

# Director's Report on Proposed Material Amendments to the EMRA Draft Regional Spatial and Economic Strategy 2019-2031

Prepared in relation to submissions received pursuant to S. 24 (8) of the Planning and  
Development Act, 2000 (as amended)

April 2019



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

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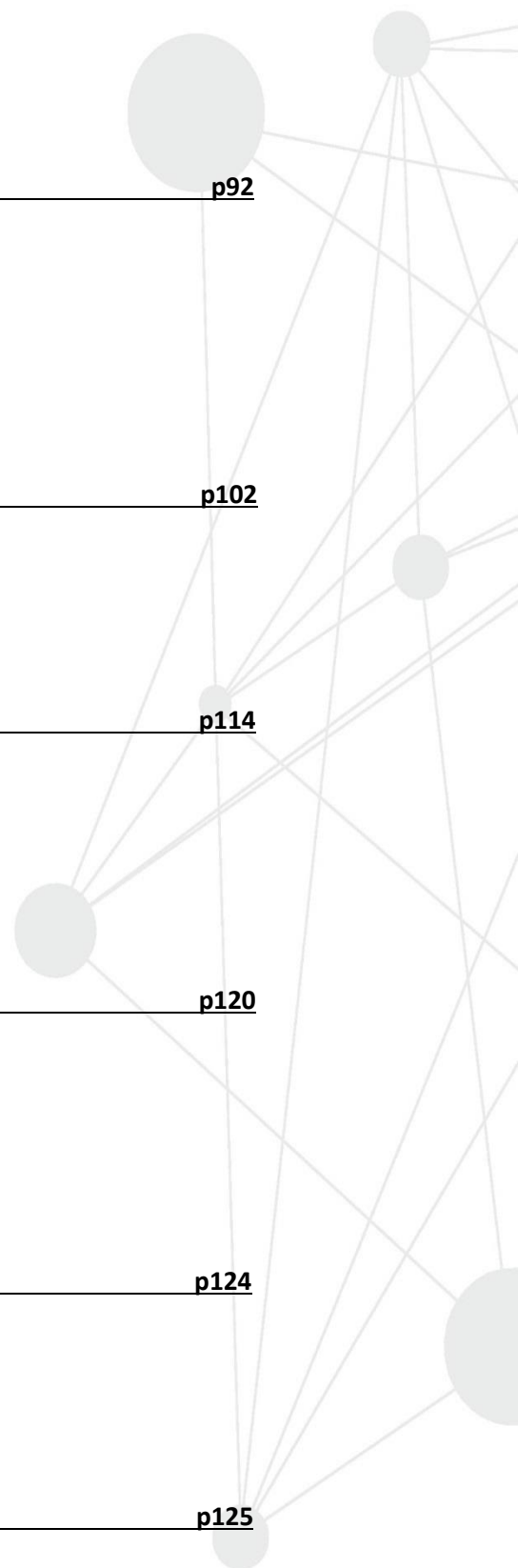
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List of Submissions Received on the Proposed Material Amendments to the Draft RSES



## **Introduction**

### Purpose, format and contents of the Director's report

The purpose of this Director's Report is to report on the outcome of the public consultation process of the Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region.

The report should be read in conjunction with the proposed material amendments that were placed on public display. It provides a summary of the submissions received during the statutory period, indicates key submissions and sets out the Director's response to the issues raised in the submissions and the recommendation to accept, reject or accept with a minor modification the proposed amendments to the draft RSES.

This Report forms part of the statutory procedure for the preparation of the RSES and is prepared in accordance with the requirements of Section 24(9) of the Planning and Development Act, 2000, as amended.

The Report is structured in a similar manner to the published Draft RSES and follow the numbering of the proposed material amendment as they were placed on public display. The document is presented in the order of the chapters of the Strategy as follows:

2. Strategic Vision
3. Growth Strategy
4. People and Place
5. Dublin Metropolitan Area Strategy Plan (MASP)
6. Economy and Employment
7. Environment
8. Connectivity
9. Quality of Life
10. Infrastructure
11. All Island Cohesion

An Environmental report been prepared to determine potential significant effects for any of the proposed amendments and where necessary, further assessment and mitigation has been provided. This is available as a separate Environmental Assessment Report to accompany the existing SEA Environmental Report which was prepared in accordance with the SEA Directive and the Planning and Development (Strategic Environmental Assessment) Regulations S.I. No. 436/2004 (as amended), including a Regional Flood Risk Appraisal Report; and the Natura Impact Report (to inform the Appropriate Assessment) which is being prepared in accordance with Article 6(3) of the Habitats Directive and Part XAB of the Planning and Development Act 2000-2018.

There are a few selected submissions that are summarised at the start of the Report as they are from prescribed bodies in the RSES process as stated in the Planning and Development Act 2000, as amended.

## RSES Process to date

The stages in the preparation and adoption of the RSES are set out in Figure 1 below.

### *Stage 1: Issues Paper*

The Assembly commenced the process with an Issues Paper that was made available for public comment on strategic planning and economic development matters between 20th November 2017 and 16th February 2018. 171 submissions were received during this initial consultation process.

Extensive stakeholder engagement was also undertaken during the process with the establishment of Technical Working Groups and a series of meetings and workshops held with Local Authorities, State Agencies and other public bodies.

The Assembly is also arranged into three Strategic Planning Area (SPA) Committees consisting of elected members, which feed into the RSES process. There is also a Senior Officials Advisory Group, made up of representatives from Local Authorities, Government Departments and public agencies that provides a strategic advisory role during the process.

### *Stage 2: Draft RSES*

On foot of the above consultations and engagement, the Eastern and Midland Regional Assembly (EMRA) prepared a draft Regional Spatial and Economic Strategy for the Eastern and Midland Region period 2019-2031, for Public Consultation, between 5th November 2018 to the 23rd January 2019 inclusive. 312 submissions were received to the Draft RSES.

A Director's report on the submissions was prepared for the Elected members of the Assembly and presented at the Assembly meeting of the 15th February. The members then submitted 29 no. valid motions for proposed amendments to the draft RSES by the 25th February. A Director's report in response to these motions was issued on the 27th February.

At the Assembly meeting of 1st March 2019, as required under section 24(8) of the Planning and Development Acts 2000-2018, the members considered the motions, then the Director's Report and recommendations, except where it was superseded by the agreed motions. At this meeting the members of the Assembly agreed to make the strategy subject to the amendments agreed.

It was deemed that a number of these amendments were material and as such, would require environmental assessment SEA/AA/RFRA and be subject to a further public display period in accordance with the requirements of section 24(8) of the Planning and Development Acts 2000-2018. There were 139 material amendments including to the growth and settlement strategy, economy, environment and climate, connectivity, infrastructure, quality of life and placemaking.

### *Stage 3: Material Amendments*

On foot of the above, the Assembly prepared a Directors Report on Proposed Material Amendments to the draft RSES, and accompanying Environmental Reports for display as part of the public consultation period from March 15<sup>th</sup> to April 12<sup>th</sup> 2019. 139 material amendments were placed on display for further submission/comment.

106 submissions were received to this third and final public consultation process. This report sets out a summary of the issues raised and the Directors response and recommendation on foot of those submissions on the Proposed Material Amendments to the Draft RSES 2019-2031

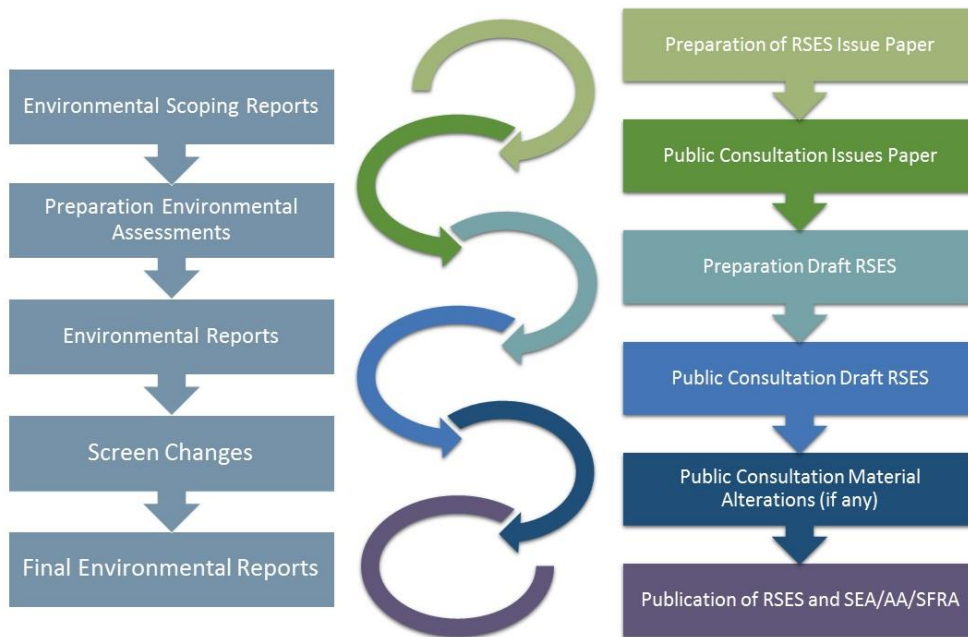


Figure 1.1 RSES Process

Next Step – Finalise RSES

Following consideration of this Director’s Report, the Eastern and Midland Regional Assembly shall make the regional spatial and economic strategy with or without the proposed material amendments, subject to any minor modifications considered necessary, as set out under Section 24 (9) of the Planning Act as Amended.

## **Submissions From:**

### **National Transport Authority (NTA)**

Submission No: 069

#### Summary of Issues

##### Review of the Transport Strategy

The review of the Transport Strategy 2016-2035 for the Greater Dublin Areas 2016-2035 (the “Transport Strategy”) will commence in the coming years, in line with the provisions of Section 12 (16) of the Dublin Transport Authority Act, which provides for such a review every 6 years. This review will incorporate a re-examination of travel demand across the Greater Dublin Area based on the most recent forecasts of population and employment distribution. The NTA is of the view that it is more appropriate at this point, and through this process, that the requirement for additional rail lines, or for expediting certain elements of the strategy, is identified.

##### Statement of Consistency

The current Transport Strategy supports the delivery of the Draft RSES, as published in November 2018. This Draft was prepared on the basis that the land use patterns and associated demand for travel would be served by the measures contained within the Transport Strategy. The NTA and EMRA cooperated closely throughout the making of the Draft RSES and this approach was reflected in the NTA’s submission to the draft RSES which stated that the NTA are satisfied that their key objectives in terms of transport priorities for the period of the RSES are catered for, and that the overall policy platform of the RSES supports the integration of land use and transport planning.

On review of the Material Amendments to this draft, the NTA is of the view that the Draft RSES, as amended is not consistent with the Transport Strategy as required under Section 23 (7) (c) of the Planning Act. The NTA recommend a number of modifications to the proposed Material Amendments, which are required to ensure that the final RSES is consistent with the NTA Transport Strategy. These refer to proposed Material Amendment nos. 68, 70, 113, 114 and 117, which contain additional road and rail infrastructure that are not deemed to be consistent with the Transport Strategy for the Greater Dublin Region 2016-2035.

##### Other Matters

The NTA makes a number of additional recommendations in order to provide clarity in some areas and in order to strengthen the RSES in terms of the integration of land use planning and transport planning in the EMRA. These include support for regional-level GHG emissions assessments (Amendment no. 10), modifications to the Key Towns of Maynooth, Navan, Naas and Bray (Amendments no.31, 38, 40 and 45) and to the Guiding Principles (Amendment no. 108).

### Director's Response

There is a statutory requirement for the RSES to be consistent with the Greater Dublin Area (GDA) Transport Strategy 2016-2035. The NTA has raised concerns relating to a number of proposed material Amendments nos. 68, 70, 113, 114 and 117, which contain additional road and rail infrastructure that are not deemed to be consistent with the NTA Transport Strategy and which are also beyond the scope of national transport, planning and investment policy as set out National Planning Framework 2019-2040 and the National Development Plan 2019-2027.

The Assembly welcomes the submission from the NTA, which sets out a number of recommended modifications to the above-mentioned Amendments, which are required to ensure consistency between the final RSES and the NTA Transport Strategy. It is further noted that the upcoming review of the GDA Transport Strategy will provide an opportunity for the re-examination of travel demand and accelerating certain elements of the strategy.

Having regard to the above, it is considered that the recommended modifications be incorporated to ensure consistency between the final RSES and the Transport Strategy. These are addressed in further detail under the relevant sections.

### Director's Recommendations

The Directors Recommendations are set out under the relevant proposed Amendments in the following chapters.

## **Department of Culture, Heritage and the Gaeltacht**

Submission No: 081

### Summary of Issues

The Department of Culture, Heritage and the Gaeltacht, make a number of heritage-related recommendations to assist EMRA in meeting its obligations and commitments in relation to nature conservation, European sites, biodiversity and environmental protection in the context of the plan and its implementation, and in relation to environmental assessment.

These include the need for the recommendations of the SEA/AA/FRA to be fully implemented and for the potential impacts of the proposed material amendments on the environment to be assessed in full, with particular reference to proposed Growth Enablers for the Gateway Region / publicly owned peatlands (Amendment no.6), the River Barrow (Amendment no.62), new Guiding Principles for the location of strategic employment (Amendment no.76), Natural and Cultural Tourism Assets (Amendment no. 84) and Green and Blue Infrastructure (Amendment no.97).

### Director's Response

The Director welcomes the support from DCHG and recognises its role as the authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and



Habitats Directives). The Assembly will work with the Department during the implementation of the RSES. The Directors response to the above material Amendments are addressed under the relevant sections, with a view to ensuring that the RSES meets its obligations relation to nature conservation, European sites, biodiversity, environmental protection and assessment.

#### Director's Recommendation

The Directors Recommendations are set out under the relevant proposed Amendments in the following chapters.

### **Department of Transport, Tourism and Sport**

Submission No: 094

#### Summary of Issues

The Department of Transport, Tourism and Sport (DTTS) in their submission highlight the statutory requirement for the RSES to be consistent with the NTA's Transport Strategy for the GDA. In this regard the Department is concerned that a number of the proposed amendments to the draft RSES relate to new projects which are not consistent with the Transport Strategy for the Greater Dublin Area (GDA) 2016-2035 and Project Ireland 2040.

These include the proposed material Amendments nos. 69 and 113 on Rail projects to implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy. The Department considers that the text in the previous draft RSES is more consistent with the NDP and should be retained as follows:

*Reappraisal of the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy.*

The DTTS further comment on proposed amendments numbers 70 and 114 Road Projects noting that the NDP provides the investment Framework for the national and regional roads programme from 2018 to 2027 and that where a national road project is not identified in the NDP either for development or appraisal, it falls outside the scope of the NDP

#### Director's Response

The Directors welcomes the support from DTTS in their submission, this is reflective of the engagement and input from this department as part of their role on the Senior Officials Advisory Group. The Directors response to the above material Amendments are addressed under the relevant sections, with a view to ensuring consistency between the RSES and both the National Transport Authority's (NTA) Transport Strategy for the Greater Dublin Area 2016-2035 and Project Ireland 2040.

### Director's Recommendation

The Directors Recommendations are set out under the relevant proposed Amendments in the following chapters.

## **Department of Housing, Planning and Local Government (DHPLG)**

Submission No: 096

### Summary of Issues

The submission of the DHPLG acknowledges the significant work that the Assembly is continuing to perform in the preparation of the Draft Regional Spatial and Economic Strategy (RSES) that will appropriately address the national policies and objectives of the National Planning Framework (NPF) at a regional level. It is submitted that 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 ensuring a strong and consistent alignment between national and local level planning policies.

The Department welcomes that the Assembly has incorporated the suggestions made in the Department's submission on the Draft RSES (dated 23<sup>rd</sup> January 2019). These include the inclusion of reference to the infill/brownfield targets set out in the National Planning Framework, additional policies supporting the rural economy, and amendments to RPO 7.29 in relation to Climate Action to reflect the roles of key agencies.

The Department has some concerns relating to a number of proposed material Amendments, which are detailed under the relevant headings in Chapter 3 Growth Strategy (Amendments 6, 7, 10) Chapter 4 People and Place (Amendments 11, 13, 33, 58, 60), Chapter 5 Dublin MASP (Amendment 73) and Chapter 5 Dublin MASP/Chapter 8 Connectivity (Amendments 69, 70, 77, 113 and 114).

### Director's Response

The Directors welcomes the support from DHPLG in their submission, this is reflective of the engagement and input from this department as part of their role on the Senior Officials Advisory Group. The Directors response to the above material Amendments are addressed under the relevant sections, with a view to ensuring consistency between the RSES and national policy.

### Director's Recommendation

The Directors Recommendations are set out under the relevant proposed Amendments in the following chapters.



## **Chapter 2 Strategic Vision**

### **Submission Number(s)**

086 (Longford County Council), 090, 095,

#### **1. Amend RSO3 Rural Communities**

##### Summary of Issues

No submissions received

##### Director's Response

It is considered that the proposed amendment is acceptable.

##### Director's Recommendations

Accept the proposed material amendment.

#### **2. Amend RSO 4 Healthy Communities**

##### Summary of Issues

No submissions received

##### Director's Response

It is considered that the proposed amendment is acceptable.

##### Director's Recommendations

Accept the proposed material amendment.

#### **3. Amend RSO 15 Enhance Strategic Connectivity**

##### Summary of Issues

Supporting text is requested to include reference to improvements to the N55.

A submission requests that a statement is included referencing the National Planning Framework.

Another submission states that inter and intra regional should be referenced along with better quality of life.

### Director's Response

There is no requirement to reference the National Planning Framework at every opportunity, it is evident from the outset of the RSES that it is influenced by and consistent with the NPF.

There is no rationale for inclusion of specific roads or projects in Regional Strategic Outcomes, as these are high level outcomes aligned with national, European and International outcomes.

This RSO is proposed to be amended to reflect the international and inter regional aspects of the Region and its strategic nature, this does not require further explanation.

### Director's Recommendation

Accept the proposed material amendment.

## **Chapter 3 Growth Strategy**

### **Submission Number(s)**

061, 065 (TII), 069 (NTA), 071, 073, 075 (Meath County Council), 076 (Dun Laoghaire-Rathdown County Council), 078, 079 (Wexford County Council), 080, 081 (DCHG), 082 (South Dublin County Council), 084 (Fingal County Council), 085 (Dublin City Council), 087 (Wicklow County Council), 088, 090, 091 (Kildare County Council), 095, 096 (DHPLG), 099 (NWRA), 106 (Westmeath County Council)

## **4. Amend Overview of Growth Strategy**

### Summary of Issues

Submissions received were generally supportive of the need to support the transition to a low carbon resilient and sustainable region, however no submissions were received that directly referred to the proposed Amendment.

### Director's Response

It is considered that the proposed amendment is acceptable.

### Director's Recommendations

Accept the proposed material amendment

## **5. Amend Table 3.1 Asset Based Criteria Approach**

### Summary of Issues

While submissions received were generally supportive of the asset-based approach to the development of RSES strategy, and a number of submissions welcome the production of the data and methodology used in determining the RSES settlements strategy. No submissions were received that related directly to the above proposed amendment, on the identified criteria to ensure integration of the recommendations and mitigation measures, arising from SEA/AA/FRA.

### Director's Response

The amendment was proposed to strengthen the link between the strategic environmental assessment and RSES process and to ensure proper integration of the recommendations and mitigation measures, arising from SEA/AA/FRA into local land use planning.

### Director's Recommendations

Accept the proposed material amendment

## 6. New Growth Enablers for the Region

### Summary of Issues

Submissions were received in support of the proposed new Growth Enablers for the Region, others expressed concern about certain points and set out recommendations for further modifications, to address the following issues;

In relation to point 1, a number of submissions were received in support of the inclusion of additional references to key strategic corridors and improved spatial inter-and intra-regional linkages to the Northern and Western and Southern region, also referring to point 4 and the need for an additional RPO in this regard.

