



Eastern & Midlands Regional Assembly  
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[by email to: [rses@emra.ie](mailto:rses@emra.ie)]

**Re: Public consultation - Draft EMRA Regional Spatial and Economic Strategy**

A chara,

The Climate Adaptation, Soils, GMOs and Chemicals Division in the Department of Communications, Climate Action and Environment welcome the opportunity to contribute to the public consultation on the EMRA draft Regional Spatial and Economic Strategy. We wish to make the following initial comments on the draft.

**Spatial planning and climate change adaptation**

As noted in the National Adaptation Framework, the planning process provides an established means through which climate change adaptation objectives can be integrated and implemented at local level. Climate change considerations need to be taken into account as a matter of course in planning-related decision making processes and the deepening of adaptation considerations in planning policy and development management is essential to increasing the resilience of the built environment.

The implementation of the National Planning Framework through the RSESs must ensure that the planning system responds successfully to the challenges of climate change and specifically those associated with how Ireland transitions successfully to a low carbon, climate resilient economy by 2050. The most effective strategy is to integrate or mainstream climate change considerations into statutory plans and guidelines, policy statements, programmes and projects at all levels of government. It is therefore welcome to see such a strong emphasis on climate action throughout the draft RSES, however it is essential to ensure there is the appropriate coordination and coherence through the various offices and planning processes at national, regional and local level.

**Regional and local level climate action - role of CAROs**

The National Adaptation Framework sets out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions and ensure climate adaptation considerations are mainstreamed into policy making.



The Framework identifies the critical role to be played by local authorities in addressing climate change adaptation. This will effectively build on their existing expertise and experience as first responders in emergency planning scenarios. Under the Framework each local authority will also be developing their own adaptation strategies in line with the “Local Authority Adaptation Strategy Development Guidelines” published by the Department of Communications, Climate Action and Environment in December 2018. The Guidelines note the role of the Assemblies and the RSEs. As you are aware, local authorities have been set a deadline for the completion of local strategies of 30 September 2019. These completed adaptation strategies should then be used over time to mainstream climate adaptation considerations into the plans and policies of the local authority including County/City Development plans.

The establishment of four Climate Action Regional Offices (CAROs), funded by this Department, recognises the significant obligation which has been placed on local government to develop and implement its own climate action measures, as well as the need to build capacity within the sector to engage effectively with climate change – both in terms of mitigation and adaptation.

Service level agreements (SLAs) have been put in place between the Department of Communications, Climate Action and Environment and each CARO lead authority and the Department is currently finalising a work programme with the CAROs for 2019. Items in the work programme will reflect the role outlined for the CAROs in the agreed SLAs and under the National Adaptation Framework. This will include a role for the CAROs in supporting the development of local adaptation strategies.

The work programme will also ensure the CAROs review local authority progress in terms of mitigation to date, allowing them to then consider the options available to advance the low carbon agenda within the local authority sector in consultation with the Department and other stakeholders as necessary. National climate mitigation policy is continuing to develop as can be seen in the ongoing preparation of an All of Government Plan for Climate Disruption which will build upon existing policy frameworks and will also have regard to the objectives of the National Planning Framework.

In light of this we recommend that the RSES should include high level objectives in relation to climate mitigation which reflect the relevant National Policy Objectives of the National Planning Framework. This will help to promote the best possible coherence between the objectives of the National Planning Framework and the activities of both Regional Assemblies and individual local authorities.

Any role included for the CAROs within the RSES must reflect the role envisaged for the CAROs within the SLAs and their annual work programme agreed with the Department. We understand that there have been ongoing discussions between EMRA and the CAROs within the region in relation to this matter. This division is happy to facilitate further



discussion on how the CAROs can support the RSES process going forward and welcome further engagement with all three regional assemblies going forward on these issues.

Mise le meas,

A handwritten signature in black ink, appearing to be 'M. J. ...', is written over a horizontal dashed line.

Principal Officer,  
Climate Adaptation, Soils, GMOs and Chemicals Division

