergency energy;</p> <ul style="list-style-type: none"> all suggest that energy is a crisis that has already started. And this is before the major move towards electrification of transport. Despite this, the report only makes mild reference to "invest[ing] in our electricity-generating capacity" and seems to imply that most of the issue will be addressed through future buildings being more energy efficient, smart sensors and the north-south interconnectors. These are all good things but do not seem to offer the drastic fixes that are required. Budget: of most concern is the report's lack of reference to how infrastructure investment will be funded. Where money is referenced it is misleading (investment is £800 per person per year not £8k as implied) or of extreme concern. Current road maintenance backlogs are in excess of £1bn (NIAO 2019), and the Health Estate has backlogs of £1.2bn (DoH 2021). <i>E.G., maintenance backlogs in just two depts. are in excess of the current total annual investment in infrastructure.</i> Additionally, it is not stated how much EU money was used for investment over the last 10 years, what expectations are for the new Shared Prosperity Fund, nor how additional funds will be raised to cover backlogs and new ambitions other than "an assessment of all other sources of public finance..." and "potential private finance...". <p><u>Infrastructure</u></p> <p>There is a need to ensure that the resourcing deficit with required water / wastewater infrastructure including exploration of the potential for alternative funding models, is urgently addressed to ensure this does not prohibit current and future development, in particular housing development. Council through the consultation on the Housing Supply Strategy have highlighted the need to demonstrate that there is a clear route map to show how</p>
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			<p>the housing growth ambitions can be facilitated in terms of all the requisite infrastructure requirements and particularly in relation to the wastewater infrastructure. Page 8 paragraph –</p> <ul style="list-style-type: none"> • Pressure on water infrastructure is a problem now not in the medium term. • Page 9 on the strategy, Key points – include water infrastructure to key points. • There are currently a number of policy, financial and structural challenges to delivery of placemaking regeneration schemes via public /private partnerships and this is significantly impacting on the ability to delivery of regenerative housing at scale. Council would propose that a Task Group be set up to undertake a sharp, short, and focused review of these challenges and the mechanisms to overcome. This is critical to understand and deliver on optimal ways of working and delivery vehicles that involve the public sector working with the private sector and funders to bring forward appropriate housing development opportunities in a more agile way. This would ensure the required processes, delivery vehicles, funding and supporting infrastructure are aligned to deliver agreed outcomes to provide for appropriate housing development at scale whilst ensuring proper integrated placemaking. • Regarding ‘our approach to delivery’, Belfast, and NI, needs a programme of infrastructure investment that is coordinated across sectors and infrastructure types, responds to change, is both sustainable and resilient, and can be delivered in good time, at a reasonable cost. It will be critical to recognise the inter-dependencies and potential efficiencies of planning investment to meet the challenges identified and avoid treating each as a separate strand. Further clarity would be welcomed on the role of the NI Infrastructure Commission in this context.
3	Do you agree that these five key investment objectives address the challenges? If not, what would you consider to be the key investment objectives?	Y	<p>The five key investment objectives are:</p> <ol style="list-style-type: none"> 1. decarbonise our economy and society 2. strengthen and protect our essential services 3. build a strong, connected and competitive region 4. enhance our communities and places 5. maximise the benefits from new technology and innovation. <p>Belfast City Council agrees with the key investment objectives as outlined. However, as implied in our previous response, without substantially strengthening our essential services in an environmentally sustainable way, perhaps by taking advantage of new technology it will be extremely difficult to make any meaningful long-term improvements for our communities and in our competitiveness.</p>

			<p>We would also draw your attention to the response that has been provided for the previous question, as there is overlap particularly in relation to the comments around Living with Water and the investment required in water infrastructure.</p> <p>As previously noted, there is a need for integrated planning and investment across these objectives, rather than operating in ‘silos’. Clarity regarding the role of the NI Infrastructure commission would be welcomed.</p> <p>We have also made comments in our response to question 4 around ‘A bolder Vision’ that relate to this question.</p> <p>We believe that the content on page 23 would benefit from greater clarity if it was amended as laid out in bold below.</p> <p>Paragraph 2 – In 2020 for example, less than 1% of newly registered /purchased vehicles are electrically powered, compared to nearly 25% in the Netherlands and 74% in Norway.</p> <p>Paragraph 3 – We have a strong record in the development of renewable energy. Around 42% of our electricity or electrical energy was generated from renewable sources.</p> <p>Paragraph 3 – Most properties need to be linked to the gas grid and we must decarbonise the system using bio-gas or natural gas blended with hydrogen.</p>
4	<p>Are these the investment priority areas we need to focus on to decarbonise our economy and society? If not, what are the investment priority areas that will help decarbonise our economy?</p>	Y	<p>The priority areas are well defined and accurate and below we outline some specific comments are concerns we have in relation to the investment priority areas we need to focus on to decarbonise our economy and society.</p> <p><u>Waste and the Circular Economy</u></p> <p>We note that under the “decarbonisation” objective, although waste is referenced, the process does not cover the “where we need to be” with regards to waste. Our view is that reference should be made to the requirement for adequate waste infrastructure such as waste treatment and reprocessing plants.</p> <p>On page 23, it notes that we have the capacity to reprocess <u>some</u> (not all) of the recycling that we collect. This highlights a gap in Northern Ireland, in that that we cannot reprocess all of the recycling produced and, therefore,</p>

rely on exportations of potentially valuable material. In order to support a circular economy and a closed loop structure we need serious investment in building the appropriate infrastructure at a local level.