In relation to point 4, a number of submissions were received in support of the proposed amendment to include strengthened links to the South East and requesting a further modification from the ‘Dublin-Belfast Economic Corridor’ to the ‘Eastern Economic Corridor’, extending from Belfast to Rosslare Europort’.

In relation to point 5, submissions highlight the need for clarification as to the status of (UAPs) to be prepared for the Regional Growth Centres of Athlone, Drogheda and Dundalk UAPs. Transport Infrastructure Ireland (TII) in their submission recommend that reference be made to the need for ‘statutory’ Urban Area Plans

In relation to point 6, a number of submissions were received in relation to compact growth targets. It is submitted that the National Planning Framework (NPF) objectives of requiring a higher proportion of new housing to be located within the built-up areas of existing settlements is inconsistently applied and there is need to ensure that a more consistent approach to the terminology around targets and geographical scales in the RSES to allow for implementation and monitoring of compact growth and active land management, including specific reference to ‘Dublin city and suburbs’.

Submissions were also received which highlight the constraints and complexities involved in achieving compact growth, and that local authorities should have greater flexibility when assessing applications for increased urban densities conversely other submissions state that targets are not ambitious enough particularly outside of the metropolitan areas.

In relation to points 8 and 9, additional guidance relating to the basis for identifying and selecting lower order settlements was requested by a number of submissions. A submission was also received that outlined the lack of ‘ambition’ in relation to compact growth targets and that the identification of 11 Key towns and an, as yet unidentified number of Moderate Growth/Consolidation towns represent an unwelcome dilution of focus in the Growth Strategy.

The Department of Housing Planning and local Government (DHPLG), have outlined concern about the use of the terms “moderate”, which is poorly defined and likely to vary considerably and ‘consolidation’, which will apply to all towns to some extent, especially given infill and brownfield

objectives. Revised terminology is proposed whereby “moderate growth town” may be replaced by “self-sustaining growth town” and “consolidation town” changed to “self-sustaining town”.

#### Director’s Response

The Directors response to the above submissions are set out below in a sequential manner under the relevant points below;

In response to submissions relating to point 1; it is considered that the inclusion of an additional new RPO would constitute a further material amendment that was not subject to public consultation, and cannot be considered at this stage in the making of an RSES. It should be noted that the importance of protecting and enhancing strategic inter-regional and intra-regional connections is recognised and will be referenced in the ‘Strategic Connections’ narrative and map as set out in the Directors Report on Submissions to the Draft RSES.

In response to point 4, it should be noted the Eastern Economic Corridor is recognised and specifically referenced in the proposed new narrative on ‘Strategic Connections’ as set out in the Director’s Report on Submissions Received to the Draft RSES. Having regard to the above and considering the international importance of the Dublin-Belfast Cross Border Network as highlighted as a central element in both the RSES and the NPF Growth Strategy, it is recommended that ‘Dublin-Belfast-Economic Corridor’ is retained as the appropriate terminology in the Strategy.

In response to point 5, Having regard to requests for clarity around the status of Urban Area Plans (UAPs) to be prepared for the Regional Growth Centres of Athlone, Drogheda and Dundalk it is considered appropriate to include reference to ‘statutory’ Urban Area Plans (UAPs) in the RSES. However it is not required in the Growth Enablers here, but it will be referenced under the Regional Growth Centres and the relevant material amendments thereunder.

In response to point 6, it is acknowledged that there is a need to ensure a consistent approach to the terminology used for ‘compact growth’ objectives and targets. In the interests of clarity and policy alignment throughout the RSES it is considered appropriate to modify the text where it refers to ‘*up to 50%/30%*’ of new homes to state ‘*at least 50%/30%*’ of new homes, to update ‘*Dublin*’ to reference the defined CSO boundary of ‘*Dublin city and suburbs*’ and to modify the text where it refers to ‘*within or close to*’ to ‘*within or contiguous to*’ the existing built up urban area, in recognition of the fact that the boundaries for census towns and suburbs are determined by the CSO for the five yearly census of population. This change is to be reflected throughout the Strategy.

In response to points 8 and 9, the concern expressed by the DHPLG with respect to the terminology change is acknowledged, and it is considered appropriate to revise the terminology used in the Growth Enablers to refer to ‘self-sustaining’ rather than ‘moderate growth’ (point 8) and to omit reference to ‘consolidation’ (point 9) having regard to the fact that the objective of consolidation will apply to all towns to some extent, especially given infill and brownfield objectives and to achieve. These terminology changes are also to be addressed throughout the Strategy including in Chapter 4 – People and Place.

In relation to the need for more clarity around the identification of settlements other than those Key Towns that are identified in the RSES, the designation of lower tier settlements is a matter for local authorities in the review of their city and county development plans, to be determined in



accordance with the Guiding Principles set out in Section 4.2 Settlement Strategy and is clarified in this Chapter.

It is recommended to accept the Amendment subject to minor modifications to points 6 and 9 as outlined above.

#### Director's Recommendations

**Accept new Growth Enablers for the Region**, with minor modifications to read as follows;

1. Promote **global connectivity and regional accessibility** as part of an integrated land use and transport strategy, with a focus on protecting national assets and enhanced inter-regional connectivity.
2. Support the future success of **Dublin as Ireland's leading global city of scale** by better managing strategic assets to increase opportunity and sustain national economic growth and competitiveness
3. Deliver strategic development areas identified in the Dublin **Metropolitan Area Strategic Plan (MASP)** to ensure a steady supply of serviced development lands to support Dublin's sustainable growth.
4. Facilitate collaboration to support the development of the **Dublin-Belfast Economic Corridor**, to drive synergy in the Drogheda-Dundalk-Newry cross border network and strengthen economic links with the South East extending to Rosslare Europort.
5. Target significant growth in the **Regional Growth Centres** of Athlone, Drogheda and Dundalk to enable them to act as regional drivers, with a focus on improving local economies and quality of life to attract investment and the preparation of Urban Area Plans (UAPs).
6. Promote **compact urban growth** to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.
7. Embed a **network of Key Towns** throughout the Region, which have the capacity to deliver sustainable compact growth and employment for their catchments in tandem with enabling public transport, infrastructure and services.
8. Promote **balanced growth** in a limited number of economically active settlements which have the identified capacity and potential for self-sustaining growth.
9. Promote **targeted 'catch up' investment** to support self-sustaining local employment, and in services, sustainable transport and amenities in places that have experienced rapid commuter driven population growth.
10. Promote regeneration and revitalisation of small towns and villages and support local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas.
11. Support rural areas by harnessing natural resources to develop renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.

## **7. Amend Growth Enablers for Dublin City & Metropolitan Area**

### Summary of Issues

In relation to point 2, a number of submissions were received in relation to compact growth targets. It is submitted that there is a need to ensure that a more consistent approach to the terminology around targets and geographical scales in the RSES, including specific reference to 'Dublin city and suburbs'. Some submissions highlight the need for more detailed county level compact growth targets, while other submissions support the setting of post-adoption compact growth targets.

In relation to point 3, 'to deliver strategic development areas within MASP,....' it is submitted that it is unclear why the infrastructure on the 'steady supply of serviced sites' is related only to housing, and this should be widened to include employment and/or mixed-use developments.

In relation to point 4, "to increase employment in strategic locations, with a focus on re-intensification and regeneration of lands within the M50, ...", the Department of Housing Planning and Local Government (DHPLG), has concerns that the proposed Amendment may conflict with national objectives to secure increased mixed-use and residential development on some lands that are currently in industrial/employment use within the M50. It is suggested that "with a focus on re-intensification and regeneration of lands within the M50, and", should be deleted.

Also in relation to point 4, it is submitted that the enabler for the location of strategic employment areas would benefit from being reframed to include areas immediately contiguous to the M50 as well as within the M50. Another submission suggests the inclusion of 'industry clusters and smart specialisation' to promote the emergence of new opportunities.

In relation to point 5, DHPLG note the expansion to "include district heating and water conservation" and considers that this is too specific for the level of compact growth enablers. They should either be omitted, or, alternatively, changed from "to include", to "which may include". Another submission recommends that the reference to district heating and water conservation be omitted.

In relation to point 6, it is submitted that the Eastern Economic Corridor and Rosslare Harbour be referenced. A couple of submissions request inclusion of supporting narrative and mapping of strategic inter-regional connections as set out in the Directors Report on submissions received to the Draft RSES.

It is also submitted that there should be consistency in terminology referring to the Dublin-Belfast Economic Corridor throughout the RSES.

### Director's Response

The Directors response to the above submissions are set out below in a sequential manner under the relevant points below;

In response to point 2, it is acknowledged that there is a need to ensure a consistent approach to the terminology used for 'compact growth' objectives and targets. In this regard it is recommended that the terminology be updated to refer to 'Dublin city and suburbs' rather than 'Dublin'. Further detail

in relation to compact growth objectives and targets are more appropriately addressed in further detail in the MASP – Chapter 5.

In relation to point 3, it is acknowledged that the supply of serviced sites is also a key enabler for development other than residential. Having regard to the pressing need for accelerated delivery of housing in the Dublin metropolitan area however, it is considered that this can be addressed by inserting ‘and to support... accelerated delivery of housing’, so as not to preclude the supply of serviced sites for employment and/or mixed-use development.

In relation to point 4, it is considered appropriate to omit “with a focus on re-intensification and regeneration of lands within the M50, and”, as recommended by DHPLG in their submission. It is acknowledged that the wording of the proposed amendment may be construed to assume that all current industrial/employment lands inside the M50 will be suitable for the continuation of such uses and should be intensified. The omission of this text would serve to align the remainder of the objective towards the other suitable locations referred to, such as near public transport nodes and commercial/research synergies, which do include some lands within the M50.

In relation to the requested inclusion of reference to ‘smart specialisation and clustering’ it is acknowledged that the RSES would benefit from greater alignment and integration between the key elements of the spatial and economic strategy and this is considered reasonable.

In relation to point 5, it is considered appropriate to omit the referenced to “district heating and water conservation” as it is too specific for the level of compact growth enablers.

In response to point 6; having regard to the central importance of the Dublin-Belfast Cross Border Network as a key growth enabler in both the RSES and the NPF Growth Strategy, it is not considered appropriate to dilute the key focus on the Dublin-Belfast corridor in this instance. However, it should be noted that the importance of the Eastern Economic Corridor and Rosslare Europort is recognised and referenced in the new Growth Enablers for the Region (Amendment no. 6) and in the new ‘Strategic Connections’ narrative and map as set out in the Directors Report on Submissions to the Draft RSES.

It is further considered that there should be consistency in terminology referring to the Dublin-Belfast Economic Corridor throughout the RSES, in this regard point 6 should be modified to include ‘economic’

It is recommended to accept the Amendment subject to minor modifications to a number of points as outlined above.

#### Director’s Recommendations

**Accept Amended Growth Enablers for Dublin City & Metropolitan Area**, with minor modifications to read as follows

1. To sustainably manage Dublin’s growth as critical to Ireland’s competitiveness, achieving growth of 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031.
2. To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs and a target of

at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life

3. To deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.
4. To increase employment in strategic locations, providing for people intensive employment at other sustainable locations near high quality public transport nodes, building on commercial and research synergies in proximity to large employers, industry clusters and smart specialisation and activating strategic sites to strengthen the local employment base in commuter towns.
5. Enhance co-ordination across Local Authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability.
6. Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the region and to serve the Nation, and safeguard and improve regional accessibility and service by rail, road and communication, with a key focus on the Dublin-Belfast Economic Corridor.

## **8. Amend Growth Enablers for the Core Region**

### Summary of Issues

Submissions were received in support of the proposed new Growth Enablers for the Core Region. A Submission also highlighted a number of regional assets and attractions, to be included in the introductory narrative describing the Core Region. Other submissions propose minor modifications to the Growth Enablers for the Core Region, including;

In relation to point 2, it is submitted that the Eastern Economic Corridor and Rosslare Harbour be referenced.

In relation to point 3, a number of submissions were received in relation to compact growth targets. It is submitted there is need to ensure that a consistent approach should be taken with reference to the National Planning Framework (NPF) terminology and compact growth targets.

Also in relation to point 3, a submission highlighted the need to include the expanding adjacent town of Laytown-Bettystown within Drogheda's agglomerated region.

In relation to point 5, it is submitted to include reference to 'clustering and smart specialisation' to promote the emergence of new economic opportunities.

### Director's Response

The Directors response to the above submissions are set out below in a sequential manner under the relevant points below;

The requested narrative changes to highlight regional assets and attractions are minor in substance and can be reflected in editing of the narrative in the RSES.

In response to point 2; having regard to the central importance of the Dublin-Belfast Cross Border Network as a key growth enabler in both the RSES and the NPF Growth Strategy, it is not considered appropriate to dilute the key focus on the Dublin-Belfast corridor in this instance. However, it should be noted that the importance of the Eastern Economic Corridor and Rosslare Europort is recognised and referenced in the new Growth Enablers for the Region (Amendment no. 6) and in the new 'Strategic Connections' narrative set out in the Directors Report on Submissions to the Draft RSES.

In response to point 3, It is considered that the text on compact growth targets and objective is in alignment with the NPF, National Policy Objectives 3a,b and c refer.

In relation to the request to include Drogheda's agglomerated region, it should be noted that NPF and RSES objectives and targets for compact growth are linked to the delivery of a higher proportion of targeted homes within the existing built up footprint of settlements, as determined by the CSO for the census. The use of CSO defined boundaries allows for a consistent approach to be taken to implementation and monitoring of compact growth across all settlements. It should also be noted, that the Joint Urban Area Plan (UAP) to be prepared for Drogheda shall identify a boundary for the plan area.

In response to point 5, which requests the inclusion of reference to 'smart specialisation and clustering', it is acknowledged that the RSES would benefit from greater alignment and integration between the key elements of the spatial and economic strategy and this is considered reasonable.

It is recommended to accept the Amendment subject to minor modifications to point 5 as outlined above.

#### Director's Recommendations

**Accept Amended Growth Enablers for the Core Region**, with minor modifications to read as follows

1. To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.
2. Drogheda to realise its potential to grow to city scale and secure investment to become a self-sustaining Regional Growth Centre on the Dublin-Belfast Economic Corridor, driving synergies between the Drogheda - Dundalk - Newry cross border network.
3. Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.
4. 'Catch up' investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.
5. Diversification and specialisation of local economies with a focus on clustering, smart specialisation, place making and urban regeneration to create the quality of life to attract FDI and indigenous investment and increase high value knowledge-based employment including second site and relocation opportunities.

6. Promote the region for tourism, leisure and recreational activities including development of an integrated greenway network while ensuring that high value assets and amenities are protected and enhanced.

## **9. Amend Growth Enablers for the Gateway Region**

### Summary of Issues

Submissions were received in support of the proposed new Growth Enablers for the Gateway Region. A number of submissions also propose minor modifications to the Growth Enablers for the Gateway Region, including;

In relation to point 2, it is submitted that the Eastern Economic Corridor and Rosslare Harbour be referenced.

It is also submitted that there should be consistency in terminology referring to the 'Dublin-Belfast Economic Corridor' throughout the RSES.

In relation to point 5, it is submitted to include reference to 'smart specialisation' and 'clustering' to promote the emergence of new economic opportunities.

DCHG request that the impacts of point 5 in relation to publicly owned peatlands be subject to assessment as part of the AA, SEA and FRA. Cumulative impacts must be considered given the emerging development pressures on non-designated peatlands including the harvesting of peat for use as animal bedding. Analysis to be consistent with general principle NPS2 of the National Peatlands Strategy which states that potential economic, environmental and social benefits and costs of peatland uses to be considered and applied to policy and landuse decisions. The growth enabler must also be examined in relation to its compatibility with Article 10 of the Habitats Directive.

A number of submissions highlight that there is a lack of vision for sustainable growth in the Midlands, outside of policy and objectives for the Regional Growth Centre of Athlone. Another submission proposes a new growth enabler is proposed to exploit the central location of the Midlands as a transport and distribution hub for the country.

### Director's Response

The Directors response to the above submissions are set out below in a sequential manner under the relevant points below;

In response to point 2; having regard to the central importance of the Dublin-Belfast Cross Border Network as a key growth enabler in both the RSES and the NPF Growth Strategy, it is not considered appropriate to dilute the key focus on the Dublin-Belfast corridor in this instance. However, it should be noted that the importance of the Eastern Economic Corridor and Rosslare Europort is recognised and referenced in the new Growth Enablers for the Region (Amendment no. 6) and in the new 'Strategic Connections' narrative set out in the Directors Report on Submissions to the Draft RSES.

It is further considered that there should be consistency in terminology referring to the 'Dublin-Belfast Economic Corridor' throughout the RSES and a minor amendment is proposed to point 2 in this regard to include the word 'economic'. Reference should also be made to a 'just' transition to realise socio economic benefits in the midlands.

In response to point 5, the requested inclusion of reference to 'smart specialisation and clustering' and to a 'just' transition' it is acknowledged that the RSES would benefit from greater alignment and integration between the key elements of the spatial and economic strategy and this is considered reasonable.

In relation to the proposal for a new growth enabler for the Midlands as a transport and distribution hub for the country. The Director considers that this is not appropriate to introduce as a Growth Enabler, as it may be project specific in nature.

It is recommended to accept the Amendment subject to minor modifications to points 2 and 5 as outlined above.

#### Director's Recommendations

**Accept Amended Growth Enablers for the Gateway Region**, with minor modifications to read as follows;

1. Support continued growth of Athlone, 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
2. Support compact growth in the regional growth centre of Dundalk to grow to city scale, capitalising on its location on the Dublin – Belfast Economic Corridor to drive the linkage between Dundalk and Newry to strengthen cross border synergy in services and functions.
3. 'Catch up' investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.
4. Regeneration of small towns and villages, with a focus on the identification of rural town, village and rural regeneration priorities to bring vibrancy to these areas.
5. Diversification and growth of smart specialisation of local economies with a strong focus on clustering including sustainable farming and food production, tourism, marine, energy and renewables, bio economy and circular economy, with a focus on publicly owned peatlands in the midlands, to support a 'Just' transition and realise the benefits of green technologies.
6. Promote the region as a key destination for tourism, leisure and recreation activities and support the development of an integrated network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced.

## **10. New Regional Policy Objective Quantitative assessment of proposals for GHGs**

### Summary of Issues

The NTA submission raises concerns that an overly prescriptive or solely quantitative approach may lead to inappropriately detailed assessments being required at all levels in the planning process, in

particular at the local level or scheme-specific level. They are further concerned regarding the availability of appropriate modelling tools. It recommends that the objective should be altered to remove the term 'quantitative' and to include for regional-level assessments only, in accordance with RPO 7.28.

Dublin City Council highlights that in the interests of consistency, it should be made clear as to which organisation(s) should carry out the assessment and assess these proposals against emission reduction targets, as is suggested.

Meath County Council in their submission state that whilst the Council would not be opposed to the carrying out of such an assessment, it is important that the requirement for the lands/infrastructure is also assessed against the growth strategy for the Region. In addition, such assessments could only be carried out if the baseline data and national and regional emissions targets are available to Local Authorities.

Dun Laoghaire Rathdown County Council state that they have major concerns and reservations around the potential consequences and ramifications of this RPO – particularly in relation to land use designations. Local Authorities do not have the technical expertise, capacity and/or skill sets necessary to undertake comparative quantitative assessments of the type envisaged. The Council recommends that this RPO be omitted from the final RSES document.

DHPLG's submission states that DHPLG and DCCAE are working on proposals to further develop capacity and requirements in this area. This work includes objectives to develop a suitable methodology for measuring carbon emissions, appropriate to strategic land use designation and related transport infrastructure in the context of the preparation of City/County Development Plans. DHPLG is currently developing updated Development Plan Guidance for Local Authorities that will be available for future development plan review processes further to the publication of the RSES and will address this issue. DHPLG states that it would be premature to address this matter as proposed in the RPO and it would be beyond the remit of the RSES to render approval of land use designation or transport infrastructure, conditional on consistency with GHG emissions reductions targets. The DHPLG requests that the wording of this RPO should be amended to be consistent with the DHPLG/DCCAE's future policy response in this area.

