

Offaly County Council

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Mr. Jim Conway
Eastern and Midland Regional Assembly
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22nd January 2019

Dear Jim,

Please find attached Offaly County Council's submission to the draft RSES.

If you require any clarification on the points raised, do not hesitate to contact Andrew Murray in the Planning Section.

Kind regards,

Tom Shanahan

Director of Services for Planning, Economic Development, Tourism, Housing & Tullamore
Municipal District

Designated Public Official under the Regulation of Lobbying Act, 2015

**Offaly County Council's submission to Draft Regional Social & Economic
Strategy for the Eastern and Midlands Region**

Jan. 2019

Key Points:

1. The Council has serious concerns regarding the 'Outer' area designation in the draft. The growth strategy map, to which potential investors would refer indicates very little outside of Dublin, the Dublin-Belfast Corridor and Athlone. In all previous submissions and to the NPF, this Council has asked for a specific designation for the Midlands SPA with positively-biased jobs and population growth targets. This would allow it to 'catch up', to develop an economic gravity of its own and to provide for appropriate growth focussed mainly on (i) a strong urban hierarchy and (ii) the Midlands' own fundamentals and competitive sectors.
2. The alternative to the Midlands area developing an economic gravity of its own by developing its larger towns in particular as drivers and economic engines, is the continuance of the 'business as usual' commuting-led overspill model. In this regard, it is requested that the strategic vision for Athlone be stronger and more spatially expressed in the RSES, with particular regard to its network of supporting towns and intervening rural areas across the midlands. The Midlands, with this potential economic gravity, can assist a successful Dublin which continues to struggle with long commuting times, lack of housing supply, expensive lands etc. Reverse commuting, relocations of back office supports out of Dublin, in addition to the availability of cheaper lands for start-ups and an available workforce who would relish the opportunity to work locally in are all positives which need to be stronger applied in the RSES in the Council's opinion.
3. The Midlands' economy faces a particular imminent challenge of the cessation of peat extraction by Bord na Mona. While this will have major positive environmental impacts within the lifetime of the RSES and will also provide scope for a multiplicity of potential afteruses, there is the immediacy of major job losses to be dealt with. The RSES should note and support the Transition Team in place to deal with both the immediacies of job losses and the longer term strategic planning for the 80,000+ ha, of peatlands, together with a large array of workshop buildings, associated industrial sites and offices which will come available for a range of afteruses. This must be set firmly in train while the transition from peat extraction is ongoing as opposed to waiting for the use to cease and the local expertise being lost. The pending revised Midlands Action Plan for Jobs should be specifically prioritised.
4. The Council is requesting that a number of RPO's for Tullamore be added, in particular with relating to its local advantages and role as an economic centre. While the Council realises that a Regional Strategy can't specifically mention all towns it is requested that the role of Birr as a very attractive place to live and visit be noted, in addition to the very significant potential for science and data related development associated with Birr Castle and the ILOFAR project, including a potential national centre of excellence for astronomy. Similarly, it is requested that the potential role of Edenderry as an enhanced employment centre to counter the high levels of long distance commuting ('business as usual') taking place from this part of the region be noted.
5. The Council considers that a RPO for intra-regional connectivity be included, specially focussing on (i) the N80, N52 and N62 which link the M4/6 and M7, (ii) important Regional routes which perform roles similar to national secondary routes (eg. R420), (iii) the network of towns in the Midlands - Athlone, Tullamore, Birr, Portlaoise and (iv) onward (potentially imperative depending on Brexit) connections to the Ports of Bellview and Rosslare.

Chapter 1 – Introduction

Section 1.6 Urban Structure

Draft RSES	Proposed Amendment
<p><i>“The National Planning Framework identifies an urban structure for the region based on commuting patterns, with reference to the EU/OECD definition of “functional urban areas”.</i></p>	<p>[OY01] The Functional Urban Area (FUA) map for the GDA is shown, however that for the remainder of the region has been removed from earlier drafts. It is apparent that these FUAs will be fundamental to how CDP policies are formulated and indeed reviewed by EMRA or the Planning Regulator. Offaly County Council suggests that they should be shown in the RSES as the RSES is the key regional planning document.</p> <p>(In section 4.8 ‘Rural Areas’, it is stated that 72.9% of the Midlands SPA area is under urban influence).</p>

Draft RSES	Proposed Amendment
<p>Figure 1.10 - Defining Functional Areas, 2016</p>	<p>[OY02] This map divides the region into Dublin City / Metropolitan Areas, Hinterland Area and Outer EMRA Region and is a significant departure from those figures in figure 1.5, which are Dublin, Eastern and Midland regions. Offaly County Councils submission to the Issues Paper Stage <u>and</u> on the draft NPF stated:</p> <p>“The Council would request that the Midlands be given a special designation in the NPF, a defined regional growth centre / supporting centres, its own population and positively-biased jobs allocations and commensurate funding in the NIP. Without same, the Midlands sub-region is unlikely to fulfil its potential as part of a successful Ireland in 2040”.</p> <p>This request still applies, particularly in light of the area titles of Dublin, Hinterland and ‘Outer’ chosen. (See summary points above).</p>

Chapter 2 – Strategic Vision

2.3 Regional Strategic Outcomes (RSO's)

General Comments on the RSO's:

- The Settlement pattern RSO stops at the Key Growth Centres, i.e. Dundalk, Athlone.
- The 'Rural Communities' RSO is limited to *management* of the area under urban influence.
- There should be a compensatory positive focus on the rest of the rural communities / areas.

Draft RSES	Proposed Amendment
<p>RSO 3 Rural communities <i>"Support sustainable rural development by managing urban generated growth in areas under strong urban influence and by encouraging sustainable growth in areas that have experienced decline or stagnation. (NSO 1, 3)"</i></p>	<p>[OY03] This RPO should state the key roles of our existing Town and Village network in meeting the social, employment, housing and entertainment needs of such communities.</p> <p>(This RPO will inevitably be cited in funding calls).</p>

Draft RSES	Proposed Amendment
<p>RSO 5 Creative places <i>"Enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration. (NSO 5, 7)"</i></p>	<p>[OY04] This should state the importance of the Public Realm in creating successful places and state that this is the responsibility of the private sector (to ensure the outward face / public areas of developments are high quality), as well as public authorities.</p> <p>(This RPO will also inevitably be cited in funding calls).</p>

Draft RSES	Proposed Amendment
<p>RSO 9 Support the Transition to Low Carbon and Clean Energy <i>"Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. (NSO 8, 9)"</i></p>	<p>[OY05] This should in our opinion strongly require that the region must secure the economic benefit from this transition in addition to facilitating the end product machinery, that is, for example, headquarters, servicing, assembly, R&D, possibly financing development etc. It should reference the current transition from employment in peat extraction and the urgency of creating replacement enterprise.</p>

Chapter 3 – Growth Strategy

General Comments on the Growth Strategy:

- Most of the map is blank apart from Dublin, the Dublin-Belfast corridor and the Regional Growth Centre of Athlone. This could be very damaging to attracting economic development to much of the region, especially the Midlands. (It is acknowledged of course that every settlement shouldn't be shown on a regional growth strategy map, but key strategic corridors and proposed improves spatial linkages could be shown).

