Call for Evidence on A Future Focused Review of the Strategic Planning Policy Statement (SPPS) on the issue of Climate Change

Comments by

Northern Ireland Environment Link

28th March 2024

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 69 Full Members represent 190,000 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.

Malachy Campbell
Senior Policy Officer
Northern Ireland Environment Link
89 Loopland Drive
Belfast
BT6 9DW
P: 028 9045 5770
E: info@nienvironmentlink.org
W: www.nienvironmentlink.org

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Q1) Can you provide any evidence on how and why the Department should update, revise, and improve 'The Purpose of Planning' as contained within the SPPS so that it is fit for purpose and suitably future proofed to appropriately support the Climate Change agenda going forward? Please detail.

The Department needs to update the SPPS to take account of the many developments in policy, legislation and scientific evidence that have taken place since the 2015 SPPS.

The Strategic Planning Policy Statement for Northern Ireland[1] (SPPS) Planning for Sustainable Development 2015 says in paragraph 2,1 on page 10 that

"*The objective of the planning system, consistent with Part 1, Section 1 of the Planning Act (Northern Ireland) 2011 (hereafter referred to as the 2011 Act), is to secure the orderly and consistent development of land whilst furthering sustainable development and improving well-being.* "

This is a worthwhile aim which NIEL would support. However, this could potentially be improved by expanding on the objective, for example, to

"*deliver a shared and dynamic vision of land use, where development of land takes place in a timely and consistent manner, and prioritises the long-term needs of present and future generations by embedding sustainability, resilience and wellbeing at the core."*

The first of the green growth principles in the draft Green Growth Strategy consultation[2] from 2021 for example, aims to (see page 15)

"*Respect our planet - by restoring and protecting our natural capital. Future human wellbeing depends on a healthy and resilient natural world*"

The NI Audit Office (NIAO) recommended in its 2022 report[3] "Planning in Northern Ireland"

"*The planning system should positively and proactively facilitate development that contributes to a more socially, economically and environmentally sustainable Northern Ireland*."

However, it appears the NIAO regard the planning system as not living up to those aspirations as illustrated by its conclusion[4] that

"*Ultimately, as it currently operates, the system doesn't deliver for customers, communities or the environment*."

Amongst many other issues, the NIAO found[5] that

"*Almost one-fifth of the most important planning applications aren't processed within three years*."

Related to that, in its current form, planning is, amongst other things, regarded by many as a barrier to the achievement of NI's renewable energy targets. For example, according to the 2024 report by the Northern Ireland Chamber of Commerce "Planning Improvement and Reform Position Paper"[6]

"*Northern Ireland Chamber of Commerce and Industry (NI Chamber) has become increasingly concerned with the performance of the Northern Ireland planning system and how it is delaying investment in the Northern Ireland economy, impacting on the delivery of housing, both private and for an increasingly acute affordable housing need, and perhaps most critically, affecting the transition to net zero*."

One of the priorities for the Chamber of Commerce[7] was to prioritise renewables and to do that made the following recommendation

"*Provide mechanisms for the prioritisation and effective resourcing of projects at all stages of the process which will deliver for renewable energy and energy decarbonisation targets*."

The report goes on to say[8]

"*Investment, particularly in renewables, will be lost without a clear and timely route through planning, including the PAC*."

In its written evidence to the House of Commons Renewable Energy and Net Zero in Northern Ireland Inquiry in 2024, Queens University Belfast (QUB) said that[9]

"*Changes to the planning system will be a key measure needed to meet NI's 2030 renewables target*."

QUB went on to argue that

"*Bringing down the processing times for planning applications is essential otherwise it is difficult, if not impossible, for the 2030 targets to be met*."

In the course of that HoC inquiry, the Permanent Secretary of the Department for the Economy[10] said that in relation to the key barriers to allowing NI to meet its renewable energy targets

"*The speed at which we can progress planning applications, or indeed the ability to get them passed at all, will be a significant barrier to us achieving that*."

The case for reform of the planning system seems clear.