The SEA report highlights that this proposed new RPO is broadly positive however it is noted that any new land use designation or transport infrastructure can have localised, regional or national positive/negative impacts. Given that all national and regional emissions targets are for reduction, this could rule out a number of projects that may have an overall positive impact but may score negatively on quantification. The SEA report suggests that the RPO should be amended to state that "shall be approved subject to their consistency with national and regional emissions reductions policies."

#### Director's Response

The Director acknowledges the issues raised and welcomes the NTA and Departmental submissions received which provide clarity in this area, and, in particular, with regards to upcoming primary legislative responses for the Local Authority city/county development plan level.

The Assembly is strongly committed to the principle of evidence-based policy making in relation to assessing the impact of development on Greenhouse Gas emissions and have been liaising with the



relevant transport authorities to agree a robust model for the calculation of emissions from road transport in the region. As such, EMRA are committed to carrying out a regional transport emissions assessment, in consultation with other stakeholders (RPO 7.28), which will be incorporated as a key Regional Indicator into the statutory monitoring and reporting process of the RSES, as set out in Chapter 11 Implementation and Monitoring, including the statutory two-yearly reporting and six-year review of RSES implementation.

The Director notes and welcomes the DHPLG/DCCAE's upcoming supporting methodology in terms of assessing the impact of city and county development plan strategies on carbon reductions targets and of measures to monitor and review progress towards implementation of those strategies. The RSES supports the development of future additional assessment methodology at the Local Authority city/county level and the DHPLG has suggested the wording of the RPO be modified to reflect this. It is considered that this amended RPO can sit alongside the environmental assessment policy objectives RPO 3.2 and 3.3 and additional narrative be provided as part of the finalised RSES outlining the DHPLG/DCCAE's approach to future policy responses in this area.

NTA's submission is noted and the amended RPO as per the DHPLG submission provides clarity in this area and in effect addresses the concern in relation to inappropriately detailed assessments being required at all levels in the planning process. In terms of the NTA's recommendation that the objective be altered to include regional-level assessment only, this commitment is clearly outlined in RPO 7.28.

In conclusion, the RPO should be modified so that it will be consistent with future DHPLG/DCCAE policy responses in this area. The Director therefore accepts the DHPLG's rewording of the proposed RPO.

#### Director's Recommendations

Accept the proposed material amendment with minor modifications to read as follows:

City and County Development Plans shall undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress towards carbon reduction targets.

## **Chapter 4 People and Place**

### **Submission Number(s)**

058, 060, 061, 062, 064 (EPA), 065 (TII), 067 (Louth County Council), 068, 069 (NTA), 071, 072, 073, 074 (Laois County Council), 075 (Meath County Council), 076 (Dun Laoghaire-Rathdown County Council), 077 (DAA), 078, 079 (Wexford County Council), 080, 081 (DCHG), 083, 084 (Fingal County Council), 086 (Longford County Council), 088, 089 (Offaly County Council), 090, 091 (Kildare County Council), 095, 096 (DHPLG), 098, 099 (NWRA), 100 (Roscommon County Council), 101, 102, 103, 104, 106 (Westmeath County Council)

### **Section 4.2 Settlement Strategy**

Proposed Material Amendments 11 and 12 relate to this section.

#### **11. Amend Table 4.1**

##### Summary of Issues:

The DHPLG, as part of their submission, have outlined that the terminology of ‘Medium to Large Towns’ should not be changed to ‘Moderate Growth Towns and Consolidation Towns’. It is indicated that the terms proposed are poorly defined and as a result the classification of such towns will vary considerably from county to county. Revised terms are put forward to facilitate further classification of settlements, as intended by the proposed material amendment.

As part of the submissions received, it was indicated that the proposal to remove the population threshold for the definition of small towns, villages and rural areas is welcomed. Additional text requesting differentiation between a small town and village is requested.

##### Director’s Response:

The concern expressed by the DHPLG with respect to the terminology change associated with the use of ‘Moderate Growth Towns and Consolidation Towns’ is recognised, particularly given that this may vary considerable from settlement to settlement. It is considered appropriate however to revise the terminology used, as per the submission of the DHPLG, to secure the intention of the proposed material amendment and facilitate added classification.

With respect to the population thresholds for Small Towns and Villages and Rural Areas, the previous Director’s Report recognised the shortcomings associated with defining these areas based solely on population size. This includes that these areas can serve a large hinterland, operate at a function higher than that of their population and that the approach does not allow for consideration of the differing nature and context of the assets of small towns and villages across the region. In terms of differentiating between small towns and villages, it is considered that this is best dealt with at local level through County Development Plans that will be made in consultation with the EMRA.

With respect to the population thresholds for ‘Small towns and Villages’ and ‘Rural’, having regard to the above it is recommended that the RSES be made with the proposed material amendment as displayed.

Director's Recommendation:

Accept amendment with minor modification to read as follows;

New;

Headings for Medium to Large Towns to read as

*i) Self-Sustaining Growth Town and ii) Self Sustaining Town*

12. Amend Guiding Principles for Core Strategies

Summary of Issues:

Submissions received outlining that reference to the Eastern Economic Corridor and Rosslare Harbour is included. It is suggested that in point 4 of the guiding principles for Core Strategies that the removal of the term 'urban' and the introduction of references to 'villages' and 'rural' alters and diminishes the focus of the guiding principle as crafted. Support is also indicated with respect to the term 'at least 50%' related to compact sustainable growth. There is a suggestion that reference to the Dublin- Belfast Corridor include the term 'Economic'. It is submitted that there should be consistency in terminology referring to the Dublin-Belfast Economic Corridor throughout the RSES.

In relation to point 6, it is also submitted that the Eastern Economic Corridor and Rosslare Harbour be referenced.

Director's Response:

It is considered appropriate that the guiding principles associated with Core Strategies, including the principle associated with regeneration and development, is tailored to reflect the variety of places, both urban and rural, across the region. This is particularly pertinent given the content of the NPF which places emphasis on the dedicated €3 Billion Regeneration and Development Funds put in place to drive and support the aims of the National Planning Framework, for both urban and rural areas, through the URDF and RRDF channels. It is not considered necessary that the Core Strategy Guiding Principles be amended to reflect the above issues raised.

In response to point 6; having regard to the central importance of the Dublin-Belfast Cross Border Network as a key growth enabler in both the RSES and the NPF Growth Strategy, it is not considered appropriate to dilute the key focus on the Dublin-Belfast corridor by amending the Guiding Principles in this instance. It is further considered that there should be consistency in terminology referring to the 'Dublin-Belfast Economic Corridor' throughout the RSES and a minor modification is proposed in this regard to include the word 'economic'.

Notwithstanding the above, it should also be noted that the importance of the Eastern Corridor and Rosslare Europort is recognised and referenced in the new Growth Enablers for the Region (Amendment no. 6) and in the new 'Strategic Connections' narrative, as set out in the Directors Report on Submissions to the Draft RSES

Director's Recommendation:

Accept Amendment with minor modification to read as follows;

Local Authorities, in developing their Core Strategies and settlement hierarchies will consider the following growth enablers for every part of the Region to meet its potential including;

1. **Economic Growth** – Harness opportunities for economic growth by supporting synergies between talent and place, building on identified assets to strengthen enterprise ecosystems and provide quality jobs. Re-intensify employment within existing urban areas, complemented by strategic employment growth in the right locations and diversification of local and rural economies to better withstand economic shocks and sustain national growth.
2. **Align population, employment and housing growth** – Divergence between the places people live and work leads to long-distance commuting and congestion, which is having a negative impact on quality of life. To address this, promote sustainable growth in the right locations and ‘catch up’ investment and consolidation in local services, amenities and employment in areas that have experienced large scale commuter driven housing development.
3. **Compact sustainable growth** – Promote compact, sequential and sustainable development of urban areas from large to small to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs and a target of at least 30% for other urban areas. Support co-ordination across Local Authorities and agencies to promote active land management and better use of under-utilised, brownfield and public lands.
4. **Regeneration and Development** – Identify significant ready-to-go regeneration projects in the existing built areas of our cities, towns, villages as well as rural regeneration opportunities, which could leverage private and public-sector support and investment, including NPF and European funding with a focus on social as well as physical regeneration.
5. **Strategic connectivity** – Protect and enhance global connectivity including the TEN-T network to ensure the best use of existing and planned transport infrastructure, safeguard national assets and improve sustainable mobility. Enhance regional accessibility as part of an integrated land use and transport strategy to enable the development of designated towns on strategic and public transport corridors and in tandem with enabling infrastructure.
6. **Dublin-Belfast Economic Corridor** - Safeguard and improve accessibility and service by rail, road and communication between Dublin and Belfast and drive cross border networks between Drogheda, Dundalk and Newry. Post – Brexit, consideration should be given to a process that can establish protocols for environmental protection and movement of people and goods.
7. **Healthy Placemaking** - To realise sustained economic growth and employment including the integration of better urban design, public realm, amenities and heritage to create attractive places to live, work, visit and invest in. Focus on placemaking to create attractive and sustainable communities to support active lifestyles including walking and cycling.
8. **Climate Action** – to accelerate a transition to a greener, low carbon and climate resilient region with focus on energy transition, carbon sequestration and reduced travel demand through the promotion of sustainable settlement patterns. Support the Climate Action Regional Offices and Local Authorities in their implementation of climate strategies.
9. **Collaboration** – The Assembly will foster collaboration in the allocation of funds to maximise the value for money and delivery of RSES policy and to promote enhanced collaboration between local and regional stakeholders in relation to enterprise and employment, transport, education, retail and service delivery and in the preparation of Local Transport Plans and

*Urban Area Plans (UAP). There will be a need to co-ordinate the sources of funding of infrastructure, including community facilities that will be located within Joint Urban Area Plans.*

### **Section 4.3 Taking Account of Existing Plans**

Proposed Material Amendments 13, 14 and 15 relate to this section.

#### **13. Amend Section 4.3**

##### Summary of Issues:

A number of submissions received endorsed and outlined support for proposed material amendment number 13. The point was also raised that the roadmap population targets to 2031 are conservative. Additions to the wording of the proposed amendment are suggested as part of further submissions including references related to serviced sites and strategic land reserve. The DHPLG commented that this amendment, as worded, could be restrictive insofar as it could limit individual local authorities, the Office of the Planning Regulator (OPR), the DHPLG and ultimately the Minister, to one course of action, i.e. to only apply prioritisation measures in situations where de-zoning may be desirable and/or necessary. Accordingly the DHPLG outlined that a combination of such measures may be suitable and that the wording of the proposed material amendment be changed to reflect this.

##### Director's Response:

Having regard to the submissions received and to the contents of Circular PSSP 6 2010, Guidance Note on Core Strategies, it is not considered appropriate that a policy be included as part of the RSES that could restrict Local Authorities, the OPR, the DHPLG and the Minister to one course of action i.e. prioritisation measures in situations where de-zoning may be desirable and/or necessary. The merits of the overall focus of the policy to facilitate prioritisation measures is however recognised and it is considered acceptable that the text be reworded to take account of the concerns of the DHPLG whilst maintaining the principal emphasis of the amendment.

It should also be noted that the population targets are national policy, with which the RSES must comply, and are stated as part of the Implementation Roadmap for the National Planning Framework.

##### Director's Recommendation:

Accept with minor modification to read as follows;

*Core Strategies may apply prioritisation measures and/or de-zoning of land where a surplus of land is identified in 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.*

#### **14. Amend RPO 4.1 Settlement Strategy**

### Summary of Issues

Support has been outlined for proposed amendment no. 14.

### Director's Response

It is considered that the proposed material amendment is acceptable.

### Director's Recommendations

Accept proposed material amendment.

## **15. Amend RPO 4.2 Settlement Strategy**

### Summary of Issues

Support is indicated for the proposed amendment as part of a submission received.

The SEA considers that the addition of "or planned" to this RPO has the potential to have direct, indirect and cumulative negative effects on a range of environmental receptors as it introduces the possibility that developments are permitted before essential services are secured and fully committed. Without certainty around service delivery there is an increased risk of direct and indirect environmental impact in the short to medium term until services catch up. The SEA recommends that the original wording of RPO 4.2 is retained to reduce the risks in this regard.

### Director's Response

The Director acknowledges that the inclusion of the words "or planned" introduces ambiguity with potential significant environmental impacts and in the interests of the precautionary principle this amendment should be rejected and the original wording retained.

### Director's Recommendations

Reject the proposed material amendment.

## Section 4.5 Regional Growth Centres

Proposed Material Amendments 16-25 relate to this section.

### 16. Amend Guiding Principles for Athlone Joint Urban Area Plan (UAP)

#### Summary of Issues:

A number of issues were raised by Westmeath County Council with respect to proposed material amendment no 16. These include; reference to Lissywollen South Framework Plan as an important policy framework currently associated with the delivery of LIHAF supported residential development in Athlone; the guiding principle associated with the upgrading of the water supply and treatment system would be better expressed as an RPO; reference to a joint Economic Strategy for Athlone should include reference to the regional hinterland associated with Athlone and provide support for the consideration/investigation of fast track planning mechanisms such as, for example, the designation of an SDZ at Creggan; support for the proposal to make AIT a Technological University and that other policy contained as part of the plan does not undermine this; 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 the objective of promoting Athlone as a sustainable transport hub; and that reference to *'taking account of the proximity of sites of international nature conservation interest'* be omitted.

Another submission has highlighted the importance of dual rail connections and support for the provision of adequate water and wastewater infrastructure.

TII's submission notes concern regarding the status of the Urban Area Plans (UAP). The submission states that given the importance, complexity and requirements for the Regional Growth Centres and key towns, it would be expected that these plans would form part of a statutory plan to inform the relevant development plans, local area plans, retail strategies, etc. required for these critical centres. It highlights that in relation to national roads, engagement with the Authority is required to facilitate appropriate transport assessment and inform planning objectives would be critical to the Urban Area Plans concerned. TII request written clarification in the finalised RSES addressing the preparation and subsequent status of these plans and proposals to ensure the integration of land use and transport planning in their preparation. TII request minor non-material amendments to the text to address some of the concerns raised. In addition to the above, TII have outlined as part of the submission the requirement to define Urban Area Plans to indicate stakeholder/ statutory consultee engagement, public consultation and inputs into future plans.

IBEC have indicated that the level of population growth is too limited and that it should be amended to in excess of 50,000 up to 2040 with scope of 50% headroom and that Core Strategies allow for 150% headroom.

The Northern and Western Regional Assembly outlined as part of their submission that they consider the population target for Athlone to be very arduous and that the methodology used in reaching this figure is not contained as part of the Draft RSES for EMRA. The NWRA suggest that the RSES for the Eastern and Midland Regional Assembly should be amended to reflect the population targets applied in the NWRA draft RSES for Regional Growth Centres.

The NWRA have outlined that EMRA should indicate that a 'Regional Growth Centre Strategic Plan' for Athlone be prepared as the NWRA have advocated this approach within their respective RSES. It is suggested that this approach would fully acknowledge the status of the Regional Growth Centres and bestow on them the advantages that the status deserves. It contends that Athlone could be at a disadvantage if the RSES does not include a 'Regional Growth Centre Strategic Plan.'

Director's Response:

The reference to the inclusion of Lissywollen South is welcome, particularly given that the development of housing at this location is associated with the Rebuilding Ireland Local Infrastructure Housing Activation Fund (LIHAF). As part of the guiding principle that references economic development, it is considered acceptable to acknowledge that this take account of the wider hinterland and support for the consideration/investigation of fast track planning mechanisms including the possible designation of an SDZ at Creggan.

In response to the suggestions for the inclusion of specific infrastructural improvements, including water, wastewater, high speed rail links between Dublin and Galway and double tracking along the route, it is considered that these issues have been addressed in their generality as part of guiding principles 5, 6 and 7.

In response to the suggestions from TII it is considered appropriate to alter the text to indicate that the forthcoming UAPs will be statutory plans. It is considered premature at present, in the absence of further guidance that may or may not include primary legislation, and without full engagement with the DHPLG, for the RSES to outline in a prescriptive manner the nature of stakeholder/statutory consultee engagement, public consultation and inputs into future plans. It is further considered that the suggested inclusion of same may be out of place in a strategic policy document.

With respect to the population target for Athlone, it is considered that the target as expressed in the draft RSES, is commensurate and appropriate for Athlone and that the rationale of taking an asset based approach to determine same is in keeping with the National Planning Framework. The NPF has been put in place to shape and co-ordinate planning, economic and spatial development and infrastructure investment at national, regional and local levels, through the Regional Spatial and Economic Strategy. The Implementation Roadmap for the National Planning Framework outlines that the RSES process will recognise the step change required in order to align population with the NPF's objectives. Accordingly, EMRA have devised the population targets based on consideration of demographic modelling growth combined with an evidence driven asset-based approach that recognises the capacity, potential for growth, ambition and the ability to act as an engine for wider regional growth. It is further important to acknowledge the lower starting baseline associated with Athlone, in comparison to the other Regional Growth Centres, which has a population target in the region of 30,000 by 2031, whilst Drogheda and Dundalk have a population target of 50,000 each during the same period.

Regarding the suggestion of a 'Regional Growth Centre Strategic Plan' for Athlone, it is considered that the focus of plan making for Athlone (and indeed the other Regional Growth Centres in the Region) is best served by advocating strongly for the legally required Joint Urban Area Plan, as opposed to introducing an additional non-statutory layer of plan making. It is considered that the Joint UAP mechanism as introduction in the NPF, offers ample potential to fully acknowledge the status of the Regional Growth Centres and to also bestow on them the advantages they deserve. This is highlighted



at Section 3(c) of the Implementation Roadmap for the National Planning Framework which states that the plan should include, amongst other points, a strategic vision setting out the ambition for the town and the identification of strategic needs related to infrastructure, employment, public realm and environment as well as housing and transport.

Finally, it is important to note that the DHPLG in their submission to the Draft RSES, commended the work undertaken by the Assembly in preparing the RSES and outlined that the Department considered 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. This sentiment was again reflected in the submission received from the DHPLG with respect to the Proposed Material Amendments, outlining that 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 ensuring a strong and consistent alignment between national and local level planning policies.

Minor modifications made as part of this section are to be applied, where applicable and appropriate, throughout the entire RSES document to the other Regional Growth Centres, in order to ensure consistency and legibility.

Director's Recommendation:

Accept Amendment with minor modification to read as follows;

*The RSES envisages a population target of 30,000 is for the entire settlement of Athlone up to 2031. This includes lands within the combined functional area of the two Local Authorities of Westmeath and Roscommon. The preparation and adoption of a statutory Joint Urban Area Plan (UAP) by Westmeath and Roscommon County Councils is to be a priority. The joint UAP under agreement of both local authorities, is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population which should be generally in proportion to existing population levels in each local authority area. In tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework the Joint UAP for the Regional Centre of Athlone should endeavour to support and provide for the following:*

- 1. A strategic vision for the future development of Athlone as a Regional Growth Centre, including the development of critical mass and reflective of its role as a regional driver.*
- 2. A boundary for the plan area to support the achievement of compact growth targets with a minimum of 30% of new homes to be built within the existing built up area, supported by the large scale delivery of lands at Curragh Lissywollen, Lissywollen South, Cornamagh, Cornamaddy and Monksland / Bellanamullia.*
- 3. Preparation of a wider collaborative Economic Development Strategy to promote increased employment and enterprise opportunities in Athlone, and to facilitate enhanced co-ordination between local authorities, enterprise agencies and regional stakeholders to support the phased delivery of serviced employment lands at Garrycastle IDA, Blyry, Creggan and Monksland. In promoting the economic development of Athlone, this may include support for the consideration/investigation of fast track planning mechanisms such as, the designation of an SDZ.*

4. *The regeneration of underused, vacant or derelict town centre lands and the consolidation of retail and commercial functions in line with a joint Retail Strategy prepared by the local authorities.*
5. *The identification of infrastructural investment priorities and promotion of a joined-up approach to the delivery of key enabling infrastructure to facilitate the sequential delivery of strategic residential, employment and regeneration development areas.*
6. *Support the upgrading of the Water Supply and Treatment System to meet the growth targets set in this strategy.*
7. *Promote 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.*
8. *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.*
9. *Support the development of a cross sectoral approach to maximise the tourism potential of the River Shannon and Lough Ree, involving Westmeath, Roscommon and Longford County Council and relevant stakeholders.*
10. *Support the implementation of the Athlone Waterfront Strategy to provide for public realm and amenity enhancements and tourist related developments along the waterfront*
11. *Support ongoing implementation of flood risk management and flood alleviation measures to facilitate the growth of Athlone.*
12. *Support the development of an Open Space Strategy with provision for a public park in Monksland and the provision of sustainable transport, recreation and amenity spaces to support existing and future populations.*

## **17. Amend RPO 4.4- Athlone**

### Summary of Issues:

The enhanced approach set out as part of proposed material amendment no. 17 is welcomed and in particular the collaborative approach endorsed between the two Regional Assemblies to the preparation of any future Joint UAP. The submission received from Westmeath County Council calls for a joint approach between the NWRA and EMRA in delivering a regional policy context across their respective strategies including ensuring alignment and consistency between both RSESs. Likewise, the EPA indicate that joint plans should include a coordinated approach to environmental protection and environmentally sustainable development. 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. It is further submitted that proposed material amendment no. 17 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 relevant to other Regional centres prescribed under the Strategy) as a vibrant Regional Centre (as opposed to a sole focus on the provisions of a UAP).

