

Directors Report on submissions received in relation to Public Consultation on the RSES Issues Paper

Prepared in relation to submissions received pursuant to S. 24 (1) of the Planning and Development Act, 2000 (as amended)



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

March 2018

Table of Contents

1.	Introduction	1
1.1	Purpose, Format and Contents of the Director's Report	1
2.	Theme: People and Place.....	4
2.1	Sub-theme: Developing a Growth and Settlement Pattern for the Region.....	4
2.2	Sub-theme: Urban Structure.....	10
2.3	Sub-theme: Rural Communities.....	12
2.4	Sub-theme: People's Health and Wellbeing	14
2.5	Sub-theme: Dublin MASP.....	16
3.	Theme: Economy and Employment.....	18
3.1	General Issues Raised	18
3.2	Sub-theme: Dublin as global capital city.....	20
3.3	Sub-theme: Smaller towns, rural economy and urban-rural interaction	21
3.4	Sub-theme: Key Sectors	23
3.5	Sub-theme: Strategic locations, assets and bottlenecks	25
4.	Theme: Environment and Heritage.....	28
4.1	Overall Summary of submissions.....	28
4.2	Sub-theme: Integrated Land and Marine Planning.....	29
4.3	Sub-theme: Sustainable Water and Flood Management	31
4.4	Sub-theme: Land use and Resource Efficiency	33
4.5	Sub-theme: Built and Natural Heritage.....	36
4.6	Sub theme: Tourism.....	39
4.7	Sub theme: Strategic Environmental Assessment.....	41
5.	Theme: Climate and Infrastructure.....	43
5.1	Sub-theme: Transport	43
5.2	Sub-theme: Utilities.....	47
5.3	Sub-theme: Energy and Climate.....	49
5.4	Sub-theme: Social Infrastructure	52
6.	Miscellaneous issued raised.....	54

Appendix 1: List of Submissions Received

1. Introduction

1.1 Purpose, Format and Contents of the Director's Report

The purpose of this Director's Report is to report on the outcome of the consultation process of the initial consultation process and the Issues Paper of the Regional Spatial and Economic Strategy (RSES). It provides a summary of the submissions received during the statutory period and sets out the Director's response to the issues raised in the submissions.

The report forms part of the statutory procedure for the preparation of the RSES and is prepared in accordance with the requirements of Section 24(3) of the Planning and Development Act, 2000, as amended.

The Report is structured in a similar manner to the published Issues Paper and so is formatted as follows:

1. People and Place
2. Economy and Employment
3. Environment and Heritage
4. Climate and Infrastructure
5. Miscellaneous issues raised

This report has also considered submissions relating to Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Regional Flood Risk Assessment (RFRA).

Current Consultation Process- Issues Paper Stage

This statutory consultation period ran from 20th November, 2017 until 5pm on 16th February, 2018. Local authorities, public and private agencies, interest groups and any interested member of the public were invited to make submissions. Consultation included the following:

- Press: An advertisement was placed in the Sunday Business Post on 19th November 2017 announcing the intention of the Eastern and Midland Regional Assembly to commence the process of making a Regional Spatial and Economic Strategy for the whole of the Eastern and Midland Region and that an Issues Paper had been prepared in order to stimulate debate and encourage participation in the process. The press release also encouraged people to refer to the dedicated website for further information.
- A further advertisement was placed in the Irish Times on the 26th January 2018 announcing the extension of the consultation period to the 16th February.
- The Issues Paper was made available for viewing throughout the Local Authorities within the Region.
- Details of the Issues Paper, together with other relevant documents were also placed on the Assembly website. During the public consultation period, the Assembly also engaged a social

media strategy, mainly via Facebook and Twitter, to disseminate information and raise the profile of the Issues Paper consultation process.

- The Assembly also held an Info Event on 29th November 2017, inviting key stakeholders, promoting the Issues Paper and inviting submissions.
- There were 171 submissions received during this public consultation process. Further detail on the submissions received is outlined below.

Chart 1: Submissions received categorised by Body/Organisation

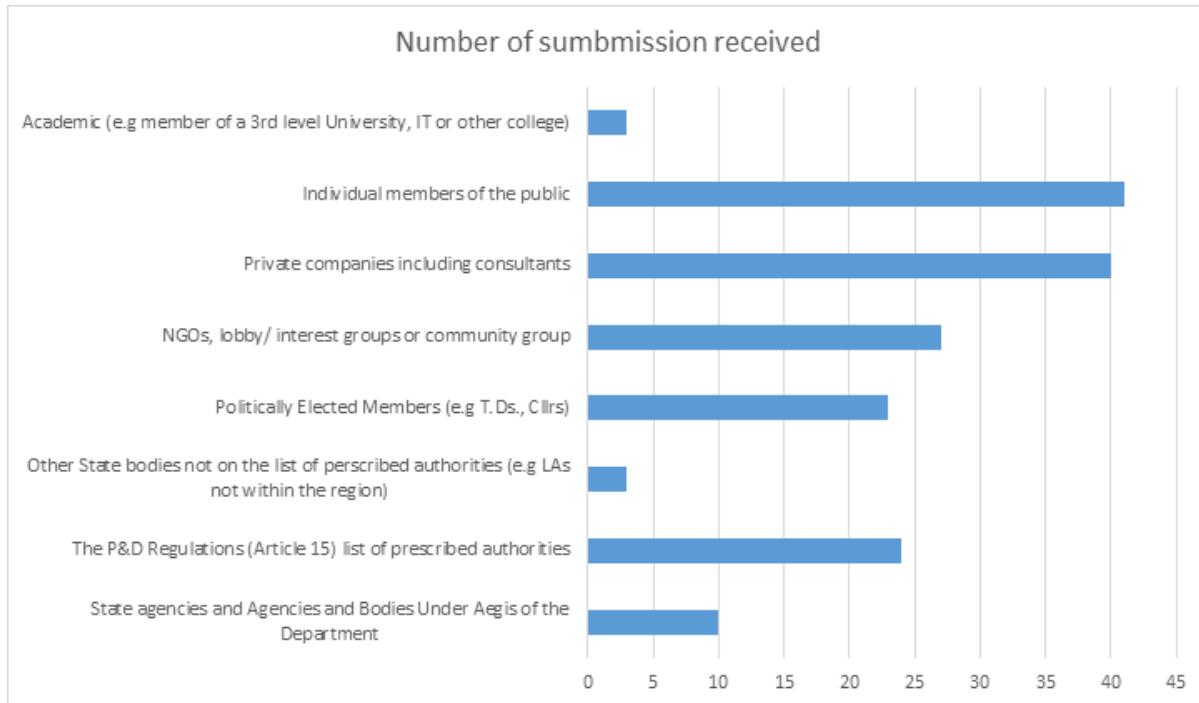


Table 1: Submissions Received categorised by Body/Organisation

Category of organisation	Number of Submissions Received
State agencies and Agencies and Bodies Under Aegis of the Department	10
The P&D Regulations (Article 15) list of prescribed authorities	24
Other State bodies not on the list of prescribed authorities (e.g. LAs not within the region)	3
Politically Elected Members (e.g. T.Ds., Cllrs)	23
NGOs, lobby/ interest groups or community group	27
Private companies including consultants	40
Individual members of the public	41
Academic (e.g. member of a 3rd level University, IT or other college)	3
Total number of submissions received	171

The Assembly wishes to express its appreciation to those who made submissions. The high volume and detailed nature of the submissions received highlights the significant level of interest in the RSES plan making process.

Complimentary On-going Consultation

In addition to the above, it is important to indicate that The Eastern and Midland Regional Assembly are currently engaging with Technical Working Groups (TWGs), Strategic Planning Area (SPA) Committees and other relevant stakeholders on an on-going and facilitative basis, beyond the remit of statutory consultation periods. Feedback to date on these forums has been extremely positive from participants involved. The Assembly are committed to continuing this level of engagement throughout the process.

Next Stages

Following consideration of this Director's Report, the Eastern and Midland Regional Assembly will engage in the preparation of a Draft Regional Spatial and Economic Strategy (RSES). The Draft RSES will be circulated to members in advance of the second public consultation stage. The Draft RSES will remain on public display for a number of weeks (not less than 10 weeks) and submissions will be invited to inform the process.

2. Theme: People and Place

Submission Received Relevant to this Section of the Issues Paper:

Submission Reference Number

0004, 0005, 0006, 0008, 0011, 0012, 0013, 0015, 0016, 0017, 0019, 0020 (Dept. of Infrastructure Northern Ireland), 0023, 0026, 0032, 0033, 0035, 0036, 0037, 0038, 0039, 0040, 041, 0043, 0044, 0045, 0046, 0047, 0048, 0049, 0050, 0051, 0052, 0053, 0054, 0055, 0057 (Dún Laoghaire- Rathdown County Council), 0059, 0060, 0061, 0062, 0063, 0064, 0065 0066, 0067, 0068, 0069, 0070, 0071, 0072, 0073, 0074, 0076, 0077, 0078, 0079, 0080, 0081, 0083 (South Dublin County Council), 0084, 0086, 0087, 0088, 0089, 0090, 0091, 0092, 0093, 0094, 0095, 0099, 0100, 0101 (Údarás na Gaeltachta), 0103 (Fingal County Council), 0104, 0105, 0108 (Laois County Council), 0109, 0110, 0111, 0112, 0113, 0114, 0115, 0117, 0118, 0119 (Offaly County Council), 0120, 0121, 0122, 0123 (An Taisce), 0124 (Meath County Council), 0127, 0129, 0130, 0131, 0132, 0134 (Kildare County Council), 0135, 0137 (Louth County Council), 0138, 0139, 0144, 0145, 0146 (Longford County Council), 0147, 0148, 0149, 0150, 0152, 0153, 0154, 0156, 0159, 0161, 0162, 0163, 0165, 0167 (Wicklow County Council), 0168, 0169, 0170 (Dublin City Council), 0171 (Westmeath County Council).

The main themes of the submissions received which addressed this section of the Issues Paper have been allocated to working subthemes. These are as follows;

- Developing a Growth and Settlement Pattern for the Region
- Urban Structure, Function, Form and Sustainability
- Rural Communities
- People's Health and Wellbeing
- Dublin MASP (Metropolitan Area Strategic Plan)

2.1 Sub-theme: Developing a Growth and Settlement Pattern for the Region

2.1.1 Summary of Submissions

The submissions received within this subtheme covered numerous issues. These can be summarised as follows;

NPF Growth Parameters and Spatial Patterns of Growth

A number of issues were raised with respect to the defined NPF growth parameters and spatial patterns of growth. A summary of the issues are as follows;

Whilst one submission was particularly supportive of the defined NPF growth parameters, the majority of submissions expressed concerns that the growth figures prescribed may lead to the artificial suppression of growth in the Region, including that of natural growth trends, which could prove counterproductive to sustainable regional growth in the medium and long term and stagnation of some areas, including rural towns and villages. This was indicated to be specifically concerning as the rationale behind the NPF figures are unclear.

Concerns were raised that the growth figures were as a result of a redirection of population towards the other Regional Assembly Areas, which is stated as part of a submission received to be considered unrealistic at projected growth rates of 200% and 450% for the Southern and Northern & Western

Assembly areas respectively. Having regard to this, concerns were also raised as to how these growth figures would impact on the border areas of the EMR. Submissions received called for assurances as part of the RSES that this would not result in the stagnation of the border areas of the EMR, whilst nearby settlements under the administration of different Regional Assemblies could enjoy more favourable and less restrictive growth rates. Likewise, many of the submissions identified the importance of acknowledging and building upon key inter regional linkages and opportunities. However, clarity is requested surrounding the roll out of urban area plans and in particular for those areas that straddle administrative boundaries.

Some submissions received outlined that the RSES should give consideration to growth rates beyond that prescribed by the NPF and consider that the current growth parameters are too conservative. Whilst some of the submissions accept that there will be areas more favourably positioned to avail of additional growth, concerns were raised as to how this would impact on remaining areas given the stated requirement to remain within the overall figures outlined by the NPF.

This above concern was coupled with submissions that identified how some areas have experienced substantial growth over the previous intercensal periods and consequently may have or may not have been the recipient of necessary government investment. Submissions outline that where investment was provided this level of investment needs to be capitalised upon and accordingly these areas should not be curtailed. Similarly, however, it is also indicated that where investment was not provided, these areas should not be further unduly restricted resulting from the lack of investment in infrastructure and job creation, given previous strong population growth trends. It was highlighted that this should all be considered within the context that infrastructure provision should not be exploited in a manner that allows for the continuation of dispersed commercial and residential development and urban driven sprawl.

It is also important to highlight that some of the submissions recognised that when planning a settlement hierarchy, there is need for the RSES to clearly identify the roles of supporting towns at all scales and provide recognition that all towns cannot benefit from things such as 'FDI', although there is provision to support industry that backs up FDI.

In contrast to the draft NPF focus on the city area, it is identified that there should be a shift in strategic planning towards the concept of the polycentric urban region and away from a metropolitan city focus. In this regard it is stated that The Greater Dublin Area can be conceived as a polycentric urban region, incorporating an area within about a 60 km radius of the city.

Linkage of Jobs with Population

Many submissions called for the need to address the mismatch between living and working in the EMR and some welcomed the inclusion within the Issues Paper of the proposal to bring people and jobs closer together as a means of developing health and wellbeing. It is noted that concerns were expressed outlining that the proposed alignment of population with job growth and housing provision, could give rise to regional disparities in areas more geographically remote from identified 'growth centres' and in particular rural locations. This is coupled with the stated need to support job creation in areas that witnessed high levels of population growth during previous intercensal periods.

Various proposals have been received and noted as part of the submissions that identify mechanisms aimed at achieving this linkage. This includes exploiting the assets of locations, such as less congested road infrastructure and land availability, through the provision of jobs in these locations thus helping to ensure the creation of economic opportunity for populations of the various SPAs. Likewise, enhancement of housing provision and population growth in urban cores is identified as central to

this, providing necessary housing in areas where jobs are currently located and likely to locate in the future.

Geographic Variability

Many of the submissions received identified that it is imperative that the RSES, while looking at the coherence of the region as a whole, is very clear that very different development strategies are necessary for each SPA. It is indicated as part of submissions received that the strategy should have the ability to respond to the different needs of different areas, including distinguishing between urban and rural development so that they are not competing with each other. It is suggested that variability and flexibility is allowed to take account of local circumstances. Caution is also urged that failure to do this, will lead to an ongoing degree of regional imbalance especially with respect to the Midland SPA.

Housing

Supply: Many submissions highlighted apprehensions about the undersupply of appropriate and affordable housing. This is coupled with expressed concern regarding the impact the NPF growth parameters will have on the ability to meet housing demand in the region. It is indicated that government backed investments in housing delivery projects already underway, such as SDZs, MUHDS (Major Urban Housing Development Sites) and LIHAF (Local Infrastructure Housing Activation Fund) projects should be supported and recognised as part of the RSES, given the existing government commitment and public money already secured to deliver these strategic sites. There is also support for evidence based realistic targets based on sustainable derived growth targets.

Although the point of housing supply and affordability was highlighted geographically across the entire Region, this was particularly apparent as part of submissions received with respect to the Dublin Area. The issues of housing supply and affordability in the Dublin Area, if not addressed, is suggested will potentially enforce the continuation of the trend which has seen the outflow of urban growth to counties surrounding the Dublin Area, leading to inevitable long term commuting. Having regard to this, many submissions identified the important role that surrounding counties have played in providing necessary housing which was otherwise unavailable or unaffordable within the Dublin Area. It is suggested that accompanying government policy on housing affordability is required in order to counteract this trend.

Submissions received call for The Regional Spatial and Economic Strategy to facilitate the provision of land for development in areas where it is most needed and where existing services will ensure speedy delivery of homes and workplaces. Following from this, the strategy should also prioritise areas for infrastructure development to increase their attractiveness for development.

Density and Integration: The RSES should support the appropriate level of densification in towns and villages in order to maximise community, economic and infrastructure viability and discourage the development of dispersed housing. It is highlighted as part of submissions received however, that housing supply can never be addressed in isolation and consideration should be given to ways that ensure that employment, infrastructure, services and housing supply are considered together.

Socially Sustainable Communities: A key function of the RSES could be to highlight mechanisms that support tenure diversity and tenure integration in both new and existing communities and how Part V of the Planning Act currently plays a part in this.

Inclusion: The RSES should take an active role ensuring inclusive built communities. This is suggested to include addressing the needs of an aging population, creating child friendly spaces and traveller accommodation.

