



# Views on the Climate Change Bill

Response to the call for evidence by the Committee for Agriculture, Environment and Rural Affairs by RTPI NI

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## Call for Evidence

The [Climate Change Bill](#) has recently come before the Northern Ireland Assembly sets out a framework to mitigate the effects of Climate Change in the coming years.

As part of the Assembly's normal legislative processes, the Climate Change Bill has been referred to the Committee for Agriculture, Environment and Rural Affairs for scrutiny and evaluation.

This document provides the response submitted by RTPI NI in July 2021 to the Committee.

## The Policy Objectives

The policy objectives of the Bill are to:

- Enable the mitigation of the impact of climate change in Northern Ireland;
- Establish a legally binding net-zero carbon target for Northern Ireland;
- Provide for the establishment and powers of a Northern Ireland Climate Commissioner and Northern Ireland Climate Office;
- Guarantee existing environmental and climate protections.

### 1. **What are your views on the overall policy objectives?**

RTPI NI supports the Climate Change Bill for Northern Ireland and its overall policy objectives. Climate change is one of the biggest challenges facing our society. As well as a climate emergency, we are also in the middle of an ecological emergency. Both are connected and should be tackled together. Climate change has exacerbated the impact of habitat loss and the fragmentation of biodiversity.

Northern Ireland has been slow to take climate action and therefore should not delay progressing climate change policies and actions.

The IPCC warns that any delay in action risks "cost escalation" and "reduced flexibility in future response options". This means the longer we wait to take action, the more costly the action will be for governments, businesses and society.



## **2. Do you think that the Bill will meet these objectives?**

Yes

The UK Climate Change Committee recommended that any climate legislation for Northern Ireland include a target to reduce all greenhouse gas (GHG) emissions by at least 82% by 2050 as part of a fair contribution to the UK Net Zero target in 2050 and international obligations under the Paris Agreement.

The Climate Change Bill is an important step forward in taking essential action to address climate change in Northern Ireland. Without legislation it will be too easy to be unfocused and risk an ineffective approach, taking short term decisions which do not address the problems.

It must also be recognised that the Bill will not deliver the changes needed on its own, the application of the policy and resourcing is also vital.

## **Declaration of a Climate Emergency**

### **1. What are your views on this?**

Declaring a climate emergency provides a public focus and attention to the problem which must be addressed. However declaring an emergency is not sufficient on its own; this must be backed by taking meaningful action to address the emergency. A failure to act now will defer costs to future generations and the most vulnerable, with the risks of climate and ecological breakdown to a weak economy becoming rapidly unmanageable in scale and complexity.

## **Net Zero Target**

### **1. What are your views on the target set out in the Bill to achieve a Net Zero carbon, climate resilient and environmentally sustainable economy by the year 2045?**

Northern Ireland needs to be proactive in the approach to be taken. The Bill sets out a legally binding net zero target for Northern Ireland that should have been established before now to make sure targets will be met. Nonetheless, RTPI NI supports the establishment of the targets in the Bill.

The Bill will help Northern Ireland achieve and deal with the issues specifically relevant to the Region in relation to mitigation and adaptation measures.

### **2. Do you think that the Net Zero emissions target is achievable?**

Yes

RTPI NI believes this is an achievable target, however it is important to impress that to achieve the very ambitious emissions reductions targeted the NI Executive will need to use the whole complement of public policy tools at its disposal. Crucially, this includes planning, which by helping to shape places that support sustainable decision making by people in their day to day lives, would help to mitigate some of the projected costs of cutting emissions, and associated impacts on vulnerable groups in particular.

The UN's New Urban Agenda, to which the United Kingdom is a signatory, provides a clear framework within which our towns and cities should develop as part of our efforts to reduce climate change causing emissions. Transformative changes in our built environment and infrastructure need to be comprehensively planned and closely coordinated in order to maximise co-benefits and be effectively implemented on the ground.

### **3. Do you think that the timescale to deliver the Net Zero emissions target is achievable?**

Yes

This rapid transition will require structural changes to the economy, and new ways of living and working. It will inevitably take time to change behaviours and make the



significant investment required, which is why there should be no delay in putting in place action plans to deliver the ambitions of this Bill.

The following decades are likely to see further risks from extreme weather and the breakdown of ecological systems, which will disproportionately affect the most vulnerable in society. A focus on long term impact is however essential.

The recovery from the pandemic must be different from recovery from past economic downturns: with no alternative but to rebuild in a way that creates a more sustainable, resilient and inclusive society. A failure to act now will simply defer costs to future generations and the most vulnerable, with the risks of climate and ecological breakdown to a weak economy becoming rapidly unmanageable in scale and complexity.

