

Therefore the provision of amenity and recreational facilities tends to be adhoc or community lead rather than local authority lead.

The increased densities of new housing developments being sought by An Bord Pleanala under strategic housing developments will result in smaller gardens and also a greater need for open space to cater for recreational and amenity requirements by communities. In planning for open space provision there needs to a requirement on local authorities to ensure that zoning of open space for recreational needs is deliverable and achievable to sustain the recreational needs of the town /county etc. Designing and zoning for open space in County Development plans and local area plans is easily done but delivering the open space for use by the community is problematic because the land still has to be acquired and developed. Open space zonings are unlike most other zonings within an LAP like residential and industrial vulnerable to being rezoned as LAP plans and county development plans evolve. Hence further reasons why there is a need to emphasise that zoning is achievable and that Local Authorities have strategies in place.

Therefore the addition of principles and objectives in relation to open space strategies should be added to the RSES to encourage and facilitate local authorities to do this. Best practise in the design and provision of open space needs to be an objective within the RSES also so that amenity and recreational open space is provided in conjunction with new residential or commercial development, new schools to protect or enhance existing green infrastructure. Additionally the open space needs to have good connectivity and have passive supervision. The emphasis on the need to link amenity and recreation provision is one that particularly needs to be strengthened as currently there is very little co-ordination of this in my experience in Kildare and it is difficult to get the Department of Education on board with this concept.

The sustainable financing of open space is also required to facilitate provision of open space in counties. Any support the RSES could lend to this would also be beneficial. Local authorities are unlike other key infrastructure expected to deliver open space out of their own resources while other key infrastructure is funded by central government. There is a need for the cost of acquiring open space to be supported by financing other than development levies and revenue to be sustainable to meet the needs of the community.

I hope these issues highlighted above can be considered in the final report for the Regional Spatial & Economic Strategy.

Yours sincerely

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21st January 2019

## Re: Submission on Draft Regional Spatial and Economic Strategy for Eastern and Midland Region

Dear Sir /Madam

I refer to the Draft Regional Spatial and Economic Strategy. The following are my comments relating particularly to the provision of open space for amenity and recreational purposes.

In the introduction to the section 9.8 on Healthy Communities there is references to the role of open space in fulfilling other objectives in other sections dealt with in the report such as climate change which is indirectly met by the references to flooding etc and green infrastructure. However there should also be reference to the role of open space in the fulfilment of a large number of the RSOs set out at the start of the document these are sustainable settlement patterns, compact growth and urban regeneration, rural communities, healthy communities creative places, integrated transport & land use, Sustainable Management of Water, Waste and other Environmental Resources, Build Climate Resilience, Support the Transition to Low Carbon and Clean Energy, Enhanced Green Infrastructure, Biodiversity & Natural Heritage. This would strengthen and show the importance of recreational and amenity resources and open space/ green space to provide these. It would also demonstrate that amenity resources and green spaces have a role beyond healthy communities.

There should be an emphasis that recreational open space provision needs to be considered on the same terms within local authority planning as other infrastructure such as roads, water and housing and not the poor relation of infrastructure planning as it tends to be.

In the guiding principles the wording 'Facilitate a sufficient supply of good quality sports and recreation facilities' should be further strengthened to require local authorities to relate the provision and planning of open space in close alignment to the development of counties and in particular cities, towns & villages. This is so the quantity and quality of the open space provision relates to the population centres and any future expansion of these. The provision of open space should also relate the types of recreational and amenity uses required, age groups and existing amenity and recreational facilities. There should be a requirement on all local authorities to develop a strategy for the provision of open space. Very few if any have done this or developed a hierarchy for open space provision beyond the requirement for 10-15% in new residential builds on green or brownfield sites.