Overview of Growth Strategy

Draft RSES	Proposed Amendment
<p><i>"The Growth Strategy for the Eastern and Midland Region will;</i></p> <ul style="list-style-type: none"> • <i>Support the continued growth of Dublin as our national economic engine</i> • <i>Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP)</i> • <i>Target Growth of our Regional Growth Centres of Athlone, Drogheda and Dundalk as regional drivers</i> • <i>Support our vibrant rural areas with a network of towns and villages</i> • <i>Facilitate the collaboration and growth of the Dublin – Belfast corridor</i> • <i>Embed a network of key towns through the Region to deliver sustainable regional development"</i> 	<p>[OY06] [Add]</p> <ul style="list-style-type: none"> • <i>Support the proportionate growth of smaller rural towns based on local function, to be determined by County Development Plans.</i> <p>[OY07] There are no Regional Policy Objectives for the growth strategy other than mandating LA's to commit to the delivery of it. The Council suggests there should be a RPO for each Settlement Typology to guide consistency in CDP's across the region.</p>

3.1 Developing a Growth Strategy for the Region

The Growth Strategy Map (Figure 3.1)

Point for comment	Proposed Amendment
<p>While the Council appreciates that larger amounts of economic and population growth will take place in the City, the Metropolitan area, the Dublin Belfast corridor and the Regional Growth centres, figure 3.1 <u>could be read, for example by proposed investors, that growth isn't welcome outside these areas.</u></p> <p>This map has only two towns marked in the 'Outer Region', which is 150km from corner to corner.</p> <p>This could be damaging to potential economic investment in the Hinterland Area and the Outer Region, (the latter of which is urgently required to arrest long distance commuting and rural decline). It could damage potential for the</p>	<p>[OY08] While it is recognised that this is a high-level map and not all settlements should be listed, it is respectfully suggested that the settlements per figure 4.2 (settlement strategy) be placed on it to reflect balance. Also that key strategic corridors and proposed improves spatial linkages could be shown.</p>

<p>sorts of investment which may have needs based on rural resources, or simply a locational or historical aspiration on the part of the investor.</p>	
<p>A lot of detail in terms of population targets etc. has been removed from earlier drafts. It is a concern that a RSES which is overly bereft of such detail will make the job of 12 individual Local Authorities in getting County Development Plans adopted more difficult. This is because the parameters within which they must stick are opaque and are only likely to become really apparent post adoption of the RSES.</p>	<p>[OY09] In order to have a more transparent document, the Growth Strategy could specify the approximate amount of population growth earmarked for the City and Suburbs (+200,000), DMA (+50,000), Hinterland (unknown) and Outer area (unknown).</p> <p>(Figures extrapolated from the box in table 3.2).</p>

Athlone Regional Growth Centre (Section 3.1)

Point for comment	Proposed Amendment
<p>Please refer to Offaly County Councils repeated request for a designation for the Midlands, including population and jobs targets, developing an economic gravity of its own and also the Councils comments regarding the proposed 'Outer Area' above.</p> <p>Extracts from the Councils submission to the Issues Paper stage (and to the NPF) is below:</p> <p><i>“Offaly County Council requests that the RSES tackles the regional imbalance that has developed over the last 50 years by specifically and actively intervening and directing population, jobs and infrastructural investment into the Midlands Region”.</i></p> <p><i>“The Council would request that “the Midlands be given a special designation, a defined regional growth centre / supporting centres, its own population and positively-biased jobs allocations and commensurate funding Without same, the Midlands sub-region is unlikely to fulfil its potential as part of a successful Ireland in 2040”.</i></p>	<p>[OY10] The RSES should have a spatial representation of this requested designation which links the Key Growth Centre of Athlone with the Key Towns and others within the Midlands. Furthermore, the role of Athlone needs to be much more ambitious and stronger as an anchor / driver for the region. The western part of the region should have a positive bias to avoid the business as usual approach and 'counterbalance' the eastward pull.</p> <p>[OY11] The east – west growth axis for Athlone should be amended to include north and south and should indicate a stronger growth axis into the EMRA region.</p>

The Hinterland area (Section 3.2)

Point for comment	Proposed Amendment
<p>This is the part of the region where much of the growth which ran contrary to the NSS took place. Settlements like Edenderry in Offaly, Portarlinton in Offaly / Laois and many others grew in population at a rapid and disproportionate rate and many now have a large jobs deficit.</p>	<p>[OY12] Consideration should be given to a strong, two pronged RPO for the Hinterland, broadly as follows:</p> <ul style="list-style-type: none"> • Restraint of population overspill from the Dublin Metropolitan Area (DMA) and compact and sustainable growth. • Positively disproportionate investment in employment enablers.

The 'Outer Region' (Section 3.2)

(Note the Councils doesn't agree with this designation, see above).

Draft RSES	Proposed Amendment
<p><i>"However these towns function at a much higher level than their resident population and play a key regional role in providing employment and services for their own hinterland. These are county towns such as, Longford, Mullingar, Portlaoise and Tullamore"</i></p>	<p>[OY13] On a far more moderate scale, this comment should also be attributed to smaller towns within the Outer Region. It is considered that strategy is not strong enough on the capability of smaller towns to attract (commensurate) growth based on their own unique assets.</p> <p>[OY14] In the Outer Region there is a very strong network of small towns but many of these towns are in decline. They need a RPO to allow them to work to their strengths (at an appropriate scale, however). Without mention as a group, investment opportunities could be lost due to a possible perception that the RSES doesn't fully recognise them as assets.</p>

Box in Section 3.2 "The guiding principles for growth in the Region include;"

Draft RSES	Proposed Amendment
<p>Second bullet..</p> <ul style="list-style-type: none"> • <i>Aligning population and housing growth – More emphasis on consolidating the development of places that grew rapidly in the past decade or so experiencing large scale commuter driven housing development with a particular focus on addressing local community and amenity provision in many of the larger commuter towns.</i> 	<p>[OY15] [Add = red text, Amend = strikethrough]</p> <ul style="list-style-type: none"> • Aligning population and housing growth – More emphasis on consolidating the development of places that grew rapidly in the past decade or so experiencing large scale commuter driven housing development with a particular focus on addressing local community and

	<p>amenity provision and also employment catch-up in many of the larger commuter towns.</p>
<p>Fifth Bullet..</p> <ul style="list-style-type: none"> • Regional Accessibility –To enhance regional accessibility and enable the development of key towns on the strategic and public transport corridors. To promote the best use of existing and planned transport infrastructure and to promote sustainable and active modes of travel. 	<p>[OY16] [Add]</p> <ul style="list-style-type: none"> • To significantly enhance cross-regional transport linkages, in particular the key National Secondary Roads through the Midlands eg. N52, N62 & N80 which connect the M4/6 and M7, which connect the Regional Growth Centre of Athlone with the other Midlands County towns and which have important present and future connections to adjoining regions and ports.