Housing Stock: The changes associated with demographic shifts should be considered in order to address the requirements associated with housing stock within the Region.

Design: The RSES should ensure good design and identify ways in which it can actively support high quality place making. RSES to identify measures to support good design, such as, use of masterplans and design codes, use of design competitions and retaining design teams throughout the design construction process. RSES to consider how procurement can support quality.

Housing Strategies: Submissions highlighted the greater role that local housing strategies can play and how the RSES can encourage ways to ensure planning authorities maximise this tool. This is suggested to include committing to the implementation of active, plan lead development, through building up a detailed knowledge of existing sites and buildings, through effective land management strategies and through linking housing supply to specific sites. It is suggested as part of a submission received that the HDNA model for rural housing is excessive and contrary to rural revitalisation.

The Gaeltacht as a Planning district in the EMR

Submissions were received with respect to the Gaeltacht within the EMR and the Irish language. These are predominantly rural districts in the Gaeltacht areas of Ráth Cairn and Baile Ghib located in county Meath. It is outlined that the RSES provides a mechanism for the Gaeltacht areas to engage with the macro-level spatial planning considerations which will determine the strategic orientation and the necessary co-ordination measures which will drive sustainable development interventions in the region over the coming decades. In this regard the critical role of the RSES in support of Gaeltacht development is defined.

Private Development Proposals

A number of submissions were received on behalf of private developers advocating for particular locations to be included as part of the overall settlement strategy of the future RSES. This includes proposals for designations associated with overall settlements and identification of specific land parcels in order to facilitate residential and/or commercial and mixed use development. It is noted that several of these have contextualised their proposal from a planning policy view point.

Advocations for Specific Spatial Designations

Dublin SPA Specific Proposed Designations

Many of the submissions highlighted the necessity to acknowledge Dublin City as the National Capital, acting as the main centre of employment and population in the Region and State, and the only city in the Country to truly compete on a global scale. Some of the submissions indicated that it was necessary to refute claims that Dublin is 'too big' and that the aim of industrial policy should be to divert resources away from the region. In this regard, it is stated that far from suffering from diseconomies of scale, Dublin suffers from a dearth of productive investment in its infrastructure and services. One submission highlighted that the Dublin Region has received the lowest per capita capital investment over the last ten years, lower than average spending on essential local services and an average level of total government spending despite being a hub of economic activity and public services. In light of this, submissions received have welcomed the acknowledgement within the Issues Paper ensuring that Dublin's growth is positively managed.

Several strategic sites and areas within the Dublin Region have been outlined as relevant to the RSES and MASP, as part of submissions received and are noted. An example of this for instance, is the inclusion of Swords-Dublin Airport as a key location for population and employment growth aligning with committed and important infrastructural investments.

Eastern SPA Specific Proposed Designations

Newbridge:

Numerous submissions were received advocating for the designation of Newbridge as a Tier One settlement in tandem with Naas. Whilst numerous reasons have been put forward for this designation, the most reoccurring was that the population of Newbridge has now exceeded Naas and that this should be recognised in order to plan appropriately for the settlement.

Drogheda:

Submissions have highlighted the potential role of Drogheda as a city within the Region, particularly having regard to its population size and favourable location. This is coupled with calls for infrastructure provision and implementation of administrative/governance changes to support this.

Midland SPA Specific Proposed Designations

Midlands Sub Region Designation:

Submissions received called for a specific designation for the Midland Region, whereby it was allocated its own population and positively biased jobs allocation and commensurate funding as part of the National Investment Plan. It is identified that this is required as the overall performance picture of the Eastern and Midland Region as a whole in terms of prosperity and growth, is stated to provide a false narrative with respect to the Midlands.

Portlaoise as a ‘Strategic Growth Centre’ of Dublin:

This was advocated on the basis of Portlaoise’s location within a 60 minute zone of influence from Dublin City, Limerick City and Waterford City. This was also coupled with the retention of the Togher ‘inland port’ designation.

ATM (Athlone, Tullamore and Mullingar) supported by Longford and Portlaoise:

There was suggestion that the Midlands area needs to develop an economic gravity of its own, an urban counterweight, by developing its larger towns in particular as drivers and economic engines as opposed to continuing the commuting led overspill model. Linking Midland Towns to Dublin could enhance the attractiveness of the Midlands for inward investment.

Athlone as a Regional City for the Midlands:

It is indicated that this would provide a needed ‘counter magnet’ to Dublin and a viable alternative to long distance commuting. It is also indicated that Athlone would serve the area on an interregional scale, supporting the Northern & Western Assembly Area also. Collaboration in this regard is welcome as stated in submissions received. This proposal is coupled with outlined infrastructure and service supports needed to realise the potential of Athlone.

Regional Designations (across various SPAs)

Dublin- Belfast Economic Corridor:

Several submissions advocated for the recognition of the Dublin- Belfast Economic Corridor, with the necessary supporting infrastructure, as a key location for strategic population and economic growth that also enhanced cross-border spatial development. This included submissions relating to for instance the M1 Payments Corridor- Swords, Navan, Drogheda, Dundalk. The M1 Digital Payments Corridor is stated to be a key part of the Government's North-East Action plan for Jobs. In this regard, the importance of the M1 Economic Corridor, and the settlements that are located along it, is strongly advocated for.

A Polycentric Urban Region:

It is suggested that that The Greater Dublin Area can be conceived as a polycentric urban region, incorporating an area within about a 60 km radius of the city. This urban region, if developed, would involve a number of highly networked economic nodes with a degree of functional differentiation. The nodes are highly concentrated and separated from each other by green zones. Obvious nodal locations would include, inter alia, Drogheda, Navan, Maynooth and Naas/Newbridge. This polycentric urban region would allow a larger share of its workforce to live and work in the same location. It would experience a lower level of congestion by reducing the level of one-directional commuting from the hinterland into Dublin City. This polycentric urban region would be economically, socially and environmentally more sustainable than a region where a larger proportion of growth is accommodated within the metropolitan boundaries.

2.1.2 Response to Submissions

The Director acknowledges the positive support provided with regard to the information contained as part of the Issues Paper on this topic. The future Development and Growth Settlement Pattern defined will seek to ensure that the needs of the EMR and its people are met for the duration of the RSES plan period and beyond. It is acknowledged that this development and growth settlement pattern is important for the sound and sustainable development of the Region and in this regard the high level of detail provided as part of submissions received is welcome.

The Eastern and Midland Regional Assembly are currently engaging with Technical Working Groups (TWGs), Strategic Planning Area (SPA) Committees and other key stakeholders. The Assembly are committed to providing a Development and Growth Settlement Pattern that is informed by this engagement and which is in line with relevant Government Policy as required by the Planning and Development Act, 2000, as amended. In this regard, when formulating the RSES, policy must be consistent with that outlined as part of the National Planning Framework in the first instance.

2.2 Sub-theme: Urban Structure

2.2.1 Summary of Submissions

Sustainable Growth of Urban Areas:

Several submissions acknowledged the benefits associated with creating sustainable urban environments to support urban settlements in achieving their full potential at international, national and regional level. It is suggested that key policy areas to ensure the sustainable growth of urban areas include transport, land-use and environmental policies and that high quality public transport, cycling infrastructure, safe walking routes, green infrastructure and high quality services are needed in tandem with future growth in order to make urban areas more attractive to live and work in. Robust urban centres are also identified as critical in determining the Region's ability to respond to shocks. An example of this is stated to be the need for robust urban centres in the border area in order to mitigate the effects of BREXIT for instance.

Proposals for a future retail strategy are put forward as part of submissions in order to ensure the sustainable growth of the retail sector and consequently the EMR's urban areas. This is particularly highlighted in the context of the Greater Dublin Area, with some submissions highlighting areas for consideration such as Collinstown.

Consolidation/Smart/ Compact Growth:

Many of the submissions received supported proposals that encouraged brownfield development and urban renewal in order to ensure a move away from the extensive greenfield development which has occurred to date. It was further acknowledged that urban consolidation policies identified in the NPF can only be achieved in this way and suggested that this needs to be supported by government policy in respect of housing affordability.

Submissions also identified how this approach should be embedded within the RSES thus encouraging and supporting commercial regeneration as well as family units to move back in to town centres. In terms of proposals to support this, it was indicated that the RSES should give consideration and support to issues such as adoption of strong sequential development policies, vacant homes, vacant and derelict sites legislation, densification, intensification, height parameters and enhanced land reform policy such as CPOs.

In doing this however, submissions have cautioned that it is important that such redevelopment does not take precedence over the creation of a quality urban environment. This should be taken into account in the design and density of developments whereby the delivery of such developments should aim to deliver an attractive environment where people want to live, visit and relax rather than focusing on a numerical target. Likewise, it is also highlighted that the use of state owned land development through the suggested National Regeneration and Management Agency must be strategic.

It is further suggested that the RSES should enable creative solutions to both support the concept of compact growth, whilst also facilitating new growth management solutions for the regions 'in between' suburban and peri-urban spaces for more environmentally sustainable and socially equitable development.

The Role of County Towns:

Submissions received identified the need to acknowledge the important role that County Towns have, both within the Region and where relevant inter-regionally. It is stated that this will help to define the

purpose of these important settlements and allow for the provision of necessary infrastructure and services required to support their population and the surrounding hinterland economically and socially.

Urban Catchments:

Many of the submissions received called for the ‘zone of influence’ or functional hinterland of towns within the Region to be identified in addition to that of Dublin’s, thus allowing for a better understanding of these settlements and provision of policy that supports these towns and their hinterland. It is suggested that the RSES must be strong on settlement size following on from economic function.

2.2.2 Response to Submissions

The necessity of generating robust and sustainable urban settlements is key to the success of the performance of the Eastern and Midland Region. It is acknowledged that resilient urban settlements across the geographic extent of the Region not only serve the settlement directly but also that of the surrounding hinterland. Submissions received relevant to this topic were therefore extremely welcome as part of the process.

The issues relating to Urban Structure that include urban functions, the extent of their hinterland, their form and factors relating to urban sustainability, will be fully considered in order to form a Resilient Development and Settlement Growth Pattern for the Eastern and Midland Region. This work is currently underway at present as part of the ongoing consultation with TWGs, SPA Committees and other stakeholders.

2.3 Sub-theme: Rural Communities

2.3.1 Summary of Submissions

Definition of Rural Ireland:

Submissions received called for a clear definition of what is meant by Rural Ireland to be provided as part of the RSES.

Rural Housing:

It is identified as part of submissions received that the RSES must facilitate a robust and clear settlement strategy that does not allow for the unmitigated development and pressures associated with single houses in rural locations. By way of contrast some submissions outline that the RSES should not be limited to enabling or restricting residential housing construction in rural areas but rather a broader approach should be taken encompassing social and economic dimensions. It is suggested that a focus of the RSES should be providing alternatives such as small town and village living at appropriate scales, designed appropriately that are more attractive, desirable and affordable. It is acknowledged that this ties in well with a strong statement on place making contained as part of the Issues Paper. In this regard submissions have outlined proposals to help address this including emphasising proportionate growth of rural towns and villages and roll out of necessary schemes such as the ‘service sites initiative’.

Rural Infrastructure Provision:

Numerous submissions have advocated for the adequate provision of rural infrastructure provision in order to enhance rural viability. Key to this is securing rural broadband and transport provision, with ‘Local Link’ being specifically mentioned as a transport service to build upon, including through enhanced integration with other transport plans.

Rural Towns and Villages:

Mechanisms to enhance the attractiveness of smaller towns and villages are needed to encourage town and village living. Submissions advocated for growth and diversity in rural economic sectors, Rural Smart Growth Funding Streams that include a strong commitment to address decline in rural towns and villages and learning from existing studies such as the Heritage Council’s 2015 study on Irish Towns and the RIAI’s Town and Village Toolkit.

2.3.2 Response to Submissions

The Issues Paper sought to ensure that rural areas and their communities are identified as a key component of the RSES for the Eastern and Midland Region. It is strongly advocated that the viability of the rural areas within the Region is key to delivering a successful RSES and in this regard the numerous submissions received are considered extremely informative towards shaping future policy.

The sustainability and long term resilience of the rural areas of the EMR will be considered as part of an overall holistic Development and Growth Settlement Pattern for the EMR, which encompasses all of its geographical areas. As previously outlined, the Assembly are currently engaging with Technical Working Groups (TWGs), Strategic Planning Area (SPA) Committees and other key stakeholders and are committed to providing a Development and Growth Settlement Pattern (which includes the rural areas and communities of the Region) that is informed by this engagement and which is in line with

relevant Government Policy as required by the Planning and Development Act, 2000, as amended. It is also noted that key policy documents such as the Government's Action Plan for Rural Development will assist in this regard.

2.4 Sub-theme: People's Health and Wellbeing

2.4.1 Summary of Submissions

Placemaking:

The importance of placemaking has been identified in several of the submissions received. They indicate the importance of recognising macro and micro factors in enhancing placemaking. At a macro scale, it is indicated that this includes sustainability and quality of life objectives including that housing must be provided adjacent to jobs and other supporting community facilities including education facilities, healthcare and retail. At a micro level it is indicated that the RSES should encourage mixed use and mixed tenure communities, underpinned and informed by sound architectural design principles, facilitating greater permeability and journeys that can be made by means other than the private car.

The importance of creating healthy and attractive places is identified as critical factors in attracting and retaining a skilled workforce, resident population and in encouraging mobile foreign direct investment.

The importance and capacity of the cultural sector to contribute to the making of strong 'Place' identities, to assist in the integration of new communities; to assist young people in particular develop the skills of innovative and lateral thinking that will be necessary if they are to create opportunities for themselves, to contribute to the sustainable diversity of rural economies and to create the kind of culturally rich environments that are attractive to both domestic and foreign direct investment, should not be underestimated or overlooked in the RSES. Numerous supports and investments have been identified in order to deliver this as part of submissions received.

Quality of Life:

It is identified that the term 'quality of life' encapsulates strong economic output and stability, good environmental performance and a standard of liveability with rich and fulfilling experiences for all. This may prove useful as part of the RSES formulation, however, it is also recommended that the RSES develop quality of life indicators in order to measure progress. Closely linked to this, is the inclusion as part of submissions received to address deprivation, poverty and inequality.

Provision of Necessary Services:

Several submissions championed the link between providing necessary services such as healthcare (including mental health and specialist care) and education facilities (including community education providers for rural and remote areas), as a means to enhancing people's health and wellbeing. It is indicated that this will also provide linkages to improved economic resilience and better societal interaction for all, including marginalised groups, through enhanced educational opportunities and access to services. Numerous submissions put forward suggested infrastructural requirements in this regard.

Commuting and Congestion:

Many of the submissions addressed how the issue of long distance commuting and congestion is impacting on the health and wellbeing of people within the EMR. The acknowledgment of this as part of the Issues Paper is welcomed in many of the submissions received and various proposals to remedy this trend have been suggested in order to enhance people's health and wellbeing and allow for them

to offer more to the communities in which they reside. An example of this is the ‘Live-work’ community model.

Aging Population:

It was indicated as part of submissions received that the RSES should ensure that the age demographic was taken into account, thus allowing to adequately plan for additional necessary facilities to cater for this.

Open and Green Spaces:

Many submissions received have advocated for the provision of open and green spaces as a means to improving the health of people with the EMR. Several proposals have been suggested as part of the submissions received, including the continued development of national greenways and investment in tourism infrastructure that are indicated will enhance this.

Collaboration and Participation:

Many of the submissions received identified how enhanced collaboration could facilitate enhancing people’s health and wellbeing. This includes, for instance, integration with the PPNs and LECP processes. In addition to this, it is indicated that improved data quality and metrics can provide better insights to the operation of our cities and regional markets. Improved data collection (of property, infrastructural, social and economic datasets), data cleaning, quality control, accessibility to open data and data analysis can inform decision makers; ensuring better spatial outcomes such as housing being well placed, connected and serviced by infrastructure. This in turn is important in influencing people’s wellbeing and on their economic and social participation.

2.4.2 Response to Submissions

The Director welcomes the numerous submissions received with respect to a cross cutting topic of the future RSES, which seeks to ensure that the health and wellbeing of the people of the EMR is central to future policy formation. The enhancement of this will only serve to ensure a sound and sustainable development trajectory for the Region during the plan period and beyond. The wealth of information documented as part of the submissions is considered extremely beneficial in this regard.