In addition to the above, some wording changes have been suggested as part of the submissions received including a submission that outlines support for the amendment with inclusion of specific details in the RSES on the development and implementation of a cross-boundary UAP including specific Local Authority development initiatives with timelines.

Director's Response:

Having regard to the submissions received, the Director welcomes the stated support for a collaborative approach at Local Authority and Regional Assembly levels. In endeavouring to ensure transparency and clarity within and between RSESs, the EMRA have adopted an approach that is in keeping with the overarching requirements of the National Planning Framework and has applied this approach consistently across the Region, to all the Regional Growth Centres, including Athlone. Notwithstanding this, it is recognised that differences between the RSESs will arise, due to the differing context of each Region. Accordingly, having regard to Athlone's position straddling two local authority and regional assembly boundaries and in the interests of clarity it is considered that additional narrative be provided as part of the finalised RSES outlining the approach pursued by EMRA. It is considered that the proposal to enhance RPO 4.4 by providing an emphasis on the positive impact that the UAP provides for the development of Athlone as a vibrant Regional Centre is appropriate and the inclusion of additional wording to this effect will serve to support Athlone's role and ambition as a Regional Growth Centre.

Minor modifications made as part of this section are to be applied, where applicable and appropriate, throughout the entire RSES document to the other Regional Growth Centres, in order to ensure consistency and vice versa.

Director's Recommendation:

Accept amendment with minor modification to read as follows;

*A cross boundary statutory Joint Urban Area Plan (UAP) for the Regional Growth Centre of Athlone shall be jointly prepared by Westmeath and Roscommon County Councils in collaboration with EMRA and NWRA. The UAP will support, the development of Athlone as an attractive, vibrant and highly accessible Regional Centre and economic driver for the centre of the Country.*

*The Joint UAP will identify Athlone's functional urban area and outline a boundary for the plan area, in addition to the identification of strategic housing and employment development areas and the infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.*

**18. Amend RPO 4.5- Athlone**

Summary of Issues:

Submission outlining that reference should be made to clusters and smart specialisation.

Director's Response:

Having regard to the wording of the proposed material amendment, it is considered that the suggested wording is partially acceptable.

Director's Recommendation:

Accept with minor modification to read as follows;

*Promote Athlone as a key location for regional economic development supporting the provision of increased employment through the expansion of the existing enterprise ecosystem in Athlone and smart specialisation, that have developed through collaboration with the relevant enterprise agencies including the IDA, Athlone Institute of Technology and the Midlands Innovation and Research Centre and support the provision of physical infrastructure and zoned lands to realise the phased delivery of strategic employment lands in central accessible locations.*

**19. Amend RPO 4.7 Athlone**

Summary of Issues

Support has been outlined for proposed amendment no. 19.

Director's Response

It is considered that the proposed amendment is acceptable.

Director's Recommendations

Accept proposed material amendment.

**20. New RPO- Athlone**

Summary of Issues

Support has been outlined for proposed amendment no. 20.

Director's Response

It is considered that the proposed amendment is acceptable.

Director's Recommendations

Accept proposed material amendment.

**21. New RPO- Athlone**

### Summary of Issues:

Westmeath County Council as part of their submission received have indicated that they 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. The submission indicates, however, that it is not considered that the inclusion of location based specific environmental assessment and conservation policy is appropriate for inclusion as part of the Guiding Principles (MA 16) or as part of this amendment.

The EPA as part of their submission did welcome the inclusion of the wording when referencing alternative proposed amendments (with respect to Longford and Mullingar), but indicated that where international nature conservation interests relate to European Sites designated under the Habitats directive, this should be clarified with a view to ensuring that the relevant requirements are fully integrated.

### Director's Response:

It is noted that 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 and consistent application of policy across the Region, it is submitted therefore that reference to *'taking account of the proximity of sites of international nature conservation interest'* be omitted from the place based specific text and replaced by an overall general objective, applicable to all locations, 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.

On foot of the above proposal it is recommended that policy RPO 3.2 is modified to take account of the above change that is to be applied throughout the document and additional wording added to RPO 3.2 to state that;

*In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.*

### Director's Recommendation:

Accept with minor modification to read as follows;

*Support ongoing implementation of flood risk management and flood alleviation measures to facilitate the growth of Athlone.*

## **22. New RPO- Athlone**

### Summary of Issues:

Submissions received relating to this amendment principally related to wording suggestions, including the insertion of the word 'state' before the term 'agencies' and the inclusion of reference to other local authorities.

Director's Response:

Whilst the role of state agencies is considered paramount in the preparation of such plans, it is considered the inclusion of the term as suggested would serve to hinder collaboration with any agencies that fall outside of this remit. The reference to other local authorities is recognised.

Directors' Recommendation:

Accept with minor modification to read as follows;

*Support the development of joint economic, transport and retail plans by Westmeath and Roscommon County Councils in collaboration with, and where appropriate, relevant Local Authorities and relevant agencies, to facilitate the growth of Athlone as a regional economic driver.*

### **23. Amend RPO 4.8 – Drogheda**

Summary of Issues

General supportive submissions for the proposed material amendment.

TII's submission notes concern regarding the status of the Urban Area Plans (UAP). The submission states that given the importance, complexity and requirements for the Regional Growth Centres and key towns, it would be expected that these plans would form part of a statutory plan to inform the relevant development, local area plans, retail strategies, etc. required for these critical centres. It highlights that in relation to national roads, engagement with the Authority is required to facilitate appropriate transport assessment and inform planning objectives would be critical to the Urban Area Plans concerned. TII request written clarification in the finalised RSES addressing the preparation and subsequent status of these plans and proposals to ensure the integration of land use and transport planning in their preparation. TII request minor non-material amendments to the text to address the concerns raised. In addition to the above, TII have outlined as part of the submission the requirement to define Urban Area Plans to indicate stakeholder/ statutory consultee engagement, public consultation and inputs into future plans.

A submission states that decisions made by Louth County Council continually favour Dundalk over Drogheda and that Drogheda should get city status and have one centre of administration.

A submission requests that there be consistency when referencing the Dublin-Belfast Corridor with the inclusion of "economic" each time in the specific sub-regional growth enablers for the Dublin City and Metropolitan Area, the Core Region and the Gateway Region.

Meath County Council's submission requests a textual change to support economic investment in a broader context with regards to the Southern Environs of the town.

It is noted that submissions received raised concern about the delivery of the Port Access Northern Cross Route (PANCR) as critical road infrastructure, that it has not been adequately addressed in the RSES and 'supporting' its future development as stated in the Draft RSES (under RPO 4.9) is not acceptable anymore, and it should be developed in its entirety immediately. Requests that this be included within this amended RPO.

A submission states that the expected population growth of Drogheda to 50,000 by 2031 is too low. The Draft RSES does not recognise the growth of Laytown-Bettystown-Mornington and how this area is merging with Drogheda.

A submission requests that subsection V be amended to include reference to the joint cross-boundary plan developed by Louth and Meath Council Councils in order to ensure a cohesive approach to development of commercial and residential projects in this area, taking into account the appropriate population (existing and forecast) within a 15 minute commute. It is requested that this subsection should include a line that "the Joint Local Area Plan prepared by Meath and Louth County Councils shall identify a boundary for the plan area, strategic housing and employment development areas and infrastructure requirements, including appropriate investment in water and waste water infrastructure, and promote a greater co-ordination and sequential delivery of serviced lands for development."

A submission requests that subsection VI be extended to include a sequence and timetable for its implementation and include practical guidance for planning staff.

#### Director's Response

The support received with respect to the proposed material amendment is welcome.

It is the intention of the RSES that the approach to all Regional Growth Centres is consistent and, as such, minor modifications in this regard are recommended and will be applied throughout the document. Minor modifications made as part of this section are to be applied, where applicable and appropriate, throughout the entire RSES document to the other Regional Growth Centres, in order to ensure consistency and vice versa.

In response to the suggestions from TII it is considered appropriate to alter the text to indicate that the forthcoming UAPs will be statutory plans. It is considered premature at present, in the absence of further guidance that may or may not include primary legislation, and without full engagement with the DHPLG, for the RSES to outline in a prescriptive manner the nature of stakeholder/statutory consultee engagement, public consultation and inputs into future plans. It is further considered that the suggested inclusion of same may be out of place in a strategic policy document.

The textual change in relation to the southern environs of the town supports economic investment in a broader and positive context, is minor and deemed acceptable.

The textual change in relation to referencing the Dublin-Belfast Corridor as the Dublin Belfast Economic Corridor is minor and deemed acceptable in terms of consistency.

In relation to the PANCR, it is considered that the RSES satisfactorily supports the delivery of same under RPO 4.9 which is not subject to material amendment.

In relation to the population projection for Drogheda being too low, it is considered that the population target of 50,000 would enable a city scale population to be achieved in Drogheda and this is considered an appropriate target to aim for. It is important to note that this should not be viewed as a constraint on the growth of the town, rather that it is expected to reach this target and if it is exceeded by 2031, that it will be considered successful. The rationale of taking an asset based approach to determine the population target is in keeping with the National Planning Framework. EMRA have devised the population targets based on consideration of demographic modelling growth combined with an evidence driven asset-based approach that recognises the capacity, potential for growth, ambition and the ability of Drogheda to act as an engine for wider regional growth.

Having regard to the calls for city status to be assigned to Drogheda, it is considered that the designation of city status to a settlement is not a function within the remit of the RSES, it is acknowledged that a population of at least 50,000 is considered to be a city scale and that is the target set in the RSES. However the RSES focuses on growth in the right locations and establishing the drivers for the settlement to sustainably grow as a strong Regional Growth Centre that is a priority focus for the region.

In relation to subsection V the additional text of referring to appropriate investment in water and waste water infrastructure is considered to be covered under the umbrella of “infrastructure investment requirements” as stated in the existing RPO. No additional wording is required.

In relation to subsection VI the additional text is not required as this would be a matter for the Local Authority and is not appropriate for an RSES.

The previous Director’s Report highlighted the need to amend the reference to McBride station as an employment hub with potential to curtail other sustainable development at this transport node and as such this should be revised.

#### Director’s Recommendations

Accept the proposed material amendment with minor modification to read as follows:

*A cross boundary statutory Joint Urban Area Plan (UAP) for the Regional Growth Centre of Drogheda shall be jointly prepared by Louth and Meath County Councils in collaboration with EMRA.. The UAP will support, the development of Drogheda as an attractive, vibrant and highly accessible Regional Centre and economic driver. The joint UAP will provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Drogheda to ensure it achieves targeted compact brownfield / infill growth of a minimum of 30% and ensure a coordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre on the Dublin – Belfast Economic Corridor. The Joint UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.*

*The RSES envisages a population target of 50,000 is for the entire settlement of Drogheda up to 2031. This includes lands within the combined functional area of the two Local Authorities of Louth and Meath. The preparation and adoption of a statutory Joint Urban Area Plan (UAP) by Louth and*



*Meath County Councils is to be a priority. The joint UAP under agreement of both local authorities, is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population which should be generally in proportion to existing population levels in each local authority area. In tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework the Joint UAP for the Regional Centre of Drogheda should endeavour to support and provide for the following:*

- i. Provide for the sustainable, compact, sequential growth and urban regeneration in the town core by promoting the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.
- ii. Support the regeneration of the Westgate area of Drogheda's historic town centre to address vacancy and dereliction in the town core and as an alternative to new development on green field sites.
- iii. Facilitate the regeneration of lands at McBride Station to capitalise on existing and planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.
- iv. Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.
- v. Support the sustainable development of existing zoned lands in the Southern Environs of the town with a particular emphasis on the promotion of the IDA Business Park as a location for economic investment and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs
- vi. Support the implementation of the Urban Design Framework Plan for the Heritage Quarter.

## **24. New RPO – Drogheda**

### Summary of Issues

General supportive submissions for proposed RPO.

A submission requests that reference be made to the Government economic support agencies (IDA, Enterprise Ireland, and Local Enterprise Offices) from the two regions that serve Drogheda and they should develop a joint cohesive economic development policy for the wider Drogheda area.

A submission states that South Drogheda Environs is an important area for growth in County Meath therefore acknowledgement of the potential of this area with regard to the long term growth of Drogheda is welcomed. A minor amendment to the text for the Southern Environs is proposed.

A submission requests that additional text be added to the RPO supporting the development of locally based Senior Local Government staff cohort and structure, to expedite this and its evolution into the EMRA's second city, as well as providing an appropriate local IDA, Enterprise Ireland and LEO presence commensurate with the current combined population of Drogheda and the agglomeration of Laytown-Bettystown-Mornington-Donacarne, compared to Dundalk-Blackrock

and Athlone. The population figures of both Drogheda and Dundalk need to be robustly re-examined.

A submission requests that recognition be made that the North East Regional Hospital (Our Lady of Lourdes Hospital) has received extensive infrastructural investment by Government over the past decade and is a significant employment centre. The submission notes that RPO 4.31 appears to contradict Government and HSE policy unless it is omitted or amended to support the development of the regional hospital on the existing site in Drogheda to serve the north-east of the country.

Wexford County Council's submission requests that reference to the Eastern Economic Corridor and Rosslare Harbour be referenced in the RPO.

The SEA states that given the natural and cultural sensitivities identified in the ER and NIR prepared for the draft plan, this new RPO will require similar mitigation to that already proposed in these documents noting site selection to be subject by a quality site selection process and subject to detailed environmental assessment which is more appropriately addressed at the county level.

#### Director's Response

RPO 6.1 sets out the RSES support for the relevant economic and enterprise agencies and their plans for job creation and enterprise development throughout the region and does not require to be reiterated or specific details added on certain employment roles in this new RPO for Drogheda.

RPO 4.31 did not form part of the material amendments and will not be subject to further amendment.

In terms of the population target of 50,000, this would enable a city scale population to be achieved in Drogheda and this is considered an appropriate target to aim for. It is important to note that this should not be viewed as a constraint on the growth of the town, rather that it is expected to reach this target and if it is exceeded by 2031, that it will be considered successful. Having regard to the calls for city status to be assigned to Drogheda, it is considered that the designation of city status to a settlement is not a function within the remit of the RSES, it is acknowledged that a population of at least 50,000 is considered to be a city scale and that is the target set in the RSES. However, the RSES focuses on growth in the right locations and establishing the drivers for the settlement to sustainably grow as a strong Regional Growth Centre that is a priority focus for the region.

The importance of the Eastern Economic Corridor and Rosslare Europort is recognised and referenced in the new Growth Enablers for the Region (Amendment no. 6) and in the new 'Strategic Connections' narrative, as set out in the Directors Report on Submissions to the Draft RSES.

The Director highlights that the RSES acknowledges the environmental assessment responsibilities for all plans/projects as set out clearly by RPOs 3.2 and 3.3 and the Strategy's Guiding Principles.

#### Director's Recommendations

Accept the proposed material amendment

## **25. Amend RPO 4.15 – Dundalk**

### Summary of Issues

General supportive submissions for the proposed material amendment. TII's submission notes concern regarding the status of the Urban Area Plans (UAP). The submission states that given the importance, complexity and requirements for the Regional Growth Centres and key towns, it would be expected that these plans would form part of a statutory plan to inform the relevant development, local area plans, retail strategies, etc. required for these critical centres. It highlights that in relation to national roads, engagement with the Authority is required to facilitate appropriate transport assessment and inform planning objectives would be critical to the Urban Area Plans concerned. TII request written clarification in the finalised RSES addressing the preparation and subsequent status of these plans and proposals to ensure the integration of land use and transport planning in their preparation. TII request minor non-material amendments to the text to address the concerns raised. In addition to the above, TII have outlined as part of the submission the requirement to define Urban Area Plans to indicate stakeholder/ statutory consultee engagement, public consultation and inputs into future plans

### Director's Response

The support received with respect to the proposed material amendment is welcome.

It is the intention of the RSES that the approach to all Regional Growth Centres is consistent and, as such, minor modifications in this regard are recommended and will be applied throughout the document. In line with amendments relating to Drogheda and Athlone, it is indicated as part of the Director's Response that minor modifications made as part of this section are to be applied, where applicable and appropriate, throughout the entire RSES document to the other Regional Growth Centres, in order to ensure consistency and vice versa.

In relation to TII's submission, the change relating to inclusion of 'statutory' are considered appropriate and should be included. It is considered premature at present, in the absence of further guidance that may or may not include primary legislation, and without full engagement with the DHPLG, for the RSES to outline in a prescriptive manner the nature of stakeholder/statutory consultee engagement, public consultation and inputs into future plans. It is further considered that the suggested inclusion of same may be out of place in a strategic policy document.

TII also suggests that local transport plans should look at enhancing sustainability within town centres and it is considered that the amendment should be modified to reflect this.

### Director's Recommendations

Accept and modify the proposed material amendment to read as follows:

A cross boundary statutory Urban Area Plan (UAP) shall be prepared by Louth County Council for the Regional Growth Centre of Dundalk in collaboration with the EMRA. The UAP will support the development of Dundalk as an attractive, vibrant and highly accessible Regional Centre and economic driver. The UAP will provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of

the town to ensure targeted compact growth of a minimum of 30% is achieved. The UAP shall facilitate the sustainable, compact, sequential growth and urban regeneration in the town core by consolidating the built footprint of Dundalk through regeneration of the town centre Core Character Area with a focus on rejuvenation of Clanbrassil Street / St. Nicholas Quarter and development of key town centre infill / brownfield sites in this area. A significant proportion of future urban development shall be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth. The Joint UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.

The RSES envisages a population target of 50,000 is for the entire settlement of Dundalk up to 2031. The preparation and adoption of a statutory Urban Area Plan (UAP) by Louth County Council is to be a priority. The UAP is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population. In tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework the UAP for the Regional Centre of Dundalk should endeavour to support and provide for the following:

- i. Support development on key town centre infill/brownfield sites include Long Walk Shopping Centre, Carroll's Village Shopping Centre, Williamson's Mall, and Dunne's Park Street
- ii. To enhance accessibility and sustainable mobility within the town centre by improving links between the core and surrounding areas through the further integration of public transport, walking and cycling facilities.
- iii. Promote the Seatown / Port Harbour Area for regeneration and repurpose of a water based urban quarter
- iv. Facilitate Urban Expansion through development of the Mount Avenue masterplan lands.
- v. Support the implementation of the Dundalk Urban Design Framework Plan (2008) or any update thereof.

## **Section 4.6 Key Towns**

Proposed Material Amendments 26-62 relate to this section.

### **26. Amend RPO 4.24 – Swords**

#### Summary of Issues

As part of a submission received from Fingal County Council a series of text additions to the main narrative of the RSES document are suggested on foot of the proposed material amendments. This is noted.

