

Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

3ú Urlár ó Thuaidh | Ionad Cathartha | An tSráid Mhór | Baile Munna | Baile Átha Cliath 9 3rd Floor North | Ballymun Civic Centre | Main Street | Ballymun | Dublin 9

Draft National Adaptation Framework 2024

The Regional Assembly welcomes this stakeholder consultation on the draft National Adaptation Framework 2024.

The purpose of the National Adaptation Framework (NAF) is to provide a national strategy for the application of adaptation measures in different sectors, and by local authorities, to reduce the vulnerability of the State to the negative effects of climate change, and to avail of any positive effects that may occur. The NAF acts as a roadmap for governments, organisations, and communities to plan and implement adaptation strategies, in particular Sectoral Adaptation Plans and Local Adaptation Strategies, and it helps coordinate efforts, allocate resources, and prioritise actions that reduce vulnerability and enhance resilience.

The NAF 2024 is a review of the existing NAF 2018. This new NAF promotes an outcomes-based approach which will assist in monitoring and measuring progress towards improving the resilience of infrastructure, ecosystems and broader society to climate change.

This submission is structured to include an overall context, detailing the role and function of the Regional Assembly and the importance of the Regional Spatial and Economic Strategy (RSES), including the priorities of the Eastern and Midland Region.

1.0 Overall Context

1.1 Role and Function of the Regional Assembly

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional Spatial and Economic Strategy (RSES), oversight and coordination of County Development Plans and Local Economic and Community Plans, management of EU Operational Programs, EU project participation, implementation of national economic policy, and additional functions working with the National Oversight and Audit Commission. As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

The Planning and Development Act 2000, as amended, which sets out the legislation for the role and function of the Regional Assemblies, including the content and timeframe of the RSES, is currently under review, and the Planning and Development Bill 2023 was approved by Cabinet on 3rd October

2023 and was published on 21st November 2023. It is anticipated that the Planning and Development Bill 2023 will be enacted into legislation in the coming months. The Planning and Development Bill 2023 identifies that the commencement of the review of the current RSES shall be implemented within the coming months.

1.2 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region

The current RSES for the Eastern and Midland Region was made by the Members of the Assembly in June 2019 and is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision of the RSES is supported by sixteen Regional Strategic Outcomes (RSOs) that are framed around the key principles of Healthy Placemaking, Climate Action and Economic Opportunity. These Regional Strategic Outcomes are closely aligned with and supportive of the National Strategic Outcomes of the National Planning Framework.

A primary statutory objective of the Regional Spatial and Economic Strategy (RSES) is to support the implementation of the National Planning Framework (NPF), aligning with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES is of critical importance for the delivery of Project Ireland 2040, given that it is the succeeding tier of policy delivery in Ireland.

The RSES for the Eastern and Midland Region presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; securing Athlone, Drogheda and Dundalk as Regional Growth Centres, acting as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns (which include Swords, Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places. The RSES identifies Regional Growth Centres and Key Towns within the Region, however Self-Sustaining Growth Towns, Self-Sustaining Towns and Rural Areas are to be defined by each local authority's development plans.

2.0 Submission

The draft National Adaptation Framework has been structured under four key areas of focus which include: policy context; climate change adaptation planning and progress in Ireland; framework for delivering climate adaptation and resilience; and implementation and governance. Seventeen key actions are proposed in order to implement the framework; these are outlined in Table 6 of the draft NAF.

Having considered the draft Strategy, this submission outlines the observations of the Regional Assembly in relation to the regional adaptation measures identified in the draft Strategy.

2.1 Regional Adaptation

The RSES acknowledges that the responsibility of planning and actions regarding climate change mitigation and adaptation in the Eastern and Midland Region is the remit of the Eastern and Midland Climate Action Regional Office and the Dublin Metropolitan Climate Action Regional Office, and this is also reflected in the draft National Adaptation Framework, and its accompanying actions.