In forming future policy, the RSES will also take full consideration of existing relevant policy including, amongst others, national planning policy guidance, the National Anti-Poverty Strategy, the National Action Plan for Social Inclusion and Healthy Ireland – A framework for improved health and well-being 2013-2025. It will be endeavoured that People’s Health and Wellbeing is embedded within the RSES, framed within the overall context of the requirements of the overarching National Planning Framework.

2.5 Sub-theme: Dublin MASP

2.5.1 Summary of Submissions

It was indicated as part of submissions received that the purpose of the MASP and where it will sit in the hierarchy of plan making in the state requires further clarification in tandem with assurances that population figures mentioned as part of the NPF do not set any artificial constraints on the growth of the Dublin Metropolitan Area in terms of population and housing numbers.

It is also indicated that the overall governance structure for the MASP should be clarified. This included the need to address the administrative and political structure in which the MASP will be made, and the oversight mechanisms in relation to its implementation. Concerns also centre on the need for a Dublin Mayor and that the Dublin MASP may be decided upon by non-Dublin representatives. In addition, it is stated that the MASP should not render the preparation and making of the Development Plan a reduced function of the relevant local authority and its elected representatives. In this regard, it should be used to support and strengthen the Development Plan process and coordinate them at a strategic level across the Region, thus retaining autonomy for local government.

Many of the submissions received acknowledge that the boundary of the Dublin MASP is aligned with the established Dublin Metropolitan Area Boundary as set out in the current RPGs. Submissions also call for clarity surrounding the many definitions used as part of the Draft NPF to define ‘Dublin’. It is also noted that some submissions have indicated that there is need for review of this boundary and its suitability now for use, particularly given that the methodology for determining the boundary remains unclear. Submissions received outline that there is need to consider, that as part of the preparation of the RSES and the forthcoming Metropolitan Area Strategic Plans, it would be appropriate to review settlement and employment growth within and in the vicinity of the Metropolitan Area, assessing the merits of revising the Metropolitan Area boundary to include additional settlements, updating the boundary based on current and meaningful criteria, using Census 2016 data.

It is recommended that the MASP give effect to the strategic policy of the RSES at a more specific spatial level. In order to deliver the MASP, it is identified that it is critical that there is a robust top down approach to spatial planning policy, identifying the infrastructure required to sustain growth, secure housing and jobs thus ensuring that exchequer funding can be directed through initiatives such as the Local Infrastructure Housing Activation Fund (LIHAF) to locations where it can maximise a return on state investment. Various targeted sites, infrastructure investment and initiatives have been identified as part of the submissions received that are highlighted by way of submission as being relevant for inclusion as part of the MASP.

Similar to general submissions regarding the provision of housing, some of the submissions related to the MASP have indicated concern regarding housing figures contained as part of the Draft NPF and how this may limit housing supply in the Dublin Region, particularly having regard to the potential of SDZs, the LIHAF scheme and MUHDS.

Submissions acknowledged the benefit that the socio-economic profiles had offered to the process. However, it was considered that a full review of the existing RPGs was missing and in this regard it was indicated that it is difficult to establish the successes of the current RPGs, which, if identified, could consequently be replicated as part of the RSES.

2.5.2 Response to Submissions

The National Planning Framework introduced the MASP as a new policy tool to be in tandem with and as part of the RSES process. The detailed formulation of the Dublin Metropolitan Area Strategic Plan is within its conceptual stages. The Assembly are actively consulting with key stakeholders within the process including Local Authorities, whilst seeking additional information and support from the Department of Housing, Planning and Local Government to develop the MASP further. The EMRA are committed to ensuring ongoing dialogue and consultation in this regard in order to develop a fully functional MASP that serves the area and Region well. The numerous submissions and level of detail provided relevant to the MASP, is extremely welcomed at this stage of the process and it is considered to provide clear launch points from which to continue the progression of the Plan.

3. Theme: Economy and Employment

Submission Received Relevant to this Section of the Issues Paper:

Submission Reference Number

15, 20 (Department for Infrastructure NI), 21, 22, 26, 28, 29, 31, 42, 48, 53, 54, 57 (Dun Laoghaire – Rathdown County Council) 59, 62, 68, 70, 72, 73, 74, 76, 78, 83 (South Dublin County Council), 84, 94, 95, 100, 101 (Údarás na Gaeltachta), 102, 103 (Fingal County Council), 108 (Laois County Council), 111, 117, 119 (Offaly County Council), 124 (Meath County Council), 127, 128, 129, 130, 133, 134 (Kildare County Council), 137 (Louth County Council), 138, 140, 142, 144, 146 (Longford County Council), 148, 149, 151, 152, 154, 160, 163, 165, 167 (Wicklow County Council), 169, 170 (Dublin City Council), 171 (Westmeath County Council).

The main issues of the submissions which addressed economy and employment have been allocated to working subthemes. These are;

- Dublin as a capital global city
- Smaller towns, rural economy and urban-rural interaction
- Key Sectors
- Strategic locations, assets and bottlenecks

There was some general issues and commentary under the theme of Economy and Employment that will be summarised and addressed here before commencing with the sub themes above.

3.1 General Issues Raised

3.1.1 Summary of Submissions

In submissions it was stated that the Economic Strategy in the RSES should be informed by national policy and a bottom up approach from existing local level economic strategies the regional Action Plans for Jobs and the local authority LECPs..

It was stated that the RSES should be aligned to national and sectoral enterprise policy (Enterprise 2025, RAPJs, regional skills fora and the Action Plan for Rural Development. IDA, EI, LEOs, Science Foundation Ireland and Údarás na Gaeltachta). The strategy should have a place making and liveability emphasis, an enterprise focus, densification should be a principle in all urban areas combined with active land use management. Site valuation tax should be introduced to incentivise land development in the correct location, finally it should be agile and robust, and drive greater spatial alignment of jobs and people

Several submissions contended that reverse commuting or reciprocal commuter flows to outer locations on the rail and motorway network, from Dublin and the larger settlements would lead to more efficient transport usage and enhancement of quality of life. This can be facilitated by second sites for back of house functions of larger companies and digital hubs for remote working of staff based in larger urban areas.

A submission contended that the existing economic model needs to be changed away from GDP to focus on sustainable economic practices such as the circular economy especially in usage of materials and waste, cradle to cradle, transition to a low carbon economy, Energy Efficiency and the

Electrification of Heat and Transport and Life Cycle Analysis, and that these principles should inform the economic strategy.

A further example proposed as that the RSES goal and vision should reflect UN Sustainable Development Goals (SDGs) with meaningful indicators. That the RSES should set out the path to a decarbonised economy as it relates to spatial planning, land use and infrastructure. The Strategy should set out the principles of spatial planning for a circular economy and put in place a process which will ensure that the Assembly and local authorities can adequately engage with this important challenge.

It was suggested that smart specialisation can inform the RSES economic strategy and strategies for same should be approached at a regional level with regional smart-specialisation strategies embedded in the RSES.

A number of submissions referenced Brexit as a challenge and an opportunity to the country and the region. The existing trade and supply routes through the UK may have to be assessed and changed to direct access to the EU market, this will impact on ports in the region and on cross border synergy through Louth.

There have been suggested criteria or assets to determine designation for growth and investment can include urbanisation, connectivity, talent and innovation, colocation / clusters, policy coordination, social infrastructure and enterprise. Also a 'health check' on existing enterprise in the region to assess possible restrictions for growth. Further submissions listed factors that matter for firm location such as infrastructure, agglomeration, distance from markets, wage rates, productivity, human capital, and proximity to universities. Spatial policy in the RSES should not only consider the location but the density of economic activity and respond accordingly.

3.1.2 Directors Response to Submissions

The Director recognises that this is the first venture in aligning spatial planning policy and economic strategy at a regional level in Ireland, in this regard there are significant policy documents at a national, sectoral and local level that must inform the formulation of the strategy and the custodians of these policies are key stakeholders in the process who we have and will be engaging with on a technical basis to assist in the preparation of the strategy.

The Eastern and Midland Regional Assembly is committed to a robust evidence based approach to policy making and this has been represented in the issues paper and accompanying socio – economic reports that informed this consultation period. It is acknowledged that further information and data is required to inform the formulation of the economic strategy and this will be attained in the coming months. Furthermore a robust methodology will have to be applied to the growth strategy in the preparation of the RSES and it is welcomed that attributes to apply such a methodology have been presented in some of the submissions received.

3.2 Sub-theme: Dublin as global capital city

3.2.1 Summary of Submissions

Submissions received stated that Dublin requires strategic infrastructure investment to allow for continued growth in the pivotal role it plays as the country's main economic engine, it has been underinvested to date, and future development in Dublin should be compact and smart. Some submissions stated that Dublin competes on an international scale with other similar cities and not with other cities in Ireland, and as such should have a different policy support in the RSES.

Smart Dublin a test bed: Smart Dublin is to support industry and research to utilise places such as districts. There should be an emphasis on data and smart technology to improve the functioning of the city in the areas of transport, education, skills, etc.

Some submissions stated that the Dublin – Belfast Economic Corridor is an economic functional zone of scale and mass to compete internationally with other larger urban zones of scale. The corridor consists of Belfast, Lisburn, Banbridge, Newry, Dundalk, Navan, Drogheda, Fingal and Dublin. However this corridor requires improved investment in transport and digital connectivity. With the context of this corridor Drogheda should be explicitly referenced as a settlement of scale, whilst Newry – Dundalk is a key emerging conurbation of growth. These two areas should be identified as key areas of agglomeration in a paired city region and supported as such in the RSES.

It was proposed that space intensive and low employment uses such as light industry, warehousing and logistics should move out of central locations in the city to more peripheral locations on the transport – motorway network. This would allow for the redevelopment of these well located and serviced sites within the city to denser and more sustainable mixed use propositions.

Numerous submissions listed the challenges to Dublin such as: infrastructure and lack of investment, access and connectivity, congestion, urban sprawl, lack of affordable housing, restriction to height and density, long commuting times, high commercial and accommodation rents that the strategy should address.

3.2.2 Directors Response to Submissions

The Director acknowledges the key role that Dublin plays in the national economy and that the economic strategy of the RSES should promote and enhance this strategic economic function. It is recognised that there are significant challenges to supporting the economic function of Dublin which have been well expressed in the submissions received, these challenges will be key factors in the preparation of the overall RSES for the Eastern and Midland Region.

The Eastern and Midland Regional Assembly are currently engaging with Technical Working Groups (TWGs), Strategic Planning Area (SPA) Committees and other key stakeholders to inform the formulation of the RSES. The Assembly are committed to providing an Economic Strategy that is informed by this engagement, a robust evidence base and which is in line with relevant Government Policy including the National Planning Framework – Project 2040 as required by the Planning and Development Act, 2000, as amended.

3.3 Sub-theme: Smaller towns, rural economy and urban-rural interaction

3.3.1 Summary of Submissions

Submissions stated that regional Development is largely urban driven and factored by agglomerations and economic spill over, whilst the most dynamic sectors prefer higher order urban location, most sectors are now urban driven in their choice of location. However it was also stated that driving growth in key urban areas outside of Dublin will have wider regional and macro-economic benefits, these key areas of economic activity can be focused along economic corridors, primarily along high capacity transport routes.

Numerous submissions proposed that areas with a high rate of commuting to Dublin should have more investment to create more jobs in these areas which will arrest the level of commuting and provide for more sustainable communities. Proposals for Athlone, Tullamore and Mullingar and the Midlands area that provide a counterbalance to Dublin with significant population and employment growth that due to strategic locations and proximity to key assets would provide for an alternative lifestyle. These areas should also benefit from special designation and a policy approach of ‘positive biased’ strategy that recognises its location and is supported in being an economic and transport zone.

Submissions from the Midlands and Eastern SPAs referenced County Towns that have experienced significant investment and are well placed to lead in regeneration and driver economic growth in the region, they are a focal point for heritage and tourism, with a high quality of life and wide hinterland that they support. An example given of these towns was Tullamore that sustains more jobs than resident workers – this should be replicated in other settlements to provide for sustainable regional economic drivers outside of Dublin. It was also contended that rural towns are key drivers regionally and the heritage aspect can be used to foster economic growth and that rural areas should focus on rural based developments.

Several submission stated that Athlone IT should gain Technological University status. There was also proposals that there should be a Technological University outside of Dublin to promote economic activity as it recognised that third level education is a key driver.

A theme of some submissions was that key regional employment areas have experienced growth such as IDA Business Parks and other successful business / industrial parks they should be supported and allowed to further grow. A network of industrial parks based on existing sites should be established to deliver on the sectoral strengths of areas, across the Midlands and Eastern SPAs.

There was support in some submissions for indigenous local business that can be key employers and contributors in a rural area, including proposals to support SMEs in rural areas facing lack of access to finance by Local Public Banking.

It was suggested that Local Authorities should work together at SPA level to form Regional Development Groups to overcome barriers for start ups, relocation and expansion with more supports of SMEs, micro enterprises and Start Ups.

One submission stated specific targets for rural area to increase entrepreneurs / start ups by 25%; improve survival rates of SMEs by 25%; Increase FDI by 30-40% and Regional unemployment with 1% of state unemployment rate that should be considered in the strategy.

3.3.2 Directors Response to Submissions

The Director recognises the various challenges in economic growth and employment through the region and it is accepted that the strategy will have to have nuanced responses to individual different issues. Submissions received helpfully detailed the variance that is in place across the region and the opportunities that exist in our urban structure to support the economic wellbeing of the whole region.

The Eastern and Midland Regional Assembly are currently engaging with Technical Working Groups (TWGs), Strategic Planning Area (SPA) Committees and other key stakeholders to inform the formulation of the RSES. The Assembly are committed to providing an Economic Strategy that is informed by this engagement, a robust evidence base and which is in line with relevant Government Policy such as the National Enterprise Strategy 2025, as required by the Planning and Development Act, 2000, as amended.

3.4 Sub-theme: Key Sectors

3.4.1 Summary of Submissions

Several submissions stated that Higher Education Institutes are a key driver of regional economic growth and can skills match with nearby sectoral clusters, they are well placed to contribute to intra-regional collaboration, and they also provide social, economic and cultural contributions. Proposals to designate Athlone IT with University were numerous. However some commented that this sector requires additional investment to improve standards upskill the workforce and compete internationally.

It was suggested that greater analysis is required into the type and nature of FDI and MNCs in the region to better understand their diverse needs and requirements, this should include analysis on Global Production Networks, Global Value chains governance patterns, sectoral analysis and Industrial Business cycles. It is recognised that agglomeration or clustering of economic activity should be encouraged to maximise synergistic effects. Alternate methodologies to the Location Quotient approach to identifying clusters should be taken such as that in the Intertrade Ireland report 2015.

There were significant submissions stating that tourism is an existing strong sector that has further potential in cultural heritage, eco-tourism and greenways / blueways and spatially in the midlands with a new midlands proposition. The RSES should identify locations, linkages and services that support tourism as a wider economic activity.

The Digital Economy should be harnessed with an environment conducive to innovation, new business formation and economic growth. Along with smart infrastructure and smart cities technologies that are emerging in our cities.

One submission contended that primary industries especially cement manufacturing require support across the region as they play a key role in the recovery of the economy.

Dublin

Specific submissions stated that Dun Laoghaire – Rathdown has Financial Services, Wholesale and retail, health and social services, professional services, ICT and Education with existing indigenous and state supported multinationals. Emerging opportunities in the green Economy, international services, high tech sectors, marine / maritime, agriculture and rural economy. A cultural and creative hub in Dun Laoghaire for the creative class with linkages to the existing third level institutes and high tech business in the county to foster skills matching.

Further that Fingal has ICT in Blanchardstown, Aviation at the Airport, Food and Beverage in North County Dublin Marine and Maritime and Healthcare / Pharmaceutical in Swords Blanchardstown

Eastern

Numerous sectors have been indicated in the Eastern Strategic Planning Area such as Film Industry in Wicklow with the National Film Studio and a proposal for a film hub to support the industry. Logistics and Equine in Kildare / Meath, and general economic clusters in North and East Kildare. Financial, payment and shared services in Drogheda with the M1 payments corridor based on fin-tech /ePayments and a national payments centre in Drogheda at the centre of the corridor. Food and food technology in Dundalk, Wicklow and the Boyne Valley. And generally in the Eastern SPA, internationally traded services, digital media, IOT initiatives, Food and Bio-resources.