#### Director’s Response

The proposed suggested narrative changes are noted and will be considered for inclusion as part of the final RSES where the additions are non-material in nature.

#### Director’s Recommendations

Accept the proposed material amendment.

### **27. Amend RPO 4.25- Swords**

#### Summary of Issues

As part of a submission received from Fingal County Council a series of text additions to the main narrative of the RSES document are suggested on foot of the proposed material amendments. This is noted.

#### Director’s Response

The proposed suggested narrative changes are noted and will be considered for inclusion as part of the final RSES where the additions are non-material in nature.

#### Director’s Recommendations

Accept the proposed material amendment.

### **28. Amend RPO 4.26 – Swords**

#### Summary of Issues

As part of a submission received from Fingal County Council a series of text additions to the main narrative of the RSES document are suggested on foot of the proposed material amendments. This is noted.

### Director's Response

The proposed suggested narrative changes are noted and will be considered for inclusion as part of the final RSES where the additions are non-material in nature.

### Director's Recommendations

Accept the proposed material amendment.

## **29. New RPO – Swords.**

### Summary of Issues

As part of a submission received from Fingal County Council a series of text additions to the main narrative of the RSES document are suggested on foot of the proposed material amendments. This is noted.

Submissions raised issues with respect to this amendment referencing a number of wording amendments including the omission of the term 'airport related' and reference to a 'western access road'. TII suggest that additional wording is required to facilitate schemes and action associated with Dublin Airport Ten-T.

### Director's Response

The importance of Dublin Airport is widely recognised with respect to its contribution to economic development and employment provision for the region and the nation. The majority of economic development that occurs at this location is on the back of the proximal location to Dublin Airport. It is considered that the wording of the proposed amendment as is, recognises this and ensures that the development of the area is not undermined by development that should locate elsewhere within the Dublin City area, thus maintaining the City's economic role.

With respect to the wording change proposed by TII, it is important to note that the proposed material amendment does not preclude any future development proposal from compliance with related statutory requirements, including traffic modelling and demonstration of the suitability of the proposal from the perspective of access and transport.

### Director's Recommendations

Accept the proposed material amendment.

## **30. New RPO – Swords**

### Summary of Issues

As part of a submission received from Fingal County Council a series of text additions to the main narrative of the RSES document are suggested on foot of the proposed material amendments. This is noted.

### Director's Response

The proposed suggested narrative changes are noted and will be considered for inclusion as part of the final RSES where the additions are non-material in nature.

### Director's Recommendations

Accept the proposed material amendment.

## **31. Amend RPO 4.27 – Maynooth**

### Summary of Issues

Support has been indicated for proposed amendment no. 31. The NTA recommend that additional text is added which states that the Maynooth Outer Orbital Route provides opportunities for the reallocation of road space within Maynooth Town Centre, in accordance with the Transport Strategy of the NTA.

### Director's Response

The recommendation of the NTA is recognised and it is noted that this issue is dealt with through the inclusion of a new Guiding Principle to Guiding Principles for Integration of Land Use and Transport in Chapter 8 Connectivity which states that;

*Where additional road capacity is provided within or around any town which has an objective to cater for traffic that currently uses the road network in central areas and their immediate environs, that this additional capacity would be used for the improvement of the public transport, walking and cycling networks within the towns through the reallocation of road space to these modes.*

It is considered that this satisfactorily deals with the issue at hand and therefore no additional modification of this proposed material amendment is required.

### Director's Recommendations

Accept the proposed material amendment

## **32. New RPO – Maynooth**

### Summary of Issues;

Support has been indicated for proposed amendment no. 32.

### Director's Response

It is considered that the proposed amendment is acceptable.

### Director's Recommendations

Accept the proposed material amendment.

### **33. New RPO – Maynooth**

#### Summary of Issues

A number of submissions have outlined support for the preparation of a Joint Local Area Plan for Maynooth. TII have requested that additional wording be included stating 'consistent with official policy objectives'.

The DHPLG have indicated that there should not be any presumption of development zoning in advance of both local authorities concluding and agreeing a joint local area planning process, particularly as the RSES is not a mechanism for zoning land. Clarification to this amendment is suggested.

A submission requests clarity surrounding procedure associated with the previous Director's Report with regard to their submission. In the absence of such clarity a suggested change to this RPO to mention lands at Moygaddy is requested.

#### Director's Response

The support for the joint LAP is welcomed. The RPO does not remove the legal requirements associated with the preparation and adoption of Local Area Plans and in this regard it is not considered that the wording change suggested by TII is necessary.

It is fully acknowledged that the RSES is not a mechanism for zoning land and it is not considered that the proposed material amendment is suggestive of this.

As part of the previous Director's Report, it was indicated that the final issue was to be dealt with via inclusion in the narrative of the document. This remains the case.

#### Director's Recommendations

Accept the proposed material amendment.

### **34. New RPO – Maynooth**

#### Summary of Issues

Support has been indicated for proposed amendment no. 32.

#### Director's Response

It is considered that the proposed amendment is acceptable.



### Director's Recommendations

Accept the proposed material amendment.

## **35. Amend RPO 4.28 – Bray**

### Summary of Issues

A submission from Dún Laoghaire-Rathdown County Council requests that the wording of this proposed amendment be changed to ensure co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown and transport agencies. Reference to the 'Bray-Fassaroe-Old Connaught' public transport links is also put forward as a wording amendment.

TII suggest that the term 'road improvements' is added to the end of the proposed material amendment.

A submission indicates that at the end of the paragraph after "links" add "and recreational facilities". Bray has a requirement for a major recreational development.

### Director's Response

It is considered appropriate that reference to Dún Laoghaire-Rathdown County Council is included as part of this proposed amendment. The reference to 'road improvements' is also considered acceptable. It is not considered that reference to recreational facilities is needed as part of this RPO given the range of other policies throughout the document that address this.

### Director's Recommendations

Accept with minor modification to read as follows;

*Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links and road improvements.*

## **36. New RPO – Bray**

### Summary of Issues

No issues have been raised with respect to the proposed material amendment.

### Director's Response

It is considered that the proposed material amendment is acceptable.

### Director's Recommendations

Accept the proposed material amendment.

### **37. New RPO – Bray**

#### Summary of Issues

No issues have been raised with respect to the proposed material amendment.

#### Director's Response

It is considered that the proposed material amendment is acceptable.

#### Director's Recommendations

Accept the proposed material amendment.

### **38. New RPO – Bray**

#### Summary of Issues

The NTA recommend the removal of the following text from proposed material amendment no.38:- 'to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity.' It is further recommended that the term 'and services' be added to the end of the policy.

TII recommend that reference to Dún Laoghaire-Rathdown County council is included within this policy.

#### Director's Response

The reference to Dún Laoghaire-Rathdown County Council is considered acceptable. The proposal by the NTA to remove text is considered appropriate and the RPO should be amended to reflect this.

#### Director's Recommendations

Accept with minor modification to read as follows;

*To support ongoing investment in public transport infrastructure, including the appraisal, planning and design of the LUAS extension to Bray. The development of Bray- Fassaroe should be undertaken in collaboration between Wicklow County Council, Dún Laoghaire-Rathdown County Council and the transport agencies to ensure the delivery of enabling transportation infrastructure and services.*

### **39. New RPO – Bray**

### Summary of Issues

No issues have been raised with respect to the proposed material amendment.

### Director's Response

It is considered that the proposed material amendment is acceptable.

### Director's Recommendations

Accept the proposed material amendment.

## **40. Amend RPO 4.29 – Navan**

### Summary of Issues

The SEA states that this amendment is directly at odds with the previous proposed RPO and has the potential for negative direct and indirect impacts to a number of environmental receptors to facilitate a network of distributor roads. The SEA remarks that if there is a genuine desire to shift to low carbon transport modes, identification and development of employment and residential lands must be prioritised on the basis of their suitability for more sustainable transport modes. The SEA recommends that the RPO is not altered in the manner proposed.

Whilst support is indicated for the RPO as part of submissions received, The NTA in their submission have raised concern in relation to the manner in which the Navan Distributor Roads are described as infrastructure which would support future development, without any reference as to how the additional capacity provided by this scheme could be exploited for the improvement of the public transport, walking and cycling networks within the town. The NTA recommends that a guiding principle be inserted which states that such road schemes would also provide opportunities for the reallocation of road space within Navan Town Centre, in accordance with Section 5.8.2 of the Transport Strategy.

The EPA in their submission support the SEA recommendation that this RPO should not be altered as proposed due to the identified conflicts with existing RPOs and the potential for negative and indirect impacts on many environmental protection objective assessment criteria.

### Director's Response

The Director acknowledges the concerns raised in particular with regards to the potential for negative and indirect impacts on environmental protection and sustainable transport. To address these concerns an additional Guiding Principle should be added to the Guiding Principles for Integration of Land Use and Transport in Chapter 8 Connectivity. This new guiding principle will satisfy the SEA requirements in relation to promoting sustainable transport modes within towns.

The wording of RPO should be amended in light of the environmental concerns raised.

### Director's Recommendations

Accept the proposed material amendment with minor modification to read as follows:

Support the delivery of road infrastructure to release strategic residential and employment lands for sustainable development and to improve connectivity and the efficient movement of people and services in the town.

Insert the following new Guiding Principle to Guiding Principles for Integration of Land Use and Transport in Chapter 8 Connectivity:

Where additional road capacity is provided within or around any town which has an objective to cater for traffic that currently uses the road network in central areas and their immediate environs, that this additional capacity would be used for the improvement of the public transport, walking and cycling networks within the towns through the reallocation of road space to these modes.

### **41. New RPO – Navan**

#### Summary of Issues

A submission supports the additional RPO for Navan.

The SEA highlights that the location of development lands is not specified, however Trim Road in Navan is in close proximity to the River Boyne and River Blackwater SAC and SPA (River Boyne about 1km to the east and River Boyne/Blackwater confluence about 1.5km to the north). As such any development of strategic employment lands in proximity to the River Boyne and Blackwater SAC/SPA and pNHA should consider all likely significant effects. The SEA states that this RPO should state that any such development will be preceded by and subject to the outcome of the planning process and environmental assessments. In general, further development must ensure that increased load on services does not degrade the water environment.

#### Director's Response

The RSES recognises that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse environmental impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect. RPO 3.2 sets out clearly that all plans, projects and activities requiring consent arising from the RSES will be subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate. RPO 3.3 sets out that the identification of suitable employment and residential lands and suitable site for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum. In addition, key aspects of the environmental profile of all key towns will be included as an Appendix to the RSES which will inform future decision-making for project/plans.

It is considered that the RPO can be modified to acknowledge the environmental assessment responsibilities required.

### Director's Recommendations

Accept the proposed material amendment with minor modification to read as follows:

Support the development of strategic employment lands on the Trim Road in Navan, subject to the outcome of appropriate environmental assessment and the planning process.

### **42. Amend RPO 4.34 – Naas**

#### Summary of Issues

Support has been highlighted for the proposed amendment as part of submissions received and it is indicated that NPF national policy objective no. 9 should be applied to Naas.

#### Director's Response

The reference to the application of NPF national policy objective no. 9, which refers to the fact that settlements may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth, is not considered to relate the proposed material amendment and is beyond the scope for consideration at this stage in the RSES process.

#### Director's Recommendations

Accept the proposed material amendment

### **43. New RPO - Naas**

#### Summary of Issues

No issues have been raised with respect to the proposed material amendment.

#### Director's Response

It is considered that the proposed material amendment is acceptable.

#### Director's Recommendations

Accept the proposed material amendment

### **44. New RPO – Naas**

#### Summary of Issues

Kildare County Council outlined their support for proposed material amendment no. 44. The council have asked for the word 'including' to be added as there are other employment lands.

### Director's Response

The additional wording is considered acceptable.

### Director's Recommendations

Accept the proposed material amendment with minor modification as follows;

*Strengthen the local employment base including through the development of MERITS, Millennium Park in the North West Quadrant and the regeneration of underutilised lands including industrial lands in the north east of the town.*

## **45. New RPO – Naas**

### Summary of Issues

The SEA highlights that as no specific location is outlined, the siting of such an interchange should be based on appropriate site/route selection and any environmental assessments as appropriate given that three 'branches' of the River Boyne and River Blackwater SAC/SPA are within the town centre, and the potential issues with flooding and land use zoning constrained by such. The SEA further notes that environmental sensitivities of the area should be duly noted in the RSES to ensure that future site selection has proper regard to protection of the environment.

The NTA has concerns that this new RPO as proposed is not consistent with the Transport Strategy and recommends rewording so that the overall policy platform of the RSES supports the integration of land use and transport planning and is consistent with the Transport Strategy. The NTA recommends that the RPO is reworded as follows: "Support the delivery of new and enhanced public transport infrastructure in Naas and Sallins, including Park and Ride and interchange facilities as identified by the NTA and Kildare County Council."

### Director's Response

The RSES recognises that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse environmental impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect. RPO 3.2 sets out clearly that all plans, projects and activities requiring consent arising from the RSES will be subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate. RPO 3.3 sets out that the identification of suitable employment and residential lands and suitable site for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum. In addition, key aspects of the environmental profile of all key towns will be included as an Appendix to the RSES which will inform future decision-making for project/plans.

To ensure consistency with the NTA strategy the RPO should be reworded as recommended by the NTA.

### Director's Recommendations

Accept the proposed material amendment with minor modification as follows:

Support the delivery of new and enhanced public transport infrastructure in Naas and Sallins, including Park and Ride and interchange facilities as identified by the NTA and Kildare County Council.

### **46. New RPO – Naas**

#### Summary of Issues

Support has been highlighted for the proposed amendment as part of a submission received and it is indicated that NPF national policy objective no. 9 should be applied to Naas.

#### Director's Response

The reference to the application of NPF national policy objective no. 9, which refers to the fact that settlements may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth, is not considered to relate the proposed material amendment and is beyond the scope for consideration at this stage in the RSES process.

#### Director's Recommendations

Accept the proposed material amendment.

### **47. Amend RPO 4.36 – Wicklow-Rathnew**

#### Summary of Issues

No issues have been raised with respect to the proposed material amendment.

#### Director's Response

It is considered that the proposed material amendment is acceptable.

#### Director's Recommendations

Accept the proposed material amendment.

### **48. New RPO - Wicklow-Rathnew**

#### Summary of Issues

Wexford County Council's submission requests that reference to the Eastern Economic Corridor and Rosslare Harbour be referenced in the RPO.

#### Director's Response

The importance of the Eastern Economic Corridor and Rosslare Europort is recognised and referenced in the new Growth Enablers for the Region (Amendment no. 6) and in the new 'Strategic Connections' narrative, as set out in the Directors Report on Submissions to the Draft RSES.

#### Director's Recommendations

Accept the proposed material amendment.

### **49. New RPO – Longford**

#### Summary of Issues

Issues raised include the welcoming of the additional RPO.

#### Director's Response

It is considered that the proposed amendment is acceptable.

#### Director's Recommendations

Accept the proposed material amendment.

### **50. New RPO – Longford**

#### Summary of Issues

Support for the inclusion of the RPO was indicated as part of the submissions received. Issues raised also indicated that reference to Longford's role as a key employment centre is provided.

#### Director's Response

The support for the inclusion of proposed material amendment no.50 is welcomed. Given that the proposed amendment recognises the key location of Longford, proximal to the Regional Growth Centre of Athlone and acting as a strategic portal to the north-west and south, it is considered that this RPO could be enhanced through specific reference to Longford as an employment centre.

#### Director's Recommendations

Accept the proposed material amendment with minor modification to read as follows;

*Support Longford Town as a strategic portal to the northwest and south in recognition of its location at the junction of the N55; M4/N4 Dublin/Sligo and N5; due to its proximity to the regional growth centre of Athlone; and support its role as a strategic employment centre.*

### **51. New RPO – Longford**



### Summary of Issues

Support was received for the inclusion of this RPO, however, in line with submissions received on this issue relating to different settlements, concern was raised that this specific Longford policy (in tandem with the stated flooding policy) would be best applied in a consistent manner throughout the RSES.

### Director's Response

It is noted that 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 and consistent application of policy across the Region, it is submitted therefore that reference to *'taking account of the proximity of sites of international nature conservation interest'* be omitted from the place based specific text and replaced by an overall general objective, applicable to all locations, 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.

On foot of the above proposal and to ensure consistency throughout the document, policy RPO 3.2 is modified to take account of the above change that is to be applied throughout the document and additional wording added to RPO 3.2 to state that;

*In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.*

RPO 4.42 is also to be omitted to ensure consistency throughout the document. It is recommended that RPO 7.14 is modified to take account of the above change that is to be applied throughout the document and additional wording added to the beginning of RPO 7.14 to state that;

*The future strategic development of settlements throughout the Region will have full cognisance of their requirements with respect to flood risk management.*

### Director's Recommendations

Reject the proposed material amendment.

## **52. Amend RPO 4.44 – Mullingar**

### Summary of Issues

It is indicated in a submission that this should be enhanced by way of inclusion of an expanded/additional non-material amendment which supports the development of assets in built, natural and cultural heritage as an inherent part of the town's appeal as a tourism hub.

### Director's Response

It is considered that the text included as part of this proposed material amendment and by way of existing RPO 4.43 of the Draft RSES, sufficiently deals with the issue raised.

Director's Recommendations

Accept the proposed material amendment.

**53. Amend RPO 4.45 – Mullingar**

Summary of Issues

Support is stated for the proposed amendment.

Director's Response

It is considered that the proposed amendment is acceptable.

Director's Recommendations

Accept the proposed material amendment.

**54. New RPO – Mullingar**

Summary of Issues

Support is stated for the proposed amendment.

Director's Response

It is considered that the proposed amendment is acceptable.

Director's Recommendations

Accept the proposed material amendment.

**55. New RPO – Mullingar**

Summary of Issues

A submission stated that the sentiment of the RPO is welcomed, however, concern is indicated with regard to the inclusion of this RPO as a location based specific policy and it is suggested that this be better served as a general objective relating to the entirety of the document or omitted.

Director's Response

It is noted that 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 and consistent application of policy across the Region, it is submitted therefore that reference to *'taking account of the proximity of sites of international nature conservation interest'* be omitted from the place based specific text and replaced by an overall general objective, applicable to all locations, 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.

On foot of the above proposal and to ensure consistency throughout the document, policy RPO 3.2 is modified to take account of the above change that is to be applied throughout the document and additional wording added to RPO 3.2 to state that;

*In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.*

#### Director's Recommendations

Reject the proposed material amendment.

### **56. Amend RPO 4.46 – Tullamore**

#### Summary of Issues

Support for the proposed material amendment is indicated as part of the submissions received. As part of a submission received from Offaly County Council a series of text additions to the main narrative of the RSES document are suggested on foot of the proposed material amendments. This is noted.

#### Director's Response

Support for the proposed material amendment is welcome. The proposed suggested narrative changes are noted and will be considered for inclusion as part of the final RSES where the additions are non-material in nature.

#### Director's Recommendations

Accept the proposed material amendment.

### **57. New RPO – Tullamore**

#### Summary of Issues

As part of a submission received from Offaly County Council a series of text additions to the main narrative of the RSES document are suggested on foot of the proposed material amendments. This is noted.

#### Director's Response

The proposed suggested narrative changes are noted and will be considered for inclusion as part of the final RSES where the additions are non-material in nature.

#### Director's Recommendations

Accept the proposed material amendment.

### **58. New RPO – Tullamore**

#### Summary of Issues

As part of a submission received from Offaly County Council a series of text additions to the main narrative of the RSES document are suggested on foot of the proposed material amendments. This is noted. The DHPLG have indicated that the Department would be supportive of any outreach facilities in Tullamore to complement the provision of services at Athlone IT and that there are no proposals for a separate University for this region. A suggested amended text is provided as part of their submission. Offaly County Council have indicated that the provision of University facilities at Tullamore is linked to the Tullamore Regional Hospital and that support should be indicated in this regard as part of the finalised RPO. IBEC have also suggested that the wording be revised to read that access to a Technological University in the Midlands, which will benefit Tullamore and Co. Offaly is supported.