On page 23, with reference to the 50% recycling rate in 2020, we note that in the subsequent period, recycling rates have been under significant pressure. Whilst the pandemic may have had a role to play in this impact, there is no doubt that investment in waste infrastructure is necessary to help stimulate and increase recycling rates. Similarly, diversion from landfill requires infrastructure to enable delivery of targets.

On page 25, we note the omission of Energy from Waste (EFW) within the “Energy Generation” section and suggest that this be given due consideration.

On page 26, we welcome the inclusion of a circular economy (CE) within the Investment Strategy. However, overall, the document reflects a very ‘waste-based’ understanding of the circular economy, as opposed to a resources-based understanding and the need to create a more sustainable pattern of consumption, production and waste.

The idea that one principle of the CE is to, ‘implement measures to sequester carbon’, is not a familiar terminology. CE approaches can be useful in reducing carbon emissions but we would regard that as a benefit as opposed to a principle. If the strategy wishes to particularly encourage CE approaches because they reduce carbon emissions that is a separate matter.

The ‘infrastructure’ requirements around the CE include concepts such as:

- education and training on circular design
- policy changes to minimise consumption from non-sustainable sources, encourage long life-times for products, and maximise the capture and recycling of waste products and materials (i.e. to create a more sustainable pattern of consumption, production and waste)
- data on the stocks and flows of products and materials through NI in order to inform the most impactful areas for improvement
- education and support for reuse/ repair/ remanufacturing

Some of the measures in the draft strategy are certainly consistent with the CE e.g. the use of existing building stock and brownfield sites as opposed to new builds and greenfield sites; better public transport and sustainable travel options to reduce the need for cars.

On page 28, under “Circular Economy”, consideration could be given to stimulating markets and investing in start-ups focusing on innovation and best practice in resource/waste management.

SIB is also producing the NI CE Strategic Framework; it would be important to make sure the draft investment strategy aligns with it.

As an aside, it may be worth considering community wealth building approaches such as The Preston Model in developing the investment strategy <https://www.preston.gov.uk/article/1791/The-definitive-guide-to-the-Preston-model>.

With respect to the Circular economy, is worth noting that many cities use residual waste streams, ie waste left over which cannot be recycled, as a renewable energy source. The gasification of residual waste can provide valuable renewable heat and renewable electricity which can be injected into district heating systems and electricity networks. This is a viable solution instead of exporting the residual waste outside the region.

Final bullet p18 – Delays and lack of certainty over water infrastructure, along with potential increased costs leads to Belfast being a less attractive place to invest than other part of the UK. Belfast is potentially missing out on the opportunity for inward private investment.

- **Draw on Belfast net zero road map**
- **Innovation and Inclusive Growth Commission Reset for Growth retrofit recommendations should be referenced**
- **Innovation and Inclusive Growth Commission Reset for Growth Renewed Future City key proposition on** - Create a connected and animated core city centre through the delivery of key commitments in the Bolder Vision document

Belfast Agenda commitments - The vision as set out in the Belfast Agenda, the city’s Community Plan, outlines the City’s ambition to promote the development of sustainable transport, including promoting walking and

cycling. The Belfast Agenda set a target for the City to achieve 15% increase in the use of sustainable transport. Council would therefore advocate and promote these modes and investment in the same. Example in current BCC led projects such as roll out of active travel infrastructure. In our ambition to attract 66,000 new residents to the city it is critical that connectivity considerations and alternative travel options can align with these growth ambitions. For example, the development of housing close to existing services may mean shorter, more localised journeys, allowing higher levels of cycling and walking or public transport, therefore reducing dependence upon the car and mitigating negative impacts such as traffic congestion and air pollution. A capacity-building approach alone is neither efficient nor sustainable to address the myriad of pressures facing transportation systems. Consideration of the spatial planning of the urban environment has a direct impact on movement patterns and therefore demand on a city's transport network.

- **The Belfast City Centre Regeneration and Investment Strategy (BCCRIS)** identifies creating a green, walkable, cyclable centre and connecting to the city around as two of its eight key policies, recognising that active travel and connectivity are closely aligned to regeneration and development.
- Belfast City Council (BCC), the Department for Infrastructure (DfI) and the Department for Communities (DfC) are developing **A Bolder Vision** for the future of Belfast City Centre. This will inform actions, interventions and a more joined-up approach across planning, transport and regeneration in developing Belfast City Centre as the attractive, accessible, safe and vibrant space central to the partners shared ambitions for Belfast. A Bolder Vision for Belfast involves a fundamental rethink of how streets and places are used to make them attractive, inclusive, accessible, healthy, and vibrant places. The first Phase of the Vision was agreed by Council and endorsed by the DfC and DfI Ministers in 2020. It is underpinned by four Visioning Principles that will drive and shape the city centre, which includes; fundamentally changing the centre of Belfast to prioritise integrated walking, cycling and public transport and end the dominance of the car. These Principles have shaped COVID recovery place-making and active travel interventions in Belfast and have supported modal change. However, this requires a collaborative and holistic approach across a number of stakeholders and partners to deliver strategic connections and improved access between, and into local communities and the city centre. Towards this aim, Belfast City Council and the Department for Infrastructure are working together to deliver a package of sustainable travel interventions that support improved connectivity to the city centre, including cycle parking (covered and secured), active travel hubs that encourage cycling and walking, and have expanded the Belfast Bike Share scheme to link communities to the city centre. Council recognises that people take different types of transport, depending on their circumstances and at times, these may be multi-modal