Midland

Specific submissions related to the potential of onshore renewable energy in the Midlands, biomass production for energy generation, Renewable biogas in the Eastern and Midland SPAs that can be converted, and by way of a renewable gas injection facility incorporated into the gas network. The Midlands as a wetlands destination based on the reuse of the peatlands in the region was also promoted as an opportunity sector.

Various sectors were suggested in submissions that are strong or relevant to the Midland SPA these include internationally traded services, STREAM (engineering and innovation), life sciences, Food / Agri food, Medical and Pharma, Energy, Green Enterprise, Advanced Manufacturing, Engineering related industries, Low Carbon Energy Generation, and Equine.

3.4.2 Directors Response to Submissions

The Director recognises that there is significant economic activity in the region across a wide range of sectors and these have been detailed significantly in the submissions received, this will be informative in the preparation of the draft RSES. The economic strategy of the RSES will have to acknowledge these sectors and form policy that supports and develops these sectors whilst facilitating new sectors that are emerging.

This will be further enhanced by our engagement with key stakeholders in enterprise throughout the region and other key stakeholders to inform the formulation of the RSES. The Assembly are committed to providing an Economic Strategy that is informed by this engagement, a robust evidence base and which is in line with relevant Government Policy as required by the Planning and Development Act, 2000, as amended.

3.5 Sub-theme: Strategic locations, assets and bottlenecks

3.5.1 Summary of Submissions

A key bottleneck expressed in numerous submissions was affordable and accessible housing that is seen as a barrier to economic growth, this housing is being delivered in outer locations which will exacerbate the trend of commuting, and people not living proximate to their place of work. Numerous infrastructure sectors and services have been promoted as bottlenecks, recurring issues of commuting transport usage, traffic congestion and broadband provision are extensively referenced.

Several submissions advocated for prioritisation of Strategic locations for employment and population growth. These include: Dublin Docklands, Sandyford Business District, Cherrywood, Swords Metro Corridor, Dublin Airport, Dublin Enterprise Zone, Tallaght, Grange Castle, Maynooth, Naas, Leixlip, Drogheda, Dundalk, Navan, South Drogheda, Dunboyne, Ashbourne, Kilbride and Kells and more broadly the Dublin-Belfast corridor.

In particular there is an appetite to adopt industrial cluster development and management approach in specific locations. For instance, Kildare (Medtech and ICT), Midlands-Athlone (Engineering and advanced Manufacturing/Medtech)

Strategic Energy Zones should be considered as part of the RSES throughout the region, more so in rural areas, to develop and sustain renewable energy in the region and the country, and to meet national climate and energy targets.

Dublin

There are various key locations promoted in Dublin, including Dublin Airport as a key national asset to Ireland's economic success which is linked with its global connectivity to trade and tourism markets and requires support to ensure it continues as an economic driver. Submissions stated that the National Aviation Strategy supports the growth of the Airport to a transatlantic secondary hub, others that the Airport should be designated as 'Regional Airport Economic and Employment Zone'

It was contended that the Metro Economic Corridor from the Airport to Swords should be supported in the RSES as a functional economic unit with expansion of Swords to the Lissnehall area with designation as an SDZ.

Several submissions referenced Sandyford Business District is a strategic economic growth centre and further expansion of this area should be supported including promotion of increased mode shift from private car and infrastructure investment to provide BRT links and Metro to Airport.

The Grange Castle Business Park should be recognised as a regional centre for employment and enterprise, it is in close proximity to two key residential SDZs of Adamstown and Clonburris.

One submission promoted South Fingal Fringe as a key employment site to counterbalance the flow of commuters from north Dublin to office work in south Dublin.

Eastern

A significant number of submissions promoted Newbridge / Naas as a commercial and economic hub for the region to encourage outward investment from Dublin. Also some stated that space extensive employment uses could be relocated to Naas and the Newhall interchange on the M7.

Submissions received stated that Navan (21.5% of County Jobs), Drogheda with key linkages to Dublin and Belfast, Duboyn, Ashbourne and Kells should all be identified in the RSES as key strategic employment sites

Key sites along the rail network for consolidated economic growth were also referenced such as – Maynooth, Collinstown, and Millennium Park in Naas Dundalk and Drogheda

One submission stated that Collinstown currently has a Major Town Centre designation in the Regional Planning Guidelines this is not appropriate to this location and the designation should change to regional scale employment.

Cross border economic relationships should be continued in light of Brexit building on existing relationships between Newry – Dundalk for example. Also Drogheda has a significant catchment capacity that is not reflected in current policy and given its key location and level of services it is a key settlement

It was requested that the Gaeltacht satellite digital hub in Baile Ghib Co. Meath be supported in the economic strategy.

Midland

Several submissions stated that Athlone should be identified as a Regional City (with a dedicated fund) as an alternative growth centre to Dublin, it is already a significant urban area with its own hinterland, has significant potential. It could be further supported by the large county towns in the Midlands that should have specific economic SDZs to promote economic growth within each settlement.

A submission contended that the M4/N4 knowledge corridor from Dublin to Sligo should be promoted as an economic corridor of growth. Forthcoming Centre Parcs resort in Longford is a significant employment opportunity and there is potential spill over in tourism related industry from this development in the region.

It was proposed that viable enterprise hubs in the Midlands should be supported in the strategy, as a tool to promote indigenous industry and encourage SMEs to increase economic activity in the Midlands.

Togher National Enterprise Park - Inland Port which has current policy support in the Regional Planning Guidelines should continue to be supported in the RSES.

Birr technology centre as a location for data management and analytical skills using the LOFAR radio telescope, was identified as a key asset that has economic potential.

3.5.2 Directors Response to Submissions

The Director recognises that there is significant economic activity across the region in a wide number of locations some of which are well established with others planned or emerging. The RSES is an opportunity to spatially identify key locations of economic activity and to respond with the relevant policy to support these locations and allow them to fulfil their potential.

The Eastern and Midland Regional Assembly are currently engaging with Technical Working Groups (TWGs), Strategic Planning Area (SPA) Committees and other key stakeholders to inform the formulation of the RSES. The Assembly are committed to providing an Economic Strategy that is informed by this engagement, a robust evidence base and which is in line with relevant Government Policy as required by the Planning and Development Act, 2000, as amended.

4. Theme: Environment and Heritage

Submission Received Relevant to this Section of the Issues Paper:

Submission Reference Number

0004, 0015, 0017, 0018, 0019, 0020, 0021, 0024, 0025, 0026, 0028, 0030, 0031 (Heritage Council), 0032, 0034, 0042, 0048, 0053 (the Midlands Local Authorities), 0054 (Wicklow County Council), 0056, 0057 (Dun Laoghaire Rathdown County Council), 0064, 0068, 0075, 0076, 0083 (South Dublin County Council), 0097, 100, 0103 (Fingal County Council), 0106, 0108 (Laois County Council), 0111, 0116, 0119 (Offaly County Council), 0121, 0123 (An Taisce), 0124, 0125 (Department of Culture, Heritage and the Gaeltacht), 0130, 0133, 0134 (Kildare County Council), 0135, 0136, 0137 (Louth County Council), 0141 (Failte Ireland), 0143, 0144, 0145, 0146 (Longford County Council), 0148, 0150, 0154, 0158, 0160, 0161, 0163, 0165, 0166 (Environmental Protection Agency), 0167 (Wicklow County Council), 0171 (Westmeath County Council).

4.1 Overall Summary of submissions

A number of submissions received that referred to environmental and heritage matters also set out some cross cutting considerations including; the need to plan for sustainable land use and transportation and supporting infrastructure delivery to meet future food, energy, water and waste needs; the benefits of a good quality environment to health and wellbeing; the need for accelerated actions to address climate change and support a move to a low carbon, climate resilient economy and society.

In addition to their inclusion under the ‘Environment and Heritage’ theme a number of submissions are cross referred to other relevant themes including; ‘People and Place’, ‘Economy and Enterprise’ and ‘Climate and Infrastructure’.

Issues that related to the parallel Strategic Environmental Assessment (SEA) are also referred to the SEA Scoping Process, which provides a forum for ongoing engagement with environmental stakeholders.

The RSES will ensure good integration and alignment with the National Planning Framework and other relevant European and national policy, legislation and guidance when preparing the RSES and the SEA Environmental Report.

4.2 Sub-theme: Integrated Land and Marine Planning

4.2.1 Submissions summary

Ireland is one of Europe's leading maritime countries with an extensive marine resource. Submissions received highlight a number of recommendations in relation to the need for integrated land and marine planning that brings together coastal landscapes and seascapes, recreation and tourism, fishing and aquaculture, biodiversity protection, offshore renewables and port development.

Marine Spatial Planning

Submissions outline the need for RSES to support the implementation of the Marine Strategy Framework Directive (MSFD); to maintain the Good Environmental Status (GES) of the marine ecosystem; to apply the precautionary and polluter pays principles; and to set out environmental targets and indicators to achieve and maintain GES by 2020. Compliance with MSFD will play a key part in protecting the marine environment from threats such as climate change, ocean warming, ocean acidification, overfishing, marine litter and pollution. Consideration should be given to the designation of Marine Protected Areas and preparation of management plans to promote sustainable marine practices and explore alternative forms of income for coastal communities.

The preparation of the first statutory marine spatial plan (MSP) for Ireland, by 2021 offers an opportunity to unlock the sustainable development potential of our natural marine and coastal resources. The MSP follows the publication in 2017 of 'Towards a Marine Spatial Plan for Ireland' and in 2018 of the National Planning Framework. It is submitted that the RSES should provide clarity as to the integration and alignment between these marine and territorial plans at a regional level, including the relationship between foreshore planning and land use planning to support a more streamlined consent and licencing system. Subsequent regional and coastal zone management plans should then be prepared to support an integrated approach to the development of marine and coastal resources, protection of heritage and promotion of recreation and amenity opportunities for coastal towns in region. Consideration should also be had to the non-spatial 'Harnessing Our Ocean Wealth' Strategy.

Port Development

Ireland's connectivity as an island national on the periphery of Europe and the uncertainty of Brexit are key challenges and policy is needed to support regional port development. Dublin Port is a key international gateway for maritime freight and tourism, with annual movement of about 2 million passengers on ferry services to the UK and Continental Europe and increasingly on cruise ships. The Dublin Port Masterplan 2012-2040 sets out the framework to add additional capacity to meet major growth projections up to 2040, including the expansion of non-core port activities at Dublin Inland Port in Fingal, the redevelopment of Alexandra Basin and the completion of the Southern Port Access Route which will enable the development of the south port on the Poolbeg Peninsula. By 2040, Dublin Port is projected to meet maximum capacity and additional port capacity will be required at another east coast location.

A number of submissions highlight the strategic importance of smaller ports as engines of regional economic growth and the need to address infrastructural deficiencies including road access to support the overspill of Dublin Port for certain activities or for a new Port facility on the East Coast. A number of port locations are submitted to have expansion potential including Greenore and Drogheda Ports in County Louth, Wicklow and Arklow Ports in Co. Wicklow and a proposed new deepwater port in Gormanstown, Co. Meath. The RSES can support regional port development and policy alignment

between the National Ports Policy 2013 and county level regulation. The need for full assessment of the potential environmental impacts of major port projects should be a consideration in the RSES.

Offshore renewables

The offshore energy industry can unlock investment in the regions maritime sector and ports and create new jobs in engineering, maintenance and supply chain services, with the added benefit of providing energy security and reducing carbon emissions. To date most renewable electricity generation in Ireland has focussed on onshore wind generation and submissions highlight the potential for the development of offshore wind energy. Access to the electricity grid will be a key factor in the development of offshore potential and investment will be needed in this regard however the location of energy generation close to large demand centres such as Dublin helps to minimise costs in providing for network infrastructure. The Arklow Bank Wind Park in County Wicklow is currently the largest offshore energy project in the State and has the potential to become a flagship project.

It is suggested that the RSES will have a key role in supporting the development of off-shore renewables by identifying Strategic Energy Zones and facilitating co-ordination across local boundaries. Consideration needs to be given to the siting of offshore wind farms to ensure against adverse impacts on the marine environment and mammals (including protected seals and cetaceans), and on coastal communities, having regard also to the upcoming Wind Energy Guidelines.

4.2.2 Response to Submissions

The Director acknowledges that the RSES will address integrated land and marine spatial planning in formulating the strategy for the region. The Director welcomes the numerous submissions and cross-cutting policy responses will be considered under the following themes; People and Place, Economy and Enterprise, Climate and Infrastructure, Environment and Heritage.

To ensure an integrated and coherent approach to forming future policy, the RSES will take consideration of existing policy including the EU Marine Strategy Framework Initiative and key national policy including the National Planning Framework, Integrated Coastal Zone Management (ICZM), National Ports Policy, Climate Mitigation and Adaptation Plans, and any other policy or guidance that may be relevant to the integrated land and marine spatial planning in the region.

The RSES will also be informed by a robust and evidence based Strategic Environmental Assessment (SEA) will also consider the relevant EU Directives and national legislation in relation to undertaking SEA and its associated environmental assessments.

4.3 Sub-theme: Sustainable Water and Flood Management

4.3.1 Submissions Summary

Submissions highlight the importance of achieving good environmental status of water bodies from source to the sea in compliance with the Water Framework Directive, the provision of a safe and secure drinking water supply, the need for water conservation and adequate waste water treatment. Submissions also support the implementation of measures that increase our resilience in dealing with adverse climate impacts, flood risk management and coastal protection in compliance with the Floods Directive.

Water services /water quality

Submissions highlight the importance of a reliable and secure water supply and good water quality in terms of the environmental, social and economic benefits to the region. It is recognised that decades of under-investment has led to substandard water infrastructure, with high water leakage from supply and sewer systems, low water pressure and supply issues due to flooding and drought. Key issues of concern include discharges from agriculture and untreated wastewater from towns, villages and rural houses, which is causing serious pollution in rivers, lakes, canals, transitional and bathing waters with resultant impact on the environment, human health and tourism.

Within the region, Irish Water has identified 3 settlements discharging untreated effluent and the need for upgrading of 12 UWW treatment plants, improvement of storm water and water infrastructure. There is a need to ensure that the necessary funds are provided to support implementation of Irish Waters 25-year Water Services Strategic Plan (WSSP) and capital investment plan. It also submitted that given the scale of the problem it is likely that the level of investment by Irish Water into water and waste water infrastructure will need to grow and the Dublin Metropolitan area will require significant investment in water and wastewater treatment to support the growth targets in the national Planning Framework (NPF).

The provision of water services, by way of waste water treatment and supply of potable water has potential environmental impacts such as water quality, species and habitat loss. Major proposed infrastructure projects include the Eastern and Midlands water supply project, the proposed new waste water treatment plant (WWTP) in North Dublin and the upgrading of the Poolbeg WWTP. Potential impacts on biodiversity and designated sites will need to be considered in relation to the development of water infrastructure projects. Water conservation efforts should be made to reduce leakage from old and damaged water pipes and through rainwater harvesting, use of grey water and eco-friendly systems in all new homes, and retro-fitted in existing housing stock. There is potential to consider natural measures such as Integrated Constructed Wetlands (ICW) to provide for the treatment of waste water in rural areas, while also providing an enhanced recreational amenity.

Climate change and flooding

The Floods Directive needs to be fully integrated into planning to ensure the protection of flood plains from development pressures. The CFRAM programme is being carried out by the OPW to alleviate flooding and a series of Flood Risk Management Plans are currently being finalised, which will be accompanied by an interactive web-based flood related information system.

Flood barriers have the potential to impact on biodiversity and designated sites, including river SACs and can lead to changes in the natural processes of erosion and deposition and the loss of flood plains and associated habitats. Coastal protection measures can also lead to changes in dynamic natural

coastal processes such as patterns of erosion and deposition and could result in impacts on other coastal sites. The review of the River Basin Management Plans offers an opportunity to take a catchment-based approach and to examine the potential for an integrated approach to reducing flood risks. The implementation of soft measures in areas of flood risk may include Sustainable Urban Drainage Systems (SUDs) and permeable surfaces in urban areas, constructed wetlands including farm based and community wetlands, peatland restoration and afforestation and water conservation.

The availability of comprehensive national flood risk mapping together with 'The Planning System and Flood Risk Management: Guidelines for Local Authorities' published in 2009, provide the RSES with the tools to ensure that planning authorities take full account of flood risk, preventing inappropriate development in areas at risk. The vulnerability of the existing housing and infrastructure stock also needs to be assessed with a view to mitigating the expected impact of both flooding and sea level rise due to climate change. A regional approach to coastal erosion and flooding should identify areas at risk, priorities for protection and relocation as well as areas for 'managed retreat'. Consideration should be given to the development of National Standards of flood resilient construction to ensure further damage is minimised and the recovery time following flood damage is minimised.