Chapter 4 – People and Place

General comment: This chapter is very heavily focussed on towns above c.10,000 population (18 pages) with 1 page dedicated to towns below this. While this emphasis is suitable for say chapter 3 – Growth Strategy, it seems that the ‘People & Place’ chapter, which is in effect a settlement strategy for the entire region, should be broader in its focus on smaller towns. Per section 4.1, there are 21 settlements between 4,000 and 10,000 within the region. Beneath that layer, there are 30 smaller ‘urban settlements’ (above 1,500 population) and many more smaller towns and villages.

4.2 Settlement Strategy

Point for comment / Draft RSES	Proposed Amendment
<p>Similar to our comments regarding figure 3.1 (growth strategy map), figure 4.2 which is the Settlement Strategy map, stops at Key Towns. Many towns, particularly in the ‘Outer’ Region, while being considerably less than 10,000 in population are fundamental to how the region functions and indeed how the ‘business as usual’ patterns identified in the NSS developed.</p> <p>This could be damaging to potential economic investment in the hinterland area and the ‘outer’ area, (the latter of which is urgently required to arrest long distance commuting and rural decline). It could damage potential for the sorts of investment which may have needs based on rural resources, or simply a locational or historical aspiration on the part of the investor.</p>	<p>[OY17] Like for fig. 3.1, while it is recognised that this is a high-level map and not all settlements should be listed, it is respectfully suggested that more settlement hierarchy detail should be put on it.</p>
<p>Text under figure 4.2 Medium to large sized settlements <i>“Promote consolidation coupled with targeted investment where required to improve local employment and services, in line with a development strategy to be determined by local authorities to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy”.</i> (Emphasis added).</p> <p>In Co. Offaly, for example Birr – including Crinkle (4,972), Edenderry (7,359), Clara (3,242) and Portarlinton (Laois/Offaly) (8,368) are key settlements in the context of our CDP settlement strategy.</p> <p>Edenderry and Portarlinton have been subject to considerable commuter-driven growth while the others have not. However, the text in figure 4.2 requires that growth be at a “sustainable level appropriate to their position in the</p>	<p>[OY18] A guide as to what consolidation is in terms of % growth would assist in CDP preparation.</p> <p>This comment also applies to 4: Medium to large sized Settlements in table 4.3.</p>

<p><i>hierarchy</i>". There are very few cues in the draft to guide this consideration. In other counties, the situation is exacerbated in that, aside from a county town all or most other towns are within the "small towns and villages" RSES category.</p>	
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4.3 Defining a Settlement Typology

Draft RSES	Proposed Amendment
<p><i>"Towns in the lower tiers should provide for commensurate population and employment growth, providing for natural increase [emphasis added] and to become more economically self-sustaining, in line with the quality and capacity of public transport, services and infrastructure available. It is considered appropriate that population targets for these Medium to Large Towns be defined in the Core Strategies of Development Plans, and be reflective of local conditions and place potential" (Emphasis added)</i></p>	<p>[OY19] The two sections in bold text seem contradictory.</p>
<p><i>"However there should be a graded reduction in residential densities for medium to large towns, smaller towns, and villages that is commensurate to the existing built environment"</i></p>	<p>[OY20] <u>OCC strongly agrees with this statement.</u></p> <p>[OY21] It would be stronger as a RPO. While the Council advocates best use of land, higher density and high quality housing, it is imperative that there is a <u>range</u> of housing types available to give choice to people, in particular the choice between rural one-off housing and medium density town and village living.</p>
<p>Table 4.3 Settlement Typologies and Policy Responses</p> <p>5. Small towns, villages and rural areas <i>"Consolidation [emphasis added] coupled with targeted rural housing and investment policies where required to improve local employment, services and sustainable transport options and to become more self-sustaining".</i></p>	<p>[OY22] Particularly in the 'Outer' region, attaching the word <u>consolidation</u> to the entire group of towns and villages may not be appropriate, particularly if some, for example as support towns to Key growth towns, may be suitable for moderate growth levels.</p>

4.3 (con't.) Headroom

Draft RSES	Proposed Amendment
<p><i>“NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Appendix 2). This may be supplemented by additional 25% headroom, applicable in the 16 local authority areas that are projected to grow at or above the national average growth figure (page 5 of the NPF Roadmap). This further headroom may be applied regionally and locally, at RSES and City and County Development Plan stage”.</i> (Emphasis added)</p> <p>(Note Offaly is not one of the 16)</p>	<p>[OV23] This text, which refers to all three Regional Assembly areas, doesn't reflect the reality of the use of 'headroom' in town plans for smaller towns, eg. those less than 5,000 population. In Offaly for example, experience has been during the period of the NSS (and there is no evidence it will be different under the NPF), that when population targets for (i) Regional Growth Centres or Key Towns, (ii) rural areas, including one-off dwellings are allocated, the population 'balance' for towns and villages in the middle or lower tiers of the CDP hierarchy is extremely small. While experience has also shown that growth is not even and only some settlements will reach their targets, the amount of zoned land to be allocated to these settlements can be very small and gives rise to difficulties in producing town or village plans which are reasonable and gives some element of choice.</p> <p>To use a practical example, if a village has a target of say 10% or 50 people over the CDP period, that is 20 houses, the zoning at say 12 units per ha. would be 1.6 ha (4 acres). The LA is faced with the choice of zoning 4 x 1 acre fields or 1 x 4 acre field as an arbitrary example. Experience has shown that many of these zoned areas simply will not be released.</p> <p>It is important to note that resources in smaller LA's for 'land management' to try and encourage release of zoned lands are very limited or absent presently in our experience.</p> <p>It is in this context that headroom (or choice) as critical. The core strategy figure for the settlement would be the ultimate guide as to whether proposed or permitted developments are leading to excessive development of individual settlements or indeed a tier of settlements.</p>

4.6 Key Towns (eg. Longford, Mullingar, Portlaoise, Tullamore)

Point for comment	Proposed Amendment
Regional Policy Objectives	[OY24] There should be a RPO indicating the envisaged levels of population growth which would apply to these towns. This would serve to help ring-fence it in some areas <u>and</u> limit excessive growth in others i.e. in the business as usual scenario in the Hinterland area.