			<p>journeys. The key is that A Bolder Vision is providing safe, sustainable choices for people. A Bolder Vision Phase 2 is currently out for public consultation and is the overarching framework for this initial work and within it there are four Key Moves that groups short and long term interventions in critical parts of the city to create a green, people focused, connected city centre for current and future users. Each of these Key Moves supports connectivity to the city centre and introduces a strategic direction of travel accompanied by short, medium- and longer-term interventions to encourage walking, cycling and wheeling. It is critical that the correct strategy and policy framework, coupled with investment is put in place to deliver on the objectives of the Bolder Vision and other key place-making documents including the DfI Ministers 'Time for Change'. The public sector needs to be more flexible to change and have the correct frameworks and strategic direction in place to ensure effective decision making.</p>
5	<p>Are these the priority areas we need to focus on to strengthen our essential services? If not, what do you think are the investment priorities that will strengthen our essential services?</p>	Y	<p>The priority areas are well defined and accurate and below we outline some specific comments are concerns we have in relation to the investment priority areas we need to focus on to strengthen our essential services.</p> <p>We would highlight the concerns we have previously raised around waste water capacity (q2). Wastewater Capacity: LWWP provides a framework to invest in essential wastewater infrastructure, though the model for funding water infrastructure makes it difficult to future proof the system and allow growth capacity to be built in.</p> <p>We would also refer you back to the previous comments made in q 3&4 re 'A Bolder Vision' document.</p>
6	<p>Are these the investment priority areas we need to focus on to enhance our communities and places? If not, what do you think are the investment priorities that will enhance our communities and places?</p>	Y	<p>The priority areas are well defined and accurate and below we outline some specific comments are concerns we have in relation to the investment priority areas we need to focus on to enhance our communities and places.</p> <p>Pages 36 – 36 Regeneration: Consideration should be given to storage and access requirements with regards to waste, particularly in apartment/high rise type living. Investment must be made in waste infrastructure here – for example in communal waste collection and storage facilities that are not just “bin”/ “receptacle” focused but could include for example vacuum extraction systems (requiring major investment)</p> <p>Investment could also be considered, into the reuse and repair economies within town centres and new ways of incorporating these into the everyday lifestyle of residents – e.g. the development of circular economy/artisan/zero waste type quarters such as those being considered within the Belfast Linen BID.</p>

On Page 39, we could incorporate a rethink of city centre toilets. With a changing population, they will inevitably be a requirement for more public conveniences across the city. Investment could be made into upgrading them into multi-functioning sites – e.g. incorporating newsagent kiosks/flower stands at our toilet facilities.

Safety and equality considerations must be given to any city centre re-design and accessibility issues should be addressed at every stage. All quiet lanes must have collection of waste and utility vehicles considered at the planning stage rather than post completion.

Page 41 – Housing developments must take into account waste storage and access requirements and these need to be future proofed as part of the planning process. We would reference our corporate guidance on this matter (hyperlink)

The Council is already closely with DfI and DfC on many of these priority areas through our various initiatives for the High Street, Housing, Active Travel and Public Transport (see Bolder Vision, Green and Blue Infrastructure Plan, Belfast City Centre Regeneration and Investment Strategy, Future City, Cultural Strategy, and the Belfast Agenda). Consequently, we are in support of these priority areas.

However, the Council believes there is scope to increase local level decision making and the ability to introduce local interventions. Hence, as the council has argued before, we would welcome an increase in delegated authority in these areas.

Redefine the purpose of our High Streets / urban centres:

- the recommendations of the High Street Taskforce need to be costed by DfC and presented as priorities in multi-annual budgeting processes across departments. the scale of commitment demonstrated through the £820 million 'Future High Streets Fund' and the £1.6 billion 'Stronger Towns Fund' put in place to support the high streets of over 200 towns within England, via councils. Similar investment programmes of scale, centrally funded, have been brought forward in the last 18 months in Wales and Scotland. A similar level of investment or commitment is currently absent in Northern Ireland and consideration needs to be urgently given to a dedicated fund of scale to enable emerging investment plans to be developed in accordance with local community planning, development planning and growth planning priorities for Belfast. This could potentially bring together multi departmental, council and other sources of funding into an aggregate multi-annual

fund. Such a fund could be allocated and administered through councils and subject to all partners (including government departments) working to deliver an agreed solutions / action plans.

- Cities, Towns and Villages – We believe strongly that the Taskforce recommendations for all places with High Streets across NI should feature in its emerging Call for Evidence recommendations. We understand that there needs to be a balance across the region. This is true for cities too. Belfast is everyone’s main city and its important it plays its role as a centre for commerce, culture, tourist attractions, recreation, entertainment, learning and employment. Its core centre area needs to be reimagined entirely to ensure it can continue to perform these important roles for all areas to derive benefit. This will take investment. If Belfast is not supported to thrive then NI will collectively lose out on FDI, tourist spend, small business cluster development, cultural vibrancy etc and we will continue to lose our young people to cities which provide a much more attractive mix in other jurisdictions. This is not simply a matter of saying Belfast is big enough and so will survive. Without investment any growth will be sub-optimal for all of the people across the island and we will continue to suffer from low productivity levels and higher rates of economic inactivity and poverty. The role of Belfast needs to be clearly set out and consider the support needed to strengthen its role in positioning the region for investment and innovation. Belfast City Council, alongside partners, has carried out extensive work, through the Belfast City Centre Regeneration & Investment Strategy, BRCD Programme, Belfast Innovation City, the Renewed Ambition public private partnership, our Future City Centre Programme, Cultural and Tourism Strategies and work to support arterial routes/neighbourhood centres. These all provide a strong platform to support the diversification of the High Street while still ensuring support for our retail and business population. These programmes and policies are supported through extensive research and best practice and require strong leadership and commitment across all our public and private sector partners and the NI Executive particularly in terms of policy, legislation and financing.
- There is a need for place-based leadership across NI which brings together key partners, interests and stakeholders with a focus on high streets and significantly better coordination between central and local government, together with a recognition that local government can be best placed to deliver and support local interventions.
- Long Term and Holistic Placemaking Approach - Whilst immediate and interim solutions are welcomed it is important to recognise that a long-term and sustained approach is required. The interim support measures brought forward by the Executive, including furlough, rates relief and Revitalisation Funding

helped to stabilise our city/town centres during a period of significant stress. However, we feel that it is critically important now to bring forward an holistic approach to diversifying and strengthening our High Streets, supported under the Programme for Government/Executive Recovery Plan and our collective key strategies and policies and adequately funded, to ensure our city centre and high streets are supported to thrive and most importantly survive.

