



Views on the Climate Change (No.2) Bill

RTPI Northern Ireland response to the call for evidence and views

.....

The Climate Change (No.2) Bill aims to set targets for 2030, 2040 and 2050 that will reduce greenhouse gas, provide a system for carbon budgeting, for reporting against targets and budgets, give power to impose reporting duties on public bodies and to provide for reports and advice from the Committee on climate change. The Bill has been introduced by the Minister for Agriculture, Environment and Rural Affairs [Climate Change \(No. 2\) Bill \(niassembly.gov.uk\)](#)

This document provides the response submitted by RTPI NI in September 2021.

RTPI NI has also responded to the call for evidence on the previous [Climate Change Bill in July 2021](#). The Climate Change (No. 2) Bill is a second proposed climate change bill for Northern Ireland.

1. The Bill Objectives

What are your views on the overall Bill 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 there should be no further delay in progressing climate change legislation, policies and actions.

Do you think that the Bill will meet these objectives?

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. The Climate Change (No.2) Bill, whilst it has some value, does not deliver the necessary legislative requirements for taking climate action.

2. Emissions Targets

What are your views on these emissions targets?

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 and this is reflected in the Bill. However, the Bill should be striving for a higher target and set a commitment to net zero carbon, which is essential.

Do you think these emissions targets are achievable?

RTPI NI is unsure if the targets are achievable. There are many caveats in the Bill which could lead to further delays in achieving the targets.



Do you think that the timescales to deliver the emissions targets are achievable?

The targets are not overtly challenging and should be achievable. However there is a need to set higher targets for Northern Ireland.

3. Power to Amend Targets

Do you think that this is appropriate?

RTPI NI does not support the powers to amend targets as set out in the Bill.

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.

4. Carbon Budgets

RTPI NI welcomes the use of carbon budgets as a way of breaking down the journey of reducing carbon emissions.

Do you think the proposed Carbon Budgets are an effective way of delivering on the emissions targets?

Unsure, however, the Bill contains many opportunities for amendments and transfer of budgets between periods which reduces the focus on the reason for taking climate action and may result in not achieving the overall target.

Clause 15 of the Bill allows DAERA to adjust a Carbon Budget by carrying a proportion of the emissions level forwards or backwards to a different Carbon Budget period (up to a maximum of 1% of the later Budget) after consulting other Government Departments and the CCC. Do you think that this is appropriate?

This provides a loss of focus in taking action to reducing carbon emissions. There should be an absolute focus on reducing emissions as quickly as possible, without 'get out clauses'.

5. Progress Reporting

Do you think that this is an effective way to monitor progress?

Yes.

6. Independent Oversight

What are your views on this?

The UK Climate Change Committee is a valuable independent and specialist resource. However action in Northern Ireland would benefit from also having its own independent oversight.

7. Responsibilities on Government Departments and Public Bodies

Do you think that the responsibilities on Government Departments set out in the Bill are appropriate?

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. 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.

Under Clause 21 DAERA may impose Climate Change reporting duties on specified public bodies following consultation with the organisation/entity concerned. What are your views on this?

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

8. Resource Implications

What are your views on this? Please tell us your views

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. Whilst the RTPI recognises there is a cost in taking climate action, the cost of not taking action will be far greater.

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

Departmental budget setting will need to have climate change as a core consideration. It must be understood that not taking action will lead to significant problems with rising costs and increasingly limited solutions to address them.

9. Access to Specialist Advice

Northern Ireland would greatly benefit from its own independent climate change commissioner, giving a focus to the issues in Northern Ireland and the resources required.

10. Transboundary Considerations

What are your views on how the Bill addresses transboundary issues in relation to Climate Change? By transboundary we mean different countries and/or jurisdictions working together.

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

RTPI NI would support a transboundary approach to Climate Change.

11. Additional Information a) Are there any other measures not included in the Bill that you think should be included and why?

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.



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.

Royal Town Planning Institute (RTPI)

The RTPI champions the power of planning in creating prosperous places and vibrant communities; RTPI NI leads on our work in Northern Ireland. We have over 26,000 members, with 750 in Northern Ireland, in the private, public, academic and third sectors.

Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social and environmental challenges. We are the only body in the United Kingdom that confers Chartered status to planners, the highest professional qualification sought after by employers in both private and public sectors.