4.6 'Outer Region' Key Towns

Tullamore

Draft RSES	Proposed Amendment
<i>"Tullamore, located on the Dublin to Galway rail line, acts as a key population and employment centre for the surrounding hinterland".</i>	[OY25] [Add] <i>Flanked by the Slieve Bloom Mountains to the south, with Lough Boora Discovery park to be connected by greenway along the Grand Canal in 2019/2020, the town offers significant quality of life advantages.</i>
<i>"Consolidation and regeneration shall be a key priority and objective for the development of Tullamore and future development plans will be required to identify opportunity sites for town centre regeneration such as regeneration of the Shannon canal harbour in the town which has potential for commercial and tourism related development".</i>	[OY26] Consolidation and <i>Continued employment growth, population growth in line with the principles of the NPF and</i> regeneration shall be key priorities and objectives for the development of Tullamore. and <i>Future development plans will be required to identify further develop framework plans for the opportunity sites already identified for town centre regeneration such as regeneration of the Shannon Grand Canal Harbour in the town which has potential for commercial enterprise, recreation, residential, public realm and tourism related development.</i>
New RPO for Tullamore	[OY27] [Add – <u>in advance of RPO 4.46</u>] <i>Support the role of Tullamore as a major employment centre which is sufficiently removed from the Dublin Metropolitan Area to do so sustainably, with key assets being its existing positive jobs to resident employees ratio, excellent quality of life and future strategic development sites. Also to support infrastructural development to facilitate this role in particular the need for continued investment in the rail service to the town in terms of capacity, high frequency and customer support.</i>

<p>New RPO for Tullamore</p>	<p>[OY28] [Add – in advance of RPO 4.46]</p> <p><i>Support the enhancement of Tullamore’s accessibility as a key node between the M4/6 and M7 by improving capacity and journey times on the N80, N52/N62 National secondary Routes and the R420 to the M7. This is necessary in terms of the cohesiveness of the Midlands SPA as an attractor of economic development and in terms of the Midland Regional Hospital’s designation as a Major Trauma for the Midlands.*</i></p> <p><i>*Per the recommendations of the Trauma Steering Group – A Trauma System for Ireland</i></p>
<p>New RPO for Tullamore</p>	<p>[OY29] [Add – in advance of RPO 4.46]</p> <p><i>Support Tullamore and Offaly in the development of an energy retrofitting centre of excellence in recognition of the area’s central location within the country and the high dependence on solid fuel such as turf for home heating.</i></p>
<p>New RPO for Tullamore</p>	<p>[OY30] [Add – in advance of RPO 4.46]</p> <p><i>To support the further development of the Med-tech cluster centered on the IDA business park in Srah.</i></p>
<p>New RPO for Tullamore</p>	<p>[OY31] [Add – in advance of RPO 4.46]</p> <p><i>To support applications for Urban Regeneration and Development Funding (URDF) for the redevelopment, focused on compact growth, place making and transition to a low-carbon society / economy of the town’s designated opportunity sites such as the Grand Canal Harbour, former ‘Texas’ site, Tanyard & former ‘Carrolls’ site, former ‘Coens site’ and the Railway Node.</i></p>
<p>RPO 4.46 <i>“Support Tullamore’s role as a tourism hub having regard to its accessibility to key tourist destinations including proximity to natural amenities and recreational opportunities including Grand Canal Greenways and Blueways and outdoor recreation parks”.</i></p>	<p>[OY32] Support Tullamore’s role as a tourism hub and development as a Tourism Destination Town having particular regard to its distilling heritage and industry, accessibility to key tourist destinations including proximity and accessibility to key tourist destinations, natural amenities and recreational opportunities including the Grand Canal Greenways and /</p>

	<p>Blueways, and outdoor recreation parks, <i>Lough Boora Discovery Park, Slieve Bloom Mountains and the vast array of peatlands which will transition to afteruse over the course of this strategy and beyond. Also to support Tullamore as the major services hub for the 'Midlands Cycle destination – Offaly' which is a priority project in the 'Outdoor Recreation Plan for State Lands and Waters'. Further, to recognize Tullamore's potential as a conferencing and event hub, given the towns central location, accessibility and experience in hosting large scale outdoor events such as the National Ploughing Championships.</i></p>
<p>New RPO for Tullamore</p>	<p>[OY33] [Add – after 4.46] To support the designation of Tullamore Regional Hospital as a major Trauma Centre and also its continued development as a 'Teaching' Hospital / University Hospital, together with the potential for linkages to existing and new med-tech businesses and research facilities. Also to support the potential for a regional hospice at this location.</p>
<p>New RPO for Tullamore Section 1.6 – Regional Profile states “By 2031 there will be a significant increase in the number of people in the 15-24 years age cohort, which will lead to greater demand for third level education”.</p> <p>The Council considers that this will give weight to the examination of the potential for a University with multiple campuses based on various sectoral strengths such as food, energy, pharma & medtech, engineering and advanced manufacturing etc. in the west of the Region. It would also act as a 'pull' factor to provide an alternative to incremental sprawl of the Greater Dublin Area (GDA).</p>	<p>[OY34] [Add – after 4.46] To support proposals for a University in the Midlands and in particular Tullamore's and Co. Offaly's role in its provision.</p>

4.7 Other towns

Draft RSES	Proposed Amendment
<p><i>“The more sustainable have a moderate level of jobs and services and includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self sustaining. Other towns which have experienced</i></p>	<p>[OY35] State the population range.</p> <p>[OY36] Should the title say 'Medium to Large Sized Settlements' per table 4.3?</p>

<p><i>high levels of population growth but have a weak employment base and which are reliant on other areas for employment and/or services and require targeted 'catch up' investment to become more self-sustaining are consolidation towns".</i></p>	<p>[OY37] [Add] A RPO for the consolidation towns in particular, in order that there may be some consistency in CDP's.</p>
<p><i>"A number of settlements within the Metropolitan and Hinterland areas have undergone rapid commuter-focused residential expansion over the recent decade, without equivalent increases in jobs (i.e. settlements characterised by a low ratio of jobs to resident workforce) and services. They shall have a more contained focus with a drive for investment in services, employment growth and infrastructure whilst balancing housing delivery. Population growth in these towns shall be at a rate in order to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision."</i></p>	<p>[OY38] A number of settlements within the Metropolitan Area, and Hinterland Areas and at the eastern fringes of the Outer Region (eg. Edenderry) have undergone rapid commuter-focused residential expansion over the recent decade, without equivalent increases in jobs (i.e. settlements characterised by a low ratio of jobs to resident workforce) and services. They shall have a more contained focus with a drive for investment in services, employment growth and infrastructure whilst balancing housing delivery. Population growth in these towns shall be at a rate in order to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision.</p>