Q2) Can you provide any evidence on how and why the Department should update, revise, and improve 'Furthering Sustainable Development' (including Mitigating and Adapting to Climate Change and The Importance of Ecosystem Services) in order to better support the Climate Change agenda? Please detail.

According to paragraph 3.1 of the 2015 SPPS

"*Sustainable development is at the heart of the SPPS and the planning system*."

Paragraph 2.4 of the SPPS states that

"*In furthering sustainable development and improving well-being it is crucial that our planning system supports the Executive's Programme for Government commitments and priorities as well as the aims and objectives of the Regional Development Strategy 2035 (RDS) which is its overarching spatial strategy for Northern Ireland*."

Unfortunately there is no current PfG (as of March 2024) for the SPPS to reflect and this is one of the strategies the Executive needs to update now that the NI Assembly is up and running again. While it is appropriate that the SPPS supports the aims and objectives of the RDS, it is just one of the strategies and policies the SPPS needs to support. The new Executive will need to review how the legislative and policy landscape has changed since the SPPS was published in 2015 and amend it and the new SPPS on climate change accordingly. While we wait for a new PfG, NIEL would encourage DfI to ensure that planning is managed and implemented in line with the statement in the Programme For Government's Outcome Delivery Plan for 2018-19 which said[11]

"*Our health and wellbeing are directly affected by the quality of the environment around us and, therefore, it is vitally important that we take steps to protect and enrich our natural environment. Achieving economic growth at the expense of the environment, through degradation of finite resources by overuse or causing pollution is not sustainable*."

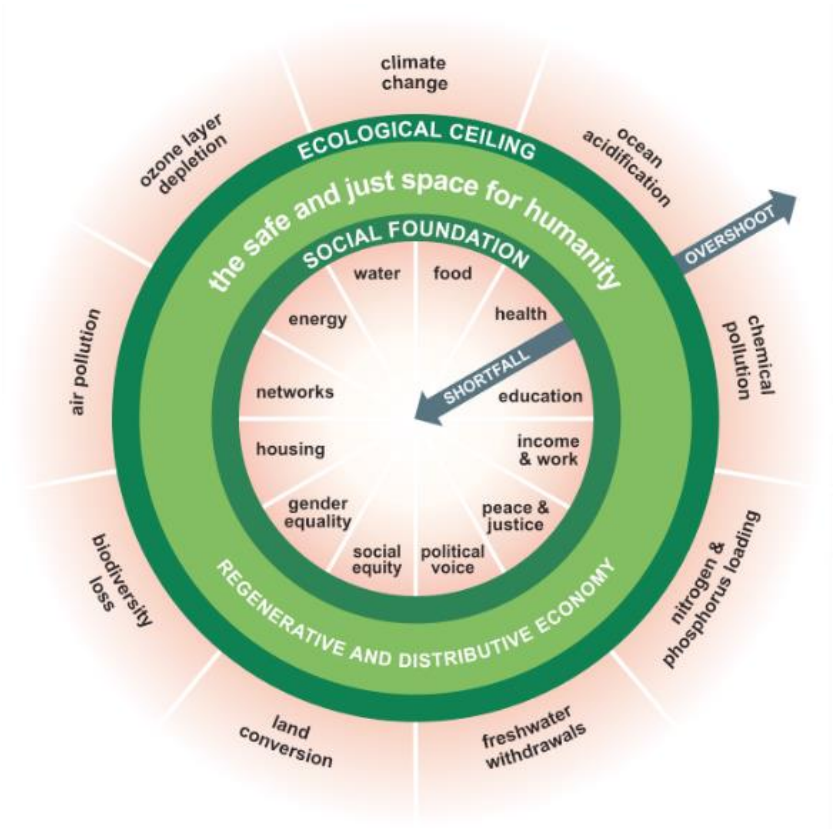
NIEL notes that in paragraph 2.2 of the 2015 SPPS it says that

"*A key dimension of sustainable development for Northern Ireland is economic growth."*

This statement appears to lack balance and seems to be emphasising economic interests above others when considering sustainability, which would be an inappropriate step.