#### Director's Response

It is considered appropriate that the wording of proposed material amendment 58 is modified to consolidate the above views. The proposed suggested narrative changes are noted and will be considered for inclusion as part of the final document where the additions are non-material in nature.

#### Director's Recommendations

Accept with minor modification to read as follows;

*To examine the need for complementary third level outreach educational facilities at Tullamore, particularly with regard to support for Tullamore Regional Hospital and where appropriate, its continued development as a Teaching/University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.*

### **59. New RPO – Portlaoise**

#### Summary of Issues

Support is stated for the proposed amendment. The EPA as part of their submission indicate that the SEA, Habitats and Flood Directive should be taken into account with respect to the Masterplan where it proposes zoning or the development of land.

#### Director's Response

It is considered appropriate that the above concern of the EPA is taken on-board.

#### Director's Recommendations

Accept with minor modification to read as follows;

*Support the vision and objectives of the J17 National Enterprise Park Masterplan, where appropriate, which aims to deliver a viable economic zone within Portlaoise which will accommodate a range of potential businesses and industries whilst having regard to spatial planning, infrastructural, environmental and transportation requirements and compatibility with adjoining land uses. This is subject to compliance with the requirements of the SEA, Habitats and Floods Directive.*

### **60. New RPO – Portlaoise**

#### Summary of Issues

Support is stated for the proposed amendment as part of a number of submissions received. As part of the submission received from the DHPLG, whilst broadly supportive, concern was expressed that the inclusion of text stating 'centre of excellence' is beyond the remit of the RSES, is a matter of health policy and would not be appropriate. In this regard it is suggested that the text 'centre of excellence' is omitted.

#### Director's Response

The suggested wording amendment from the DHPLG is considered appropriate in this instance.

#### Director's Recommendations

Accept with minor modification to read as follows;

*Support the development and expansion of the Midlands Regional Hospital at Portlaoise.*

### **61. Amend RPO 4.49 – Graiguecullen-Carlow**

#### Summary of Issues

Submission received outlining support for Proposed Material Amendment No. 61. It is also suggested that reference to UAP should be changed to LAP.

#### Director's Response

It is considered appropriate that the above issue is taken into account to ensure that the correct terminology is applied.

#### Director's Recommendations

Accept with minor modification to read as follows;

*A cross-boundary Joint Local Area Plan (LAP) shall be prepared for Carlow by Carlow County Council and Laois County Council having regard to its location within the combined functional area of both local authorities. The Joint LAP shall provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Carlow/Graiguecullen to ensure it achieves targeted compact growth of a minimum of 30% and ensure a co-ordinated approach is taken to the future growth and development of the combined urban area, ensuring that it has the capacity to grow sustainably and secure investment as a Key Town. The Joint LAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development. Regard shall be had to the respective housing, retail and other Local Authority strategies that may be in place.*

## **62. New RPO - Graiguecullen-Carlow**

### Summary of Issues

The Environmental Assessment Report states that this proposed RPO has significant potential for direct and indirect negative environmental impacts on numerous sensitive receptors. While also being a designated SAC and SPA, the SEA, ER and NIR assessments flag that the River Barrow has a WFD status of Moderate, while the Burren tributary is at Poor status, with both At Risk of not meeting WFD objectives. The Barrow is also a designated Nutrient Sensitive River from Portarlinton to Graiguenamanagh, and therefore has little to no assimilative capacity to absorb current wastewater or other development pressures. The SFRA also flags that “any undeveloped sites adjacent to the River Barrow have been zoned for green space and this should be maintained to retain existing floodplain areas.” The Environmental Report recommends that this RPO be removed in light of the environmental sensitivities and in having regard to the recommend mitigation measures.

The DCHG submission states that the Department is in agreement with the screening assessment in the Environmental Reports document that this policy has significant potential for direct and indirect negative impacts for biodiversity, flora and fauna, taking into account the findings of the SEA ER, the NIR and FRA. The Department notes that a significant portion of the lands are within an SAC and underlines the need to protect such sites. A large part of these lands have been zoned amenity and open space in the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018 and the Department agrees with the recommendation in the Strategic Flood Risk Assessment that this zoning should be maintained to retain existing floodplain areas. Based on the conclusions of the environmental assessments undertaken, the Department supports the recommendation in the Environmental Reports document that this RPO should not be included in the RSES.

The EPA submission acknowledges the recommendation that tourism initiatives, including Ireland’s Ancient East and Ireland’s Hidden Heartlands, should consider the requirements of the SEA and Habitats Directives. The submission further states that in relation to the proposed RPO to support regional tourism strategies and the proposed Barrow Blueway at a regional level, the RSES should ensure that the requirements of relevant directives including the SEA, Habitats, Water Framework,

EIA and Floods directives are integrated as appropriate. The EPA submission states that this new RPO does not appear to take into account the potential direct and indirect impacts on the River Barrow SAC or potential flood risk assessment recommendations and acknowledges the SEA recommendation that this proposed new RPO be removed.

Laos County council as part of their submission have requested that the wording of the proposed amendment be altered to include that development on these lands be subject to the provisions of the Habitats Directive.

#### Director's Response

The concern raised as part of the accompanying SEA is fully recognised and it is considered that the wording of the material amendment as proposed is inappropriate and falls short of that required to ensure compliance with the relevant environmental and flood risk legislation.

The intention of the policy objective was not to permit any type of development on underused lands along the River Barrow, but was to facilitate environmentally sensitive development associated with low intensity uses such as amenity walkways where compatible. The Director notes that the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018 has zoned a large part of these lands along the River Barrow as amenity and open space and some, or part, of these lands may have the capacity to allow for environmentally sensitive limited development, subject to the required environmental assessments and in accordance with the mitigation measures of the NIR, SEA and SFRA of the 2012 spatial plan. It would be remiss to exclude suitable environmentally sensitive development where this has been achieved in other parts of the region. It is recommended that the RPO, with minor modifications, could facilitate sensitive minor recreation related development compatible with the existing amenity and open space zoning of these lands. The RPO should be modified on this basis.

#### Director's Recommendations

Accept with minor modification to read as follows;

*Support the sustainable development of environmentally sensitive, low intensity amenity development associated with the Barrow Blueway subject to compliance with the Habitats and Birds Directive and Floods Directive.*

## **Section 4.8 Rural Areas**

### **63. Amend RPO 4.50 – Rural Areas**

#### Summary of Issues

Support has been outlined for proposed amendment no. 63. Additional wording has been suggested to include that renewal strategies must address the full range of issues from housing and enterprise through to specific sectoral activities such as retail mix.

#### Director's Response

It is considered that the policy as is, allows for a range of issues to be addressed and therefore it is not considered that any further modification of the proposed material amendment is required.

#### Director's Recommendations

Accept the proposed material amendment.

### **64. Amend RPO 4.51 – Rural Areas**

#### Summary of Issues

Support has been outlined for proposed amendment no. 64. It is indicated that further guidance for Local Authorities in relation to the identification of relevant settlements would be welcomed.

#### Director's Response

It is considered that the addition of detailed selection criteria associated with selecting settlements for initiatives such as that proposed as part of this material amendment, is beyond the scope of the RSES as a strategic document and therefore it is not recommended that such information be included. This in no way precludes the potential future role that EMRA may have in advising on such matters in the future.

#### Director's Recommendations

Accept the proposed material amendment.

### **65. Amend RPO 4.52 – Rural areas**

#### Summary of Issues

Support has been outlined for proposed amendment no. 65. It is indicated however, that it is disappointing that more emphasis has not been placed on the contribution that small towns and villages make to the rural counties social and economic well-being. Reference to inclusion of the term 'agri food' is also suggested. A submission supports the amended RPO and would request the following addition "retirement villages".

#### Director's Response



Given the strategic nature of the RSES, it is not considered that the proposed amendment be altered to specifically cater for particular development types. This is appropriately dealt with through the local level planning mechanisms of County Development Plans and Local Area Plans. It is considered that 'agri food' development is dealt with under the term agri business. With respect to emphasis on the contribution that small towns and villages make to social and economic wellbeing, it is considered that additional wording should be added in this regard.

#### Director's Recommendations

Accept with minor modification to read as follows;

*Local Authorities shall identify and provide policies that recognise the contribution that small towns, villages and rural areas contribute to social and economic wellbeing. As part of this policy provision that seeks to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, energy, tourism and forestry enterprise is supported.*

### **66. New RPO – Rural Areas**

#### Summary of Issues

Support has been indicated for proposed material amendment no. 66. An issue raised recommends the inclusion of a specific sub-section in the RSES stating the relationship, connectivity and inter-dependence between the focus urban centre (e.g. MASP, Regional Growth Centre, Key Town) and the smaller towns, villages and rural areas.

#### Director's Response

It is considered that the above is dealt with throughout the RSES including chapters three and four of the document. It is not considered that any further modification of the proposed material amendment is required.

#### Director's Recommendations

Accept the proposed material amendment.

### **67. New RPO - Rural Areas**

#### Summary of Issues

Submissions have been received outlining support for the RPO. One submission, however, did call for the omission of the proposed material amendment on the basis that it duplicates other policy. A further submission indicated that Co-working locations should be included in this paragraph. The development of such facilities will assist in addressing traffic and quality of life issues.

A further submission indicates that this section could be strengthened through the inclusion of narrative with respect to the afteruse of peatlands.

### Director's Response

The inclusion of narrative with respect to the afteruse of Peatlands, given that it is already supported throughout the document, is considered acceptable and appropriate in this instance, having regard to the intention of the RPO and significance of peatland afteruse for the Eastern and Midland Region.

### Director's Recommendations

Accept with minor modification to read as follows;

*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. In keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive afteruse framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.*

## Chapter 5 MASP

### Submission Number(s)

001, 002, 003, 004, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 015, 016, 017, 018, 019, 020, 021, 022, 023, 024, 025, 026, 027, 028, 029, 030, 031, 032, 033, 034, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 049, 050, 051, 052, 053, 054, 055, 056, 057, 059, 061, 065 (TII), 069 (NTA), 070, 071, 075 (Meath County Council), 076 (Dun Laoghaire-Rathdown County Council), 077 (DAA), 079 (Wexford County Council), 081 (DCHG), 082 (South Dublin County Council), 084 (Fingal County Council), 085 (Dublin City Council), 087 (Wicklow County Council), 088, 090, 092 (Irish Water), 094 (Department Transport, Tourism and Sport), 095, 096 (DHPLG), 102, 105, 106 (Westmeath County Council)

### 68. Amend Guiding Principles for MASP

#### Summary of Issues

In general, submissions express support for the inclusion of Guiding Principles that support a planned approach for the development of the Dublin Metropolitan Area. Submissions were received relating to different Guiding Principles, which are detailed in a sequential manner below;

In relation to point 1, a number of submissions identify the need for more explicit support for the future growth and expansion of national assets Dublin Airport and Dublin Port. It is submitted that there is a need to identify the Dublin Airport Western Access to support the expansion of Dublin Airport. Another submission also highlights the importance of the East-West distributor Road to the expansion of the Airport to facilitate the delivery of a third terminal in the Western Campus. Further submissions highlight the need for explicit reference to supporting increased 'passengers and air traffic movements' and to support access improvements 'in line with industry requirements'. Other submissions request recognition of the role Dublin Airport can play in non-aviation related economic development.

In relation to point 2, It is submitted there is need to ensure that a consistent approach is taken throughout the RSES to compact growth targets with reference to the National Planning Framework (NPF) terminology and to the defined 'Dublin city and suburbs' geographic area. It is both submitted that reference be made to compact growth 'within the existing built up footprint' while other submissions welcome the recognition that the delivery of compact growth requires the development of lands contiguous to the built-up area of Dublin city and suburbs.

It is also submitted that the 'steady supply of serviced sites' should be an enabler for employment and/or mixed use development as well as housing.

In relation to point 5, it is submitted that the inclusion of "district heating and water conservation" is too specific for the strategic level of Guiding Principles and should be omitted.

In relation to point 7, It is submitted that Guiding Principles should be expanded to include additional development areas including those needed in the short term and not just beyond 2031. It

is also submitted that it should be made explicit that the identified list of strategic development areas are not exhaustive.

The removal of reference to specific spatial areas in points 6 and 7 is welcomed in one submission, conversely another submission requests that reference to specific sites be reinstated.

In relation to point 9, It is submitted that further county level targets are needed for infill/brownfield to achieve implementation and monitoring of compact growth targets.

#### Directors Response

In response to submissions that request further detail in relation to compact growth targets and to include spatially specific areas, points 2,6,7 and 9 refer, it is not considered appropriate to include such detail having regard to the strategic nature of Guiding Principles.

In response to point 1, it is noted that the Guiding Principles are intended to be strategic, reflecting the need to protect and enhance strategic national assets such as Dublin Port and Dublin Airport. To this end it is not considered appropriate to identify spatially specific elements in the Guiding Principles but to focus on the strategic role of Dublin Port and Airport as global gateways.

In response to point 2, again having regard to the strategic nature of the Guiding Principles, it is not recommended to include spatially specific compact growth targets i.e. to city or county level, however for the purposes of consistency and to assist in implementation and monitoring of compact growth it is recommended that reference to 'Dublin' is updated to the CSO defined area of 'Dublin city and suburbs'. The reference to contiguous urban areas is a recognition that the boundaries for census towns and suburbs are determined by the CSO for the five-yearly census of population.

Also in response to point 2, It is recommended to insert 'and' accelerate housing supply so as not to preclude employment and/or mixed use development in this regard.

In response to point 5, it is considered that the specific inclusion of "district heating and water conservation" can be omitted, as it is already addressed at strategic level in the Guiding Principle which is to promote "national projects and improvements in water and waste water, sustainable energy, waste management and resource efficiency".

In response to point 7, the Guiding Principle to identify future development areas that may be delivered beyond the lifetime of MASP is a recognition of the long lead in time often required to deliver large scale development and is not intended to preclude the ongoing development of underutilised lands within the metropolitan area, which is explicitly recognised in Section 5.6 Core Strategies. This principle allows for the inclusion within MASP of strategic development areas such as Dunsink and Lissenhall which are likely to be delivered in the longer term beyond 2031.

It is recommended to accept the Amended Guiding Principle, with minor modifications to point 2 and point 5 as outlined above.

#### Directors Recommendation

**Accept Amendment**, with minor modifications to read as follows:

1. **Dublin as a Global Gateway** – In recognition of the international role of Dublin, to support and facilitate the continued growth of Dublin Airport and Dublin Port, to protect and improve existing access and support related access improvements.
2. **Compact sustainable growth and accelerated housing delivery** – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target to 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.
3. **Integrated Transport and Land use** – To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of ‘BusConnects’, DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.
4. **Increased employment density in the right places** – To plan for increased employment densities within Dublin city and suburbs and at other sustainable locations near high quality public transport nodes, near third level institutes and existing employment hubs, and to relocate less intensive employment uses outside the M50 ring and existing built-up areas.
5. **Alignment of growth with enabling infrastructure** – To promote quality infrastructure provision and capacity improvement, in tandem with new development and aligned with national projects and improvements in water and waste water, sustainable energy, waste management and resource efficiency.
6. **Social Regeneration** – To realise opportunities for social as well as physical regeneration, particularly in those areas of the metropolitan area which have been identified as having high relative deprivation
7. **Identify Future Development Areas** – To identify future development area that may be delivered beyond the lifetime of the draft RSES, but within the longer-term 2040 horizon set out by the NPF.
8. **Metropolitan Scale Amenities** – To enhance provision of regional parks and strategic Green Infrastructure to develop an integrated network of metropolitan scale amenities, and to develop greenways/blueways along the canals, rivers and coast as part of the implementation of the National Transport Authorities’ Cycle Network Plan for the Greater Dublin Area.
9. **Co-ordination and active land management** – To enhance co-ordination across Local Authorities and relevant agencies to promote more active urban development and land management policies that help develop underutilised, brownfield, vacant and public lands.

## 69. Amend Rail projects

### Summary of Issues

The NTA in their submission recommend that the following changes to the above material amendment are required in order to ensure consistency with the Transport Strategy:

- Remove reference to the electrification of the rail line further north of Drogheda and further south of Hazelhatch;

- Alter the reference to the Navan Rail line from “implementation” to “investigate the feasibility”;
- Remove reference to a Mid Term Review of the Transport Strategy;
- Remove reference to underground rail links to UCD and Knocklyon;
- Remove reference to Luas network expansion to Hazelhatch, Booterstown and Blessington;
- Remove reference to an evaluation of underground metro routes inside the M50

Department of Housing Planning and Local Government (DHPLG) has also raised concerns relating to this Amendment, which proposes additional rail projects that go beyond the scope of the Transport Strategy for the Greater Dublin Region 2016-2035, National Transport Authority, the National Planning Framework and, the National Development Plan 2018 – 2027 including the construction of Metrolink to include underground extensions to UCD and Knocklyon and the expansion of the LUAS network to include Hazelhatch, Booterstown and Blessington.

Furthermore, the Department of Transport Tourism and Sport (DTTS) raises concerns in relation to material Amendments to implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy, and for the expansion of the proposed Metrolink to include underground extensions to UCD and Knocklyon.

DTTS notes that the NTA has published the MetroLink "Preferred Route" for public consultation on 26th March, 2019 which now proposes a number of changes to the previous route. The NTA/TII proposal is now to develop MetroLink from Charlemont to Swords also completing the Green Line Capacity Enhancement Project already underway. It is now proposed to defer the proposed tie-in between the Metro with the existing Luas Green Line and extend Metro services southward along that line. DTTS therefore considers that the Amendment should be modified to ensure consistency with the NTA Strategy, Project Ireland 2040 and the MetroLink preferred route, to refer to

- “Complete construction of Metrolink”
- “LUAS Green Line Capacity Enhancement”

A number of submissions were also received in support of the proposed Amendment to extend Metrolink to Knocklyon, the extension of Luas to Booterstown creating a south orbital route linking the existing Luas, proposed Metro and Dart, and the extension of the Saggart Luas to Hazelhatch. Further submissions suggest additional locations to be served including Firhouse, Rathfarnham, Marlay Park and Ballyboden.

Further submissions request improvements to the DART South Eastern line and in support of the extension of the Dunboyne/M3 parkway line to Navan during the Mid Term Review of the GDA Transport Strategy.

A number of submissions highlight the need for transport infrastructure projects to be supported by national investment plans under the NDP or the NTAs Transport Strategy, and support the omission of projects that would be at variance with national strategies and investment plans. Another submission contends that the inclusion of such projects, which are not supported at a national level would significantly undermine the strategic nature of the RSES and would damage its credibility.

## Directors Response

There is a statutory requirement for the RSES to be consistent with the Greater Dublin Area (GDA) Transport Strategy. The GDA strategy provides the statutory framework for the planning and delivery of transport infrastructure for the region, and for which Project Ireland 2040 included the funding to progress these projects. While certain additional projects may be of future merit, they are somewhat premature within the period of this RSES at this point, and would serve to undermine the delivery of the Strategy.

There are extensive submissions from government departments, state agencies and local authorities that are all stating that the additional rail projects included in the proposed amendments should be rejected and not included in the RSES.