#### **4. Do you think that the timescale outlined in the Bill to achieve Net Zero should be revised if circumstances change?**

No

There is a robust and wide-spread body of evidence which points to the need for speed in taking action and whilst it is accepted that many of the changes needed will take time, the focus for taking action must not be alleviated. It is imperative that timescales are not relaxed. In fact, as learning across sectors and society and technological advancements are made, progress can be incrementally accelerated, but the focus must be there from the start with investment in public policy understanding and delivery.

The Bill sets a time limit for producing the climate action plan to be within three years of Royal assent. RTPI NI regards this as too long a framework and would recommend a shorter timescale of a maximum of two years.

### **Climate Action Plans**

Clause 3 of the Bill requires the government to produce Climate Action Plans on a 5-yearly basis to achieve the Net Zero Target. The Climate Action Plans will:

- Have annual targets for net greenhouse gas emissions, water quality, soil quality and biodiversity
- Outline measures to achieve the target including carbon budgets and nitrogen budgets

#### **1. What are your views on this?**

This is a proactive approach which is welcomed and makes the targets more achievable by breaking them down to direct action across all of the essential indicators. Setting targets will also help people and communities socially adapt to meet the new targets, as well as mitigate the impacts of climate change.

RTPI NI welcomes the recognition that future Local Development Plans (LDPs) should align with the Climate Action Plans. This will however open up a debate about the cycle of local plans compared with climate action plans. Planners will need skills and resources to ensure they can not only produce LDPs which align with the Council's targets in terms of carbon budgets, biodiversity etc but also monitor their performance. This will also require much more interdisciplinary working in Councils between planners and climate change and sustainability officers to ensure alignment.

A useful tool that planners in local authorities could use when coming up with their carbon budgets is the online tool developed by the [Tyndall Centre for Climate Change](#) which allows local authorities to calculate a carbon budget for any UK local authority or larger administrative area, and create climate change targets that are based on the commitments from COP21 and the latest synthesis report from the IPCC. The [RTPI Index of Climate Tools](#) would also benefit this area of work.

The RTPI is also publishing an update to our [Rising to the Climate Crisis](#) with the TCPA which will cover Northern Ireland (due for publication at the end of this year). The current guide gives politicians and planners the knowledge and confidence to



tackle climate change and improve resilience. The current guide is aimed primarily at the local planning system in England, although the principles have wider applicability.

## **2. Do you think the proposed Climate Action Plans are an effective way of delivering the Net Zero target?**

Yes

The proposed Climate Action Plans provide a way of breaking down the issues and necessary action into manageable segments, providing clear reporting lines and accountability for action.

The Climate Actions Plans should set out a clear role for Councils to avoid mass confusion. The UK CCC has produced a very good report on how the UK Government should support authorities in climate action and similarities can be drawn: [Local Authorities and the Sixth Carbon Budget - Climate Change Committee \(theccc.org.uk\)](https://www.theccc.org.uk/reports-and-consultations/2022/06/02/local-authorities-and-the-sixth-carbon-budget-climate-change-committee/). A key point in this report is that there should be collaboration between Government and local authorities through the following four key things:

- **Framework:** An agreed framework for delivery for Net Zero incorporating local and national climate action
- **Financing:** Appropriate long-term financing to support local authorities in delivering Net Zero
- **Flexibility:** Local operational flexibility around how local areas address climate change
- **Facilitation:** coherent policy and powers for the facilitation of delivery.

In the UK CCC's [annual progress report](https://www.theccc.org.uk/reports-and-consultations/2022/06/02/annual-progress-report/) to Parliament, published at the end of June, they recommend that in order to meet carbon budgets, the Government should introduce a 'net zero test' which all decisions should be measured against, including planning decisions. This is something the Executive should consider introducing in their climate action plans.

## **Office of a Climate Commissioner**

### **1. What are your views on this?**

RTPI NI supports the establishment of an independent climate commissioner to hold the Assembly and Executive to account on the implementation of the Act. An independent commissioner which is able to withstand changes in political priorities would provide long term direction and stability for this critically important need.

### **2. What role and powers do you think the proposed Commissioner should have?**

As well as monitoring the implementation of the Act, the Climate Change Commissioner should offer a positive role in enabling climate action by providing an education / awareness raising role to highlight measures to support the implementation of the Act to a wide range of stakeholders.

## **Sectoral Plans**

The Bill sets out that within the Climate Action Plans there will be specific policies and proposals in the following sectors to achieve the overall emissions target:

- energy production and supply (including for residential, public and district;
- heating and cooling purposes;
- transport (including shipping and aviation);
- infrastructure (including infrastructure for electric vehicular transport);
- business and industrial processes;
- residential and public (in relation to buildings in these sectors);
- waste management;
- land use and land-use change, including forestry; and
- agriculture



**1. Do you agree with the proposal to have specific sectoral policies associated with the Climate Action Plans?**

Yes

Having specialist focused Actions Plans is beneficial and provides focused responses to be developed and delivered, however it is essential that they work together and are not written and delivered in isolation.