If delivering on the Sustainable Development Goals (SDGs) is such an important part of the SSPS then NIEL would encourage the NI Executive to go further and explicitly refer to the importance of delivering on the SDGs in NI as a principle of the SPPS. If NI is to develop in a sustainable manner then NIEL believes NI needs to move towards a Doughnut Economics model[12], where we thrive within the planetary boundaries and ensure everyone is above the social foundation level. The Doughnut model is outlined in Figure 1. It consists of two concentric rings: a social foundation, to ensure that no one is left falling short on life's essentials, and an ecological ceiling, to ensure that humanity does not collectively overshoot the planetary boundaries[13] that protect Earth's life-supporting systems. Between these two sets of boundaries lies a doughnut-shaped space that is both ecologically safe and socially just: a space in which humanity can thrive.

Figure 1 Doughnut economics model



NIEL would certainly support sustainable development being at the heart of the SPPS and the planning system but unfortunately, as outlined in our response to Q1, it is clear from experience and available evidence that this is not the case.

The current SPPS[14] (from 2015) does recognise climate change as a challenge in furthering sustainable development (see paragraph 3.10) and Paragraph 3.13 sets out how the planning system can help to mitigate and adapt to climate change. However, the (2015) SPPS needs to be updated to reflect the climate emergency and biodiversity crisis formally declared by the NI Assembly in February 2020[15] and other relevant legislative and policy changes including the Climate Change Act (Northern Ireland) 2022[16]. The 2015 SPSS and Section 3 in particular should be updated to account for the need to incorporate climate change mitigation and adaptation issues into all planning decisions.

Biodiversity and Ecosystem services

The state of biodiversity in NI can be used as an indicator of how NI is performing in relation to sustainability and is also a relevant consideration in terms of the importance of ecosystem services, as many ecosystems are not healthy and functioning as they should.

It has been clear for a while that biodiversity in NI is not doing well. As the DAERA draft NI Environment Strategy[17] published in 2021 said

"*Key reports in 2019 reported concerning trends in abundance indicators for a suite of species in NI and widespread loss, degradation and fragmentation of habitats*."

There are many other sources of evidence of the poor state of NI's biodiversity. For example the State of Nature Report (2023)[18] found that of 2,508 species in Northern Ireland that have been assessed using IUCN Regional Red List criteria, 12% have been classified as threatened with extinction from Ireland as a whole. This represents a deterioration of the situation revealed by the State of Nature Report 2019[19] which found that 11% (272) of the 2,450 species found in Northern Ireland that have been assessed using the IUCN Regional Red List criteria, and for which sufficient data were available, were threatened with extinction from Ireland as a whole.

The 2015-2020 NI Biodiversity Strategy[20] was supposed to deliver a plan on how NI could meet its local and international commitments to protect nature and ensure the environment can continue to support people and the economy. However, a review of the NI Biodiversity Strategy by RSPB NI[21] revealed that 83% of government commitments (35/42) set out in the strategy have not been adequately met. An updated biodiversity strategy is now overdue, the previous strategy ran out in 2020.

In research by the Natural History Museum and RSPB, NI got a ranking of 12 (out of 240 countries and territories, where a ranking of 1 is the lowest biodiversity intactness and 240 the highest) in a Biodiversity Intactness Index, which indicates how much nature is left from a pristine state, for the amount of nature it has left[22,23].

The paragraphs (3.14 to 3.16) in the 2015 SPPS on the importance of ecosystems services are good but should be updated to reflect the most up-to-date evidence and policy context. For example, these paragraphs and the 2015 SPSS generally need to be amended to reflect the role of carbon budgets in our path to Net Zero, further to the Climate Change Act (Northern Ireland) 2022, for example, to account for the importance of bogs and peatlands as carbon sinks and the resulting need to restore and protect them from degradation. DAERA's Peatland Strategy, when published, will be relevant, though the draft Peatland Strategy, published in 2021, was seriously lacking in ambition and needs to be improved. The language used in the draft Peatland Strategy consultation was vague and weak and there was a noticeable lack of strategic thinking, most notably in relation to target setting, as often no dates were attached to priority actions, and a lack of recognition of the need to integrate with other relevant strategies, policies and commitments.