It is therefore recommended that Amendment 69 be revised as follows, in order to ensure consistency with national transport, spatial development, and public investment policy;

- (i) Remove reference to the electrification of the rail line further north of Drogheda and further south of Hazelhatch;
- (ii) Alter the reference to the Navan Rail line from “implementation” to “Reappraisal”;
- (iii) Remove reference to a Mid Term Review of the Transport Strategy;
- (iv) Alter the reference to Metrolink to “Complete construction of Metrolink”
- (v) Alter the reference to LUAS Green Line to “LUAS Green Line Capacity Enhancement”
- (vi) Remove reference to underground rail links to UCD and Knocklyon;
- (vii) Remove reference to Luas network expansion to Hazelhatch, Booterstown and Blessington;
- (viii) Remove reference to an evaluation of underground metro routes inside the M50

## Directors Recommendation

**Accept Amendment**, with minor modifications to read as follows;

- *DART Expansion Programme - new infrastructure and electrification of existing lines, including provision of electrified services to Drogheda on the Northern Line, Celbridge-Hazelhatch on the Kildare Line, Maynooth and M3 Parkway on the Maynooth/Sligo Line, while continuing to provide DART services on the South-Eastern Line as far south as Greystones*
- *New stations to provide interchanges with bus, LUAS and Metro network including at Kishoge, Heuston West, Cabra, Glasnevin, Pelletstown and Woodbrook*
- *Reappraisal of the extension of the Dunboyne/M3 Parkway line to Navan*
- *Complete construction of Metrolink*
- *LUAS Green Line Capacity Enhancement; and*
- *Appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan and Poolbeg*

## **70. Amend Road Projects**

### Summary of Issues

The NTA in their submission recommend that the following change to the above material amendment is required in order to ensure consistency with the Transport Strategy:

- (i) Include M50 Dublin Port South Access”

The Department of Housing Planning and Local Government (DHPLG) and Transport Infrastructure Ireland (TII), also support the inclusion of the Dublin Port Southern Access Route project.

DHPLG notes that the NTA clarified within their strategy that while the section of the route connecting the southern end of the Dublin Port Tunnel to the South Port area is included for delivery in their Transport Strategy, the remainder of the route was not proposed for development during the Strategy period. Therefore, reference to this portion of the Southern Access Route project should be included within the RSES.

TII have recommended that the M50 South Port Access Scheme (referred to as the South or Southern Port Access Route) should be included in the final RSES as it is part of national policy in Project Ireland 2040 – NDP: is consistent with DOECLG Section 28 Guidelines Spatial Planning and National Road Guidelines for Planning Authorities 2012; part of the NTA’s Transport Strategy for the Greater Dublin Area 2016-2035 and the Dublin City Development Plan 2016-2022. They state;

‘Due to the required tie-in with the Dublin Tunnel (M50) and the long term Eastern Bypass project, TII advises that careful coordination between TII, NTA, DCC and the Dublin Port Company in the planning of the future M50 Dublin Port South Access Scheme. In the interim, TII’s Dublin Eastern Bypass Corridor Protection Study Sector A: Dublin Tunnel to Sandymount Strand 2014 affords protection for the M50 Port South Access with the overall Eastern Bypass corridor until a decision is made on the preferred solution for the future M50 Port South Access Scheme.’

Another submission states that the current Dublin City Development Plan 2016-2022 supports the protection of the ‘Southern Port Access’ (see objective MTO32) and is clearly referred to in the Poolbeg West Planning Scheme (recently approved) where one of the modifications of the scheme by ABP states that DCC works with TII and NTA ‘to refine the route of the South Port Access / Eastern Bypass Corridor reservation.’ And that this scheme should not be removed from the RSES.

DHPLG also make observations in relation to the inclusion of the N81 Tallaght to Hollywood road scheme, which goes beyond the scope of national transport policy as set out in the Transport Strategy for the Greater Dublin Region 2016-2035, the National Planning Framework (NPF) and the National Development Plan (NDP). The Department of Transport Tourism and Sport (DTTS) further note that the NDP provides the investment framework for the national and regional roads programme from 2018 to 2027 and that where a national road project is not identified in the NDP either for development or appraisal, it falls outside the current scope of the NDP.

One submission proposes that the ‘Dublin Airport Western Access’ should be included in the list of road projects. Another submission proposes that the East-West Distributor road needs to be prioritised.

Other submissions received also highlight the need for transport infrastructure projects to be supported by national investment plans under the NDP or the NTAs Transport Strategy.

#### Directors Response



There is a statutory requirement for the RSES to be consistent with the Greater Dublin Area (GDA) Transport Strategy. It is therefore recommended that Amendment 70 be revised to include reference to the M50 Dublin Port South Access Route, for which a section of the route from the Dublin Port Tunnel to the South Port area is included for delivery in their Strategy.

The RSES should also be consistent with Project Ireland 2040 – the National Planning Framework and the National Development Plan (NDP), which provides the investment framework for the national and regional roads programme from 2018 to 2027. In this regard it is noted that the N81 Tallaght to Hollywood is not included as a national road project for development or appraisal in the NDP.

On foot of the above it is considered that the road projects be updated as follows to accurately reflect and be in line with national transport, spatial development, and public investment policy;

- (i) Include M50 Dublin Port South Access
- (ii) Omit N81 Tallaght to Hollywood

While certain additional projects may be of future merit, they are somewhat premature within the period of this RSES at this point. In relation to the proposed inclusion of ‘Dublin Airport Western Access’ it should be noted that this is not identified as a national road project for development or appraisal in the NDP. Moreover, the need to improve access to Dublin Airport by public transport and road is already identified in the Guiding Principles for the MASP, in Table 5.1 Phasing/Enabling Infrastructure and in the narrative for Swords – Key Town. No further modification is recommended in this regard.

It is recommended that the material Amendment be modified accordingly

#### Directors Recommendation

**Accept and Modify Amendment**, to read as follows;

- *M4 Maynooth to Leixlip*
- *M11 from Jn 4 M50 to Kilmacanogue*
- *N3 Clonee to M50*
- *M50 Dublin Port South Access*

### **71. Amend Park and Ride**

#### Summary of Issues

No submission was received that directly referred to the above material amendment.

#### Directors Response

It is recommended to accept the material amendment.

#### Directors Recommendation

**Accept Amendment.**

## **72. Amend Table 5.1 Phasing/Enabling Infrastructure for MASP**

### Summary of Issues

It is submitted that it should be made explicit that the list of strategic development corridors contained in table 5.1 should not be taken as being exhaustive. It is also submitted that reference to LIHAF funding be omitted.

Submissions were received welcoming the amendments allowing for the sequential development of lands in Dunboyne and Dunboyne North within the North West Corridor.

One submission states that the proposed footnote, which states 'Dublin Enterprise Zone and Lissenhall are not directly served by existing or planned rail', would be contrary to Metrolink Corridor policy and that Lissenhall should be omitted as it will be within 1km of Metrolink.

A number of submissions were received in relation to 'Phasing/Enabling Infrastructure' including from Irish Water highlighting the need for additional water services infrastructure to be included to support the delivery of a number of strategic development areas and corridors.

Submissions support the clarification as to the location and potential for regeneration of brownfield lands at Naas Road/Ballymount in both Dublin City Council and South Dublin County Council administrative areas. The inclusion of a new Luas stop as a medium to long term infrastructure enabler is welcomed. Another submission requests more information as to the location of the required Luas stop at Naas Road/Ballymount.

A submission was received requesting clarification of the potential of Tallaght/Cookstown for employment/mixed use development within the South West Corridor, also referencing Table 5.2 Strategic Employment Development Areas.

A submission was received proposing additional phasing/infrastructure requirements for 'Bray-Old Connaught', namely high capacity bus links between Old Connaught, Bray and Woodbrook (short to medium term) and extension of Luas to Bray via Old Connaught (long term).

It is queried why it is proposed to omit reference to Metrolink in the short to medium term for new developments in Dun Laoghaire Rathdown on the Metrolink/Greenline.

### Directors Response

In response to Irish Waters submission it is recommended to update the Phasing/Enabling Infrastructure column in Table 5.1, to include the required water services infrastructure to support the delivery of the strategic development areas and corridors. This applies across all corridors. It is also considered appropriate to omit reference to LIHAF funding across all corridors.

In response to the request that the list of strategic development areas is not regarded as exhaustive, it is explicitly recognised in Section 5.6 (Core Strategies) that the figures referenced in Table 5.1 are a statement of the population capacity and are not targets and furthermore that the identification of strategic development areas does not preclude the ongoing development of other underutilised lands within the metropolitan area.

Submissions in support of the amendments to clarify the location and potential of strategic development areas are welcomed. It is considered appropriate to also provide clarification of the potential for employment /mixed use development of lands at Tallaght/Cookstown.

In response to submissions on the additional phasing/infrastructure requirements for ‘Bray-Old Connaught’ (City Centre within the M50 corridor refers) , it is considered these are overly spatially specific and may preclude the planned appraisal, planning and design of LUAS network, which is supported by the NDP for delivery post 2027.

It is noted that Table 5.1 includes ‘LUAS extension to Bray’ as a long term infrastructure requirement for Old Connaught. In the short to medium term, it is considered appropriate that a requirement for collaboration between Dun Laoghaire Rathdown, Wicklow County Council and the transport agencies be inserted as footnote, in order to ensure high quality public transport links are in place to service targeted growth at Fassaroe. It is also recommended that ‘Old Conna’ be updated to ‘Old Connaught’, for the purposes of clarity.

In response to submissions on the Metrolink/Luas Greenline corridor; it is acknowledged that the delivery of Metrolink will support the development of significant lands in the vicinity of Swords and to that end, it is considered reasonable to omit reference to Lissenhall not being directly served by existing or planned rail, from the footnote text.

It is noted however that the new preferred Metrolink route, which is subject to public consultation, proposes to defer the extension of Metro south along the Greenline therefore it is considered appropriate to omit reference to Metrolink as an infrastructure requirement for development areas in Dun Laoghaire in the short to medium term, as recommended in extensive submissions by government departments and by transport agencies.

#### Directors Recommendation

**Accept Amendment**, with minor modifications to read as follows;

TABLE 5.1 Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing			
Corridor	Residential	Employment/ Mixed Use	Phasing/ Enabling infrastructure
<b>City Centre within the M50</b>  (Multi-modal)  <b>Population capacity</b> Short 35,000 Medium 10,000 Long 15,000  <u>Total 60,000</u>	<b>Docklands</b> build out of North Lotts and Grand Canal Docks with further physical and social regeneration of Poolbeg and northeast inner-city lands	Further development of people intensive high tech and services-based business districts in Docklands and Poolbeg.	<b>Short to Medium term</b> Dodder bridge, LUAS extension to Poolbeg, local and wider area Water upgrades, Waste Water upgrades and district heating.
	<b>City centre</b> regeneration of older social housing projects (former PPPs), Parkwest-Cherryorchard, Ballymun, Ashtown-Pelletstown and St James – Heuston lands	Regeneration of Diageo lands, health and education related employment at St James and Grangegorman campus	<b>Short to medium term</b> Waste Water upgrades, social infrastructure  <b>Long term</b> Long term capacity supported by DART underground
	<b>Naas Road /Ballymount</b> – significant brownfield lands in South Dublin and Dublin City Council areas, with	Re-intensification of underutilised lands including Naas road and older industrial estates,	<b>Medium to Long term</b> Multi-modal public transport, new Luas stop, site assembly, Waste Water upgrades and local area water network

	potential for residential development and more intensive employment/mixed uses	subject to feasibility study.	upgrades.
	<b>Dunsink</b> – major greenfield landbank with long term potential to develop a new district centre	Subject to feasibility	<b>Long term</b> LUAS extension to Finglas, access, site conditions, feasibility.
<b>North-South corridor</b>  (DART)  <b>Population capacity</b> Short 31,000 Medium 13,000 Long 7,000  <u>Total 51,000</u>	<b>North Fringe</b> – large scale urban expansion creating new communities at Clongriffin-Belmayne (Dublin city) and Baldoyle-Stapolin (Fingal)	Completion of mixed-use districts with retail and service provision.	<b>Short to medium term</b> Access to rail station, bus upgrades, new road connections, drainage, parks and social infrastructure.
	<b>Donabate</b> – significant residential capacity in this strategically located rapidly growing coastal village	Consolidation of economic and service base in tandem with population growth.	<b>Short term</b> DART expansion, Distributor Road and railway bridge, social infrastructure, local area water network and storage upgrades
	<b>South County Dublin - North Wicklow</b> – development of new residential communities at Woodbrook- Shanganagh and Bray Golf course and Harbour lands	Strengthening commercial town functions in Bray, developing IDA strategic site in Greystones to strengthen economic base in North Wicklow.	<b>Short term</b> Access road, new station at Woodbrook - Shanganagh. Access to Bray station and PT bridge.
	<b>Bray Fassaroe*</b> – westward extension of Bray at Old Connaught-Fassaroe (Dun Laoghaire) and Bray - Fassaroe (Wicklow) lands	New mixed use residential and employment district at Fassaroe, west of Bray Greystones Strategic site	<b>Short -medium term</b> High capacity bus between Bray and Fassaroe, Distributor Road, N/M11 upgrades, new bridge to Old Conna. Waste Water upgrades. Local and wider area Water Network and storage upgrades. <b>Long term</b> LUAS extension to Bray.
<b>North-West corridor</b>  (Maynooth/ Dunboyne commuter line /DART)  <b>Population capacity</b> Short 24,000 Medium 10,000 Long 3,000  <u>Total 37,000</u>	<b>Dublin 15 lands</b> – continued development of Hansfield linked to the future development of Barnhill and Kellytown landbanks to the south and east	Further development of large-scale employment in Dublin Enterprise Zone** in proximity to Blanchardstown IT.	<b>Short term</b> Public transport, Clonsilla station, Water Network and Waste Water upgrades.
	<b>Leixlip</b> – strategic greenfield lands near Confey station with capacity for phased development, poor links to Leixlip and adjoining Dublin/Meath lands	Large scale former Hewlett Packard site and Collinstown site to strengthen employment base for North Kildare.	<b>Short to Medium term</b> LUAS extension to Maynooth, roads upgrades, community and social infrastructure, Waste Water and local Water Network upgrades.
	<b>Maynooth</b> – Significant strategic residential capacity at Railpark lands and to the north and west of the town near Maynooth University	New Research & technology Park adjoining Maynooth University	<b>Short to Medium term</b> DART expansion, road upgrades, bridge, Maynooth Outer Orbital Route, Waste Water and local Water Network upgrades.

	<b>Dunboyne</b> – Sequential development prioritising zoned and serviced lands near the railway station and town centre and at Dunboyne North / M3 Parkway station	Space intensive ‘big box’ employment at Portan. Mixed use ‘live - work’ development at Dunboyne North	<b>Medium to Long term</b> Outer Orbital road, Distributor Road, additional Watermains and Waste Water upgrades.
<b>South western corridor</b>  (Kildare line/DART and LUAS redline)  <b>Population capacity</b> Short 45,000 Medium 21,000  <u>Total 66,000</u>	<b>Western suburbs-</b> Continued development of Adamstown SDZ and the phased development of Clonburris located strategically between the west Dublin suburbs of Lucan and Clondalkin. New residential community at Kilcarbery near Clondalkin.	Promotion of high tech, manufacturing and research and development in Grangecastle Business Park	<b>Short to medium term</b> New roads and railway bridge, new rail station, DART expansion to Cellbridge-Hazelhatch (Adamstown, Clonburris). .Access road and Waste Water upgrades (Kilcarbery). Public transport and access to station (Grangecastle). New water network infrastructure to supply Clonburris SDZ and local network upgrades
	<b>LUAS red line</b> - Regeneration of brownfield lands in Tallaght. New district at Fortunestown near emerging town of Saggart/Citywest	Re-intensification of older industrial estates at Naas Road/Ballymount, Intensification of industrial lands and mixed-use development at Tallaght Town Centre/Cookstown	<b>Short to Medium term</b> Brownfield conditions and site assembly. Waste Water upgrades and Citywest junction link at Tallaght/Fortunestown.
<b>Metrolink /LUAS Greenline Corridor</b>  (Metrolink/LUAS)  <b>Population capacity</b> Short 28,000 Medium 25,000 Long 18,000  <u>Total 71,000</u>	<b>Dun Laoghaire- Rathdown</b> – New and emerging mixed-use districts of Cherrywood and Sandyford. New residential communities in Ballyogan and environs and Kiltiernan-Glenamuck	Continued development of high-density business districts at Cherrywood and Sandyford. New mixed use centres in Ballyogan and Kiltiernan	<b>Short to Medium term</b> LUAS green line upgrades. Public transport and roads upgrades. New road and bridge and N11 junction (Cherrywood) and Water upgrades.
	<b>Swords</b> – sequential development of strategic residential sites within Swords and development of Oldtown-Mooretown lands	Airport related, commercial facilities and employment linked to development of Metrolink.	<b>Short - Medium term</b> Public realm, pedestrian and cyclist provision. Road improvements, BusConnects. Additional runway and improved access (Airport). Waste water upgrades. Local and wider area Water Network upgrades
	<b>Swords – Lissenhall</b> – new mixed-use urban district on the northern side of Swords linked to delivery of Metrolink	Development of high-tech research and development employment within a campus setting at Lissenhall East	<b>Medium - Long term</b> Improved bus connections, Metrolink, roads improvements and expanded internal road network and Waste Water upgrades.

\*Development at Fassaroe will be undertaken in collaboration between Wicklow County Council, Dun Laoghaire County Council and the transport agencies

\*\*Dublin Enterprise Zone is not directly served by existing or planned rail and will require improve bus connections and demand management measures

## 73. Amend Core Strategy

### Summary of Issues

The Department of Housing Planning and Local Government (DHPLG) suggests the inclusion of additional clarification text setting out that the determination of population targets within the Dublin MASP is a matter for the local authorities within the MASP area and the MASP Implementation Group, provided agreement can be reached within six months of publication of the approved RSES. This is required in order to provide an appropriate level of information necessary for effective review of the relevant City/County Development Plans. Should it not be possible to reach agreement within this timeframe, it is recommended the matter be referred to the Minister.

DHPLG also states that the Regional Assembly should ensure that the RSES is fully in accordance to the NPF particularly National Planning Objective 68, which sets out arrangements for the relocation of phased population growth subject to certain criteria i.e. it being in the form of compact development, serviced by high capacity public transport etc.

Submissions were received in support of the clarification that population targets for each local authority in the Metropolitan Area will be agreed by the MASP Implementation Group following the adoption of the RSES. One submission query if this would entail the removal of population tables provided for in Appendix B, and suggests the provision of a defined timescale for setting out of population targets. A timeframe of 8 weeks is suggested in one submission, along with the need to collaborate with Local Authority Chief Executives and to collate all relevant data in advance to inform decision making.

Another submission suggests that the RSES/MASP should go further in setting out local authority population and infill/brownfield targets to inform implementation and monitoring of the strategy.

#### Directors Response

In relation to the determination of population targets for each local authority in the Metropolitan Area, it is considered appropriate to include additional clarification text as outlined in the DHPLG submission, outlining a timescale and arrangements for agreeing population targets as set out in the recommendation below. It should be noted that the population tables set out in Appendix B, which provide for local authority population target range, are aligned with the transitional Regional and County Projections set out in Appendix 2 of the Implementation Roadmap for the NPF and as such will form the basis for more detailed population targets at metropolitan scale.

It is noted that NPF National Planning Objective 68, is explicitly referenced and included as footnote in the narrative of this section.

It is recommended that the Material Amendment be accepted incorporating additional clarification as requested by DHPLG.

#### Directors Recommendation

Accept Amendment, with minor modifications to read as follows;

*The determination of population targets for local authorities within the MASP in accordance with the NPF and this strategy, including the population targets for the city and the metropolitan key towns, should be agreed in consultation with the MASP Implementation Group, within six months of publication of the RSES to inform the preparation of the core strategies of the relevant city and county development plans. Should it not be possible to reach agreement within the above timeframe, the matter will be referred to the Minister for further determination.*

#### **74. Amend RPO 5.4 – Housing and Regeneration**

##### Summary of Issues

No submissions were received with direct comment on the above amendment.

##### Directors Response

The above amendment is proposed to reflect the adopted status of the Departmental Guidelines 'Urban Development and Building Heights Guidelines for Planning Authorities.

It is recommended that the Material Amendment be accepted.

##### Directors Recommendation

Accept Amendment

#### **75. Amend RPO 5.5 – Housing and Regeneration**

##### Summary of Issues

It is submitted that the amendment as proposed has added the development of Key Metropolitan Towns to the consolidation of Dublin for sequential residential development, whereas the primary focus should be on Dublin. It is further submitted that the amendment further dilutes objectives for the consolidation of Dublin.

It is also requested to include reference to achieving the right housing and tenure mix within the Dublin Metropolitan Area.