4.3.2 Response to Submissions

The Director acknowledges that the RSES will address sustainable water and flood risk management in formulating the strategy for the region. The Director welcomes the numerous submissions and that cross-cutting policy responses will be considered in the preparation of the draft RSES.

To ensure an integrated and coherent approach to forming future policy, the RSES will take consideration of existing policy including the EU Water Framework, Marine Strategy Framework and Floods Directives and key national policy including the National Planning Framework, Flood Risk Management Guidelines, and will also consider the Irish Water Investment Plan, the upcoming Flood Risk Management Plans and Draft River Basin Management Plans and any other policy or guidance that may be relevant to sustainable water and flood risk management in the region.

The RSES will also be informed by a robust and evidence based Strategic Environmental Assessment (SEA) will also consider the relevant EU Directives and national legislation in relation to undertaking SEA and its associated environmental assessments including Regional Flood Risk Assessment (RFRA).

4.4 Sub-theme: Land use and Resource Efficiency

4.4.1 Submissions Summary

Submissions outline the need for more sustainable land use planning to support the decarbonisation of the economy and to address climate change including a modal shift to public transport, cycling and electric vehicles, consideration of housing standards and improved broadband access to facilitate home working. Submissions also highlight the need to support resource efficiency and promote diversity in rural sectors such as agriculture, marine, forestry, tourism, energy and to develop the smart green economy. There is significant natural resource potential in large state-owned land banks in the region.

Land use change

Submissions highlight the potential impacts of land use change on the quality of the environment and nature conservation in the region. Housing, including one off housing, and employment have potential environmental impacts from disposing of sewage sludge from septic tanks, wastewater treatment and water abstraction which need to be considered in determining the spatial location of development. It is suggested that the spatial location of future development should be informed by environmental sensitivity such as habitat or ecological constraints mapping. The RSES should also recognise the importance of geological sites in accordance with the National Heritage Plan and the 'Geological Heritage Guidelines for the Extractive Industry' to protect sites of interest. It is suggested that the carbon footprint of every development should be considered in planning applications.

Agriculture

Submission highlight the potential damage that intensification of farming can do to the environment in terms of soil degradation and contribution to carbon and methane emissions. Climate change will affect the type of agricultural production in the region. Consideration will need to be given to the impacts of agricultural growth targets set out in Food Wise 2025, which will bring about major challenges in meeting our greenhouse gas emissions (GHGs) reduction targets by 2020/2030/2050 and particularly in the non-emissions trading scheme (ETS) sectors, with agriculture a significant contributor. This effectively means that efforts must increase in other areas such as the decarbonisation of energy, heat and transport, to offset emissions in the agriculture sector. There is a need to support low carbon and low impact farming such as local agri-food, biomass, permaculture, agri forestry and the use of anaerobic digesters to produce renewable gas from farm wastes.

There is a need to recognise the value of agriculture and food production, to assess agricultural land for its carrying capacity, soil quality and to determine the rate of land use change particularly near urban settlements. Policy developments such as Brexit, CAP reform and trade agreements need to be considered and there is potential to link farm payments with environmental benefits such as carbon sequestration and tree planting to protect the livelihood of farmers.

Circular /low carbon economy

The RSES should consider the integration of resource efficiency across all sectors towards the development of a circular economy, which involves the re-use of resources, such as the waste or by-product from one industry being the resource for another. Regional plans should consider the potential for recycling of construction waste, for anaerobic digesters to deal with sewage and food waste, for solar parks and wind energy, for data storage close to energy and water supplies, for waste to energy projects, biogas in rural areas, district heating from major heat sources, local combined heat and power and the recycling of plastics and raw materials to other products.

The transition to a low carbon sustainable energy economy requires further investment in smart energy systems and electric transport and a co-ordination of policy as all levels of government and with industry. The migration to electro mobility, car sharing and ride-sharing and in the longer term autonomous vehicles has potential to contribute to the decarbonisation of transport also improving air quality and road safety. The RSES should set out a pathway to achieving a low carbon economy by 2050 and set out a framework for measuring and mitigating the regional carbon footprints, having consideration to research carried out by the Environmental Protection Agency and by Codema.

Having regard to the need for energy security and competitiveness a number of submissions highlight the need for natural gas to be considered as part of a transition to a low carbon, being low cost and lower on harmful emissions compared to diesel, and having regard to the limited lifespan of the Corrib gas field and the potential impact of Brexit.

Onshore Renewables

There has been an increase in the generation of renewable energy, with a number of applications for onshore wind and solar in the region. A number of submissions outline the need for an expansion of renewable energy into domestic solar and industrial ‘flat roof’ solar and to develop community owned renewable energy projects in wind, water, solar, forestry, biomass and biogas. This will require investment in distributed electricity grids to manage a high number of smaller producers located close to their consumers. The Dublin energy agency Codema have done much research into the promotion of energy efficiency at all levels in the built environment including the production of spatial energy demand analysis which provides a model for other local authorities to identify where solar energy, wind energy and small-scale hydroelectricity projects may be spatially located.

A regional approach to renewable energy development would provide a plan led framework to address cross-county inconsistency and to inform site selection. The RSES should consider the suitable locations for Strategic Energy Zones for wind, solar, energy storage and transmission in the region, and to explore the opportunity for guidance on community gain models to address the impacts of large scale renewable projects. Consideration needs to be given to the siting of wind and solar farms and the location of cabling to ensure against adverse impacts on wildlife (including protected birds and bats) and the environment. Wind farms can also be suitable for co-located recreation uses, for example the Mount Lucas and Raheenleagh wind farms.

Forestry

Coillte Land Solutions is responsible for the asset development and management of 74,289 hectares within the Eastern and Midlands region or 5.1% of the region. Coillte lands have multi-functional potential for forestry, nature conservation, renewable energy, recreation, waste water treatment and high amenity and residential uses. Coillte outlines the potential for forestry to double over the next 10 years, for forests and forestry products to play a role in mitigating the effects of climate change and support the decarbonisation of energy as part of a transition to renewables. They also have a number of landbanks that may be suitable for wind farms, large scale solar and energy storage projects and are currently exploring different models of community benefit, ownership and energy efficiency.

Submissions outline the need to identify and map the forestry and woodlands of the region and to develop policies for their sustainable management. The benefits of afforestation for carbon sequestration is recognised but it is also important to recognise the value of high quality food production lands that need to be protected. In this regard it is suggested that lands with more difficult soils may have more potential for afforestation. The RSES should also consider benefits for the region in the preparation of woodland management plans to develop the recreational amenity of Coillte

owned lands. There are a number of recreational forest parks in the region including the Three Rock Mountain in Dublin and Raheenleagh in Wicklow, where a wind farm is co-located with a forest park and trails.

Peatlands

Peat soils comprise 20% of the Irish land area and 75% of the organic soil carbon. While extensive though damaged areas of blanket bog remain, raised bogs have been increasingly and severely damaged by decades of peat extraction and drainage and area constituted a rare European habitat. Bord na Mona is responsible for the development of Irelands peatland resource, while also providing a range of commercial peat products and services. Their landbanks include a network of raised bogs with restoration potential which have been assessed by National Parks and Wildlife Service for their nature conservation potential and large areas of cutaway peatlands in the Midlands

Bord na Mona has developed a ‘Strategic Framework for the Future Use of Peatlands’, which identifies lands suitable for renewable/industrial development, tourism and recreation to support their commitment to cease production of peat for electricity generation by 2030. To date Bord na Mona have developed a wind farm at Mount Lucas and have secured permission for another at Cloncreen in Offaly. A number of cutaway bogs are identified for renewable development include Ballydermott, Ballivor, Derrygreenagh, Boora and Mountdillon bog groups.

Cutaway peatlands also have the capacity to develop high value habitats that support species under pressure in the wider landscape, they can also provide for flood attenuation and water quality enhancement. Re-wetting and the development of new wetland habitats also has the potential to reduce GHG emissions and develop new carbon sinks. The Bord na Mona Biodiversity Action Plan 2016-21 outlines the potential to include biodiversity and ecosystem services in the realisation of the landbank. Bord na Mona works with other state organisation to progress recreation projects such as the Lough Boora Discovery Park and the Lough Ree and Mid Shannon Wilderness Projects.

4.4.2 Response to Submissions

In preparation of a draft strategy the Assembly will address sustainable land use and the management of natural resources for all parts of the region to ensure a strategic approach to land management for all the regions citizens. The Director acknowledges that this will require a cross-cutting policy responses that will be considered across the themes in the preparation of the draft RSES.

To ensure an integrated and coherent approach to forming future policy, the RSES will take consideration of existing policy including the EU Birds and Habitats Directive and provide for the integration of peatland agricultural and forestry policy with the conservation management of all Natura 2000 sites. The RSES will also consider relevant national planning policy such as the National Planning Framework and climate policy such as the national Climate Mitigation and Adaptation Plans, the Bord na Mona Biodiversity Plan 2016-2021, the upcoming Wind Energy Guidelines any other policy or guidance that may be relevant to the sustainable land use and management of natural resources in the region.

The RSES will also be informed by a robust and evidence based Strategic Environmental Assessment (SEA) will also consider the relevant EU Directives and national legislation in relation to undertaking SEA and its associated environmental assessments.

4.5 Sub-theme: Built and Natural Heritage

4.5.1 Submissions Summary

Submissions highlight the importance of protecting our natural and wild places that act as biodiversity hubs, provide habitat for species and vital eco-system services such as the protection of water and air quality and noise related factors. Coupled with our built heritage, which includes our landscape, seascapes, geology, cultural heritage and historic towns, our heritage assets provide the basis for sustainable tourism and contribute to human health and wellbeing.

Natural heritage /Biodiversity

Strategic natural assets include grasslands, wetlands, waterways, peatlands, woodlands and uplands with high biodiversity value. Submissions outline the need to ensure the protection and enhancement of the status of designated sites and to consider the environmental impacts of spatial planning policy including; habitat loss, deterioration and fragmentation, soil nutrients, disturbance to breeding birds, species change, air and water quality, invasive species, land use change, impacts on natural processes of erosion and sedimentation and to ecosystem services such as drainage, flooding and water attenuation and carbon storage.

The environmental capacity of the region to accommodate new development should be considered in the RSES and iterative SEA process, which should identify and map Special Protection Areas (SPA) designated under the Birds Directive, Natural Heritage Areas (NHA), proposed Natural Heritage Areas (pNHA), Nature Reserves and Refuges for fauna, designated under the Wildlife Acts, Ramsar Wetlands, Wildfowl Sanctuaries, National Parks, UNESCO Biospheres and World Heritage sites and other designated sites outlined in the Strategic Environmental Assessment.

Air quality

Air pollution is one of the biggest environmental risks to human health leading to respiratory disease, asthma and lung cancer, and to the environment as sources of air pollution also produce climate pollutants. The main pollutants of concern include NOx (Oxides of Nitrogen), PM10 and PM 2.5 (Particulate Matter), O₃ (Ground Level Ozone) and PAHs (Polycyclic Aromatic Hydrocarbons). Submissions outline the need for RSES to promote a reduction in fossil fuel for home heating and private cars, encourage modal shift to public transport and active travel and reduce urban sprawl.

Green Infrastructure/Ecosystem services

The EPA 2016 report 'Health Benefits from Biodiversity and Green Infrastructure' states that human health and wellbeing depends on a healthy environment and that management of such as key natural resource also has strategic importance in terms of the potential to contribute to the Irish economy. Submissions outline the need to consider a regional approach to the identification of strategic Green Infrastructure, which may include National Parks, regional parks and green belts, uplands, coast, linear features such as rivers, waterways and transport corridors, rural areas and catchments for flood control. This would set a framework for a standard approach to the zoning of Green Infrastructure by local authorities and its integration into land use planning the creation of new green areas and networks in existing built infrastructure that has added human health and recreation benefits.

Submissions also highlight the value of ecosystem services, conservatively estimated at over 2.6 billion euro. The RSES should consider the integration of performance accounting across all sectors to take account of the natural capital or economic value of Green Infrastructure. It is suggested that a Natural Capital Assessment could be required for proposed developments that impact on natural systems.

Green Infrastructure can have high biodiversity value, particularly Natura 2000 sites that act as biodiversity ‘sinks’ and linear landscapes features such as watercourse, woodlands, hedgerows and road and railway margins that act as ecological corridors for wild species. However green infrastructure should not be confused with putting built infrastructure into green areas and it is submitted that the RSES should consider separate natural heritage/biodiversity and green infrastructure chapters to ensure the development of greenways and green networks does not adversely impact sensitive environments and important habitats due to increased recreation use.

Greenways and Blueways

A National Greenway Strategy is currently in preparation to develop new recreation and tourism opportunities. This includes the development of blueways on Irelands’ extensive inland waterways network including the Shannon, the Royal and Grand Canals and the Barrow Navigation. The Royal Canal towpath is currently being developed as part of the Dublin - Galway cycle route by Waterways Ireland in association with local authorities, Failte Ireland and other partners. The Grand Canal and Spencer Docks, as the urban gateways to the Grand and Royal Canal respectively, have potential to position the Dublin Docklands as a significant water-focussed amenity. There is further potential to further develop the Shannon Wilderness Corridor to include the islands of Lough Ree, Clonmacnoise and Shannon harbour and to access the Slieve Bloom Mountains. Other greenways under development in the region include the Barrow, Carlingford and the Dodder Greenways and the Sutton to Sandycove route along Dublin Bay.

The development of greenways also provides an opportunity for sustainable commuter travelling by cycling especially in urban areas. Submissions outline the need for a regional approach to the development of a walking and cycling strategy and to promote national greenways or cycleway routes. It is also suggested that local authorities should undertake a review of walking and cycling routes particularly in areas of high amenity, uplands, lake shores, river banks, forests, heritage sites, areas of historic or archaeological importance, and National Monuments and to provide linkages from built up areas to the countryside and to link with public rights of way in adjoining counties. The development of waymarked ways and looped walks, may require the creation of new rights of way either by agreement or by the use of compulsory powers.

Submissions outline the potential for cumulative impacts of greenway development at both a regional and national level including habitat loss and disturbance. The ecological impacts of greenways should be considered when drafting the RSES Strategy and carrying out SEA environmental assessments.

Cultural heritage

There is an opportunity to move away from the term ‘Built Heritage’ to that of ‘Cultural Heritage’ as an encompassing term for sites, structures, areas, features and objects of archaeological, architectural, historical, cultural, scientific, social and technical interest. Submissions also highlight the importance of our marine heritage, industrial heritage and our historic cities, towns and villages, which are also an important part of our heritage and form the basis for our cultural identify and our tourism.

Guidelines should be in place to protect the urban fabric of historic urban centres to reduce dereliction and vacancy and inspire the future development of Irish towns. There are a number of existing and developing initiatives and guidelines including the RIAI’s Town and Village Toolkit, the Heritage Councils ‘Policy Proposal for Ireland’s Towns 2015’, community led Village Design Statements (CLVDS) and Town Centre Health Checks, the Irish Walled Towns Network and Teagasc rural town schemes.

The RSES should make providing for integrating Cultural Heritage objectives with environmental, economic and social objectives e.g. Green Infrastructure, well-being and community development. There is also an opportunity to create a regional network for Local Authorities Heritage Officers, Conservation Officers and Arts Officers in the plan making process and to create a network for prescribed bodies as part of the RSES implementation and monitoring.

Landscape

The RSES offers an opportunity to support the creation of a landscape planning and management policy hierarchy having regard to the European Landscape Convention (ELC) and the emerging National Landscape Strategy (NLS). Within the region, a number of local authorities have completed or commenced Landscape Character Assessments (LCA) however there is a lack of consistency across county borders and in some cases, a lack of landscape architecture skillsets in local authorities. LCA should also include seascapes and promote the concept of historic villagescapes (urban and rural), streetscapes, townscapes and cityscapes.

The RSES offers an opportunity to integrate the objectives and actions of the National Landscape Strategy and a commitment should be included in the RSES to the preparation of Regional Landscape Character Assessment (RLCA) including seascapes, townscapes and historic landscapes, to inform landscape capacity and spatial planning, which should commence on completion of the National Landscape Character Assessment (NLCA) expected to commence later in 2018.