The role of nature-based solutions, for example, peatland restoration, urban greening and the provision of blue and green infrastructure, must be better recognised and scaled up due to the potential to create environmental and socio-economic benefit[24]. NIEL believes that working with nature in this way also fits with Outcome 2 (We live and work sustainably –

protecting the environment) in the draft 2016-2021 Programme for Government and the approach in the UK Government's 25 year plan for nature 'A Green Future' in which the UK government committed[25] to

"using more natural flood management solutions where appropriate"

The revised SPPS for climate change should also account for the aims and objectives of all relevant strategies and legislation, including, but not limited to, the overdue and soon to be published new Environment Strategy[26]; new Biodiversity Strategy (the previous strategy covered the period up to 2020)[27]; new Food Strategy (which was due to have been published in 2022)[28]; new Waste Management Strategy (as the last one ended in 2020)[29] and new NI Marine Plan[30]. Any new SPPS on climate change should, of course, be fully aligned with the Climate Change Act 2022.

According to The Circularity Gap report[31], NI's economy is 7.9% circular—leaving a Circularity Gap of more than 92%. This also means that the vast majority of resources we consume in NI comes from virgin sources. NI consumes a total of 33.6 million tonnes of materials each year, equal to 16.6 tonnes per capita, more than twice the global average of 11.9 tonnes per capita. To live sustainably, the United Nations recommends that we should only be using an average of 6-8 tonnes of resources per person per year[32].

There are some of many potential examples of how our ecosystems are under threat and deteriorating and the planning system needs to counteract that.

Adaptation

In the original 2015 SPPS, reference is made to the first Northern Ireland Climate Adaptation Plan 2014 - 2019 (Para 3.11)

"*which set out the strategic objectives, proposals and policies by which each department would contribute to the adaptation programme."*

The NICCAP programme (led by DAERA) and the Climate Change Commission's CCRA reports (which will also inform the emerging 5 year Northern Ireland Climate Action Plan) provide a useful evidence base on how collectively as a region, across all sectors, we are adapting to climate change and the new SPPS on climate change should refer to these. The forthcoming Northern Ireland Climate Adaptation Plan (NICCAP 3) for the period 2024 to 2029 is due to be published in 2024 and the SPPS should, as far as possible, account for the evidence and advice outlined in it.

Mitigation

The first Northern Ireland Climate Action Plan is currently in development and due to be published for consultation later this year and along with the other strategies outlined above, should, as far as possible, be accounted for in the revised SPPS.

As noted by the CCC in its 2023 report "Adapting to climate change: Progress in Northern Ireland"[33] given the importance and power of the local development plans, the language in the SPPS could be strengthened to ensure climate adaptation and mitigation are demonstrable requirements. This extends to issues such as surface water flooding or requirements for mandatory SuDS. The existing wording is not legally defined which means there is little clarity for decision-makers at all levels, for developers, and for the Planning Appeals Commission (PAC), adding further stress to a range of issues regarding design and decision-making throughout the system.

3) Can you provide any evidence on how and why the Department should update, revise, and improve the 'Core Planning Principles' in order to better support the Climate Change agenda? Please detail.

According to the section "Preserving and Improving the Built and Natural Environment" in the 2015 SPPS (paragraphs 4.37 to 4.40)

"Our environment must therefore be managed in a sustainable manner in accordance with the Executive's commitment to preserve and improve the natural environment and halt the loss of biodiversity."

"Plans and proposals should be rigorously assessed for their environmental impacts."