Notwithstanding this, the RSES for the Eastern and Midland Region is a strategic plan and framework for the growth of the Region, and the draft NAF refers to this in the context of the role of national planning processes, under Section 3.5.8.2 of the draft NAF. The regional planning tier thematic approach in the preparation of the RSES is underpinned by three cross-cutting key principles, one of which is Climate Action. The RSES acknowledges that climate change is impacting, and will continue to impact, many of the policies and objectives contained in the RSES, and therefore there is a significant need for appropriate adaptation and the building of climate resilience to ensure a comprehensive response to climate change in the Region. As a result, the Climate Action Strategy, Figure 7.4 of the RSES, focuses on the areas of sustainable transport, energy and waste, flood resilience and water, green infrastructure and eco-system services, and the built environment. This Strategy is supported by six Regional Strategic Outcomes (RSOs) in the RSES, which include the following:

- RSO 6 Integrated Transport and Land Use this is the promotion of the best use of transport infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning.
- RSO 7 Sustainable Management of Water, Waste and other Environmental Resources the
 conservation and enhancement of eater resources to ensure clean water supply, adequate
 wastewater treatment and greater resource efficiency to realise the benefits of the circular
 economy.
- RSO 8 Build Climate Resilience to ensure the long-term management of flood risk and build resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region.
- RSO 9 -Support the Transition to Low Carbon and Clean Energy pursuing climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by
- RSO 10 Enhanced Green Infrastructure to identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as our coastlines, farmlands, peatlands, uplands woodlands and wetlands.
- RSO 11 Biodiversity and Natural Heritage to promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection.

The RSOs outlined above are further supported by Regional Policy Objectives (RPOs) in the RSES which are more specific to themes or areas. These RSOs and RPOs support the implementation of the objectives of the National Adaptation Framework, by focusing on building climate resilience, supporting industries in the transition to a low carbon and clean energy system, and encouraging the exploration and implementation of adaptation techniques to deal with climate change.

Specifically RPO 3.7, Sustainable Growth, which aligns with RSO 9, states that local authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments in accordance with the National Adaptation Framework. RSO 9 is also strengthened by RPO 6.23, Low Carbon and Circular Economy, and RPO 6.24, Agriculture, which support the employment of green technologies in different sectors, and the exploration of climate adaptation mechanisms to serve those industries, in line with the National Adaptation Framework.

Further RPOs in the RSES support the narrative and actions recommended in the draft NAF. Specifically, actions 3 and 4 (LACAPs) of the draft NAF are supported by RPOs 7.32 and 7.33 in the RSES regarding the development, adoption and implementation of the LACAPs, with the assistance and support of the relevant Climate Action Regional Offices. In addition, the requirement of the draft NAF for local authorities to prepare local and sectoral adaptation plans is supported by RPOs 7.12-7.15 which focus on adaptation measures in terms of areas at prone to flooding, including implementing flood risk management measures as a result of Strategic Flood Risk Assessments and Flood Risk Management Plans. Action 11 in relation to the completion of a skills gap assessment for relevant sectors is also supported by RPO 6.25 in the RSES in relation to identifying and addressing skills shortages in the Region.

2.2 Monitoring

As previously mentioned, the draft NAF 2024 promotes an outcomes-based approach which will assist in monitoring and measuring progress towards improving the resilience of infrastructure, ecosystems and broader society to climate change.

The RSES Monitoring Report 2023 for the Eastern and Midland Region, published in September 2023, presents the progress made in securing the overall objectives of the RSES in the Region. With respect to monitoring, this highlights that while it is the responsibility of the Regional Assembly to coordinate the monitoring of the RSES, the Regional Assembly relies on existing monitoring programmes managed by Departments and their agencies. In this respect, the Regional Assembly recommends that the draft NAF acknowledges the need to develop policy and resources to undertake SEA monitoring and that this should be addressed by agencies.

2.3 Other Considerations

The Regional Assembly would like to draw attention to the reference to regional authorities under Section 3.5.8.2 in the draft NAF. The correct terminology is regional assemblies as the regional authorities were disbanded in 2014, and streamlined into three regional assemblies in 2015 under the Local Government Reform Act 2014.

3.0 Conclusion

The Regional Assembly welcomes the opportunity to engage in the process of preparing the draft National Adaptation Framework and looks forward to continuing engagement with the Department of Environment, Climate and Communications in the further development and implementation of the National Adaptation Framework in order to support development throughout the Region.

Regards,



16th February 2024