4.5.2 Response to Submissions

The Director welcomes the submissions supporting the promotion and enhancement of natural and cultural heritage, this will be considered as a key part of the development of the strategy for the region.

To ensure an integrated and coherent approach to the preparation of the strategy consideration will be given to the EU Birds and Habitats and Water Framework Directives, the UN Biodiversity Convention and the European Landscape Convention. The RSES will also align with the National Planning Framework (NPF) and consider key national policy including the National Heritage Plan, Waterways Ireland Heritage Plan, Draft National Clean Air Strategy, National Landscape Strategy and National Biodiversity Plan 2017-2021 and the All Ireland Pollinator Plan 2015-2020, along with any other policy or guidance that may be relevant to the protection and enhancement of natural and cultural heritage in the region.

4.6 Sub theme: Tourism

4.6.1 Submissions Summary

The region combines tourism in Dublin, the largest centre for tourism in Ireland, the coast and uplands in the east, lakes bogs and rivers in the west and south and cultural, historic and sporting assets throughout the region. Submissions highlighted the importance of tourism as a key economic growth sector and the need for the promotion of place attractiveness, access, infrastructure, activities and services in tourism hotspots, both urban and rural. Submissions also highlight the need for sustainable visitor management to avoid adverse environmental impacts of increased tourism and recreation.

Tourism clusters/brand development

The region contains three national place making propositions- Ireland's Ancient East, Dublin and the new Midlands brand, while the 'Meet in Ireland' brand promotes Ireland as a location for business meetings and conferences. Bueways Ireland 'Heading into the Blue' initiative aims to generate new tourism and economic activity through canoeing, cycling and walking by promoting the inland waterways as a strategic coast to coast network between the Wild Atlantic Way and the Ancient East.

The development of clusters enables tourism businesses and providers to work together to improve visitor experience and services and to extend the regional and seasonal spread of tourists. There is scope for significant growth in the region and to build on local attributes such as language, music, crafts, arts and food, to deliver distinctive visitor experiences, for example building on the film industry in Wicklow, the equine tradition at the Curragh in Kildare or the Gaelic language in the Meath Gaeltacht. The success of Lough Boora in Co Offaly offers an opportunity to develop other recreational and tourism opportunities on former peatlands in the Midlands such as the Abbeyleix bog initiative.

Infrastructure and assets that sustain quality of life for residents and visitor alike is also key to attracting FDI, therefore the RSES should support enhanced place attractiveness, linkages and services in towns and villages, which support economic activity in a wider rural area. Key strategic transport infrastructure includes Dublin Port and Airport, Dublin and Dun Laoghaire Cruise Ship Berths, the intercity road and rail network and linkages between tourism destinations which support economic activity in the wider rural areas. Infrastructure capacity road and public transport capacity, waste and water services need to be maintained and enhanced.

Heritage led tourism/urban centres

Heritage assets are key to local distinctiveness in our cities, towns and villages. The RSES should promote heritage led urban regeneration in historic town centres to offer a unique visitor experience. Failte Irelands Draft 10-year vision for National Tourism Development identifies a hierarchy of tourism destinations in the region including destination towns with year-round facilities in the region such as Dublin, Bray and Athlone, supported by local seasonal destination towns such as Drogheda, Carlingford, Navan and Wicklow, which in turn offer access to key rural sites throughout the region.

Areas earmarked for significant tourism growth by Failte Ireland over the next decade include Meath-Louth and its coastal areas, building on the world heritage site of Bru na Boinne and attractions such as Tayto Park and Carlingford Lough. Wicklow is identified as having growth potential to build on key heritage assets such as Glendalough, Powerscourt, Mount Usher and Russborough House. Athlone has also been identified to serve as an accommodation hub for the midlands and a gateway to key assets such as Clonmacnoise, Athlone Castle and Kilbeggan Distillery. The planned Centre parks holiday village is also a significant project for Longford and the entire Midlands.

Activity tourism/rural areas

Submission highlight the value of activity tourism as a key growth sector – including walking, cycling, water sports and golf – as being particularly important in rural areas. Irelands landscape and scenery is a key attraction for visitors, therefore maintaining and enhancing access to the countryside, rivers, lakes and coastal areas as well as state lands such as National Parks, forest Parks, coastal areas a waterways should be considered a significant opportunity for the RSES.

The region is home to one National Park in the Wicklow Mountains and there is an opportunity to also develop the Slieve Blooms as a National Recreational Eco-Park. The Midlands presents a unique opportunity to develop visitor experiences through the development of greenways on the Shannon Wilderness Corridor, the Royal, Grand Canals and the Barrow valley. Other flagship recreation destinations include Coillte's Three Rock Mountain in Dublin and the Lough Boora Discovery Park in Offaly, which attracts over 100,000 annual visitors.

The development of greenways and activity tourism has huge potential to improve the distribution of tourism and economic benefits into rural communities. In this regard submissions outline the need for RSES to have regard to the report of the Commission for the Economic Development of Rural Areas (CEDRA), which recommends the prioritisation of national state-owned infrastructure and the development of local tourism destinations to complement the larger destination towns and cities. The RSES should also have regard to national policy 'Healthy Ireland – A framework for improved health and well-being 2013-2035' and the 'Outdoor Recreation Plan for Public Lands and Waters in Ireland 2017-2021' developed by Coillte, Waterways Ireland and others.

4.6.2 Response to Submissions

The Director acknowledges numerous submissions that highlight the significant of Tourism to the region, the RSES will consider the development and promotion of tourism as a key element of the preparation of the strategy for the region. This will require a cross-cutting policy responses across the drafting of the RSES.

To ensure an integrated and coherent approach, the RSES will consider the National Planning Framework and key national policy such as Failte Irelands 'Draft Vision for National Tourism Development', 'Healthy Ireland – A framework for improved health and well-being 2013-2035', the 'Outdoor Recreation Plan for Public Lands and Waters in Ireland 2017-2021' and 'Waterways Ireland Heritage Plan 2016-2021', and any other policy or guidance that may be relevant to the development and promotion of tourism.

The RSES will also be informed by a robust and evidence based Strategic Environmental Assessment (SEA) will also consider the relevant EU Directives and national legislation in relation to undertaking SEA and its associated environmental assessments.

4.7 Sub theme: Strategic Environmental Assessment

Submission Reference Number

0015, 0021, 0024, 0025, 0026, 0027, 0028, 0029, 0030, 0031 (Heritage Council), 0056, 0064, 0075, 0097, 0121 (Irish Water), 0123 (An Taisce), 0125 (Department of Culture, Heritage and the Gaeltacht), 0126, 0141 (Failte Ireland), 0155, 0157 (Eirgrid), 0160, 0165, 0166 (Environmental Protection Agency)

4.7.1 Submissions Summary

Submissions received also highlight a number of key cross cutting environment and heritage issues to be considered in preparing RSES and in the Strategic Environmental Assessment (SEA) to be carried out in a parallel and iterative process. These include the need for integration and alignment with the NPF, the need for sustainable transport and infrastructure planning, accelerated actions to address climate change and environmental impacts such as flooding and coastal erosion and to support a move to a low carbon, climate resilient economy and society including the development of renewable potential and the circular economy.

These are summarised where appropriate in the relevant theme/subtheme of the Directors Report and have also been referred to the SEA Scoping Process to inform the preparation of the Environmental Report and associated assessments.

Comments on SEA Scoping

Submissions with specific comments in relation to the SEA Scoping have been referred to the SEA Process. A number of prescribed bodies welcome the opportunity to engage with RSES through the SEA process, which provides a forum for ongoing engagement with environmental stakeholders and to inform the SEA Environmental Report.

Implementation, monitoring and review

Submissions welcomes the common approach to the SEA process being adopted for all three RSESs and consider that there is merit in considering adopting a similar standardised approach in preparing the Regional Strategies. Aligning the implementation and governance aspects of the RSES with the approach outlined in the NPF would provide for robust mechanisms for delivery. In this regard consideration could be given to for the preparation of a RSES Implementation Programme and establishing a system for monitoring, reporting and review.

Data and Information Sources

Submissions outline the need for the scope of the SEA to include data gathering, analysis and assessment of likely environmental impacts of the RSES. This includes key sources of data, information and publications, including GIS datasets on natural, cultural and built heritage and issues relevant to the plan and guidance in relation to the carrying out of the SEA process and its associated environmental assessments including Appropriate Assessments (AA), a Natura Impact Report (NIR) and Regional Flood Risk Appraisal (RFRA).

Transboundary effects

There is a statutory obligation arising from the EU Strategic Environmental Assessment Directive regarding trans-boundary consultation in relation to spatial and land use plans. Relevant Departments

in Northern Ireland and the Republic of Ireland working together can ensure a more coherent and consistent approach to addressing environmental issues emerging from spatial planning processes.

4.7.2 Response to Submissions

The RSES will ensure good integration and alignment with the National Planning Framework and other relevant European and national policy, legislation and guidance when preparing the RSES and the SEA Environmental Report.

The SEA will be robust, evidence based and informed by environmental sensitivity mapping for the region and will also consider the relevant EU Directives and national legislation in relation to undertaking SEA and its associated environmental assessments, including any Appropriate Assessment (AA) and Natura Impact Report.

5. Theme: Climate and Infrastructure

Submission Received Relevant to this Section of the Issues Paper:

Submission Reference Number

0001, 0002, 0003, 0004, 0007 (National Transport Authority), 0009 (Transport Infrastructure Ireland), 0010, 0014 (Irish Rail), 0015, 0017, 0018, 0019, 0020, 0021, 0022, 0024, 0025, 0026, 0027, 0028, 0029, 0030, 0034, 0035, 0042, 0045, 0048, 0053 (Midlands Local Authorities), 0054, 0056, 0057 (Dun Laoghaire-Rathdown County Council), 0058, 0060, 0062, 0064, 0066, 0068, 0070, 0074, 0075, 0076, 0082, 0083 (South Dublin County Council), 0085 (ESB), 0092, 0095, 0096, 0097, 0100, 0101, 0103 (Fingal County Council), 0106, 0108 (Laois County Council), 0111, 0116, 0117, 0119 (Offaly County Council), 0121 (Irish Water), 0123 (An Taisce), 0124 (Meath County Council), 0125 (Department of Culture, Heritage and the Gaeltacht), 0126, 0129, 0130, 0133, 0134 (Kildare County Council), 0135, 0137 (Louth County Council), 0138, 0140 (Dublin Airport Authority), 0142, 0143, 0144, 0145, 0146 (Longford County Council), 0148, 0151, 0154, 0155, 0157 (EirGrid), 0160, 0163, 0164, 0165, 0166 (EPA), 0167 (Wicklow County Council), 0168, 0170 (Dublin City Council), 0171 (Westmeath County Council).

5.1 Sub-theme: Transport

5.1.1 Summary of Submissions

Need for Sustainable Transport System

The submissions outline the need to prepare a draft RSES that prioritises a sustainable, integrated, multi modal public transport system (including heavy rail and DART), walking and cycling, and the safety and efficiency of the national road network. The importance of allocating population and employment growth into locations which will benefit from enhanced transport infrastructure is outlined. In this regard the optimal use, location, pattern and density of new development is a key consideration so that the benefits of transport investment support appropriate plan led development patterns and economic objectives. There is a need for a more coordinated approach to public transport provision and a need for investment in Dublin's infrastructure to ensure it remains a competitive location.

Investment and expansion of heavy rail in the region as a public transport network is supported by national policy prepared by the Department of Transport, Tourism and Sport. There is a pressing need for investment in the high capacity heavy rail network in the greater Dublin area and linking urban centres in the region to Dublin, to address issues including traffic congestion and GHG emissions. This includes the need for a heavy rail connection to Dublin Airport and an explicit recommendation in this regard should be included in the draft RSES.

The submissions require that the draft RSES identify major infrastructural investment required to support and facilitate national development that supports NPF objectives. This can be used to develop a framework for infrastructural investment decision making and ensure that investment is commitment by inclusion of spatial and infrastructural priorities into the draft RSES. In this regard clear direction is required on statutory land use plans for each county in terms of the key spatial planning infrastructural requirements. The draft RSES should be supported by measures such as LIHAF which will enable planning authorities to secure funding to release lands.

Existing transport infrastructure available to support growth is outlined as are details of transport infrastructure requiring investment for upgrading. Potential exists for reciprocal commuter flows to maximise infrastructure investment.

Submissions require the RSES to direct the National Transport Authority to provide better public transport in the region, including more frequent buses, new routes and a major overall capacity increase, and to ensure there are frequent buses using the bus corridors/lanes in specified areas.

An integrated approach to land use and transport policies in our cities is critical to allow the efficient movement of people and goods and to improve the viability of public transport. The implications for health of compact and connected walkable public transport orientated urban settlements is outlined. Recognition of the benefits of non-private car modes of transport on quality of life, health, environment etc. is needed. The role of public transport in addressing social exclusion and universal access and reducing regional disparities.

The importance of existing transport infrastructure in the region with capacity to facilitate growth should be recognised. There is a need to identify long term corridors required to meet public transport needs so that they can be facilitated. Direct growth to locations with rail connections.

Specific proposals are outlined in relation to rail, metro and LUAS corridor routes, rail improvements, public bus improvements and specific road improvements required. Submissions outline measures to address traffic issues in specific areas and requirement for adequate road infrastructure to address congestion and facilitate further development. Specific proposals in relation to public transport proposals, park and ride, and cycling and walking infrastructure outlined.

Submissions requests that the RSES should comply with national level policy and international agreements in relation to best practice.

There is a need to facilitate and develop a cycle network by constructing cycleways and integrate them with the DTO cycling policy for the GDA, specific cycle routes are mentioned. There is a need to provide infrastructure and facilities for safe cycling and a network of safe cycling and walking routes to be identified. Walking, cycling and public transport infrastructure to be supported by local authority development levies.

Submissions propose that EMRA support the identification and development of an inter-urban and inter-county network of high quality cycling facilities which are designed to cater for both utility and recreational cyclists which will link the various greenways proposed to each other and to urban centres.

The RSES presents an opportunity for the Regional Assembly to take a lead role in coordinating and monitoring the implementation of key infrastructure projects.

National and Regional Accessibility

The importance of the national road network in linking urban centres, ports, airports and other major trip origin and destination points and the safe and efficient movement of people and goods is outlined. The need for a Leinster Orbital Route is outlined. Submissions refer to the Dublin Belfast Economic Corridor and the role of the cross-border co-operation and collaboration in realising its potential along with the EU Ten-T policy. The N11 Ten-T route should be protected. There is a need to protect the Dublin Belfast Economic Corridor from unnecessary development and sprawl and invest in strategic infrastructure to enable the sustainable development of the corridor. The role of cross border commercial ports as a gateway for trade is outlined. The Dublin-Belfast Economic Corridor and Trans-

European Transport Network (TEN-T) corridor is a significant regional asset. Cross border collaboration in relation to infrastructure development will enhance connectivity between the jurisdictions and further strengthen cross-border co-operation. There is a need to strengthen Ireland's routes to mainland Europe to facilitate direct trade with mainland Europe. Need for improved cross border connectivity on corridors such as Dublin – Belfast and Dublin-Derry/Letterkenny and the need for practical cross-border co-operation in relation to ports, airports, road infrastructure, communications and energy interconnection.

The RSES should include policies in relation to rural transport and inter town public transport. The importance of an efficient road and public transport network in supporting connectivity of towns outside Dublin. Enhance regional accessibility via railway network rather than roads

Consideration should be given to the role of the midlands in addressing long distance commuting through provision of / facilitating economic development in the midlands. Infrastructure upgrades required in relation to road, rail and air in the midlands including designation of a midlands airport are outlined in order to improve access from the periphery of region to Dublin Airport and Ports.

Need to recognise the role of 'local link' rural transport service as an integral part of the overall transport system. Requires engagement and collaboration with other service providers for improved connectivity and requires investment in infrastructure (bus stops). Imbalance in transport service available in rural areas. Need to adopt measures to reduce commuting times for rural parts of region.

International Accessibility

The importance of Dublin Airport for connectivity between Ireland and global markets for business and leisure travel is discussed in the submissions. A clear and unambiguous regional planning policy framework is required to ensure Dublin Airport continues to be a national economic driver. In this regard inclusion of a policy to support continued growth in connectivity at Dublin Airport is requested through implementation of transport infrastructure outlined in NPF and NDP. This includes operation of a dual runway system, surface access – as per GDA Transportation strategy and also Fingal's East-West Distributor road, M1 capacity, and interim projects such as 'Bus Connects' in advance of Metro North. Inclusion of policies for the safe and effective operation of Dublin Airport in relation to Airport Noise Zones and Airport Public Safety Zone and General Airport Safeguarding (suggested policy wording included) is recommended.