NIEL would support the call for sustainable management and for rigorous assessment for plans and proposals and the full and appropriate compliance with existing requirements, for example, all Appropriate Assessments (AAs) which includes Habitats Regulations Assessments (HRA), and Environmental Impact Assessments (EIAs). All development must be accompanied by the appropriate level of environmental assessment, which must be competent and robust and this should be a key component of the SPPS. As part of this process, the mitigation hierarchy should be applied. Applying the mitigation hierarchy would mean that in the first instance, any impacts must be avoided but where this is not possible, then the impacts must be minimised. Only where this is not possible then sufficient mitigation measures must be put in place. The precautionary principle must be applied and followed so that if and where there is a lack of scientific certainty, development should not go ahead. Finally, there is the issue of habitat fragmentation. The Lawton Principles[34], from the 2010 review "Making space for nature" called for sites for nature to be bigger, better and more joined up to create an effective ecological network, should be applied.

Some elements which could be added to the five principles, include ‘resilience’ as a concept added to health and wellbeing, promoting mixed use and ‘requiring’ actions as opposed to ‘supporting’ good design. Perhaps the greatest need is for much clearer guidance on what the required standards and considerations for each of these principles should actually be, for both developers and the planning officers who are reviewing the proposals. This should be linked with a very clear sense of thresholds, metrics and standards where possible, which should ambitiously deliver for nature and climate, as well as better monitoring and collecting of data by councils, linked to a central database for ease of reporting.

Paragraphs 3.10 to 3.16 in the 2015 SPPS in particular emphasise the importance of mitigating and adapting to climate change and the importance of ecosystems.

4) Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy ‘Flood Risk’, as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

The Climate Change Commission’s CCRA3 evidence reinforces the message that we need to be prepared for more frequent and extreme weather events such as those seen over the past 10 years. Flooding presents a serious risk to people, property and the environment arising from the changing climate in Northern Ireland and so the SPPS needs to be updated to provide a robust regional strategic planning policy to mitigate and adapt to climate change.

As suggested in paragraph 10.3 of the call for evidence, the Department needs to update the document to account for more recent evidence available in the UK Climate Predictions (UKCP18) and the most recent flood maps, as current guidance is out of date.

Approval and responsibility for sustainable drainage systems remains inconsistent in Northern Ireland. DfI Stormwater Management Group is currently looking at the proposals for SuDS and considering how SuDS in developments might be approved and maintained. NIEL would support the greater use of SuDS and other nature based solutions, as referred to in our response to Q2 and the new SPPS on climate change should encourage greater use of SuDS. This would be in line with the greater use of SuDS recommended by the UK Committee on Climate Change (CCC) in its 2023 report “Adapting to climate change: Progress in Northern Ireland” [35] where it said

“*SuDS interventions must become mandatory. Government should move promptly to create a clear SuDS approval process and ensure that SuDS in new developments and retrofits are well-regulated, maintained and monitored. It should also set out mechanisms for funding installation and maintenance of SuDS and green infrastructure***.”**

The CCC also recommended[36] that

"*Councils should review and monitor local development plans to embed climate decisions and require designs to integrate the latest flood plain definitions from DfI guidance*."

Current regional planning policy, within the Strategic Planning Policy Statement (SPPS) and Flood Risk Planning Policy Statement (PPS15), is based on the present day 1 in 100-year fluvial floods and the 1 in 200-year present day coastal floodplains and is in need of updating. DfI now provides planning authorities with updated Climate Change flood mapping guidance based on a 2080s timescale, to add to what is written in policy. The SPPS should be updated to ensure that Local Development Plans (LDPs) and councils are automatically required to adhere to the most recent updates to DfI guidelines.

5) Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy 'Transportation', as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

The 2015 SPPS recognises, in paragraph 6.293, that

"*successful integration of transport and land use is fundamental to the objective of furthering sustainable development*".

There is no doubt that transport in NI needs to be much more sustainable. According to DAERA's Environmental Statistics report 2023[37], transport was the second largest sector in terms of GHG emissions in 2020 contributing 16% of NI's emissions. Agriculture was the largest emitting sector accounting for 27% of NI's GHG emissions.

