

**Mr. Jim Conway,
Director,
Eastern and Midland Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Main Street,
Ballymun,
Dublin 09C8P5**

10th April, 2019

Re: Material Amendments to the RSES for the Eastern and Midlands Region

Dear Mr. Conway,

Westmeath County Council (WCC) welcomes the collaborative and engaging approach adopted by the Assembly to date in the delivery of a spatial and economic strategy for our region. WCC further endorse the enhanced policy provision proposed to the RSES for the Eastern and Midlands Region, as set out under the proposed Material Amendments to the Draft Strategy and appreciates the opportunity to further participate in and contribute towards setting the strategic planning context for our region, in line with the NPF's vision for Ireland to 2040.

Again, the broad range of issues which have been addressed to date under the Strategy are valued. It is also acknowledged that due cognisance has been afforded to the consideration of our submissions as part of the public consultation on the Draft Strategy and in this regard WCC broadly endorse the proposed policy amendments as they relate to County Westmeath and its hinterland region.

WCC look forward to the adoption of a RSES for our region and are fully committed to its implementation in providing the policy setting for the creation of attractive places which contribute positively to people's health and well-being in an environmentally responsible manner. In this regard the Council is also committed (working jointly with Roscommon County Council), to the delivery of a Joint Urban Area Plan for Athlone Regional Centre '*based on current local area plan (LAP) provisions and utilising current LAP legislation*' as determined under the NPF.

In terms of achieving an appropriate regional and county wide strategy for development, the following is submitted in response the Proposed Material Amendments as set out both individually and, where appropriate, in the context of the generality of the proposed amendments and their wider effect on the Strategy proposed for adoption.

Westmeath in the Region

As expressed in previous submissions, in terms of achieving an appropriate regional and county wide strategy for development, it is crucial that the RSES provides for the delivery of appropriately scaled (commensurate with function) yet adequate housing provision across all areas of Westmeath. Such provision is necessary in order to support future economic development and so as to provide for a Regional Centre in the interests of sustainable planning as envisioned under the NPF.

Material Amendment 13

WCC expressed concern as part of their previous submission to the Draft RSES that the housing allocation provided for Westmeath was not adequate to support the anticipated increase in employment and population.

“Despite the designation of Athlone as a Regional Centre with a target population of 30,000 up to 2031, the percentage growth rate envisaged for Westmeath is lower than that for Laois or Offaly and marginally above that projected for Longford. In this regard there is an allocation for metropolitan satellite areas such as Dun Laoghaire - Rathdown and Swords to grow by a combined target of 71,000 (long term target at 100% growth rate). There is also scope in the Draft RSES for towns such as Naas, Navan and Portlaoise to achieve growth to a scale beyond that targeted for Athlone as a Regional Centre. These, and other similar such provisions, are not considered to be in accordance with government policy and seriously undermine the intention of the NPF to ensure that Athlone and its environs can grow sustainably to create viable alternatives to Dublin, which itself must also continue to accommodate growth, principally (as defined by the NPF) within the City Region. This limited population allocation for the remainder of the County (following population allocation from overall figures for Westmeath to designated centres of Athlone and Mullingar - to which correspondence from WCC to your office, dated 30th August 2018, relates) would be seriously prejudicial to the sustainability of the remainder of the County, including other settlements and the rural fabric of Westmeath which are vital to the future of the County”.

As such WCC strongly endorse MA 13 which propose the inclusion of additional guidance that ‘Core Strategies should apply prioritisation measures rather than de-zoning of land where a surplus of lands is identified in existing plans with regard to the NPF Implementation Roadmap up to 2031. In preparing Core Strategies account should also be given to the consideration of sequential lands which are suitable for the delivery of housing but may not be forthcoming in the Plan period having regard to 2031 Roadmap targets, subject to proper planning and sustainable development’. It is considered that the proposed amendment is essential in ensuring both the delivery of a regional centre of scale and the achieving orderly development across the remainder of the County, relative to settlements functions within the hierarchy.

