

# Belfast Green & Blue Infrastructure Plan

*Comments by*

**Northern Ireland Environment Link**

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Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 65 Full Members represent over 100,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be happy to do so.

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We welcome the opportunity to provide comments on the Belfast Green and Blue Infrastructure Plan. We applaud the Council for developing this Plan, which provides clear recognition of the critical role that green and blue infrastructure plays in creating a safe, healthy and prosperous city. Over the lifetime of the Plan, existing G&B infrastructure must be protected and enhanced and there should be a clear increase in the scale and quality of G&B infrastructure across the City.

- In general we are satisfied with the five strategy principles. However, the content under each of the principles is overly descriptive and lacking in ambition. Whilst it is useful to describe existing G&B infrastructure there is a lack of detail about what the Council intends to do over the Plan period. A number of opportunities are cited under each principle, but they are vague and non-committal. Each section requires an additional layer of detail to outline specific and measurable actions that the Council 'will' deliver, rather than 'could' deliver. For example, under opportunities for integrating G&B infrastructure into the public realm, the Plan states 'this could be done through the introduction of street trees'. We would welcome detail on the overall number of trees the Council expects to plant over the Plan period.
- The Plan requires clear targets and indicators to drive action and provide a baseline against which to measure success. This will assist with monitoring over the lifetime of the Plan.

Targets could include:

- Number of trees to be planted over the Plan period
  - How many metres of new green roofs and walls throughout the city
  - How many amenity spaces regenerated through greening measures
  - How many metres of rivers de-culverted
  - How many Sustainable Drainage Systems (SuDS) created
  - How much £ invested to improve water storage in the surrounding uplands
- We welcome the idea of a biodiversity centre to enable a better understanding of the City's ecosystem assets. Habitat mapping and the development of a Natural Capital Index would allow the gains and losses in natural capital to be measured over time. The creation of this baseline data is essential. **BCC should take the lead and develop a Natural Capital Index** as well as a 'Roadmap' with practical actions to effectively implement natural capital accounting and help inform better decision making at local level.
  - Climate change is one of the most challenging global issues facing Northern Ireland and requires a response from all parts of government to both mitigate and adapt to ensure the resilience of Northern Ireland. Flooding, sea level rise and extreme weather have significant impacts on communities, infrastructure and businesses. The timeline of these events and the millions spent repairing the damage across Northern Ireland over the last decade demonstrates that we need to take resilience and adaptation to climate change seriously. The Plan should make clearer references and cross-references to the role of G&B infrastructure in helping to create a more resilient city that is better prepared to reduce the impact of extreme weather events.
  - Green and Blue infrastructure will be important for delivering sustainable solutions for Northern Ireland – for recreation and active travel, for flood alleviation and sustainable drainage. The **Council should play a lead role in the promotion and management of Sustainable drainage schemes (SuDS)**. If integrated effectively, SuDS can positively impact on water quality, quantity and amenity value for the surrounding area; reducing combined sewer overflow spills and flood

risk. Climate NI and the Institution of Civil Engineers held a cross-sectoral conference in October 2016. The conference report<sup>1</sup> identifies barriers to SuDS implementation and outlines a roadmap for optimising use of SuDS in NI. We would welcome further engagement on effective delivery of SuDS.

- De-culverting should be supported as a mechanism for opening up water systems and revitalising the aquatic system. This can also help reduce flood risk, as well as providing opportunities for nature and human interaction with the aquatic environment.
- Belfast City Council should lead by example and introduce greening measures to all buildings within the Council Estate. For example, green roofs and walls could be considered.
- Food can play a key role in dealing with some of today's most pressing social, economic and environmental challenges; such as obesity and diet-related ill-health, food poverty, waste and climate change. Given the work that Belfast Food Network has undertaken with BCC to develop Belfast's existing status as a sustainable food city, food should be more prominent within the Plan. The Plan should look to promote opportunities for greening through city growing/farming.
- Connectivity is rightly recognised and emphasised within the Plan. Linear parks and pocket parks should be developed, as well as other greening measures to enhance the green space network and provide green corridors for nature and people.
- We support the idea of environmental net gain being imposed on all new developments. This should not result in environmental assets being lost or destroyed during development in return for compensatory measures being implemented elsewhere. Developers should be required to undertake ambitious and meaningful greening measures.

We commend the Council for publishing this Draft Plan to initiate discussion. In the next draft we would welcome the inclusion of clearer actions, targets and measures to be delivered or achieved over the lifetime of the Plan.

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<sup>1</sup> [SuDS: Good Outcomes for Business, Environment and Society](#)