The private car continues to dominate day-to-day travel in Northern Ireland. According to the Travel Survey for NI 2021[38], 69% of all journeys were made by car. This is also reflected in the very high levels of spending on roads versus public transport in Northern Ireland, as compared to England, Scotland and Wales. According to the National Audit Office[39], in 2017-18, 59% of the NI transport budget was spent on roads with 18% spent on railways, 11% on local public transport and 12% on other transport. By comparison in England 31% of the transport budget was spent on roads, 59% on railways and 8% on local public transport. In Scotland 42% of the transport budget was spent on roads and 47% on public transport (39% on railways and 8% on local public transport). In Wales 45% of the transport budget was spent on roads and 51% on public transport (46% on railways and 5% on local public transport). NIEL would like to see a significant shift in spending so that so that the overall transport spend has at least a 50/50 split between roads and public transport, similar to the spending pattern in other UK administrations. The promotion of public transport and active travel is also crucial to delivering sustainable, low carbon solutions for connected infrastructure across Northern Ireland and can create significant economic, social and environmental benefits, and the planning system will be really important in helping to facilitate that or hinder it.

The target in paragraph 22[40] of the Climate Change Act (Northern Ireland) 2022 is for NI to spend at least 10% of the transport budget on active travel and it is essential that the Department for Infrastructure complies with this legal obligation. This would represent a significant increase in funding as, according to Sustrans, in 2022 only 2% of the travel budget was spent on active travel. In contrast, the Republic was spending 20% of its transport budget on walking and cycling[41].

As the Department for the Economy Energy Strategy consultation[42] from 2019 points out

"*There has been little to no shift towards active or sustainable transport since the Travel Survey for Northern Ireland was first carried out twenty years ago*"

It therefore seems that the investments made in active travel and public transport have resulted in little or no change in the uptake of those options. Rather than thinking about how to move cars through cities and around NI, the Executive and the Department for Infrastructure in particular, needs to think about how to move people through cities and around NI. In this context, NIEL welcomes the statement in the Energy Strategy consultation[43] that

"*We need to take steps to help consumers to reduce travel and move towards active travel and public transport*."

NIEL believes that the NI Executive, in particular the Department for Infrastructure should do more encourage a shift away from private car use to active transport and public transport by the provision of the infrastructure and services that will ensure higher levels of active travel and public transport. For example, according to the Department of Infrastructure, there were 3.7 million passenger journeys on Glider services since they were introduced on 3 September 2018 up to 31 March 2019[44] and the use of the Comber Greenway has risen by 75% between April and November 2020[45].

Greater levels of investment in broadband should also help encourage a shift away from private car use for commuting if there is more home based working. As Edmund King from the AA said in 2020[46]

"*in future, we should invest more in broadband because what this current crisis has shown is that the majority of companies can continue working from home, and it can be more efficient*." [47]

There are other legislative and policy measures that could be adopted to encourage greater use of active travel and use of public transport including the introduction of an Active Travel Bill and an increase in investment in active travel and public transport. The importance of

having the appropriate infrastructure in place to enable an expansion in active travel was illustrated in the 2015 cycling strategy for NI 'Changing Gear'[48], which has a three pillar approach to getting more people to cycle and these were 'Build', 'Promote' and 'Support'. The 2021 Travel Survey for Northern Ireland shows that in 2021, cycling accounted for 1% of all journeys (a decrease from 2% in 2020) and 1% of total distance travelled (the same as in 2020)[49].

Any active travel infrastructure must be safe and the safety of cycling infrastructure is a key issue. As outlined in Sustrans 2019 report 'Bike Life', concerns about safety was the top reason why people do not cycle or cycle less often. Furthermore, 80% of those surveyed said that more traffic free cycle routes away from roads would be useful to help them cycle more and 77% of those surveyed said more cycle tracks along roads physically separated from traffic and pedestrians would be useful to help them cycle more[50]. The provision of safe, active travel infrastructure, i.e. separate from roads, which is much more extensive should also be integrated with public transport networks e.g. greenways to bus and train stations, and the provision of bike racks at public transport stations to further encourage this shifty to active travel. Also, increasing mileage allowances for travel to work by bicycle should also be applied.