Material Amendments 1-139

It is respectfully submitted that the existing RPO’s (both those associated with Proposed MAs and those intrinsically lined to Proposed MAs including supporting commentary) could be reviewed and amended for the purpose of providing the most positive perspective for the region possible.

Delivering on Athlone as a Regional Centre

Material Amendment 9

As stated at the outset WCC are fully committed, working jointly with Roscommon County Council, to the delivery of a Joint Urban Area Plan for Athlone Regional Centre based on current LAP provisions under existing LAP legislation, as determined under the NPF.

The Council therefore welcomes the comprehensive narrative, enhanced policy provision and further guidance assigned in relation to Athlone and its important lead role as a Regional Centre in the development of the region. The positive support for the continued growth of Athlone at MA 9, with a

focus on quality of life and securing the investment to fulfil its role as a key regional centre and economic driver in the centre of Ireland is strongly endorsed in this regard.

Material Amendment 16

With regard to MA 16 and the role of existing LAPs in delivering compact growth targets, it is requested that reference be included to Lissywollen South Framework Plan as an important policy framework currently associated the delivery of LIHAF supported residential development in Athlone.

Further, whilst it is noted that support is provided for the upgrading of the Water Supply and Treatment System to meet the growth targets set in this strategy, it is considered that such guiding principles would be better expressed as an RPO, given the delivery of key enabling infrastructure, physical and social, is necessary in order to realise Athlone's status as a Regional Centre.

In terms of reference to economic development, it is submitted that reference to a joint Economic Strategy for Athlone should include reference to the regional hinterland associated with Athlone. Having regard to the proposed role of Athlone as a regional driver it is important to recognise the wider zone of influence associated with such a designation. Support for the consideration/investigation of fast track planning mechanisms such as, for example, the designation of an SDZ at Creggan would also be welcome as part of the final strategy in this regard.

WCC strongly endorse the guiding principle set out for Athlone UAP to support the proposal to make '*AIT a Technological University and for the development of a 'smart cities' approach to drive research, innovation and EU funding opportunities in Athlone*'. In this regard it is important that policy elsewhere in the strategy does not undermine this principle (coupled with **RPO 4.6** for Athlone, which seeks to support the role of Athlone Institute of Technology as a centre of excellence for education and in achieving its status as a Technological University) to achieve Technological University status for AIT.

In terms of the promotion of '*Athlone as a sustainable transport hub, of national and regional importance and support the preparation of a joint Local Transport Plan between Westmeath and Roscommon County Councils in collaboration with transport agencies and key stakeholders to improve sustainable mobility in the town*' it is suggested that reference should be included to the role that improved high speed rail links between Dublin and Galway, and double-tracking along the route can make in achieving this objective.

Finally in relation to MA 16, WCC are committed to the ongoing implementation of flood risk management and flood alleviation measures to facilitate the growth of Athlone and reference to existing measures implemented under the Athlone Flood Alleviation Scheme would be welcome in this regard. It is not however considered that the inclusion of location based specific environmental assessment and conservation policy is appropriate for inclusion as part of the Guiding Principles. Legal obligation exists under European Union (EU) SEA Directive and both EU Directive 2009/147/EC (the Birds Directive) and the Habitats Directive in relation to environmental assessments and consideration of plans with the potential to impact on all areas of international conservation interest across the region. In the interest of clarity, it is submitted therefore that reference to '*taking account of the proximity of sites of international nature conservation interest*' be omitted from the text and replaced by an overall general objective which requires that all future strategic (it should be noted that the above Directives relate to all development) development within the administrative area of the RSES takes account of the proximity of sites of international nature conservation interest or that the text be simply omitted to be dealt with in line with governing legislative requirements. **Material Amendment 21** should also be amended accordingly to reflect this change.

Material Amendment 17

WCC welcome the enhanced approach set out under MA 17 in relation to the preparation of a UAP for Athlone and in particular the collaborative approach endorsed with the two Regional Assemblies to the preparation of any future Plan. In this regard it is considered that, at the outset, a joint approach between the NWRA and EMRA in delivering a regional policy context across their respective strategies is essential. Alignment and consistency between both RSESs is fundamental in this regard and steps should be taken to ensure this outcome. Given the unique position that Athlone occupies, straddling two Regional Assembly areas, it is submitted that a regional context should be provided in the strategy which provides clarity in terms of the approach adopted under the EMRA RSES having regard to the context of the NWRA RSES (and vice – versa which will form part of any future submission to NWRA RSES).

