



23<sup>rd</sup> January 2019

**Eastern & Midland Regional Assembly  
3rd Floor North  
Ballymun Civic Centre  
Main Street  
Ballymun  
Dublin D09 C8P5**

**RE: Draft Regional Spatial and Economic Strategy for the  
Eastern and Midland Regional Assembly**

A Chara,

I am directed by the Minister for Housing and Urban Development to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department welcomes the publishing of the Draft Regional Spatial and Economic Strategy (RSES) which will appropriately address the national policies and objectives of the National Planning Framework (NPF) at a regional level. The RSES for the Eastern and Midland Regional Assembly area will provide a clear strategic direction for the formulation of subsequent county/city development plans and ensure a strong and consistent alignment between national and local level planning policies.

The Assembly is to be commended for the extensive preparatory work undertaken in producing the Draft RSES. The Department considers the Draft RSES to be a comprehensive framework for the future development of the Assembly area, including in enterprise, retail, housing, community, heritage, transport, environmental and other terms. The proposed strategy importantly reflects the diversity of pressures and opportunities in the differing parts of the region.



In particular, the settlement strategy (Figure 4.2) of the Draft RSES provides a strong regional structure to accommodate future employment and housing growth. The identification of the 11 'Key Towns' (which include Graiguecullen-Carlow as an inter-assembly area Key Town) is considered to be an appropriate number of regionally distributed centres that will ensure the required focus for an increased scale of development needed to sustain a strong and vibrant regional settlement structure.

The Draft RSES has successfully avoided an excessively dispersed regional pattern, which would be at odds with the overall RSES growth strategy to develop strong urban centres in the region that are capable of providing the critical mass of employment, housing and local services development necessary to grow sustainably.

It is noted that the Draft RSES will necessarily be followed by the review process of individual county/city development plans by each local authority in order to ensure these statutory plans align with the RSES. In this regard, the future county population growth figures are included in Appendix B of the Draft RSES – per the *'Implementation Roadmap for the National Planning Framework'* (July, 2018). This schedule provides clear and unambiguous population growth parameters for the preparation of individual core strategies by the constituent local authorities in their subsequent development plans. Policy objectives RPO 4.1 & 4.2 reiterate the overarching requirement for core strategies to adhere to the RSES and ensure that infrastructural investment to support future development shall be closely spatially aligned to the RSES. For clarity, it is suggested that RPO 4.1 includes reference to the infill/brownfield targets set out in the National Planning Framework, or the relevant NPF National Policy Objective (NPO).

The approach to 'Headroom' set out on page 42 of the draft RSES appears to be based on correspondence to the three Regional Assemblies from the Department of Housing Planning and Local Government, further to the July 2018 Roadmap document referred to in the paragraph above. This text should be more tailored to the Eastern and Midland Regional Assembly area, particularly to avoid specific reference to places outside the EMRA area.



As mandated by the National Planning Framework, a Metropolitan Strategic Area Plan (MASP) for the Dublin area has been prepared and is included in the Draft RSES. The Department welcomes the integration of the MASP growth strategy with the relevant strategic transport plan – the *Transport Strategy for the Greater Dublin Region 2016-2035*’ by the National Transport Authority. The coordination of planned development with future strategic transport investment (eg. RPO 5.2, RPO 5.3, section 8.3) is a key tenet of national planning policy and is essential in the pursuit of NPF objectives relating to compact growth, brownfield development and reducing carbon emissions.

The spatially sequential approach to development fully accords with national planning policy and is critical to the sustainable and efficient use of development land and services. The emphasis in the Draft RSES on the planned and sequential development of settlements (eg. RPO 5.5), is an important objective that is needed to ensure that identified targets in relation to securing development within existing built up areas are reached and that existing services and development infrastructure is used efficiently. Regenerating important regional towns that have large derelict or underutilized sites will only be achieved where the sequential test is applied and the focus is firmly placed on actively developing such sites within our existing town cores.

The Eastern and Midland Regional Assembly includes extensive rural areas that are an important part of the region and play a key role in economic, social and environmental terms. The strategy has correctly identified the need to strengthen and diversify towns in rural areas in housing and employment terms so that they can support their surrounding communities. However, more widely within rural areas, policy support is needed to increase the available opportunities for local employment and economic development. Rural areas have significant potential for new agri-business, energy, tourism, forestry, enterprise and other development which can underpin balanced population growth and reduce damaging long distance commuting. The Assembly may wish to include additional policy supports in the RSES to assist and facilitate future rural development and employment growth as an essential element of their development strategy.

In relation to Climate Action, the draft RSES generally reflects national policy, however, RPOs 7.29 and 7.30 seek to assign functions and responsibility to the Climate Action



Regional Offices (CAROs) for which they have no remit, that would potentially conflict and/or duplicate with the role of the Department of Communications, Climate Action, and Environment (DCCA) and other key agencies, such as the Environmental Protection Agency (EPA). It is suggested that these policies be revised in conjunction with the relevant stakeholders. For clarity, it is also suggested that RPO 7.39 includes reference to the appropriate timeline for implementation of the Energy Performance in Buildings Directive (EPBD) through revised building regulations, i.e. 'by 2020'.

The following are a number of presentational and illustrative suggestions that the Assembly may wish to consider to assist in clarifying aspects of the Draft RSES proposed.

The Growth Strategy for the Region presented in the strategy map (Figure 3.1, page 27) is clear and focused. However, it is considered that the strategy map would benefit from the illustration of some further regional details. It is suggested that some of the assets/potential identified on adjoining Table 3.1 might also be reflected in the strategy map and diagram to provide additional clarity.

It is also noted that some terms such as 'second tier cities' (page 8) or 'outer region', may be perceived as wholly focused on Dublin and alternatives should be considered. The NPF generally describes the four cities other than Dublin as such, or by name, and the 'outer region' may be more appropriately described in terms of location vis-à-vis the rest of Ireland and where relevant, Northern Ireland.

Finally, there is no requirement for, nor is it considered appropriate that an EU flag or logo would appear on the cover of a Regional Spatial and Economic Strategy document. This could give the misleading impression that the RSES is an EU document or an EU-sponsored publication. The EU has no direct competence in respect of Regional Spatial and Economic Strategies, which are prepared in the context of Irish statute and the National Planning Framework and the National Development Plan, as part of Ireland 2040.

I look forward to the progress of the Draft Regional Spatial and Economic Strategy through the statutory RSES process which will enable county and city development plans to be subsequently revised and updated, where necessary. These future development plan



reviews will be important in ensuring that national and regional objectives for planning and investment can be further detailed at individual local authority level.

The officials of the Department are available to discuss the matters raised above in further detail as necessary to assist the Assembly in the statutory RSES process.

Yours sincerely,

Maria Graham

Maria Graham,  
Assistant Secretary  
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