- city centre living is critical to the reimagining and future sustainability of the high street / city centre and should be central to the High Street Task Force recommendations in its CfE report and embedded within Executive funding priorities. Increased City Centre Living is also a key area within the Council's Future City Centre Programme which is charting the way forward for the diversification and sustainability of city centre uses. The Future City Programme is a multi-faceted programme that seeks to bring together a number of strategic initiatives and projects within one overall programme approach to address the issues impacting upon the city centre. It includes projects and interventions across various pillars of work centred on regeneration and connectivity, increased city centre living, investment, inclusive economic and cultural growth.

Promote active travel, prioritising walking, cycling and wheeling for leisure and mobility – see points in question 4 under Belfast city centre regeneration strategy and A Bolder Vision.

We would also draw your attention to the Council's response to the DfC consultation on Intermediate Rent policy and model [Agenda for City Growth and Regeneration Committee on Wednesday, 8th December, 2021, 5.15 pm \(belfastcity.gov.uk\)](#) (item 14).

- The Belfast Agenda seeks to deliver increased social and affordable housing in the city and will measure outcomes through housing supply and housing stress indicators. This included specific targets for the delivery of 1,800 social housing units to 2021 and recognised the need to agree city-wide targets for affordable housing.
- We welcome that the policies will include significant committed investment and funding streams. The recently published Reset for Growth Report from the Belfast Innovation and Inclusive Growth Commission has found that Belfast presents a unique opportunity to position a significant housing building programme at the heart of its economic recovery plans. The Commission sees this investment in housing stock as having the potential to address a number of economic and social problems. These

			<p>findings should be used in support of ensuring significant investment and funding is aligned to delivery plans.</p> <ul style="list-style-type: none">• The Council believes that mixed tenure housing is important for Belfast and Northern Ireland. Housing policies within the Belfast LDP draft Plan Strategy seek to “nurture the development of balanced local communities by achieving an appropriate mix of house types, sizes and tenures”, “secure mixed tenure housing developments” and “build strong, inclusive and cohesive communities for people of all backgrounds”. Mixed tenure development is seen as vital in achieving these aspirations and in avoiding many of the problems now associated with large areas of single identity social housing in the City.• The Council believes that housing led regeneration policy contributes to reversing the physical, social, and economic decline of town and city centres. The delivery of homes offers significant opportunities to help achieve balanced communities through well-linked, accessible, inclusive, mixed-tenure neighbourhoods. Combined with creating opportunities for communities to access local employment shopping, leisure and social facilities ensuring that they can live full independent lives in an inclusive, cohesive, and sustainable community. Provision of good quality shared social and community infrastructure is critical for social cohesion and contributes to the creation of lifetime neighbourhoods. Accessibility cannot compromise attractiveness and the Council therefore supports the need for good design.• We recognise that there is a need for a broader range of affordable housing products available to help deliver these ambitions and note the on-going work in relation to the development of an affordable rent policy and model for NI and to explore the scope for private sector leasing. Whilst this work is to be welcomed, it should be noted that progress on practical delivery of mixed tenure development is required now to maximise the potential of existing proposals both within the planning system at present and those recently granted approval. Furthermore, the imminent adoption of the Plan Strategy for Belfast will necessitate the need for workable solutions for mixed tenure development in a far broader range of circumstances in the very near future.• Within this context, as well as ensuring that Housing Associations can fully participate in creating and delivering new housing options across all tenures, consideration should be given as to how private sector developers can better contribute to affordable housing tenures. This is particularly pertinent in a higher density, City Centre context where retaining ownership of rental properties may be central to the
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			<p>investment models required to ensure developments can be delivered (e.g., Build to Rent). Consideration should be given to enabling the private sector to deliver affordable homes directly, as well as in partnership with Housing Associations.</p> <ul style="list-style-type: none"> • there is a significant disconnect between the areas in which housing is most needed, most notably within the social and affordable housing sectors. For example, recent delivery shows that the highest rates of housing growth have been seen in Newry, Mourne and Down and the Mid Ulster Districts, whilst the greatest level of need in terms of social housing and the greatest affordability pressures are seen in Belfast and the North West/Derry. • To illustrate this point, there are currently 11,858 people on the social housing waiting list in Belfast, which represents over 27% of the Regional social housing demand. However, the Housing Growth Indicators (HGIs), which are published by the Department for Infrastructure (DfI) to provide a starting point for planning for future housing growth, suggest only 8.7% of new housing should be within Belfast. The Council has therefore undertaken its own work to inform the LDP draft Plan Strategy and have proposed a far more ambitious target of 31,600 new homes to 2035. This again highlights the need for a joined-up policy environment across different Departments of Regional Government, as well as broad alignment at local level. • The Innovation and Inclusive Growth Commission, Reset for Growth Report has found that Belfast presents a unique opportunity to position a significant housing building programme at the heart of its economic recovery plans. The Commission sees this investment in housing stock as having the potential to address a number of economic and social problems.
7	<p>Are these the investment priority areas we need to focus on to build a strong, competitive and connected region? If not, what do you think are the investment priorities that will help build a strong,</p>	Y	<p>The priority areas are well defined and accurate and below we outline some specific comments are concerns we have in relation to the investment priority areas we need to focus on to build a strong, competitive and connected region.</p> <p>We would reference the potential for seed funding for Eco hubs and Circular Economy hubs. The Circular Economy provides a fantastic opportunity to stimulate green growth and to encourage and build a strong competitive region.</p>