There is a need to facilitate the growth of Dublin Port by supporting the infrastructure needed for the future of Dublin Port including completion of strategic infrastructure development projects, the development of the Dublin Inland Port, the provision by 2030 of a Southern Port Access Route to link the Poolbeg Peninsula to the Dublin Port Tunnel and the development by Dublin Port Company of new port facilities at another location on the east coast within the Eastern and Midlands Region by 2040 to cater for growth post-2040.

Submissions seek recognition of the future development of regional ports throughout the region and recommend designation of an inland port. It is requested that the RSES provide supporting objectives and policies to facilitate the ongoing operations and future development of these ports. There is a need to identify alternative port capacity in the region to Dublin Port. Submissions outline suitable alternative ports in the region.

Environmental Considerations

Reliance on fossil fuels in the transport sector is resulting in significant GHG emissions, air pollution and noise. Actions in relation to sustainable transport should be implemented to improve air quality

and minimise transport related noise, it would be useful for the RSES to acknowledge and support the need for a National-level Noise Policy / Strategy. The impact of infrastructure development on natural heritage needs to be considered.

All proposed transport projects should include detailed GHG emissions figures as a key criteria in evaluating options, as the full cost-benefit of large infrastructure projects cannot be analysed or fully understood without this information.

Infrastructure to support electric vehicles and alternative fuels is required as is the need to address issues of noise on existing urban centres at the same time as providing additional road capacity.

Role of Innovation

Innovation has a role to play in transportation. For example how we better connect infrastructure through Internet of Things (IOT) and collect relevant information and how we process this into real intelligence to enhance our capacity to better plan and manage our cities.

5.1.2 Response to Submissions

The Director acknowledges that the draft RSES is required to put forward policies which promote sustainable settlement and transportation strategies in urban and rural areas, including the promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change. Also the requirements that the Assembly shall ensure that the strategy is consistent with the GDA transport strategy of the NTA.

In formulating policy for the region, the draft RSES shall address any policies or objectives of the Government and any relevant directives, policies or guidelines issued by the Minister under the Planning and Development Acts 2000 (as amended) and the relevant plans and strategies of relevant public bodies. These include the National Planning Framework and National Development Plan (2018 – 2027), the Greater Dublin Area Transport Strategy (2016 – 2035), Spatial Planning and National Roads (TII), Smarter Travel – A Sustainable Transport Future (2009 – 2020), and any other relevant guidance and policy documents.

Many of the issues raised in submissions will be addressed as part of the Strategic Environmental Assessment process whereby policy options outlined will be assessed to ensure that any potential negative impacts on the environment are identified and potential mitigation measures developed.

Local traffic management arrangements shall be addressed at Local Authority level.

5.2 Sub-theme: Utilities

5.2.1 Summary of Submissions

Water Supply and Waste Water Treatment

Submissions outline that a strong planning framework, backed by legislation that directs sequential development, on a phased basis to specific areas (within settlements) will facilitate the planning and co-ordination of infrastructure across a broad range of infrastructure providers. The inclusion of policies and objectives within the RSES that would stipulate the requirements for sequential development, phased to specific location/areas of a settlement (rather than zoning land in a number of diverse locations throughout a settlement) is recommended. Concerns are outlined that population targets may result in reduction on investment in infrastructure such as water supply and waste water treatment. Submissions include details of where capacity exists to facilitate growth in the region and it is requested that the RSES consider constraints to UWWT plants in allocating locations for population growth.

The submissions outlined that based on the NPF population growth targets it is likely that a number of significant water services projects will be required to be delivered within the timescale of the RSES to support planned development and maintain and improve existing services. It is important to expedite the planning process for strategic water services projects through their identification as priority infrastructure required to deliver the objectives of the NPF and Regional Spatial and Economic Strategies. These projects in the Eastern and Midlands Region include but are not limited to: Water Supply Project for the Midlands and Eastern Region; Greater Dublin Drainage Project; and Upgrading of Ringsend Wastewater Treatment Plant.

The Water Supply Project for the Eastern & Midlands Region is required to ensure sufficient treated water is available to meet the long-term water supply needs of the Region. In the absence of the Water Supply Project there will be an issue with servicing growth.

The Regional Assembly is encouraged to take the sensitivity of the receiving environment including requirements for environmental regulation compliance and potential impacts of climate change on water services into account when determining a spatial settlement strategy for the Region. Consideration should be given to the development of a Drought Plan to ensure resilience in critical infrastructure such as water supply.

The importance of investing in Dublin's infrastructure to ensure it remains a competitive location is outlined as is the need to include objectives to address water wasted, rainwater harvesting, grey water re-use, water conservation, and eco-friendly sanitation systems.

Waste

Particular concerns are raised in the submissions in relation to the need for waste management in the region and the role of the circular economy and innovation in addressing waste generated in this regard.

There is a need to consider the impact of the Soils Directive and its implications for dealing with contaminated sites

Broadband

The importance of high speed broadband to the region's economy is outlined and the imbalance in provision between urban and rural areas and in different parts of the region. Submissions request

that the RSES provide a coherent range of planning and development supports to accelerate and consolidate the implementation of the National Broadband Plan. The RSES should ensure its effective and expeditious roll-out in the Gaeltacht and in other rural districts across the region. The potential impact of telecommunications infrastructure on walking routes and public rights of way should be taken into consideration.

Sustainable Urban Drainage

The incorporation of the principle of Sustainable Urban Drainage (SUDs) in all public and private development in urban areas is recommended as is the need for diversion of storm water from combined sewers where possible in order to overcome challenges in relation to management of surface water and its separation from foul sewage.

5.2.2 Response to Submissions

The draft RSES shall address the provision of water services, energy and communications networks and waste management facilities in the region. In formulating policy in this regard, the draft RSES shall address any policies or objectives of the Government and any relevant directives, policies or guidelines issued by the Minister under the Planning and Development Acts 2000 (as amended) and the relevant plans and strategies of relevant public bodies. These include the National Planning Framework and National Development Plan (2018 – 2027), Draft Planning Guidelines ‘Water Services Guidelines for Planning Authorities’ 2018, Irish Water’s Water Services Strategic Plan, the National Broadband Plan and other relevant policy objectives and guidelines.

The draft RSES will be prepared in parallel with Strategic Environmental Assessment and Appropriate Assessment whereby policy options outlined will be assessed to ensure that any potential negative impacts on the environment are identified and potential mitigation measures developed.

5.3 Sub-theme: Energy and Climate

5.3.1 Summary of Submissions

Planning for Climate Change

The submissions outline the urgent need to accelerate mitigation actions to reduce greenhouse gas emissions and implement adaptation measures to increase our resilience in dealing with climate change and adverse climate impacts. There is a need to work towards achieving GHG emissions targets and provide for a secure, sustainable and cost-efficient energy supply to achieve growth in the region. Implementation of policies in respect of achieving a low carbon society by 2050 must be set out in the RSES to ensure that Ireland can achieve a low carbon, climate resilient, sustainable economy that is more self-sufficient in terms of energy production.

The RSES should describe how it proposes to incorporate Government actions and strategies in relation to climate change. The various Government policy documents should be considered in a holistic and integrated way to inform subsequent RSES policy. Existing policies that support the delivery of strategic infrastructure should be reflected in the RSES and thereby limit the possibility for local level plans to include policies that could potentially hinder the delivery of National and Regional policy objectives.

In addressing the future challenges of climate change, the EMRA should work closely with the newly appointed Regional Climate Change offices who will be responsible for planning and actions regarding Climate Change mitigation and adaptation in their regions. In order for the plans to work coherently, these action plans and the RSES should align where possible.

Regional Approach

It is outlined that the RSES will have a key role to play in relation to energy infrastructure. In this regard it is recommended that a commitment be included in the RSES regarding the preparation of a Regional Climate Adaptation Strategy so that the RSES can act as a mechanism through which to implement and integrate sustainable energy and spatial planning. This can provide measured targets to reduce transport emission; energy demands; sea level rise; flood risk; and infrastructure vulnerability. Such a strategy can present a positive approach to identifying suitable areas for renewable energy generation and its supporting infrastructure, and by maximising the opportunities for community-led and decentralised energy production.

The RSES should bring clarity and direction to renewable energy planning policy by providing a very clear policy direction on how renewable energy projects will be accommodated across the region over the lifetime of the Strategy. Large scale transmission infrastructure will be required to facilitate connection to renewable energy sources and to connect major sources of demand for energy. Policies addressing the various sources of renewable energy and biogas need to be outlined. Bord na Mona and Coillte owned lands present opportunities for renewable energy development. The RSES should identify suitable locations for both Strategic Energy Zones (areas where different types of renewable energy and energy storage can co-exist) and transmission corridors can be located. Renewable energy policy requires a regional approach to overcome governance issues such as administrative boundaries to ensure a joined-up approach to strategic infrastructure and investment decisions that have a cross-border dimension to co-ordinate mutually beneficial ways to address common environmental challenges across shared catchments.

The RSES should consider the role of low emissions vehicles including vehicles being fuelled by one or a combination of the following: electricity; biogas; hydrogen; natural gas; liquefied petroleum gas; compressed natural gas; and biofuels.

In preparing a renewable energy strategy it is necessary to consider the impact of renewable energy infrastructure and energy transmission infrastructure development on natural heritage, landscape, walking routes and public rights of way

There is a need to incorporate climate change adaptation into the RSES and into national and regional infrastructure plans and identify risks to critical infrastructure as a result of climate change. All policies favouring carbon and energy intensive infrastructure should be purposively discontinued.

The need to understand and implement a circular economy should be addressed in the RSES.

In water supply and waste water treatment the use of low carbon alternatives in the treatment process and on-site energy generation to power waste water treatment plants requires consideration. Consideration should be given to the environmental cost of servicing settlements when selecting growth centres (for example higher levels of treatment required to discharge to a sensitive receiving environment).

The RSES should consider the carbon contribution and environmental consequences of agricultural land practices and the role of green gas creation from agriculture.

RSES should have an increased spatial focus and the identification of suitable locations at a regional level for larger generation (i.e. renewable energy) and demand (i.e. data centres) centres is a key consideration and importance in formulating energy scenarios into the future and in identifying the optimum grid development solutions. It should be the intention of the RSES to have this level of spatial focus and that an appropriate context is set in the RSES to ensure that such development is directed to spatially suitable locations in local authority plans (matching energy demand with location of availability).

Role of Public Transport and Urban and Built Form

The submissions outline the urgent need to transition towards a low carbon society and the role of public transport, urban form and energy efficiency in buildings in this regard. RSES should include policies promoting a low carbon future and clear policies to promote, encourage and facilitate the use of sustainable modes and patterns of transport including use of electric vehicles. The role of compact settlements in reducing sprawl and the need to increase permeability to make places more walkable is outlined. This includes energy efficient layouts, potential in higher density urban areas such as district heating systems and creation of renewable energy, community owned energy solutions, building standards and types of building materials used, and the need for a distributed electricity grid.

The majority of renewable energy in the region is generated in rural areas whilst demand is in urban areas. The role of urban areas in creating their own energy should be explored.

Other relevant policy areas for consideration in the RSES include the potential for innovation to provide solutions in terms of improved infrastructure connectivity and climate adaptation, the role of peatlands and woodlands as carbon sinks, the delivery of regional forestry strategies, and identification of strategically located lands where flooding can be accommodated.

Electricity and Grid Infrastructure

RSES should include a section addressing strategic infrastructure/utilities and that policies and objectives which support a safe, secure and reliable supply of electricity need to be explicit in the RSES. Submissions require that RSES ensures that the long-term operational requirements of existing electricity supply utilities are protected.

Submissions outline that the electrification of the heat and transport sectors will be vital in achieving Ireland's decarbonisation goals. Increase in population and economic growth will result in increased electricity demand. Given the Region's high reliance on commuter vehicles, long term planning and investment policies will need to support the deployment of the infrastructure required to transition to a low carbon economy e.g. appropriate placement of EV charging points throughout the Region – for both private vehicles and public transport. Private cars are the biggest contribution to CO₂ emissions, and along with the decarbonisation of public transport, should be tackled as a priority.

The importance of international grid connectivity to strengthen competition and security of supply in Ireland and create opportunities to import and export electricity is outlined. The importance of the North-South Interconnector is outlined to ensure security of supply and reduce cost. Concerns are raised in relation to over-reliance on imported energy supply from the UK and potential implications of Brexit on energy supply. The construction of an electricity inter-connector to France should be considered.

There is a need to ensure sufficient grid capacity to transport electricity from rural regions to urban areas and this requires investment in the national grid to facilitate energy transmission from renewable / alternative energy sources.

5.3.2 Response to Submissions

In formulating policy for the region, the draft RSES shall address any policies or objectives of the Government and any relevant directives, policies or guidelines issued by the Minister under the Planning and Development Acts 2000 (as amended) and the relevant plans and strategies of relevant public bodies. These include the *National Development Plan 2018-2027*, the *National Planning Framework 2040*, the *National Adaptation Framework*, the *National Mitigation Plan*, the *National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland*, and the White Paper '*Ireland's Transition to a Low Carbon Energy Future 2015-2030*' and any other relevant guidance and policy documents.

The draft RSES shall include the promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change.

Incentives and supports for the development of future infrastructure suggested in this consultation will be considered as part of the preparation of the draft RSES.

The SEA and AA process will address many of the issues raised whereby policy options outlined will be assessed to ensure that any potential negative impacts on the environment are identified and potential mitigation measures developed.

5.4 Sub-theme: Social Infrastructure

5.4.1 Submission Summary

The submissions outline the importance of social infrastructure both in urban and rural areas throughout the region. An outline of areas where increased provision of social infrastructure is required and the imbalance in amenities available to rural areas compared to urban areas is discussed in the submissions. The particular requirements of Gaeltacht communities and the need for maintenance of essential rural services are highlighted as issues to be addressed.

It is outlined that there is a need for the identification of basic infrastructure, including social infrastructure at various population thresholds and a need for concentration of population to support social infrastructure. Submissions outline the availability of existing social infrastructure to support designation of particular areas for growth.

Types of social infrastructure referred to include healthcare, access to education including third level at county level, infrastructure for outdoor recreation and sporting facilities, facilities for an ageing population, retail, and garda stations. Social infrastructure should be provided for in line with population growth and should be universally accessible and cater for targeted groups including minorities. Other policy areas for consideration include health needs in rural areas including rural mental health care and community services for elderly.

The benefits of third level institutions throughout the region are outlined as is the need to address barriers to education and the role of community education providers. The importance of matching skills need with education provision and recognition of how human capital development will fit into the overarching framework to realise potential for growth should be considered in the RSES along with the need to recognise the importance of research and development role of third level institutions for socio-economic development of the region.

The importance of volunteers in meeting the needs of communities is outlined as is the role of festivals.

The RSES should have regard to the Local Economic and Community Plans prepared.

Submissions recommend inclusion of policies regarding utilisation of CCTV and Automated Number Plate Recognition technology on a networked, strategic level to combat crime and anti-social behaviour, assist in waste enforcement, and inform local authority planning and provision of services.

5.4.2 Response to Submissions

The Director acknowledges that the draft RSES shall put forward policies which promote the provision of educational, healthcare, sports and community facilities and will take into account the Local Economic and Community Plans prepared for local authorities within the region.

In formulating policy for the region, the draft RSES shall address any policies or objectives of the Government and any relevant directives, policies or guidelines issued by the Minister under the Planning and Development Acts 2000 (as amended) and the relevant plans and strategies of relevant public bodies. These include the National Planning Framework and National Development Plan (2018 – 2027).

Many of the issues raised in submissions will be addressed as part of the Strategic Environmental Assessment process whereby policy options outlined will be assessed to ensure that any potential negative impacts on the environment are identified and potential mitigation measures developed.

6. Miscellaneous issues raised

6.1 Summary of Submissions

Several submissions raised an issue with the timing of National Planning Framework launch in relation to the initial consultation period for the RSES process, and expressed concern that the final NPF could not be considered before making a submission to this stage of the RSES process.