Active travel also offers opportunities for increasing mental and physical wellbeing, reductions in pollution, improving air quality and economic benefits. For example, according to Cycling UK[51], the average economic benefit-to-cost ratio of investing in cycling and walking schemes (active travel) is 13:1 while research for the UK Department of Transport found that cycling schemes can have benefit-to-cost ratios in the range of 5:1 to 19:1, with some returns as high as 35.5:1. This research also found that a typical "cycling city" could be worth £377 million to the NHS in healthcare cost savings, in 2011 prices[52]. By comparison, according to UK Department for Transport Road Investment Strategy: Economic analysis of the investment plan[53] the benefit-to-cost ratio for bypasses and link roads is 2:1. So clearly, investing in active travel offers a very positive return on investment, generally much better than road building and on top of that, greenways can also offer opportunities for enhancing biodiversity.

According to 'The Value of the Cycling Sector to the British Economy: A Scoping Study' (2018)[54], cycling's economic contribution to the UK is £5.4 billion with the larger share of this, £4.1 billion, coming from wider impacts, particularly reductions in loss of life, and reduced pollution and congestion. Products associated with the cycling industry contribute £729 million while tourism attributable to cycling contributes, at least, a further £520 million. The researchers described these as minimum estimates of the scale of the cycling economy and argued that if benefits associated with avoidance of climate change damage, reduced morbidity, improved mental health as a result of physical activity, and improved children's health were included, there would be an additional contribution of £3.0 billion. The research also found that cycling generates around 64,000 FTE jobs in the UK including jobs in tourism, sales and repair, cycle delivery, manufacturing, and cycle infrastructure. The report compared cycling to the steel industry which in 2016 had an economic output of £1.6 billion and supported 32,000 jobs. Cycling UK also state that if cycle use in the UK were to increase from less than 2% of all journeys (2016 levels) to 10% by 2025 and 25% by 2050, the cumulative benefits would be worth £248bn between 2015 and 2050 for England -

yielding annual benefits in 2050 worth £42bn in today's money[55]. Also according to Cycling UK, cycle commuting employees take one less sick day each year than non-cyclists and save the UK economy almost £83m.

In summary, it seems that accounting for the social, recreational, health and economic benefits it generates, there should be much greater investment in cycling and active travel and public transport and so the Department for Infrastructure needs to ensure that the target in paragraph 22[56] of the Climate Change Act (Northern Ireland) 2022 for NI to spend at least 10% of the transport budget on active travel is met as soon as possible and not delayed.

6) Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy 'Development in the Countryside', as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

This is a quite broad category but development in the countryside, as elsewhere, needs to be strategically located to minimise impacts on nature while adhering to the mitigation hierarchy and complying with the requirement for competent and robust environmental assessment.

The clustering, consolidating and grouping new development in proximity to existing established building and promotion of the re-use of buildings, subject to clustered development not exerting pressure on nature by, for example, fragmenting habitat is welcome. The 2015 SPPS needs to reflect the changed (greater) priority for protecting biodiversity and mitigating and adapting to climate change, in particular paragraph 6.66 and 6.76 should also be amended to reflect this. NIEL would refer the Department to the response from RSPB NI for further information in relation to these matters.

7) In light of the declared climate emergency and the requirements of The Climate Change Act (Northern Ireland) 2022, can you provide any other evidence on how and why the Department should update, revise, and improve the SPPS to better support the Climate Change agenda? Please detail.

The 'Mitigating and Adapting to Climate Change' section in the 2015 SPPS (page 13) needs to be updated to reflect the changes in evidence, legislation and policy since 2015, in particular the Climate Change Act (Northern Ireland) 2022[57] and the Assembly motion in February 2020 that declared a climate emergency and biodiversity crisis.[58]

The Climate Change agenda has changed significantly since 2015, most recently and most significantly with the introduction of the Climate Change Act (Northern Ireland) 2022. Since 2015 when the first SPPS was published the UK as a whole and NI have introduced legislation committing each administration to achieving net zero greenhouse gas (GHG) emissions by 2050. For example, according to the targets in the Climate Change Act

(Northern Ireland) 2022, NI will need to reduce its greenhouse gas emissions by 100% by 2050 and by at least 48% by 2030 compared to the 1990 baseline. Similarly, the target in paragraph 15[59] of the Climate Change Act (Northern Ireland) 2022 is for NI to produce 80% of its electricity from renewable energy sources by 2030, higher than the previous target of 70% as outlined in the Energy Strategy[60]. The new SPPS needs to account for the new legislation and the new targets this act contains, amongst others.