<p>competitive and connected region?</p>	<p>We note that following the pandemic, more people across Northern Ireland are working from home and this may remain common practice even post recovery. Connectivity across the province needs to be more resilient and accessible to all residents, both in cities and rural areas.</p> <p>City centres may have to re-think the use of office space, where shared spaces and hot-desking become the norm. Again, this provides a wealth of opportunities for creating a circular economy hub within these spaces.</p> <p>Belfast City Council recently conducted a trial, where we wanted to develop a low-cost, low-maintenance scheme to facilitate the reuse of portable electronic devices (laptops, tablets, smartphones) donated by members of the public (householders, not businesses) at its HRCs (Household Recycling Centres). The devices would be distributed to local households in need, generating a community benefit as well as reducing waste. This example of a circular economy project in practice has resulted in environmental benefits while delivering social and / or economic benefits at the same time.</p> <p>It provided a means to offer digital technology and connectivity to those who are often digitally excluded. Our trial, even though relatively small scale, has so far demonstrated benefits in terms of carbon reduction, reuse, circular economy, connectivity and inclusion of older or more vulnerable people. This circular economy practice model has helped create a more sustainable pattern of consumption, production and waste.</p> <p>It would be prudent to include the scale up of investment in electric vehicle charging infrastructure and hydrogen refuelling stations in this section. The emissions from our transport sector are increasing unlike the emissions from our electricity and heat sectors.</p> <p>Unlike the rest of the UK and the ROI there is no Electric Vehicle Strategy for NI. There are no targets for therefore for the uptake of electric vehicles nor the expansion of the public charging network which is a pre-requisite to help the market develop. There are also no plans for taking forward EV charging for the on-street residential market. These issues need to be addressed as a matter of urgency. There is an urgency to act promptly and decisively on transport emissions if we are to cut emissions within the next decade.</p> <p>Similarly, there is a need to promote active travel through encouraging walking and cycling and to develop Greenways and safe cycling routes to encourage behaviour change and offer low carbon travel solutions. We expected to see reference to the various City Region Deals in the region and how they can align and contribute to these priorities.</p>
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			<p>As to the specific priority areas mentioned; Council is very supportive of increased public transport connections, especially to maximise the benefits from Weavers Cross, which better rail and other public transport would provide. And all while potentially reducing environmental emissions. In relation to improve connectivity and public transport network – please also see points in question 4 around A Bolder Vision.</p> <p>The ports (air and sea) are also of major importance to the region and can sometimes be overlooked as a predominantly private sector enterprise. The pandemic impact on travel and the pre-pandemic collapse of FlyBe have shown the need for careful consideration and support of essential transport links with our nearest neighbours in GB and the EU. This affects commerce, investment, inward tourism and our citizens opportunities to connect to the rest of the world.</p> <p>Belfast City Council is committed to working collaboratively with city and regional partners to support the delivery of regeneration projects across the City, and wider city region, with a focus on creating the economic and social infrastructure/assets we need for inclusive sustainable growth. We recognise the important role the built environment can play in delivering social, environmental and economic benefits to the city and wider city region.</p> <p>We would also like to highlight a number of key enablers that would support wider and more impactful sustainable development outcomes across the region.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Devolution of regeneration and transport powers and associated funding to councils • Leading by example on regeneration and infrastructure investment projects by embedding sustainability and inclusive growth outcomes into the project to ensure that that social, environmental and economic benefits are achieved • Investment in sustainable infrastructure
8	Are these the investment priority areas we need to focus on to maximise the benefits from emerging	Y	The priority areas are well defined and accurate and below we outline some specific comments are concerns we have in relation to the investment priority areas we need to focus on to maximise the benefits from emerging technologies.

	<p>technologies? If not, what do you think are the investment priorities that will maximise benefits from emerging technologies?</p>		<p>We would suggest developing facilities and technology that support the circular economy for the reuse of materials especially from construction. Also, to consider a digital passport for such materials and tie in with green procurement.</p> <p>It is quite possible that increased reliance on technology will have a bigger pull on our use of electricity and this should be considered within our green energy strategies.</p> <p>Reference should be made to the impact of digitalisation in accelerating the decarbonisation agenda. For example, the use of smart meters and data analytics at both household and industrial levels improve energy efficiency, reduce wastage which ultimately reduces carbon footprint. Digital applications are also transforming grid networks, enabling smart electric vehicle solutions and facilitating direct vehicle to grid charging which is revolutionising the transport sector.</p>
<p>9</p>	<p>How should we prioritise between maintaining or upgrading existing assets and new aspirations?</p>	<p>-</p>	<p>In terms of waste infrastructure, we would comment that the decision should be aligned to the Circular Economy Package and if they support the CE package, then that option should be prioritised, particularly where waste targets and landfill diversion is achieved.</p> <p>From a CE perspective, it is better to upgrade and reuse rather than build new. The decision to maintain and upgrade an asset should be based on a matrix of principles and not just on a cost basis. It could take into account other factors (similar to the “TEEP” model) such as technological, environmental (including CE) and practicable as well as economic considerations.</p> <p>As the report mentions and we have alluded to in our previous responses; some of the existing infrastructure is beyond being maintained and needs to be upgraded. For example, “70% of wastewater treatment works serving only 10% of the population” is clearly an inefficient way to continue.</p> <p>However, due to the concerns around budget already mentioned, we do believe that very careful consideration needs to be given to prioritising investment in terms of long versus short-term gains and the wider societal benefits or, in some cases, societal necessities (environment, water and power).</p>
<p>10</p>	<p>How should we communicate with consultees on projects that</p>	<p>-</p>	<p>There needs to be more open information around costs, impacts and the scale of the issues that already exist. As we mentioned in our response to Question 2, we feel that this report downplays many of the problems and the financial implications. It is clear that difficult decisions will need to be made, especially as we recover from</p>