It is submitted that MA 17 should be enhanced by providing an emphasis on the positive impact that the UAP provides for the development of Athlone (such approach it is suggested is also relevant to other Regional centres prescribed under the Strategy also) as a vibrant Regional Centre (as opposed to focus on the provisions of a UAP) with suggested non – material re wording as follows:

Support through the preparation and adoption of a Regional Centre Urban Area Plan (UAP), to be jointly prepared by Westmeath and Roscommon County Councils, in collaboration with EMRA and NWRA, the development of Athlone as an attractive, vibrant and highly accessible Regional Centre and economic driver for the Midlands.

This coordinated planning framework should provide for the creation of a sustainable and competitive Regional Centre that supports health and wellbeing through best practice principles in the provision of housing, employment, services, public transport, recreational amenities and community facilities together with the identification and delivery of strategic sites and regeneration areas for the future physical, economic and social development of Athlone and the Monksland/Bealnamulla area.

The Joint UAP will identify Athlone's functional urban area zone of influence and adopt a boundary for the plan area in addition to the identification of strategic housing and employment development areas together with the identification of infrastructure investment proposals to promote greater co-ordination and sequential delivery of serviced lands for development.

Delivering on Mullingar as a Key Town

In providing a policy context for the development of Mullingar as a key county town of scale which functions ‘*at a much higher level than its resident population, playing a key regional role in providing employment and services for its hinterland*’, the enhanced policy proposed as part of the Proposed Material Amendments is endorsed as follows;

Material Amendment 53, supporting infrastructure provision associated with Midlands Regional Hospital;

Material Amendment 54, supporting Mullingar as an employment hub and promoting economic development.

Material Amendment 52

It is considered that the proposed MA 52, supporting economic development and regeneration, should be enhanced by way of the inclusion of an expanded/additional non-material amendment which supports the development of Mullingar's assets in built, natural and cultural heritage as an inherent part of the town's appeal as a tourism hub (as envisioned under RPO 4.43 of the Draft Strategy).

Material Amendment 54

Concern is however expressed in relation to MA 55 which sets out '*to ensure that the future strategic development of Mullingar takes account of the close proximity of sites of international nature conservation interest*'. It is not considered that the inclusion of a location based specific conservation policy is appropriate for inclusion under the Strategy given the implicit requirements under European Union (EU) SEA Directive and both EU Directive 2009/147/EC (the Birds Directive) and the Habitats Directive that relate to all areas of international conservation interest across the region. It is submitted that this proposed MA should be either omitted to be replaced by an overall general objective which requires all future strategic (it should be noted that the above Directives relate to all development) development within the administrative area of the RSES to *take account of the close proximity of sites of international nature conservation interest* or that the MA be simply omitted to be dealt with in line with governing legislative requirements.

Towns and Villages

Material Amendments 63-67

Whilst acknowledging the positive contribution of proposed amendments set out under MA 63, MA 64 and MA 65, in relation to the role of Rural Areas including Small Towns & Villages, it is submitted that this policy area requires supplementary provision through for example support for the preparation of Village Design Statements and Public Realm Plans for these smaller settlements.

In relation to MA 64, which seeks to support the development of a New Homes in Small Towns & Villages, further guidance for Local Authorities in relation to the identification of relevant settlements for such initiatives would be welcomed.

WCC acknowledge and strongly endorse the provisions of MA 67 which seeks to 'support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas' and would welcome further policy enhancement in this area.

It is requested that the Assembly takes on board the issues raised in this submission and we would welcome the opportunity to further discuss or expand on the matters raised above, if you so wish.

Yours Sincerely,



Pat Gallagher,
Chief Executive

Designated Public Official under the Regulation of Lobbying Act