There were several comments made on implementation and monitoring of the strategy post adoption, there were queries on the role of Assembly in this matter and the need for coordination and commitment from other agencies to deliver on the strategy. Submissions suggested how the strategy could be monitored using metrics such as brownfield/ infill development, jobs created and links to national / international development and environmental targets.

One submission stated that a review of existing Regional Planning Guidelines to inform the production of the RSES would be required and referenced the review of the NSS performed in advance of the preparation of the NPF.

6.2 Directors Response to Submissions

The Eastern and Midland Regional Assembly was directed by the Minister on the 28th September 2017 to commence the formal process for the formulation of the RSES as provided for under Section 21 (1) (b) of the Planning and Development Act. The Assembly commenced the statutory 8 weeks consultation process on 20th November 2017, due to the delay in the finalisation of the National Planning Framework the Regional Assembly agreed to extend the consultation period to the 16th February 2018. The Director acknowledges that the delay in the finalisation of the NPF has been highlighted as a concern in some submissions, however this stage of the process is only relating to issues and identification of same and now that the NPF has been finalised the Assembly can commence preparing a draft RSES.

The Planning and Development Act section 25A allows for reports on the RSES including a 2 year review mechanism with key stakeholders, the Assembly will consider the requirements for monitoring and implementation as part of the preparation of the draft RSES in the coming months. Another part of the preparation of a draft RSES will include a review of previous and current policy, including the Regional Planning Guidelines that remain in effect.

Appendix 1: List of Submissions Received

Reference No.	Forename	Surname	Organisation	Theme
0001	Patrick	Brophy	Individual member of the public	Climate and Infrastructure
0002	Dymphna	Coulter	Individual member of the public	Climate and Infrastructure
0003	Joseph	Carroll	Individual member of the public	Climate and Infrastructure
0004	Fergal	MacCabe	Individual member of the public	People and Place, Environment and Heritage , Climate and Infrastructure
0005	Stephanie	McCabe	Individual member of the public	People and Place
0006	April	McCabe	Individual member of the public	People and Place
0007	David	Clements	NTA	Climate and Infrastructure
0008	Frank	Boland	Tidy Towns Volunteer	People and Place
0009	Tara	Spain	Transport Infrastructure Ireland	Climate and Infrastructure
0010	Andrew	Hay	Newry, Mourne and Down District Council	Climate and Infrastructure
0011	Brendan	O'Rourke	O'Rourkes Bar & Off Licence	People and Place
0012	Don	McCabe	Newbridge Community Group	People and Place
0013	Polly	Healy	Business Owner	People and Place
0014	Brian	Wylie	Iarnród Éireann	Climate and Infrastructure
0015	Una	Ruddock	Eco Era	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0016	Noreen	McCabe	Newbridge Community Group	People and Place
0017	Cllr Steven	Matthews	Cllr Wicklow CoCo	People and Place, Climate and Infrastructure , Environment and Heritage
0018	David	Ferguson	Brady Shipman Martin on behalf of Drogheda Port Company	Climate and Infrastructure , Environment and Heritage , Economic and Employment
0019	Judy	Osborne	Individual member of the public	People and Place, Climate and Infrastructure , Environment and Heritage
0020	Angus	Kerr	Department for Infrastructure, Northern Ireland	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0021	Richard	Webb	Wicklow Planning Alliance	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0022	Brian	Gilmore	Cement Manufacturers	Climate and Infrastructure , Economic and Employment
0023	Alan	Kerry	Local Link Kildare South Dublin	People and Place
0024	Cllr Francis	Duffy	Cllr. Green Party	People and Place, Climate and Infrastructure , Environment and Heritage , SEA
0025	Cllr Francis	Duffy	Cllr. Green Party	Climate and Infrastructure , Environment and Heritage , SEA
0026	Cllr Francis	Duffy	Cllr. Green Party	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0027	Cllr Francis	Duffy	Cllr. Green Party	People and Place, MASP

0028	Cllr Francis	Duffy	Cllr. Green Party	Economic and Employment , Climate and Infrastructure , Environment and Heritage
0029	Cllr Francis	Duffy	Cllr. Green Party	People and Place, Climate and Infrastructure , Economic and Employment
0030	Cllr Francis	Duffy	Cllr. Green Party	People and Place, Climate and Infrastructure , Environment and Heritage
0031	Alison	Harvey	The Heritage Council of Ireland	Environment and Heritage , Economic and Employment
0032	Niall	Mulligan	Tullamore & District Chamber of Commerce	People and Place, Environment and Heritage
0033	David	Howard	Property Industry Ireland	People and Place
0034	Cllr. Derek	Mitchell	Cllr. Wicklow CoCo	Environment and Heritage , Climate and Infrastructure , SEA
0035	Magdalena	Harry	Individual/ member of the public	MASP, Climate and Infrastructure
0036	Ross	Martin	Trinity College Science Department	People and Place
0037	Rose	Healy	Local business owner	People and Place
0038	Daniel	Leahy	Anderson & Leahy Funeral Directors	People and Place
0039	Luke	Wymer	John Spain Associates, on behalf of Rockture 1 Limited	People and Place
0040	Klara	Hallinan	Individual/ member of the public	People and Place
0041	Noel G	Caffrey	The 2C Company and resident of Newbridge	People and Place
0042	Richard	Manton	Engineers Ireland	Economic and Employment , Climate and Infrastructure , Environment and Heritage , MASP
0043	Karen	Heavey	Individual/ member of the public	People and Place
0044	Joan	Walsh	Individual/ member of the public	People and Place
0045	Donal	O'Brolchain	Individual/ member of the public	Climate and Infrastructure , MASP
0046	Isoilde	Dillon	Housing Agency	People and Place
0047	TD Sean	O Fearghail	TD	People and Place
0048	Kenneth	Russell	DroghedaCity.com	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0049	Sonya	Mc Mahon	newbridge resident	People and Place
0050	Zoe	Martin	Newbridge Christmas Lights Committee	People and Place
0051	Newbridge-Kildare Lions Club		Newbridge-Kildare Lions Club	People and Place
0052		Mrs.Quigley	Concerned Business owner	People and Place
0053	Sarah	Morgan	Midland Local Authorities	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0054	Cllr Nicola	Lawless	Cllr. Wicklow CoCo	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0055	Derek	Crampton	Penneys	People and Place
0056	Eamonn	O'Reilly	Dublin Port Company	Climate and Infrastructure , Environment and Heritage

0057	Maura	Murphy	Administrative Officer, Dún Laoghaire Rathdown County Council	People and Place, Climate and Infrastructure , Economic and Employment , Environment and Heritage , MASP
0058	Vincent	Hussey	T.U.C.	Climate and Infrastructure
0059	Orla	Martin	Midland LEOs, LEO Offaly CoCo	Economic and Employment , People and Place
0060	Justin	Molloy	Construction Industry Federation	People and Place, Climate and Infrastructure
0061	Susie	Coffey	Individual member of the public	People and Place
0062	Cllr Morgan	McCabe	Cllr	People and Place, Economic and Employment , Climate and Infrastructure
0063	David	Malone	Owner/Manage 'The Wine Buff' Newbridge	People and Place
0064	John	Boyle	Waterways Ireland	People and Place, Climate and Infrastructure , Environment and Heritage
0065	Margaret	Maxwell	Individual member of the public	People and Place
0066	David	Rouse	Apartment Owners' Network	People and Place, Climate and Infrastructure
0067	Jilish	Joseph	Individual member of the public	People and Place
0068	Gabriel	Dennison	Irish Academy of Engineering	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0069	Karen	Blanche	Individual member of the public	People and Place
0070	Cllr Suzanne	Doyle	Cllr. Kildare-Newbridge	People and Place, Climate and Infrastructure , Economic and Employment
0071	Maree	Holland	Individual member of the public	People and Place
0072	Paul	Turley	John Spain Associates behalf of Crylock Developments Ltd	People and Place, Economic and Employment
0073	Eddie	Phelan	VCL Consultants (Civil & Structural Engineering)	People and Place, Economic and Employment
0074	Josephine	Browne	Dun Laoghaire Institute of Art Design and Technology	People and Place, Climate and Infrastructure , Economic and Employment
0075	Caitriona	Carter	Bord na Móna	Climate and Infrastructure , Environment and Heritage
0076	Fiona	O'Connor	Gas Networks Ireland	People and Place, Economic and Employment , Environment and Heritage , Climate and Infrastructure
0077	Blaine	Cregan	John Spain Associates on behalf Ronan Group Real Estate	People and Place
0078	Claire	Doyle	Individual member of the public	People and Place, Economic and Employment
0079	Robert	Dunne	Individual member of the public	People and Place
0080	Cllr. Catherine	Fitzgerald	Cllr. Laois	People and Place
0081	Mary	Doyle	Individual member of the public	People and Place
0082	Myles	Wickham	Individual member of the public	Climate and Infrastructure
0083	Deirdre	Fallon	SDCC	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage , MASP
0084	Sean	Treacy	Individual member of the public	People and Place, Economic and Employment
0085	Colm	Cummins	ESB	Climate and Infrastructure

0086	Mary	O'Connor	Individual member of the public	People and Place
0087	Mary	Murphy	Individual member of the public	People and Place
0088	Tony	Long	Individual member of the public	People and Place
0089	Paul	Turley	John Spain Associates on behalf Park Development Group	People and Place, MASP
0090	Cllr Suzanne	Doyle	Cllr. Kildare	People and Place
0091	Tony	Donohoe	Individual member of the public	People and Place
0092	Cllr. Paul	Foley	Cllr SDCC	Climate and Infrastructure , MASP
0093	Sean	Power	Individual member of the public	People and Place
0094	Breanndán	Casey	BDM, The Mill Enterprise Hub, Drogheda	People and Place, Economic and Employment
0095	Breanndán	Casey	BDM, The Mill Enterprise Hub, Drogheda	People and Place, Economic and Employment , Climate and Infrastructure
0096	Oliver	Henry	Individual member of the public	Climate and Infrastructure
0097	Valerie	Brennan	Coillte Land Solutions	Climate and Infrastructure , Environment and Heritage
0098	Paul	Turley	John Spain Associates on behalf of Kimpton Vale Limited	People and Place, MASP
0099	Conor	Mahony	Individual member of the public	People and Place
0100	Sandra	Jameson	Meath Association of Chambers	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0101	Eamonn	Ó Neachtain	Údarás na Gaeltachta	People and Place, Economic and Employment , Climate and Infrastructure
0102	Tom	Griffith	Midlands Gateway Chamber	People and Place, Economic and Employment
0103	Matthew	McAleese	Fingal County Council	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage , MASP
0104	Desmond	Egan	Individual member of the public	People and Place
0105	Nicola	Mmccumiskey	Individual member of the public	People and Place
0106	Paula	Galvin	McCutcheon Halley Planning	Climate and Infrastructure , Environment and Heritage
0107	Ross	McCain	Individual member of the public	People and Place
0108	Angela	McEvoy	Senior Planner, Laois CoCo	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0109	Joe	O'Loughlin	Individual member of the public	People and Place
0110	Iman	C	Individual member of the public	People and Place
0111	Liam	McGarry	Bray Retailers Group	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0112	Sean	Dunne	Rotary Club	People and Place
0113	Sarah	Kelly	Individual member of the public	People and Place
0114	Colm	Morris	Individual member of the public	People and Place
0115	Noel	Heavey	Clongorey snd District Community Association	People and Place
0116	Roger	Garland	Keep Ireland Open	Environment and Heritage , Climate and Infrastructure

0117	Gabby	Mallon	DLR Chamber	People and Place, Economic and Employment , Climate and Infrastructure
0118	Cllr Gerry	Warnock	Cllr. Longford County Council	People and Place
0119	Andrew	Murray	Senior Planner, Offaly CoCo	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0120	Fiona	O'Loughlin	TD for Kildare South	People and Place
0121	Suzanne	Dempsey	Irish Water	People and Place, Climate and Infrastructure , MASP
0122	Cllr Richard	Kelly	Cllr. Newbridge	People and Place
0123	Ian	Lumley	An taisce Advocacy Officer	People and Place, Climate and Infrastructure , Environment and Heritage , SEA
0124	Sean	Clarke	Meath CoCo	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage , MASP
0125	Joanne	Lyons	Department of Culture, Heritage and the Gaeltacht	Climate and Infrastructure , Environment and Heritage , SEA
0126	Donna	Gartland	Codema	Climate and Infrastructure
0127	Thomas	Hyland	Mullingar Chamber	People and Place, Economic and Employment
0128	Deirc	O'Broin	DCU	Economic and Employment
0129	Anna	Howard	Genvest	People and Place, Economic and Employment , Climate and Infrastructure , MASP
0130	Deirdre	Lane	ShamrockSpring	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0131	Paul	Turley	John Spain Associates behalf of the Jackson Family	People and Place, MASP
0132	Philomena	Geoghegan	Irish Guide Dogs dor the Blind	People and Place
0133	Linda	Farrelly	Individual member of the public	Economic and Employment , Climate and Infrastructure , Environment and Heritage
0134	Veronica	Cooke	Planning Section, Kildare CoCo	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage , SEA
0135	Paddy	Malone	Malone & Co	People and Place, Environment and Heritage , Climate and Infrastructure
0136	Emer	Conway	Kildare Environmental Network	Environment and Heritage
0137	Terence	Loane	Senior Planner, Louth County Council	Economic and Employment , People and Place, Climate and Infrastructure , Environment and Heritage
0138	Mark	Canavan	The Dublin Chamber of Commerce	People and Place, Climate and Infrastructure , Economic and Employment
0139	Michael	Higgins	RPS Group	People and Place, MASP
0140	Tara	Cowley	DAA	Climate and Infrastructure , Economic and Employment
0141	Mary	Stack	Fáilte Ireland	Environment and Heritage
0142	Sheile	Moore	Sandyford Business Improvement District CLG	Economic and Employment , Climate and Infrastructure

0143	Gerry	Dornan	Maynooth Cycling Campaign	Climate and Infrastructure , Environment and Heritage
0144	Eddie	Phelan	Drogheda & District Chamber	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0145	Peter	Andrews	RIAI	People and Place, Climate and Infrastructure , Environment and Heritage
0146	Louise	Kiernan	Senior Executive Planner, Longford County Council	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0147	Evonne	Boland	Newbridge Tidy Towns Association	People and Place
0148	Chris	Garde	Smart Dublin, Dublin City Council	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0149	Ben	Waite	ILTP	People and Place, Economic and Employment
0150	Traolach	ó Fionnáin	Donegal County Coucil	People and Place, Environment and Heritage
0151	Elizabeth	Swanwick	SSE	Economic and Employment , Climate and Infrastructure
0152	Eddie	Phelan	Drogheda City Status Committee	People and Place, Economic and Employment
0153	Caroline	Tighe	Individual member of the public	People and Place
0154	Aidan	Sweeney	Ibec	People and Place, Climate and Infrastructure , Economic and Employment , Environment and Heritage
0155	Anne	Arnold	Elgin energy	Climate and Infrastructure , SEA
0156	Gerard	McNally	Newbridge CFR Group	People and Place
0157	Tomas	Bradley	EirGrid	Climate and Infrastructure
0158	Cllr Padraig	McEvoy	Cllr. Kildare CoCo	Environment and Heritage
0159	Nancy	C	Individual member of the public	People and Place
0160	Eoin	Wilson	Green Party	Economic and Employment , Climate and Infrastructure , Environment and Heritage , SEA
0161	Finbar	McDonnell	RF Property Management	People and Place, Environment and Heritage
0162	Breda	Reid	M&F Reid Heating and Plumbing Ltd	People and Place
0163	Martin	Heydon	Martin Heydon TD	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage
0164	Stella	Burke	IWEA	Climate and Infrastructure
0165	Louise	Lennon	Irish Rural Link	People and Place, Economic and Employment , Climate and Infrastructure
0166	Tadhg	O'Mahony	EPA	Environment and Heritage , Climate and Infrastructure , SEA
0167	Sorcha	Walsh	Senior Planner, Wicklow County Council	People and Place, Economic and Employment , Climate and Infrastructure , Environment and Heritage , MASP
0168	Cllr Dermot	Looney	Cllr. South Dublin County Council	MASP, Climate and Infrastructure

0169	John	McGrath	Athlone Chamber of Commerce and Industry	People and Place, Economic and Employment
0170	John	O'Hara	Assistant City Planner, Dublin City Council	People and Place, Climate and Infrastructure , MASP
0171	Martina	Slevin	Director of Services, Westmeath CoCo	People and Place, Climate and Infrastructure , Environment and Heritage