4.7 Other towns (cont.)

Point for comment	Proposed Amendment
<p>Small towns and villages</p>	<p>[OY39] Suggest that this grouping should be broken into two sections namely "Small Towns", (4.8) with "Villages" falling into the Rural Areas Heading underneath (would become 4.9).</p> <p>Within the existing settlement hierarchy of the region, there is a large network of small towns and villages. In some counties at the western side of the region, very small towns often perform a service role disproportionate to their population compared to those closer to the DMA. They need to be recognised as such and have RPO's to reflect their roles.</p> <p>In the Offaly context, the layer as currently set out would cover settlements from, for example Clara to Ballycumber which are only 5km apart but perform very different functions. The former has a population of 3,242 while the latter has a population of c.250.</p> <p>[OY40] A specific role-based RPO for both settlement types: (i) Small Towns and (ii) Villages</p>

	<p>[OY41] [Add] There should be separate RPO for both settlement types that EMRA will work closely with Local Authorities and Irish Water to ensure that the Irish Water Scheme for small towns and villages is prioritised within the short term in order to help offer choice in house type availability and to facilitate appropriately scaled business investment in these smaller settlements.</p>
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4.8 Rural Areas

Point for comment / Draft RSES	Proposed Amendment
	<p>[OY42] [Add] A RPO for Villages (see above)</p>
	<p>[OY43] [Add] RPO Having regard to section 5.4 of the NPF, to support the preparation, in the short term, of a comprehensive afteruse framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the Midlands and adjacent parts of the North West and Southern Regions which meets the environmental, economic and social needs of communities in these areas, also demonstrating leadership in climate change mitigation and land stewardship. Also to lead on the sourcing of E.U. funding to support the transition of the industrial peatlands to sustainable afteruses. The assembly supports in principle the examination of the potential for a Strategic Development Zone or zones in the Midlands to act as a catalyst for job creation to replace such jobs and to act as an economic ‘pull’ into the midlands SPA.</p>
<p>RPO 4.51 <i>“In Development Plan policy Local Authorities shall identify small towns and villages that have the potential for serviced sites as an alternative to one-off rural housing”</i></p>	<p>[OY 44] [Add] EMRA will work closely with Local Authorities and Irish Water to ensure that the Irish Water Scheme for small towns and villages is prioritised within the short term in order to help offer choice in house type availability and to facilitate appropriately scaled business investment in these smaller settlements.</p>

<p>RPO 4.52 <i>“Local Authorities shall identify and provide policies to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, and to protect the value and character of the open countryside”.</i></p>	<p>[OY45] [Add] <i>EMRA will collaborate with Local Authorities and consider commissioning guidance for the region on the location and positioning of solar farms and other large energy installations in this regard.</i></p>
<p>RPO’s 4.53 and 4.54 4.53 refers to economic or social need to live in a rural area within ‘Areas Under Strong Urban Influence’ and ‘Stronger Rural’ areas while 4.54 refers to encouraging sustainable growth in areas outside Areas Under Strong Urban Influence only.</p>	<p>[OY46] Could this be clarified?</p>
<p>RPO 4.55 <i>“Local Authorities shall ensure that economic development that is urban in nature should be in the first instance located in urban areas”.</i></p>	<p>[OY47] This appears to discriminate against economic development in villages within rural areas, noting that the rural areas section relates to villages of up to 1,500 people.</p>

Chapter 6 – Economy & Employment

6.1 Introduction

Point for comment / Draft RSES	Proposed Amendment
<p><i>“In accordance with Project Ireland 2040 the Region will accommodate around 320,000 additional people in employment”.</i></p>	<p>[OY48] Offaly County Council’s submissions at the Issues Paper Stage <u>and</u> to the draft NPF stated:</p> <p>“The Council would request that the Midlands be given a special designation in the NPF, a defined regional growth centre / supporting centres, its own population and positively-biased jobs allocations and commensurate funding in the NIP. Without same, the Midlands sub-region is unlikely to fulfil its potential as part of a successful Ireland in 2040”.</p> <p><u>And:</u> (at the Issues Paper Stage)</p> <p>“Definitive positively-biased jobs and population growth targets for the entity of the Midlands SPA which will allow it to ‘catch up’, to develop this gravity and to provide for appropriate growth focussed mainly on (i) a strong urban hierarchy and (ii) the Midlands’ own fundamentals and competitive sectors”.</p> <p><u>And:</u> (again at the Issues Paper Stage)</p> <p>“Strong policies in favour of jobs and population growth in the large settlements to the centre & west of the region – to create a viable alternative to long distance commuting as opposed to the continual overspill into the eastern parts of the Midlands, which will inevitably continue if policy and oversight doesn’t proactively act against it”.</p> <p>The Council would again re-iterate these points for the RSES process as it moves to finalisation.</p>

6.4 The Region’s Economic Engines and their sectoral opportunities

Point for comment / Draft RSES	Proposed Amendment
<p>Sectoral Opportunities Midlands (including Athlone)</p>	<p>[OY49] [Add] <i>Energy sector including transmission, generation, storage, research, manufacturing / assembly, headquarters and financing, carbon sequestration / storage. Having regard to its long history in power generation and its proactive position in relation to renewable energy developments</i></p>

	<p><i>over the past decade, to support the principle of an Energy Hub in Co. Offaly, with particular focus on the higher order aspects of the industry such as research, new technologies, headquarter development, assembly, maintenance and financing etc.</i></p> <p>STREAM is an initiative led by Offaly Innovation & Design Centre CLG. Its Creative Suite will be based in Birr Technology Centre. Through its association with I-LOFAR, (at Birr Castle), it provides unique opportunities to be the:</p> <ul style="list-style-type: none"> • Regional/National Hub for Big Data • Research hub for the I-LOFAR consortium and international LOFAR partners • Collaborative regional hub for industry led training in data analytics • Regional hub for research and industry collaboration <p>STREAM Creative Suite will provide a central location and space, where research and education meets business. This data can be utilised for training purposes and for proving algorithms for many sectors. Professors and researchers of universities affiliated with the international LOFAR network together with Software Developers and Data Analysts from companies operating within or in cooperation with companies based in the Midland Region will have the opportunity to use the STREAM Creative Suite – either through regular hot desk usage or through the establishment of a base there.</p>
<p>Rural Areas <i>Sectoral Opportunities Key towns, large, medium, Small Towns and rural areas</i></p> <p><i>Precision farming, biotechnology, experiential tourism, food products, functional food premium, solar energy microgeneration, wind energy, energy storage, and low carbon construction.</i></p>	<p>[OY 50] Precision farming, biotechnology, experiential tourism, food products, functional food premium, solar energy microgeneration, wind renewable energy, energy storage, and low carbon construction.</p>