NIEL believes that investing in a sustainable, resilient, low and ultimately zero carbon, green economy will help to create a bigger, better and more resilient ('future proofed') economy that is better able to meet the demands of a changing society. The many benefits of a green or greener economy have been highlighted and endorsed by many prominent organisations. For example, this is supported by the findings of the United Nations UNEP Green Economy Report (GER)[61] that

"*Greening the economy not only generates growth and in particular gains in natural capital, but it also produces a higher growth in GDP and GDP per capita. Under the GER modelling exercise, a green investment scenario achieves higher economic growth rates than a business as usual scenario within 5-10 years*"

"The whole economy needs to be green and traditional sectors of the economy will need to be transformed"

The many potential economic benefits of moving to a net zero GHG economy are clear. For example, in the Sixth Carbon Budget, the CCC found[62] that

"*the net costs of the transition to net zero by 2050 (including upfront investment, ongoing running costs and costs of financing) will be less than 1% of GDP over the entirety of 2020-2050, lower than we concluded in our 2019 Net Zero report*."

Modelling commissioned for the CCC Sixth Carbon Budget report[63] suggests achieving net zero in the UK will give a boost to UK GDP growing to around 2% of GDP by 2030, with an accompanying boost to employment of around 1%. According to this analysis the GDP boost will continue growing after 2030 before levelling off at around a 3% boost by 2050. The CCC goes on to say[64] that considering the various economic models and evaluations, the investment programme for achieving net zero set out in section 2 of the Sixth Carbon Budget report

"*can provide a significant economic boost in the coming years and support the UK's economic recovery*."

Investing in a green economy and zero carbon options can also save money in the long term. The CCC said in its Sixth Carbon Budget report (page 261) that

"*Around half of the measures to reduce emissions are expected to be cost saving by 2050, primarily decarbonising electricity and surface transport*."

The potential for job creation in renewable energy and low carbon choices is enormous and must be maximised. This was illustrated by research for The Institute for Public Policy and Research[65] which concluded that greater investment in a green recovery and clean, low-carbon jobs could create 1.6 million new jobs over the next decade in the UK, of which over 40,000 could be in Northern Ireland. This is more than three times the 11,700 FTE jobs in the low carbon and renewable energy (LCRE) economy in NI which generated £2 billion in 2017[66].

Of those 1.6 million jobs, half a million (560,000) could be created by improving the energy efficiency of homes, which would also help reduce fuel poverty and help the health and economic prospects of thousands. Action is required across government but it is important to recognise that many of the green economy policy options can generate benefits across society, in line with the aims of the Green Growth strategy and the draft NI Programme for Government (PfG) 2016-21. For example, the benefits from investing in better insulation in buildings could create jobs for people and firms (relevant to the Department for the Economy), reduce carbon emissions (relevant to DAERA) and reduce fuel poverty (relevant to the Department for Communities) by saving energy and making buildings warmer. This would have very positive impacts on the physical and mental health of those who would be taken out of fuel poverty and live in warmer properties (relevant to the Department of Health) and all of this could be delivered by improving building regulations, which is the responsibility of the Department of Finance. This illustrates why integration between departments and strategies in any new SPPS on climate change is so important.

The new SPPS on climate change will need to account for these and other policies and sources of evidence.

-ENDS-

[1] https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/SPPS.pdf
[2] https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Green%20Growth_Brochure%20V8.pdf
[3] https://www.niauditoffice.gov.uk/files/niauditoffice/media-files/NIAO%20Report%20-%20Planning%20in%20NI.pdf page 10
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