	present affordability challenges, and thus may require alternative funding and financing to be utilised?		the impacts of the pandemic, and those decisions can only be taken appropriately if there is clear and honest information, that is provided in an understandable way.
11	Do you agree with the proposed prioritisation criteria? If no, then what changes would you suggest?	Y	<p><i>1. Does the proposed investment support the achievement of the objectives of the Programme for Government and the priorities of the Investment Strategy?</i></p> <p><i>2. Will the investment be sustainable and resilient?</i></p> <p><i>3. Is the proposed investment inclusive and equitable/equal?</i></p> <p><i>4. Is the proposed investment affordable?</i></p> <p><i>5. Is the proposed investment prepared for delivery?</i></p> <p>In principle, we agree with the proposed prioritisation criteria, but we would welcome further detail on how these general criteria, and weightings, will apply in practice. We also note that some of the judgement criteria are still at the development stage e.g. “4. Is the proposed investment affordable?” contains questions about developing criteria rather than criteria that can be applied to a project proposal. We would welcome the opportunity to comment on these criteria as they are further developed in the future.</p>
12	What level of engagement should we have with consultees on project milestones and delivery progress once a project has been programmed for delivery?	-	

13	Do you agree that the proposals we have set out will adequately measure progress and impact? If no, then how should we measure progress and impact?	Y	We welcome the move to a longer-term planning framework that is more suitable to multi-year infrastructure projects. Though we would caution about the potential for this to be misused. That is, there will still need to be clear early year targets around deliverables, milestones, and budgets to ensure that projects are not allowed to progress with issues to a point where it becomes too expensive to rectify. We would also suggest that it would be appropriate to have a mechanism to cancel projects that over time are no longer viable such as when assumptions used during the development of the business case are no longer relevant or can be justified.
14	Do you agree that the proposed accountability and oversight structures will support successful delivery? If no, then what other proposals should we consider?	-	
15	Do you agree with the process and the findings of the draft EQIA and Rural Needs Impact Assessment (RNIA)? If no, then please explain why.	-	We do not have any strong views in relation to this question.
16	Are there any other issues or inequalities that have not been highlighted in the draft EQIA or RNIA that you believe need to be noted? If yes, then please explain what they are.	-	We do have anything further to add to the draft EQIA or RNIA.

17	Are there any other comments or suggestions that you think are relevant to help us develop and deliver the Investment Strategy?	-	<p>Belfast City Council welcome the opportunity to respond to this consultation on the Draft Investment Strategy and welcome the commitment to an investment in both existing and new infrastructure. We are keen to stay engaged in this very important area of work, to ensure the economic, regeneration and social sustainability of Belfast and the wider region.</p> <p>We would also like to take this opportunity to reiterate some of the key points that we made in our submission to the Call for Evidence process:</p> <ul style="list-style-type: none"> • All forms of infrastructure investment are necessary for the sustainable economic growth. • Infrastructure investment should be targeted to Belfast to release the greatest economic potential and support inclusive economic development that provides the opportunity to sustainably increase GVA, and the ability of the region to compete internationally. • OECD research suggests that concentrating infrastructure investment in Belfast, would enable the city to become a centres of economic activity that would pull the Northern Ireland region to higher productivity levels. • Infrastructure enables economic growth, builds the connections to markets and opportunities and is a key consideration for inward investors. • Northern Ireland and Belfast has suffered long-term under-investment in infrastructure meaning its current infrastructure is under strain, not keeping pace with population growth and modern requirements. • The city’s water, drainage and sewerage infrastructure should be considered a key priority. LWWP has identified that Belfast has the worst drainage infrastructure in NI (over 70% of the NI Water infrastructure is over 50 years old) and a failure to act will have a significant consequence on future development (‘No Drains No Cranes’). <p>We would also like to particularly highlight a number of key considerations which we would like to be taken into account as part of this consultation, as summarised below.</p> <p>In terms of wider infrastructure delivery for Belfast and NI, there are a number of challenges:</p>
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		<ul style="list-style-type: none">• Governance- in order to facilitate integrated infrastructure planning and delivery, there is a clear need for better cross agency working and communication. The Northern Ireland Infrastructure Commission, with a clear remit and the support of the NI Executive, could bring significant value in developing and delivering on the vision to 2050, helping to broker and break down investment and delivery silos;• Collaboration- there is a need to ensure commitment to a collaborative public - private sector approach to unlocking key challenges with identified major city regeneration schemes, recognising that these will not only contribute to the region's growth ambitions and can act as a catalyst for inclusive economic growth. Council would advocate for optimal stakeholder/delivery vehicles for progression. This includes the need for the Executive and government departments to continue collaboratively working with the Council, public and the private sector to meet the growing and shifting demands of decarbonisation, digitalisation, integration and resilience;• City and Growth Deals- we welcome the recognition of the role of particular investments arising from the City and Growth Deals within the strategy, but would recommend that the strategy recognises more fully the role of City and Growth Deals as a major, joined up, placed based approach, which with the commitment of all partners and both governments, can play a key role in delivering across the investment objectives, including in particular in relation to building a strong, connected and competitive region, enhancing our communities and places, maximising the benefits from new technology and innovation and decarbonising our economy;• Greater public engagement to increase understanding and buy-in to major infrastructure decisions. This includes improving traditional community engagement and participation in the decision-making process to enable those likely to be affected or interested to influence infrastructure planning and delivery, learning lessons from the community planning process;• Data- central to the growing role of digital in infrastructure delivery is the ability of leaders and infrastructure providers to leverage meaningful insights from the billions of pieces of data being generated by users every day. Whilst the use of real-time operational data will transform management of facilities and services, it will also help provide a better evidence base for future investment and planning. Pursuing an ambition to be a leader in open data across infrastructure providers could help to realise these opportunities, informing the work of a future Infrastructure Commission to enable data-driven decision-making regarding investment priorities. Further, if supported by the development of new
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capacity and infrastructure, access to such data could also lead to greater control and flexibility for users by underpinning a shift to -intelligent choices across infrastructure sectors, including to support modal shift, low carbon energy provision, water efficiency and more.