Natural and Cultural tourism assets: (p.100)

Point for comment / Draft RSES	Proposed Amendment
Add two RPO's	<p>[OY51] Add] RPO 6.18 Support the local strategies which are already in place to link the River Shannon Blueway, the Royal and Grand Canal Greenways and the proposed Barrow Blueway right across the Midlands, incorporating the towns of Longford, Athlone, Mullingar, Tullamore and Portarlington. These links are almost overwhelmingly on public lands. Such a network presents an international scale walking and cycling offer which is recognised by the 'Outdoor Recreation Plan for State Lands and Waters (2017)'.</p> <p>[OY52] [Add] RPO 6.18 Support Offaly County Council, Bord na Mona and Coillte in the development of the 'Midlands Cycling Destination – Offaly' which represents a potential national scale walking and cycling product almost exclusively on public lands. This project is a priority of the 'Outdoor Recreation Plan for State Lands and Waters (2017)'.</p>

Investing in the tourism product (page 101)

Point for comment / Draft RSES	Proposed Amendment
<p>RPO 6.18 Identification of Destination Towns <i>"EMRA will work with Local Authorities and Fáilte Ireland to identify destination towns within the Region for the prioritisation of investment and supports to drive tourism growth in the Region".</i></p>	<p>[OY53] EMRA will work with Local Authorities and Fáilte Ireland to identify <i>a network of</i> destination towns within the Region for the prioritisation of investment and supports to drive tourism growth in the Region, <i>to spread the benefit of tourism throughout the region and to encourage the increase of tourism product development"</i>.</p>

Low carbon Economy and circular economy (Page 102)

Point for comment / Draft RSES	Proposed Amendment
<p>Climate action is one of the 3 Key Principles of the RSES. However, there is only one RPO under the Low Carbon Economy and circular economy section.</p>	<p>[OY54] [Add] RPO To ensure that settlement patterns at all scales have sufficient regard to the need to minimise energy use for transport and heating.</p> <p>[OY55] [Add] RPO Having regard to section 5.4 of the NPF, to support the preparation, in the short term, of a comprehensive afteruse</p>

	<p><i>framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the Midlands and adjacent parts of the North West and Southern Regions which meets the environmental, economic and social needs of communities in these areas, also demonstrating leadership in climate change mitigation and land stewardship. Also to lead on the sourcing of E.U. funding to support the transition of the industrial peatlands to sustainable afteruses. The assembly supports in principle the examination of the potential for a Strategic Development Zone or zones in the Midlands to act as a catalyst for job creation to replace such jobs and to act as an economic 'pull' into the midlands SPA.</i></p>
<p>RPO 6.20 Support enterprise development agencies and LEOs on the development of industries that create and employ green technologies and take measures to accelerate the transition towards a low carbon economy and circular economy.</p>	<p>[OY56] [Amend] Support enterprise development agencies, Local Authorities, Communities and LEOs on the development of industries that create and employ green technologies and take measures to accelerate the transition towards a low carbon economy and circular economy.</p>

Infrastructure Investment (page 107)

Point for comment / Draft RSES	Proposed Amendment
<p>RPO 6.27 <i>"With the allocation outcomes from the competitive calls EMRA, in co-ordination with the Department of Public Expenditure and Reform (DPER), will prepare a Regional Investment Plan for the Region in accordance with Project Ireland 2040 and the Public Spending Code".</i></p>	<p>[OY57] It would be worth considering listing the key projects, even in summary form in the final RSES. This is particularly important in relation to the Council's points regarding developing an economic gravity within the Midlands, i.e. that the infrastructural requirements needed to make it happen are listed.</p>

Trade (page 107)

Point for comment / Draft RSES	Proposed Amendment
<p>RPO 6.28 <i>"EMRA will support the construction of a regional brand that is consistent with, and complementary to, current local and national branding, to promote the Region domestically and abroad".</i></p>	<p>[OY58] If this brand was developed before adoption of the RSESs it would add to the strategy.</p>

6.7 Capacity Building

Offaly County Council welcomes RPO's 6.29 & 6.30 regarding bidding capacity and shared evidence base.

Chapter 7 Environment

National Parks

Point for comment / Draft RSES	Proposed Amendment
<p><i>“There is also an opportunity to develop a National Park based on the raised bog peatlands of the Midlands in the emerging Lough Ree and Mid-Shannon Wilderness Park* that could act as an economic driver in the area focussing on eco-tourism and addressing climate change adaptation and mitigation whilst also acting as an important nature reserve addressing conservation and biodiversity. This would need to be led by National Parks and Wildlife Service in association with Local Authorities, landowners and other key stakeholders”.</i></p>	<p>[OY59] [Add] A further opportunity is for a National Park based on the central bogs of the Midlands in order to incorporate sustainable afteruses and provide a valuable amenity and tourism asset for the country and a rural escape for the planned 1.65 million people in the Dublin Metropolitan Area.</p> <p>*Reference also the ‘Shannon Masterplan’ which is being prepared by Waterways Ireland in conjunction with Local Authorities and other agencies and which has a footprint in all three regional assembly areas</p>
<p>RPO 7.19 <i>“Support the consideration of designating a National Park for the peatlands area in the Midlands”.</i></p>	<p>[OY60] <i>“Support the consideration of designating a National Park or parks for the peatlands area in the Midlands, based on the Lough Ree and Mid Shannon “Wet and Wild Lands - A Shared Ambition” and the central bogs of the Midlands.</i></p>

Eiscir Riada

Point for comment / Draft RSES	Proposed Amendment
<p>It is requested that a paragraph be added after the Dublin Bay Biosphere as follows:</p>	<p>[OY61] [Add RPO] Geological Heritage – Eiscir Riada <i>To support the consideration by Westmeath and Offaly County Councils, in consultation with the National Parks & Wildlife Service, the Geological Survey of Ireland and others, the potential designation of the south Westmeath / Northwest Offaly esker landscape as a UNESCO geo-park, to promote the unique geological heritage of the area.</i></p>

7.6 Green Infrastructure

Point for comment / Draft RSES	Proposed Amendment
Figure 7.3 (page 123)	[OY62] It might be worth stating that this map may be added to in the next decade having regard to in cessation of peat extraction on c. 80,000 ha. of Bord na Mona peatlands and the existence of hundreds of kilometres of industrial railway corridors through these bogs.
Table 7.1 Strategic Natural, Cultural and Heritage Assets in the Region	[OY63] [Add] <i>The proposed Midlands Cycling Destination – Offaly.</i>

Development of Greenways, Blueways & Peatways (page 126)

