

10 October 2008

Jon Freeman  
Assistant Secretary  
Royal Commission on Environmental Pollution  
Room 108  
55 Whitehall  
London  
SW1A 2EY  
[jon.freeman@rcep.org.uk](mailto:jon.freeman@rcep.org.uk)

Dear Mr Freeman,

**Study on “Adapting the UK to Climate Change”  
Invitation to Submit Formal Written Evidence**

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 51 Full Members represent over 85,000 individuals, 262 subsidiary groups, have an annual turnover of £100 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.

These comments are agreed by Members, but some members may be providing independent comments as well.

NIEL submitted comments to the Royal Commission’s original call for evidence on this topic on 25 January 2008. We would once more draw attention to these comments as they highlight many issues which are particular to Northern Ireland. We have not attempted to respond to every question in this response: however we hope you find our comments useful.

**Q2:** NIEL believes that the RCEP study should concentrate on interpreting the climate change that we may already be experiencing in the UK and what will happen in the next 5, 10, 25, 50 and 100 years. It is important that a range of possible climate change scenarios are considered including the do nothing mitigation option and the 2, 3 and 4°C temperature increase options.

**Q3:** NIEL and its member organisations have for many years been advocating strong promotion of the adaptation message. The level of understanding of the strategies required to adapt to climate change is developing all the time and our organisations are committed to sharing this knowledge with government.

NIEL is very concerned by the Northern Ireland’s Assembly’s lack of progress on adaptation or mitigation. Climate change projections are not considered in most government policies and there has been very little acknowledgement of the need to adapt to climate change by Assembly officials. European legislation is driving the limited work that is going into adaptation measures, however, we believe a much more strategic approach is now necessary. The Northern Ireland Regional Development Strategy is currently under review; adapting to and mitigating climate change must be a central aim of the revised Strategy.

**Q4:** NIEL believes that mitigation and adaptation measures are intrinsically linked and that the government should make a clear commitment to advance both. The Northern Ireland Assembly has stated its support for the UK Climate Bill, however, it

is hard to see how this has translated into specific actions. The situation is further compromised by the Northern Ireland Minister for the Environment's stance on climate change. While the Minister has accepted that the climate is changing he does not accept that man has contributed to this change and thus models that predict future scenarios based on our greenhouse gas emissions are unlikely to form the basis of future adaptation strategies (never mind introducing policies to reduce our emissions).

**Q5:** Northern Ireland is embarking on a period of considerable (£16 billion) infrastructure investment. The decisions we make in the next few years will determine to a large extent how we will cope with climate change in the next 25 years. The investment projects are continuing with little or no thought to climate change; for example, many planning decisions are based on the ability of systems to cope with one in 30 year events while in reality one in 100 year events are projected to become much more common (there have been two such flooding events in the past two years in Belfast).

**Q9&10:** It is essential that our strategies for adaptation of the natural environment are integrated with strategies for the other major land uses and institutional considerations. To allow species to adapt to the effects of climate change, wider, landscape scale, policies must also be considered. We must promote opportunities for movement and adaptation of species within a landscape, and create new landscapes that make this possible.

The review of the Regional Development Strategy will allow planning and conservation experts to take a strategic view of the habitats in Northern Ireland and offer the opportunity to design plans and policies which will create the more ecologically coherent networks of protected and important sites that are required to increase the resilience in our biodiversity.

NIEL has identified the urgent need for climate change adaptation measures to be made a priority. We believe that **climate change impact assessments should be incorporated within all government policies and strategies**. The assessments should detail the impacts of programmes and projects on mitigation targets and ensure that all policies take into account the ability of human and natural systems to adapt to climate change. In particular, planning can be used as a key driver of a low carbon economy and can help deliver 'future proofed' infrastructure and natural systems. Planning policy should ensure that the impacts of any proposed development on carbon emissions and the potential impact of climate change consequences on the development are considered. It is particularly important that climate change impacts are a strong consideration in all decisions relating to nature conservation as new ways of looking at designated sites (e.g. buffer zones, corridors, low intensity networks and landscape scale actions) will be required for wildlife to adapt to changing climatic conditions. Planning and nature conservation policies and action plans should facilitate the implementation of landscape scale action to help habitats and species adapt to climate change. The traditional practice of designating nature reserves as the primary means of protecting either species or habitats will need to be reviewed.

**Q11:** NIEL does not believe the current Assembly places sufficient value on the natural environment. While Northern Ireland citizens are becoming increasingly aware of the importance of the natural environment more work is needed to ensure that the appropriate level of protection is delivered by government. The Wildlife Order in Northern Ireland is currently being reviewed: NIEL has suggested that the legal framework for invasive non-native species is updated as part of this review.

**Q13:** As stated previously there is a lack of understanding and acceptance of climate change issues within some areas of government in Northern Ireland. There is no strategy for adaptation to climate change in Northern Ireland and movements on mitigation measures are being thwarted due to the Environment Minister's stance.

**Q17:** NIEL believes in the principles of legislative subsidiarity but believes that the policy leadership should come from the highest level. All regions should contribute to shared challenges such as climate change and should be held to account by national and international bodies.

**Q18:** Without significant external pressure it is unlikely that the Northern Ireland Assembly will be able to deliver significant policy change to allow adaptation measures to be adopted.

We thank you for the opportunity to make these comments. We hope that you find them helpful and that they will be incorporated in future policy. If you would like to discuss them further please do contact us.

Yours sincerely



Prof Sue Christie  
Director  
Northern Ireland Environment Link  
89 Loopland Drive  
Belfast  
BT6 9DW  
P: 028 9045 5770  
E: [Sue@nienvironmentlink.org](mailto:Sue@nienvironmentlink.org)  
W: [www.nienvironmentlink.org](http://www.nienvironmentlink.org)

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