**2. What impact do you think that these sectoral plans will have in terms of helping to achieve Net Zero targets?**

Spatial Planning is part of the solution to major social, economic and environmental challenges. As markets respond to the climate crisis by providing new green jobs, planning can boost the UK and Ireland's competitive advantage by creating places which meet the needs of those businesses and industries driving the shift to a zero-carbon and circular economy.

Planning plays an essential role, with its ability to integrate energy, transport and land use planning, encourage sustainable travel, develop the best local solutions to low carbon energy, deliver well located and energy efficient housing, guide investment in integrated blue and green infrastructure and coordinate strategic resilience to the impacts of climate change. Planners can also help ensure that climate mitigation and adaptation strategies align with the local development visions for the area, national policies and the UN Sustainable Development Goals, helping to maximize co-benefits and prioritise a consideration of the impact on vulnerable groups.

However, neither the planning system or its policy framework are well-equipped enough to deal with the climate crisis in Northern Ireland yet. It is essential that local planning authorities are resourced appropriately and fairly to deal with the climate emergency.

It is no surprise that spatial planning is recognised by the UK CCC as one of the biggest opportunities that Local Authorities have to deliver net zero, yet it continues to be undermined by viability and an overwhelming focus on housing numbers rather than building sustainable homes in the right location.

Climate change also poses a risk to historic landscapes, structures, buildings and archaeology, the explicit mention of measures for built heritage should be considered.

**3. How do you think the above sectors might be affected by the proposals?**

Investment will be required to meet action plans and address the climate challenges, but not making changes will cost far more in the medium to long term. In many instances, it will not be a high financial cost, it will be a change in how things are done which will bring about the benefits.

To take the necessary action, a new perspective is needed, a new approach to how we all work and live. Many of the changes can be relatively small, so that collectively they have an impact. Crucially we need to approach how we do things differently; the pandemic has shown us we can make this change.

The Climate Change Commissioner could provide a valuable role here in promoting new ways of working and sharing best practice.

## Resource Implications

**1. What do you think the resource implication of the Bill will be for:**

- **The Department of Agriculture, Environment and Rural Affairs**

The Department of Agriculture, Environment and Rural Affairs (DAERA) will have a great deal of the expertise required to inform the action required and the monitoring capability. It will need to ensure it has the resources to provide this, not only to support its own responsibilities but across all Departments and key agencies.



Not taking action will have a significant impact on the resources of DAERA, with many of its areas of responsibility adversely affected by climate change and the associated nature emergency.

- **The Northern Ireland Executive**

The Executive must take a leadership role in delivering climate action for Northern Ireland, and support all Departments, local government, and other stakeholders and business. It has a natural role to be the coordinating body and lead the necessary actions to support Northern Ireland through the very real problems the Region faces through climate change.

This will require it to fully understand the issues and to have the advice available to it for it to lead on decision making, for example through Departmental budget setting.

It must be understood that not taking action will lead to significant problems with rising costs and increasingly limited solutions to address them.

- **Specific sectors of the Northern Ireland Economy**

There will be a need for many sectors across Northern Ireland to review their approaches to how they work and operate. Public policy can support this change, for example through the design of and conditions on grant programmes or subsidies.

**2. What do you think are the most important issues for the government when making funding plans to help achieve the aims of the Bill?**

As part of a cost benefit analysis it is instructive to consider how action to reduce emissions that focuses on influencing behaviour could result in places that deliver greater economic, environmental and social benefit. For example, enabling active travel as the primary means of transport in cities could also deliver public health objectives; reducing inactivity and incidences of disease associated with it, and therefore possibly making savings on healthcare costs.

## Access to Specialist Advice

The Bill proposes that the UK Climate Change Committee (UK CCC) will provide advice to the Commissioner when they report annually against the Climate Action Plans.

**1. Do you think this is appropriate?**

Yes

The UK Climate Change Committee is an independent and specialist resource which would be helpful to provide advice to the Commissioner. However the Commissioner should be able to commission any further specific advice on specialist topics where the UK CCC is unable to advise.

**2. Are there other sources of expertise that may be needed to inform progress to achieve the Net Zero targets?**

RTPI NI do not have recommendations to make on other sources of expertise.

## Responsibility on Public Bodies

The Bill places obligations on a wide range of organisations to help achieve the emissions targets and it will influence policy across a number of public Departments. This includes introduction of a scheme to track carbon usage that will be overseen by the Department of Agriculture, Environment and Rural Affairs.

**1. What are your views on the roles and responsibilities placed on public bodies as set out in the Bill?**

It is imperative that all public bodies take climate action and deliver their own holistic plans.