Point for comment / Draft RSES	Proposed Amendment
<p><i>“There are significant opportunities to develop a number of flagship greenways in the region;”</i></p> <p>Greenways;</p>	<p>[OY64] [Add] <i>The proposed Midlands Cycling Destination – Offaly represents a potential national scale walking and cycling product almost exclusively on public lands. This project is a priority of the ‘Outdoor Recreation Plan for State Lands and Waters (2017)’.</i></p> <p>[OY65] [Add] <i>Opportunities have been identified by Longford, Westmeath and Offaly County Councils to link the River Shannon Blueway, the Royal and Grand Canal Greenways and the proposed Barrow Blueway right across the Midlands, incorporating the towns of Longford, Athlone, Mullingar, Tullamore and Portarlinton. These links are almost overwhelmingly on public lands. Such a network presents an international scale walking and cycling offer which is recognised by the ‘Outdoor Recreation Plan for State Lands and Waters (2017)’.</i></p>
	<p>[OY66] [Add] A map of the Core Regional Greenways (proposed and existing) – see Offaly County Council and Longford County Councils previous submissions to the RSES process – should be included. <u>This is considered to be of critical importance, particularly because the National Greenway Strategy does not include such a map.</u> Such a map will be important to lend RSES backing to these projects.</p>

Peatlands (page 128)

Point for comment / Draft RSES	Proposed Amendment
<p>This section does not mention Section 5.4 of the NPF which states that a medium to longer-term strategic national land use plan for the peatlands in state ownership will be prepared in order to manage their most appropriate future use.</p>	<p>[OY67] [Add] RPO <i>Having regard to section 5.4 of the NPF, to support the preparation, in the short term, of a comprehensive afteruse framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the Midlands and adjacent parts of the North West and Southern Regions which meets the environmental, economic and social needs of communities in these areas, also demonstrating leadership in climate change mitigation and land stewardship. Also to lead on the sourcing of E.U. funding to support the transition of the industrial peatlands to sustainable afteruses. The assembly supports in principle the examination of the potential for a Strategic Development Zone or zones in the Midlands to act as a catalyst for job creation to replace such jobs and to act as an economic ‘pull’ into the midlands SPA.</i></p>

7.8 Climate Change

Point for comment / Draft RSES	Proposed Amendment
<p>RPO 7.29 requires that The Climate Action Regional Offices compile a greenhouse gas emissions inventory for the Region.</p> <p>RPO 7.31 requires that Local Authorities quantify the emissions produced within their jurisdictions.</p>	<p>[OY68] This could be a duplication of efforts and costs. In addition, economies of scale could be gained by the regional inventory.</p>

Decarbonising Electricity Generation

Point for comment / Draft RSES	Proposed Amendment
<p><i>“It is necessary to establish a consistency of approach by planning authorities, both in identifying areas suitable for renewable energy development and having regard to potential impacts, inter alia on biodiversity, landscape and heritage”.</i></p>	<p>[OY69] Offaly County Council strongly agrees with this statement. The Council would note that the seven windfarms permitted in Offaly were as a result of a Wind Energy Strategy first prepared in 2008 / 2009 based on these principles, however that model has not been used across the region.</p>

<p>RPO 7.34: “EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects”.</p>	<p>[OY70] That these are not shown as part of the draft RSES weakens the process of designating the because the RSES a key guiding planning document and subject to public consultation. However, the now-short timescale for adoption of the RSES and the need to avoid ill-considered designations is noted.</p> <p>Offaly County Council’s comment to the Issues Paper stage was as follows:</p> <p>“It is unfortunate that the level of detail in the draft NPF is low on key sectoral strengths. For example, the question of strategic energy zones is deferred to the Renewable Electricity Framework which has been under preparation since 2013. Given energy use and generation will be important and urgent issues for every year of the RSES’s, consideration could be given to a regional energy strategy, covering use, generation, efficiency, grid technology and emerging technologies to accompany the RSESs”.</p>
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Decarbonising transport, Sustainable settlement Patterns and Compact Growth (page 138)

Point for comment / Draft RSES	Proposed Amendment
<p>RPO 7.41 requires land use plans to have proposals to encourage Electric Vehicle use</p>	<p>[OY71] This is welcomed.</p> <p>[OY72] [Add RPO] <i>Local Authorities shall proactively encourage decarbonisation of local journeys by promoting the infill / brownfield site targets in this RSES and also by (i) encouraging permeability in new and existing urban layouts and (ii) encouraging permeability and the provision of safe walking and cycling infrastructure between residential, town centre, employment and residential areas.</i></p> <p>The Council notes that RPO 8.1 in the Connectivity Chapter comprehensively covers this issue and more.</p>

Chapter 8 Connectivity

Local Transport Plans

Point for comment / Draft RSES	Proposed Amendment
<p>Local Transport Plans <i>"The settlements for which Local Transport Plans will be made will include, but will not be limited to, Athlone, Dundalk, Drogheda, Portlaoise, Mullingar, Tullamore, Longford, Balbriggan, Navan, Naas, Newbridge, Wicklow-Rathnew, Ashbourne and Arklow, and certain large settlements or development areas within the Dublin Metropolitan Area".</i></p>	<p>[OY73] Offaly County Council would request that EMRA could acknowledge that certain towns such as Edenderry, due to their unique linear nature and congestion would be supported by the assembly in also having transport plans prepared.</p>

8.3 Framework for the Integration of Transport planning with Spatial Planning Policies

Point for comment / Draft RSES	Proposed Amendment
<p>Figure 8.1 EMRA Strategic Infrastructure (Map)</p>	<p>[OY74] This map should reflect the Regional Roads in the Midlands which perform functions akin to National Secondary Routes and which should be considered for upgraded status in the future eg. R420 Tullamore to Monasterevin and R402 Edenderry to Enfield.</p> <p>[OY75] Importantly for a 6 year (and beyond) Regional Spatial Strategy, this map should have key transport objectives marked thereon, including rail. In particular, it should reflect the investment in the National Secondary Route network needed in the Midlands to enable Athlone, Longford, Tullamore and Portlaoise to function as a midlands network of economic drivers as per their envisaged role elsewhere in the RSES.</p> <p>Furthermore, the role of the cross regional routes such as the N52/N62 and also the N80 accessing ports such as Belview and Rosslare which may be further expanded after Brexit, needs to be further explored and listed as priority projects.</p>

8.4 Transport Investment Priorities

Rail

Point for comment / Draft RSES	Proposed Amendment
<p>RPO 8.6: <i>“The RSES supports delivery of the rail projects set out in Table 8.2, subject to the outcome of appropriate environmental assessment and the planning process;”</i></p> <p>...</p> <ul style="list-style-type: none"> • <i>Provide for an appropriate level of commuter rail service in the Midlands and South-East</i> <p>...</p>	<p>[OY76] It is considered that this bullet is unacceptable as it does not reflect the role of Athlone as a Key Growth Centre and Economic Driver in its own right, and similarly for the other Midlands Key towns of Longford, Tullamore and Portlaoise, but on a smaller scale. In addition, the presence over time of high-speed and high frequency rail will be important to allow the midlands develop its economic gravity in addition to benefiting commuters to or from the GDA. The ability of the midlands’ Key Towns, such as Tullamore to fulfil their roles as expanding urban employment centres is critically dependent on continued investment in the rail service in terms of capacity, high frequency and customer support.</p> <p>The current RPG’s have an objective to support:</p> <ul style="list-style-type: none"> • The reinstatement of the rail link between Athlone and Mullingar. • A second line between Portarlington and Galway which will facilitate the development of towns such as Portarlington, Tullamore, Clara, Athlone and Ballinasloe.

