



Subject:	BCC Public Consultation Response to the Draft NI Climate Action Plan 2023-2027
Date:	9 th October 2025
Reporting Officer:	John Tully, Director Organisational and City Strategy
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Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report/Summary of Main Issues
1.1	The purpose of this report is to inform members about the recent public consultation on the Draft NI Climate Action Plan 2023-2027
2.0	Recommendation
2.1	<p>I. Members are asked to note the proposals set out in the consultation document and to approve the draft Council response as attached at appendix 1. Subject to approval by Council, the response will be submitted to DAERA via their online consultation platform.</p> <p>II. Approve the officer response that was submitted by Belfast City Council to the public consultation which closed on 8th October 2025.</p>

3.0	Main Report
3.1	<p data-bbox="272 208 448 241">Background</p> <p data-bbox="272 253 1469 421">The Climate Change Act (Northern Ireland) 2022 committed Northern Ireland to reducing its greenhouse gas (GHG) emissions to net zero by 2050, with a series of five year carbon budgets set to ensure steady progress from the outset. In December 2024, the Executive agreed that for the period of this plan, 2023-2027, GHG gas emissions need to be reduced by an annual average of 33% from 1990 levels.</p> <p data-bbox="272 443 1469 611">Importantly, the Act places a specific legal duty on all Northern Ireland departments to exercise their functions, as far as possible, in a way that supports achieving targets and carbon budgets. This ensures a shared responsibility both to reduce emissions through policies and proposals included in this plan and to monitor any likely impact on emissions of emerging policies and proposals during this first carbon budget period, 2023-2027.</p> <p data-bbox="272 633 1369 689">The draft Climate Action Plan sets out 52 policies and proposals designed to reduce emissions across nine sectors:</p> <ul data-bbox="320 712 946 1137" style="list-style-type: none"> • energy production and supply; • transport; • business and industrial processes; • residential buildings; • public buildings; • waste management; • agriculture; • land use, land-use change and forestry; and • fisheries. <p data-bbox="272 1160 1481 1361">Some sectors are expected to contribute more than others; some policies and proposals have a greater impact than others; some contribute to emissions savings across more than one sector. Together, these policies and proposals set a roadmap of action needed to reduce emissions and keep Northern Ireland on track for future targets. Policies and programmes referenced also vary in terms of states of readiness, with some well established and others still under development.</p> <p data-bbox="272 1384 1481 1440">The CAP attempts to quantify the potential GHG emission reductions that the 52 policies and programmes might result in, with analysis based on a number of stretching assumptions.</p>
3.2	<p data-bbox="272 1469 608 1503">Draft Council Response</p> <p data-bbox="272 1514 1469 1671">Overall, the approach of the CAP's policies and proposals outlined is welcomed and supported, as is the recognition by DAERA that without adequate, secured funding and political and public backing, achieving the carbon budget will be challenging. Within the draft consultation response, a number of key points and recommendations were made, as summarised below.</p> <ul data-bbox="320 1693 1481 2069" style="list-style-type: none"> • Energy - we welcomed more detail on the proposed Renewable Electricity Support Scheme for Northern Ireland but cautioned that without a complementary additional policy towards storage, it could lead to higher electricity bills for consumers and additional challenges for the grid operator. The response also highlighted that significantly more investment will be needed than is currently planned to meet rising electricity demand and increased supply of renewable electricity. • Transport - re-ordering the three proposed transport policy priorities (of switching fuels to lower emission versions, switching modes of transport and reducing the need and length of journeys) to prioritise reducing car journeys and modal shift in urban areas, recognising the risk around the global supply chain for critical minerals needed for the proposed fuels and technologies. Transport related policies should also

consider targeted financial support, such as grants, for low-income households and consider instruments to promote the used electric vehicle market as well as incentives for rural users.

- **Business and industrial processes** – a major challenge is the labour skills gap both in terms of number of workers and skills for new low carbon services and technology. A limitation of the current Energy and Resource Efficiency Programme is that the technical consultancy support is only available for businesses spending over £30k annually on energy and resources, which excludes many small businesses (80,000 registered SMEs and 70,000 micro businesses in operation across Northern Ireland). The need for policies to incentivise the re-use of waste heat from industrial processes for heat networks was also highlighted.
- **Residential buildings** - lack of finance is a major barrier to the implementation of domestic retrofit in NI. The response welcomed a radical scaling up of the proposed energy efficiency and warmer healthier homes programmes to a scale that mirrors schemes available in GB and Rol. In addition to strengthening Building Regulations to improve building fabric, householders require impartial support and advice to help them access funds and improve the energy efficiency of their homes. The response also cautioned against policies that would incentivise the continued use of oil boilers in urban areas.
- **Public buildings sector** - councils should be included in future government energy efficiency schemes. Although councils do not represent a large proportion of emissions in this sector, they have an important presence in communities and should be seen to be leading by example in terms of energy consumption and best practice. Climate should be considered throughout public sector capital projects, factoring in considerations such as Sustainable Urban Drainage and Whole Life Carbon Modelling as standard. The need for a specific support mechanism to help develop heat networks and make them competitive with gas heating, in particular mechanisms to support/facilitate the connection of public buildings to heat networks as this will avoid the costly grid upgrades that would be required if all public buildings were fitted with individual heat pumps.
- **Waste** – a 65% municipal recycling rate whilst reducing waste to landfill to not more than 10% by 2035, will not be met without the inclusion of all commercial and industrial waste and there must be greater emphasis on statutory buy-in from this sector. To meet these targets, Northern Ireland requires clear strategic direction in the form of policy and legislation supported with adequate finances. There is also a need for improved data provision from the commercial and industrial sectors to assist with waste projections and ensure compliance with waste legislation.
- **Agriculture** - rather than seeking interventions to address pollutants caused through over stocking the pollution should be decreased at source by moving to more regenerative farming practices, identifying the carrying capacity of land to assess sustainable livestock numbers and taking into account factors such as soil type and local hydrology.
- **Land use, land-use change and forestry** – the response challenges the claim “that sustainable forestry, including afforestation meets the requirements of the UK Forestry Standard and open habitat restoration, is, by definition, a nature-based project”, as it does not meet the International Union for Conservation of Nature definition. Likewise, coniferous forests are not nature-based projects as claimed in the plan. The response advises alignment with the UK Forestry Standard which recommends 5% native broadleaved trees or shrubs; 10% of other tree species; and 10% open ground, or ground managed for biodiversity as the primary objective. The response also recommends an assessment of current forest estate planted on peat and identify opportunities to restore these peatland areas.
- **Economic Impact Assessment of the CAP** – the response highlights the failure of the Plan to frame climate action as a cost avoided, treating the short-term costs of climate

	<p>action in isolation, without comparing them to the much higher economic, social, and environmental costs of climate inaction. Cost avoidance is critical to justifying the upfront investment. Also, there is no mention of intergenerational equity, acknowledging that climate action today helps avoid passing greater costs and risks onto future generations.</p>
4.0	<u>Financial and Resource Implications</u>
4.1	At this stage there is no immediate resource or financial ask of the Council to respond to this public consultation.
5.0	<u>Equality or Good Relations Implications/Rural Needs Assessment</u> Consideration of equality, good relations and rural needs was embedded in the consultation document questions by DAERA and in Belfast City Council responses.
6.0	Appendices I – Council Public Consultation Response II – <u>Link to Draft NI Climate Action Plan 2023-2027</u>