- **Funding & Finance** - In our view the recommendations / outcomes from the consultation need to be costed and presented as priorities in multi-annual budgeting processes across departments to deliver an agreed solutions / action plans. The cost of investment is significant, but of at least equal importance is the long-term socioeconomic 'cost of not' making such investments. Strategic infrastructure delivery planning, with a long-term horizon, would help reduce the impacts of cyclical and stop-start investment. By smoothing out the impact of fixed funding cycles on pipeline delivery and enabling the investigation of options for extending some elements of work beyond current planning periods, transformative investments in infrastructure can be considered alongside more conservative options. Whilst constrained public finances is unlikely to change in future, by comparison institutional investors have huge unmet needs for safe and long-lived investments. A framework in which private investors, ranging from individual citizens to pension funds, can play a much larger role in financing public urban infrastructure investment is viewed by many as the only realistic mechanism to achieving the degree of investment cities need and should be considered as part of infrastructure planning. Council advocate for consideration of how FTC and the Northern Ireland Investment Fund, Levelling Up Funds or other funding can be best utilised or refocused to support infrastructure and regeneration priorities and unlock development and growth ambitions. Of critical importance, particularly where there are viability issues and to underpin proper placemaking, there is a need for funding to facilitate enabling infrastructure for development.
- **Programme for Government and 'Building Forward: Consolidated Covid Recovery Plan'** – that outcomes are aligned to the draft Programme for Government and the Executive's Covid Recovery Plan, to ensure deliverability, if they are agreed and implemented as an integrated element of the NI Executive's priorities.
- **Cities, Towns and Villages** – We understand that there needs to be a balance across the region. This is true for cities too. Belfast is everyone's main city and its important it plays its role as a centre for commerce, culture, tourist attractions, recreation, entertainment, learning and employment. Its core centre area needs to be reimagined entirely to ensure it can continue to perform these important roles for all areas to derive benefit. This will take investment. If Belfast is not supported to thrive then NI will collectively lose out on FDI, tourist spend, small business cluster development, cultural vibrancy etc and we will continue to lose our young people to cities

which provide a much more attractive mix in other jurisdictions. This is not simply a matter of saying Belfast is big enough and so will survive. Without investment any growth will be sub-optimal for all of the people across the island and we will continue to suffer from low productivity levels and higher rates of economic inactivity and poverty. The Taskforce needs to set out the role of Belfast and consider the support needed to strengthen its role in positioning the region for investment and innovation. Belfast City Council, alongside partners, has carried out extensive work, through the Belfast City Centre Regeneration & Investment Strategy, BRCD Programme, Belfast Innovation City, the Renewed Ambition public private partnership, our Future City Centre Programme, Cultural and Tourism Strategies and work to support arterial routes/neighbourhood centres. These all provide a strong platform to support the diversification of the High Street while still ensuring support for our retail and business population. These programmes and policies are supported through extensive research and best practice and require strong leadership and commitment across all our public and private sector partners and the NI Executive particularly in terms of policy, legislation and financing.

- There are currently a **number of policy, financial and structural challenges to delivery of placemaking housing regeneration schemes via public /private partnerships** and this is significantly impacting on the ability to delivery of regenerative housing at scale. Council would propose that a Task Group be set up to undertake a sharp, short, and focused review of these challenges and the mechanisms to overcome. This is critical to understand and deliver on optimal ways of working and delivery vehicles that involve the public sector working with the private sector and funders to bring forward appropriate housing development opportunities in a more agile way. This would ensure the required processes, delivery vehicles, funding and supporting infrastructure are aligned to deliver agreed outcomes to provide for appropriate housing development at scale whilst ensuring proper integrated placemaking.
- **Infrastructure** - There is a need to ensure that the resourcing deficit with required wastewater infrastructure including exploration of the potential for alternative funding models, is urgently addressed to ensure this does not prohibit current and future development. This should include how growth ambitions can be facilitated in terms of all the requisite infrastructure requirements and particularly in relation to the wastewater infrastructure.
- **Innovation and Inclusive Growth Commission: 'Reset for Growth' Report** – highlighted a number of key points which are relevant to the development and delivery of the Housing Supply Strategy and of

particular note are the strong recommendations around the need for structural models to support public-private collaboration and Housing Investment Funds. Relevant extract as below:

- *Renewed Future City – Housing*: There are a number of levers required to action the commitments of the Belfast Agenda at the pace and scale necessary to make an impact, which are not currently in place. A number of key gaps have been identified, principally in terms of the structural models required to support public-private collaboration and access to finance to bring forward developments. The Commission propose the establishment of a number of new institutions, namely Strategic Land Partnerships and Housing Investment Funds. The Commission feel that the scale of the task will require further intervention, particularly in stimulating private sector development, including affordable housing provision. For this reason, they suggest that the regional government and the Treasury should consider developing a Housing Investment Fund. This model has been successful in stimulating new housing construction at scale across a range of classes in many UK cities.
- Key Proposition: Create sustainable, vibrant communities in the city centre, delivering 11,500 new homes by 2035. The Commission’s proposals to accelerate delivery include Council, Northern Ireland Housing Executive (NIHE) and Department for Communities (DfC) establishing a delivery vehicle to utilise public sector land and undertake land assembly to facilitate new low carbon housing at scale across the city centre. (Note – a Housing Regeneration Group has now been set up under the Community Planning Partnership: City Development Board with BCC, NIHE, LPS and DfC, with a key focus of the group in identifying and utilising public sector lands). Vehicle should also develop housing mix, amenities, and neighbourhood development plan for city core. Target: 11,500 new homes in 10 years. Create new financial instruments including Housing Investment Funds to address market challenges related to risk and yield.

- **Current Policy and Legislation** – in relation to ensuring the appropriate policy frameworks are in place to accelerate regeneration and development, it is understood that there are issues specifically with areas which impact on housing led regeneration and with the current Housing Association Guidelines, which strongly need addressed. Our current understanding would suggest that the following issues need to be addressed:

			<ul style="list-style-type: none"> ○ Land: These require a housing association to have acquired land ownership prior to award/payment of grant assistance (land purchase, construction). However, where the land is currently in public ownership then there is scope, utilising the Development Brief process, for reflecting this public ownership of land as distinct from privately owned thereby potentially negating the need for the housing association to initially acquire a site. This ties directly into when a housing association would be expected to then pay to acquire publicly owned land and to explore potential for deferred terminal payment or equity ground rent payment approaches which will also assist with de-risking development. ○ Delivery of private sector tenure as part of a mixed tenure development is also currently impeded by Article 15 of the Housing Order with limitation on delivery of private housing by housing associations to the existing co-ownership model only (i.e., no private sales or rentals). With the desire for city centre development to be delivered across all three housing tenures there is an urgent need to address this policy issue if this objective is to be advanced. ○ Barriers: BCC have commented through the Call for Evidence response that the 3 main barriers to delivery of the Housing Supply are Funding, Delivery Vehicles & Land. Delivery of joined up policies and having supported and properly joined up infrastructure, with all 3 having to be overcome to support the development and growth ambitions of the Belfast Agenda, will be required. ○ Current lack of a policy on affordable housing, aligned to the revised definition of affordable housing, represents a risk to housing associations developing a business case in absence of affordable housing products. ○ Whilst not policy per se – lack of a city centre waiting list impacts on clarity for housing associations on latent demand. <ul style="list-style-type: none"> ● A Bolder Vision – which has ‘<i>Promote City Centre Living</i>’ as one of its 4 key moves aimed at encouraging city centre living by ensuring the enabling infrastructure is in place to facilitate city centre living with place making at its heart. It highlights the importance of providing greater quality, choice and affordability of accommodation and of critical importance is establishing a city-wide network of people friendly routes and city parks to create and underpin a liveable city centre. Council believes that the delivery of A Bolder Vision priorities via the joint BCC/DfI/DfC approach will be critical to the successful delivery of city centre living. From a Belfast perspective therefore, Council would highlight that the future delivery of A Bolder Vision is intrinsically linked to the HSS and should be embedded within Central Government /Executive priorities.
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- **High Street Task Force** – city centre living is critical to the reimagining and future sustainability of the high street / city centre and should be central to the High Street Task Force recommendations and embedded within Executive funding priorities. Increased City Centre Living is also a key area within the Council’s Future City Centre Programme which is charting the way forward for the diversification and sustainability of city centre uses. The Future City Programme is a multi-faceted programme that seeks to bring together a number of strategic initiatives and projects within one overall programme approach to address the issues impacting upon the city centre. It includes projects and interventions across various pillars of work centred on regeneration and connectivity, increased city centre living, investment, inclusive economic and cultural growth.

Waste

We note that there is no reference at all within the executive summary to deficiencies in the waste infrastructure within Northern Ireland and we emphasise the point that the scale of investment required for waste infrastructure in the region, is greater than ever before.

This overarching piece of work needs to financially support the ongoing work around waste legislation, such as the Environment Act, EPR, DRSs, CE etc. If there is not enough turnaround on support for councils, it will prove difficult for councils to deliver on requirements and targets.

In terms of the number of strategies, for example green growth, environmental and investment strategies, we would ask where the linkages between them all are and if there is one overarching strategy encompassing them all?

This overarching piece of work needs to financially support the ongoing work around waste legislation, such as the Environment Act, EPR, DRSs, CE etc. If there is not enough turnaround on support for councils, it will prove difficult for councils to deliver on requirements and targets.

We would also note the lack of a NI wide Waste Management strategy is a major barrier to waste management reviews and decisions.

We would reiterate comments that we submitted in response to the Draft Green Growth Strategy and the Draft Environment Strategy. These consultation responses can be found at the following links:

			<p>Draft Green Growth Strategy - Agenda item - Consultation on Draft Green Growth Strategy for Northern Ireland (belfastcity.gov.uk)</p> <p>Draft Environment Strategy - Agenda item - DAERA Environment Strategy consultation response (belfastcity.gov.uk)</p> <p>We would conclude by stating that there needs to be major change in the governmental approach to facilitate the development of waste infrastructure. The time scales involved in investment/planning decisions is not conducive to a region which is open for business and direct investment.</p>
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