Section 8.4 (cont.) Strategic Road Network

Point for comment / Draft RSES	Proposed Amendment
<p>Table 8.4 Road Projects for the Region and Significant Regional Road Schemes</p>	<p>[OY77] The only listed projects in the west of the Region, covering most of the Midlands, are the N52 Tullamore to Kilbeggan and N80 Improvements including inter-regional and intra-regional accessibility.</p> <p>While welcome, this table <u>does not</u> reflect the investment in the National Secondary Route network needed in the Midlands to enable Athlone, Longford, Tullamore and Portlaoise to function as a Midlands network of economic drivers as per their envisaged role elsewhere in the RSES, in particular N52/N62, N80.</p>

8.5 International Connectivity

Point for comment / Draft RSES	Proposed Amendment
Potential Midlands Green International Trade and Distribution Zone	[OY78] [Add] RPO <i>The Assembly supports the relevant authorities' examination of the feasibility of a green international trade and distribution zone in the Midlands north of Tullamore, based on international air connectivity.</i>

Chapter 9 Quality of Life

9.4 Placemaking

Point for comment / Draft RSES	Proposed Amendment
<p><i>“There is a need to ensure alternatives to the car in the design of streets and public spaces and prioritise and promote cycling and walking as active transport modes”.</i></p>	<p>[OY79] This should be formulated into a RPO as it is so fundamental to sustainable development and will be the focus of many proposals under the URDF and RRDF.</p>

9.5 Regeneration

National Land Development Agency

Point for comment / Draft RSES	Proposed Amendment
<p>The section quotes NPO 12 from the National Planning Framework which relates to the best use of ‘public lands’. The focus to date is on urban lands.</p>	<p>[OY80] The Council Suggests that a RPO could be inserted roughly as follows:</p> <p><i>EMRA, in conjunction with the relevant Local Authorities will examine the feasibility of requesting the Land Development Agency to have a positive role in the future use of some of the c.80,000 ha. of Bord na Mona lands which will transition from industrial peat extraction over the next decade. EMRA recognises that this landbank contains many industrial / workshop / administration type complexes for which appropriate, sustainable afteruses should be encouraged in order the sustain the communities which were set up based on peat extraction and to make best use of these assets for the economic development of the region.</i></p>

9.6 Social Inclusion and Economic Opportunity

Third Level education and lifelong learning

Point for comment / Draft RSES	Proposed Amendment
<p>It is requested that a paragraph be added supporting, in principle, the idea of University in the Midlands.</p>	<p>[OY81] See OY34 above.</p>

9.8 Healthy Communities

Point for comment / Draft RSES	Proposed Amendment
<p>Recreation and Open Space (page 170)</p>	<p>[OY82] This section could cross reference the potential for amenity and open space opportunities which should come available when the c. 80,000 ha. of Bord na Mona peatlands cease production.</p> <p>[OY83] [Add] RPO <i>To support Local Authorities in the development of or facilitation of Regional scale Open Space and Recreational facilities, particularly those close to large or growing population centres.</i></p>

Point for comment / Draft RSES	Proposed Amendment
<p>Provision of Health Services (page 170)</p>	<p>[OY84] <i>The assembly supports the designation of Tullamore Regional Hospital as a major Trauma Centre and also supports its continued development as a ‘Teaching’ Hospital / University Hospital, together with the potential for linkages to existing and new med-tech businesses and research facilities. Also to support the potential for a regional hospice at this location.</i></p>

Chapter 10 Infrastructure

Water Supply

Point for comment / Draft RSES	Proposed Amendment
<p><i>"The development of a new rural settlement investment approach, coordinating Irish Water, Local Authority, developer and community led solutions to ensuring that sustainable water services solutions are progressively implemented should be encouraged".</i></p>	<p>[OY85] [Amend] This should be a RPO. (See also our comments on chapter 4, Settlement Strategy).</p>
<p>Table 10.1: Strategic Water Services Projects</p> <ul style="list-style-type: none"> • <i>"The Water Supply project for the Eastern and Midlands Region to supply water to Dublin and towns in the EMRA including Athlone"</i> 	<p>[OY86] The Water Supply project for the Eastern and Midlands Region to supply water to Dublin and towns in the EMRA including Athlone, <i>also the benefitting corridor identified by the proposed scheme.</i></p>
	<p>[OY87] [Add] RPO <i>Local Authorities and Irish Water should work together to examine significant raw water sources which may be made redundant by the Eastern and Midlands Water Supply Scheme with a view to reserving and protecting them for future back up or 'windfall' type economic development opportunities where high water use is required.</i></p>
	<p>[OY88] Given Irish Water's Strategic Investment Plan is mandated to have regard to these RSES, the document should be stronger on identifying longer term water services needs to allow the Growth Strategy as set out in the RSES to be delivered.</p> <p>(This applies to Waste Water below also.)</p>

Urban Waste Water Treatment

Point for comment / Draft RSES	Proposed Amendment
<p><i>"As with the approach to water supply, EMRA supports the development of a new rural settlement investment approach, coordinating Irish Water, Local Authority, developer and community led solutions to ensure that sustainable water services solutions are progressively implemented in the Region".</i></p>	<p>[OY89] This should be a RPO. (See also our comments on chapter 4, Settlement Strategy).</p>

10.3 Energy

Point for comment / Draft RSES	Proposed Amendment
<p>The Council has concerns that, given Climate Action is one of the Three Principles of the draft RSES, the document is largely silent on energy generation, in particular by onshore renewable sources, particularly when this is such a major land use planning challenge for the region and the country. Section 10.3 is almost entirely dedicated to the Transmission Network (grid).</p>	<p>[OY90] See comment to left.</p>

10.4 Waste Management

Point for comment / Draft RSES	Proposed Amendment
<p>As for energy generation above, the draft RSES is silent on any particular large scale objectives which may be in the Waste Management Plan for the Region 2015-2021, which might have significant land use planning considerations.</p>	<p>[OY91] See comment to left.</p>