**2. Do you think that there should be a lead responsible government Department for delivering the aims of the bill?**

Yes

There would be a benefit in having a lead Department for the purposes of the lead for the Climate Change Commissioner and for drawing together monitoring etc. from all Departments and providing a corporate reporting responsibility. However all Departments should have responsibility in taking climate action, no single Department should be responsible for delivering climate change on its own.

**3. If you think there should be a lead Department, please tell us which one and why.**

A joined up approach is needed to ensure an effective response to the climate emergency.

Effective working between government departments will be critical to ensure that any demands placed on the planning system and LPAs will be matched with an adequate level of resourcing and powers to deliver them. This is key to ensure that strategies to decarbonise energy and transport, deliver low-carbon buildings and provide nature-based solutions can be integrated and be implemented without delay, creating new jobs and supporting a full and green recovery from COVID19.

Cross-departmental strategies should provide clarity on the legislation, regulation, policy and investment needed to decarbonise heat and transport, and deliver national environmental priorities. These should remove barriers to planning for networks of active travel, district heat, smart energy and multifunctional blue/green infrastructure, ensuring that investment is directed to solutions which have local support and deliver multiple benefits.

**4. What are your views on the Implementation of carbon usage-tracking scheme?**

RTPI NI does not have detailed knowledge of the carbon-usage tracking system. However there is a need for transparency on carbon usage, which will also enable individual operations understand where there needs to be action to reduce carbon emissions.

## Transboundary Considerations

**1. What are your views on how the Bill addresses transboundary issues in relation to Climate Change?**

For climate action to have any impact, the carbon production cannot be simply exported elsewhere. Therefore any decisions taken in Northern Ireland must not simply 'export' the carbon production to beyond the Northern Ireland borders. The opposite is also true, Northern Ireland should not accept to generate carbon on behalf of any other jurisdiction looking to reduce its own direct impact.

**2. Do you think that there should be a transboundary approach to Climate Change?**

Yes

Decision makers should consciously avoid any decisions which simply export carbon emissions as a solution to reducing their own emissions.

## Rural Impact Assessment

**1. Do you think it is important to assess the impact on rural communities of the proposals provided for in the Bill?**

Yes



Rural communities are important and should not be forgotten. They can be adversely affected by climate action, for example coastal communities are affected by the increase in the occurrence and ferocity of storms and rising sea levels.

The concept of 'climate justice' focuses on social dimensions, and makes clear that climate change represents an ethical challenge, as much as a scientific or technical one. Policy makers must consider not only how and why levels of vulnerability to climate change vary, but also how and why their policy responses benefit or disadvantage different groups. Answering these questions requires long-term thinking, coordination and engagement across sectors and places, all of which demands effective spatial planning.

## **2. What do you think is the best way to consider the potential rural impacts?**

Rural areas can play a huge role in addressing climate change. Introducing nature-based solutions in both rural and urban locations, such as ecosystem based adaptation and mitigation and green and blue infrastructure in addition to improving agricultural methods and environmental stewardship have the potential to provide up to 30% of the greenhouse gas mitigation required until 2030 to keep global warming to less than 2 degrees.

Planning policy provides a strong mechanism and guide to managing development, particularly in rural areas and steering development to locations which are more sustainable i.e. they are able to access the majority of services in easy reach so they reduce their own impact on carbon emissions, and are in safe locations.

### **Additional Information**

#### **1. Are there any other measures not included in the Bill that you think should be included?**

No comment.

#### **2. Do you have any other comments you would like to make about the Climate Change Bill?**

The Climate Change Bill is an important piece of legislation which must be taken seriously and not delayed. It is in the interests of all communities across Northern Ireland for the Bill and subsequent action plans and action to be action.

The RTPI promotes understanding on social justice and recognises communities will be impacted differently by climate change, and to be successful, responses to climate change must carefully consider their different needs and voices.

Well designed climate change policies can both reduce the equity concerns of climate change, and address a range of social issues for which climate change is not the primary driver. The provision of green infrastructure is an excellent example of this. It is often a central component of urban climate adaptation policy, being crucial to addressing overheating, flooding, and soil erosion. But it also has a range of co-benefits for mental health and physical fitness. Similarly, ensuring that communities have good access to public transport can reduce carbon emissions, while benefiting low-income communities which are particularly reliant on public transport for mobility.

Overall, putting people - and particularly disadvantaged communities - front-and-centre of thinking about planning for climate change helps to highlight the multiple social benefits of climate change adaptation and mitigation measures. This holistic perspective can help when prioritising adaptation planning options when resources are limited, and convince decision-makers at various levels to adopt policies which contribute to mitigation/adaptation, even when they might be reluctant to consider addressing climate change as an end in itself.





**RTPI Northern Ireland**  
Royal Town Planning Institute

## Royal Town Planning Institute (RTPI)

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