##### Directors Response

The Amendment as proposed, supports a sequential approach to development in the Metropolitan Area, which is in line with the overall Settlement Strategy of the RSES set out in Chapter 4. The request to include reference to achieving the right housing and tenure mix is reasonable and can be informed by the development of evidence based Housing Need and Demand Assessment to be carried out post adoption of RSES, as set out in RPO 9.3 – Housing.

It is recommended that the Material Amendment be accepted.

##### Directors Recommendation

**Accept Amendment**, with minor modifications to read as follows;

*Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.*

## 76. New Guiding Principles for the location of strategic employment

### Summary of Issues

It is submitted that additional reference could be made to the importance of research centres and capacity, smart specialisation, start-up hubs and incubators as determinants of ‘local strengths’ influencing the location of strategic employment.

The DCHG submission recommends a small amendment to the first bullet point to refer to “or subject to environment constraints”.

### Directors Response

The submission highlighting the importance of highlighting additional local strengths is considered reasonable and would further strengthen alignment between the Guiding Principles and the Economic Strategy of the RSES. For consistency it is considered that the terminology should also be consistent with Figures 6.5 and 6.6 Enterprise Development and Innovation Assets.

The first bullet point can be modified slightly as per the DCHG submission.

It is recommended that the Material Amendment be accepted.

### Directors Recommendation

**Accept Amendment**, with minor modifications as follows;

*The Economic Strategy sets out Guiding Principles for the location of strategic employment areas that include access to;*

- **suitable locations** (depending on the extent to which an enterprise is people or space intensive or subject to environment constraints);
- **serviced sites** (based on whether an industry is dependent on a particular infrastructure such as energy, water, transport or communications networks);
- **connectivity** (including access to international markets that requires proximity to an airport/port);
- **skilled labour force** (proximity to third level education and lifelong learning) and
- **local strengths** (a diverse sectoral mix, research, innovation and technology centres, start-up hubs and incubators, emerging clusters or cross industry value chains),

*See Section 6.3 for full list of Guiding Principles.*

## 77. Amend Table 5.2 Strategic employment development areas

### Summary of Issues

The Department of Housing Planning and Local Government (DHPLG) has raised concerns relating to the proposed Amendment to the planned Metrolink corridor to include underground extensions to UCD and Knocklyon, which goes beyond the scope of national transport policy as set out in the Transport Strategy for the Greater Dublin Region 2016-2035, National Transport Authority, the National Planning Framework and, the National Development Plan 2018 – 2027.



Other submissions also query the proposed amendment to include UCD and Knocklyon as strategic employment development areas, in particular having regard to the limited availability of development land, the absence of existing major employment centres and the predominantly residential nature in Knocklyon. It is submitted that the Tallaght Town Centre/Cookstown area is more appropriately designated as a strategic employment development area, being identified on Figure 6.5 and 6.6 as having one of the highest concentrations of enterprise development and innovation assets in the region, an existing cluster of employment and availability of a regeneration lands and proximity to public transport and the Technological University Dublin – Tallaght Campus (formerly Tallaght IT).

It is further submitted that this would not constitute a material amendment as the area is already identified in Table 5.1 of the Draft RSES as a strategic location for ‘regeneration of brownfield lands’, and reference to the area in Table 5.2 would merely provide clarification that the area is suitable for strategic employment development as part of the targeted regeneration of brownfield lands.

#### Directors Response

There is a statutory requirement for the RSES to be consistent with the Greater Dublin Area (GDA) Transport Strategy. The construction of Metrolink to include underground extensions to UCD and Knocklyon goes beyond the scope of the NTA Transport Strategy and the NDP public investment framework. It should be noted that the route selection process for MetroLink is ongoing and subject to further public consultation and that the new "Preferred Route" proposes to defer the proposed tie-in between the Metro with the existing Luas Green Line. Furthermore, it is acknowledged that Knocklyon has limited potential to develop as a strategic employment area.

It is therefore recommended to omit UCD & Knocklyon and to re-instate the ‘South County Dublin’ strategic employment location as previously set out in the Draft RSES which was considered to be consistent with the NTA Strategy as statutorily required.

In relation to the proposal to include reference to Tallaght Town Centre/Cookstown in Table 5.2, it is acknowledged that Tallaght is already identified and fulfils the criteria for inclusion as a strategic development area in Table 5.1 as set out in the MASP. To that end, it is considered reasonable to provide further clarification that Tallaght/Cookstown (South west corridor) is suitable for strategic employment development as part of the targeted regeneration of these brownfield lands and to update Tables 5.1 and 5.2 accordingly

#### Directors Recommendation

**Accept Amendment**, with minor modifications to read as follows:

Strategic corridor	Strategic Employment locations	Employment potential
<b>Docklands and City centre</b> (Multi-modal)	Docklands, Poolbeg and north east inner city	High tech, financial services and people intensive employment and regeneration of underutilised lands
	City centre (Grangegorman and St James-Diageo lands)	Re-intensification and regeneration of underutilised lands, employment opportunities related to education and hospital campus development
	Industrial lands	Re-intensification of older industrial lands subject to feasibility
<b>North-South</b>	North county Wicklow	Re-intensification of commercial town centre functions and new

<b>corridor</b> (DART)	(Bray, extension to Fassaroe, Greystones)	mixed-use district. Redevelopment of IDA strategic sites at Greystones to strengthen employment base for North Wicklow.
<b>North-West corridor</b> (DART/Maynooth-Dunboyne commuter line)	Dublin Enterprise Zone (Dublin 15)	Large scale office, research and development and high tech manufacturing in proximity to Blanchardstown IT
	Dunboyne employment lands	Space intensive 'big box' employment at Portan. Mixed use development at M3/Parkway
	Leixlip employment lands	Large scale former Hewlett Packard site and Collinstown site for regional enterprise to strengthen employment base for North Kildare.
	Maynooth Research & Technology Park	New technology and research and development employment related to synergies with Maynooth University
<b>South west corridor</b> (DART /LUAS redline)	Naas Road/Ballymount lands	Potential for intensification of industrial lands and development of new mixed-use district
	Tallaght Town Centre /Cookstown	Potential for intensification of industrial lands and development of a new mixed-use district
	Grangecastle Business Park	Space intensive uses e.g. IT, research, pharmaceuticals in a campus style setting
<b>Metrolink / LUAS Green line Corridor</b>	South County Dublin (Cherrywood, Ballyogan and Sandyford)	Mixed-use districts with significant retail and people intensive employment to complement city centre and docklands
	Swords and Dublin Airport/South Fingal	Future employment locations and airport related and commercial facilities in Swords and Dublin Airport/South Fingal

## 78. Amend RPO 5.7- Green infrastructure

### Summary of Issues

Submission received in support of the proposed amendment to co-ordinate across Local Authority boundaries identify, manage, develop and protect regional Green Infrastructure and to develop a Green Infrastructure Policy in the Dublin Metropolitan Area.

The SEA report highlights that there is potential for cumulative negative effects from GI provision where siting and routing is in conflict with existing nature conservation areas and the potential for habitat loss and disturbance is addressed at the regional level.

### Directors Response

It is recommended to accept the proposed Amendment.

In terms of the environmental concerns, Amendment 100 that includes an amended RPO for Greenways, Blueways and Peatways includes appropriate environmental safeguards with regards to GI provision.

### Directors Recommendation

Accept the proposed material amendment.

## Chapter 6 Economy and Employment

### **Submission Number(s)**

061, 064 (EPA), 073, 075 (Meath County Council), 076 (Dun Laoghaire-Rathdown County Council), 081 (DCHG), 082 (South Dublin County Council), 083, 086 (Longford County Council), 089 (Offaly County Council), 091 (Kildare County Council), 093, 095, 103, 106 (Westmeath County Council)

## **79. Amend RPO 6.1 – Competitive and Resilient Economic Base**

### Summary of Issues

A submission requests that an additional amendment to focus on prioritising areas of high urban population and large commuting communities.

Another submission requests that local business stakeholders are a key part of the national enterprise strategy and they should be acknowledged via reference to enterprise development agencies. The submission also requests the addition of wording “key enabling infrastructure, supportive regulatory environment”.

### Director’s Response

RPO 6.1 was amended to recognise the wider range of stakeholders who may be involved in the Economic Strategy and is an overarching policy objective relevant to all areas of the region. The RPO makes reference to enterprise development as part of EMRA supporting relevant stakeholders and their plans for job creation. It would be duplication to also mention enterprise development at the beginning of the RPO.

Additional text in relation to “key enabling infrastructure, supportive regulatory environment” is not required in this RPO as the Guiding Principles to Identify Locations for Strategic Employment Development and Guiding Principles for Investment Prioritisation in Placemaking for Enterprise Development and Key Growth Enablers provide sufficient guidance in this regard.

### Director’s Recommendations

Accept the proposed material amendment.

## **80. Amend RPO 6.8 – Rural Economy**

### Summary of Issues

A submission requests that the proposed RPO be amended eliminating the tautology in respect of the phrase “extractive industries” and “quarrying and mining”.

### Director’s Response

It is agreed that quarrying and mining are represented under the term “extractive industries” and the wording should be amended accordingly.

### Director’s Recommendations

Accept the proposed material amendment with minor modification as follows:

Support Local Authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy, tourism, and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.

## **81. New RPO – Regional Enterprise Strategies**

### Summary of Issues

A submission supports the addition of this new RPO however it highlights that the RPO fails to recognise Louth’s location as one of the 4 counties in the Eastern Region of the Eastern and Midland Regional Assembly. All the published aims are from the Mid-East and the Midlands Action Plan for Jobs and excludes the North East Action Plan for Jobs which is Louth’s main regional Action Plan. The submission highlights Strategic Objective 4 of the North East Action Plan that aims to “Drive a higher level of economic success in the North-East by building on niche strengths and fostering clustering amongst enterprises”. Further, Action 3 of that objectives calls for “Explore the establishment of similar network in financial services, payments and agri-food to support the sharing of ideas and peer to peer learning within the region. Seek to extend and connect these networks with aligned activities outside of the region and on a North-South basis.” The submission requests that the RSES includes the development of the M1 Payments Corridor (M1PC) as a key Regional Enterprise Strategy as it directly relates to this objective of building a financial services and payments niche in the region.

Meath County Council supports the proposed new RPO in particular the development of the Mid-East as a hub for the Screen Content Creation Sector which will promote diversification in the economy and highlight the importance and potential of the film industry to contribute to economic growth. In addition, the Council supports the development of co-working spaces in various locations in the Region that can mitigate long distance commuting.

A separate submission requests additional more general region-focused objectives to be included in this new RPO and reference to support access to a Technological University in the Midlands.

Offaly County Council in their submission states that the RPO should be amended to specifically support the Regional Enterprise Strategy – Midlands and the seven strategic objectives therein. The proposed material amendment includes general support for the regional enterprise plans (in general) and mentions a selection of only three of these objectives contained in the Midlands Plan.

Dun Laoghaire-Rathdown County Council in their submission state that either the new RPO has been incorrectly titled – in which case it should be retitled Rural Enterprise Strategies – or there is an

unwarranted and disproportionate bias in the RPO towards affording opportunities and supports to the Midlands and 'Mid-East'.

#### Director's Response

The Director acknowledges the concerns raised that parts of the region appear to be excluded and a more balanced approach to the region should be supported in this new RPO. The Director notes that this RPO has been developed on foot of the Department of Business, Enterprise and Innovation's submission on strategic objectives identified in the emerging Regional Enterprise Plans. It is considered that the proposed RPO does not preclude the growth of new and existing economic opportunities in the region and innovation capacity which is supported by RPO 6.25, the accompanying narrative and additional RPO's related to the enterprise ecosystem for the region.

In terms of supporting access to a Technological University in the Midlands it is noted that Amendment 124 supports the further development of multi-campus Technological Universities to drive research and innovation.

#### Director's Recommendations

Accept the proposed material amendment with minor modifications to read as follows:

The Regional Assembly supports the Regional Enterprise Strategies to focus on;

- Support a high level of economic success throughout the region by building on local strengths and regional innovation capacity
- Position and support the growth of the Midlands as an advanced manufacturing centre of excellence.
- Leverage opportunities in big data and data analytics from iLOFAR.
- Ensure that the Midlands is well positioned to address the challenges posed by the transition to a low carbon economy and renewable energy Increase enterprise engagement in innovation, research and development to ensure Dublin's continued competitiveness and productivity.
- Build a pipeline of sustainable and scalable start-ups in Dublin and provide quality support
- Develop the Mid-East as a hub for the Screen Content Creation Sector
- Build an ecosystem framework to support the financial services, payments and Agri-food sectors throughout the Region
- Develop a network of innovative co-working spaces in the region to mitigate long commuting times, promote remote working opportunities and life-style benefits.

## **82. New RPO – Rural Economy**

#### Summary of Issues

A submission supports the proposed new RPO, however requests the addition of "the Eastern Region" to this statement after "the Midlands". This aims to nurture tourism in the rural areas of Louth, Meath, Kildare and Wicklow which are all part of Ireland's Ancient East.

The SEA report notes that as with the Wild Atlantic Way (WAW) initiative, proposals for the Ancient East and Hidden Heartlands should be subject to their own SEA and AA process to ensure the carrying capacity of the receiving environment is aligned and limited to sustainable patterns. Lessons-learned and the evidence base will already exist along with ongoing monitoring associated with the WAW, and these learnings should be noted in the RPO.

#### Director's Response

The Director agrees that a minor modification can be made to the proposed new RPO that refers to the Region in general.

It is acknowledged that future proposals for the Ancient East and Hidden Heartlands will be subject to their own environmental assessments and it is not necessary to highlight specific aspects such as lessons learned and monitoring as part of this RPO.

#### Director's Recommendations

Accept the proposed material amendment with the following minor modification to read as follows:

To support the sustainable development of tourism in the Region in line with the strategic objectives of both the Ireland's Ancient East and Ireland's Hidden Heartlands experience brand propositions.

### **83. Amend RPO 6.15 – Access to natural assets.**

#### Summary of Issues

A submission raises concerns regarding the word 'offer', what this means and the wording of the RPO should be reworded for clarity purposes.

#### Director's Response

The proposed additional wording is superfluous and does not strengthen the existing RPO and should be removed for clarity.

#### Director's Recommendations

Reject the proposed material amendment.

### **84. Amend RPO 6.16 – Natural and Cultural Tourism Assets**

#### Summary of Issues

The DCHG in their submission request that a minor amendment be made to this amended RPO to include the word 'sustainable'. They also query the apparent reference to Monuments and Historic Properties in the ownership of the OPW when many such assets are in the ownership of a variety of state and semi-state organisations, including the DCHG.

### Director's Response

The minor modification suggested from the DCHG is appropriate given the environmental context of the RPO. A further minor modification can include a reference to semi-state assets.

### Director's Recommendations

Accept the proposed amendment with minor modification to read as follows:

Support the maintenance of, and enhanced access to state and semi-state lands such as National Parks, Forest Parks, Waterways, etc., together with Monuments and Historic Properties, for recreation and tourism purposes. Access should be planned and managed in a sustainable manner that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism.

## **85. Amend RPO 6.18 – Tourism**

### Summary of Issues

A submission requests that the amended RPO be further amended with the addition of the following text “to spread the benefit of tourism throughout the region and to encourage the increase of tourism product development, focusing first on existing tourism and heritage assets that are ripe for development before investing in the development of new features.”

### Director's Response

The proposed amended RPO has included the following text “to spread the benefit of tourism throughout the region and to encourage the increase of tourism product development” and as a high-level objective does not require further stipulation or limitation, which can be provided at the operational or project level.

### Director's Recommendations

Accept the proposed material amendment.

## **86. New RPO – Tourism**

### Summary of Issues

The EPA submission notes that consideration should be given to the environment's capacity to absorb additional development and the need to protect designated sites, protected species and supporting ecological linkages. The EPA supports the recommendation in the Environmental Report on the need for tourism-related plans to recognise and reflect the environmental sensitivities within the region and consider potential for cumulative and in combination effects. In relation to this new RPO, with regard to support of regional tourism strategies (including local strategies) and the proposed Barrow Blueway, at a regional level, the RSES should ensure that the requirements of

relevant directives including the SEA, Habitats, Water Framework, EIA and Floods directives are integrated as appropriate and relevant in any such strategies that arise over the lifetime of the RSES.

Offaly County Council request that a map of the Core Regional Greenways should be included as it is considered to be of critical importance, particularly because the National Greenway Strategy does not include such a map.

#### Director's Response

In terms of the provision of a regional greenways map RPO 7.22 highlights EMRA's commitment post adoption to co-ordinate the mapping of strategic green infrastructure in the region. In the interim, it is proposed to include, within the final RSES document, a navigational map of the green/blueways which identifies the main routes including the strategic Green and Silver triangular navigation route encompassing Dublin, Royal Canal, River Shannon, the Grand Canal and the Barrow.

The Director acknowledges potential cumulative and in combination effects to tourism-related plans given the environmental sensitivities within the region. The potential for cumulative and in combination effects are considered as part of the environmental assessment of such plans in accordance with the relevant Directives. As per previous amendments in relation to the strategic development of settlements it is recommended that policy RPO 3.2 is modified to take account of all necessary legal requirements to sensitive environmental sites and a change to be applied throughout the document and additional wording added to RPO 3.2 to state that;

*In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.*

#### Director's Recommendations

Accept the proposed material amendment.

### **87. New RPO – Tourism**

#### Summary of Issues

No submissions were received with direct comment on the above amendment.

#### Director's Response

It is considered that the proposed amendment is acceptable.

#### Director's Recommendations

Accept the proposed material amendment

### **88. New RPO – Agriculture**



### Summary of Issues

No submissions were received with direct comment on the above amendment.

The SEA report highlights that the proposed new RPO is broadly positive. The recognition of the need to urgently address climate mitigation and adaptation in this regard is noted, however the RPO could benefit from prioritising support for real and effective and adaptation mechanisms for the long-term sustainability of the agri-sector.

### Director's Response

The Director acknowledged that the sector required attention and needed to be addressed in the RSES and linked to RPO 6.8 and 7.26. This is noted in the Director's report on the Draft RSES where additional text was agreed to be introduced. With regard to the SEA it is considered prudent to incorporate this recommendation.

### Director's Recommendations

Accept the proposed material amendment with minor modifications to read as follows;

Support the Departments of Agriculture, Food and the Marine, and Communications Climate Action and Environment to enhance the competitiveness of the agriculture sector with an urgent need for mitigation as well as real and effective and adaptation mechanisms for the long-term sustainability of the agri-sector.

## **89. New RPO -Skills and Innovation.**

### Summary of Issues

No submissions were received with direct comment on the above amendment.

### Director's Response

It is considered that the proposed amendment is acceptable.

### Director's Recommendations

Accept the proposed material amendment.

## **90. New RPO – Social Enterprise**

### Summary of Issues

No submissions were received with direct comment on the above amendment.

### Director's Response

It is considered that the proposed amendment is acceptable.

### Director's Recommendations

Accept the proposed material amendment.

## **91. Amend RPO 6.32 – Anticipating Economic Structural Changes**

### Summary of Issues

Offaly County Council in their submission have concerns regarding RPO's that are limited to references to the Transition Team and partnership approaches to integrated peatland management. In particular, concerns have been raised that the Landscape chapter is not the correct place to contain an important RPO with respect to the future of peatlands and it remains weak and not reflective of the NPF aspiration or that of the current RPG's.

As such, Offaly County Council request that a RPO be included in the Rural Areas or the Low Carbon Economy and Circular Economy Sections to state "having regard to section 5.4 of the NPF, to support the preparation, in the short term and the development 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 the areas, also demonstrating leadership in climate change mitigation and land stewardship. Also to lead on the sourcing of EU funding to support the transition of the industrial peatlands to sustainable afteruses" and that the Assembly to support 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."

### Director's Response

The inclusion of narrative with respect to the afteruse of Peatlands will be provided within the final RSES document. In terms of the significance of peatland afteruse for the Eastern and Midland Region a New RPO under the Rural Areas chapter (Amendment 67) provides the required support for a comprehensive afteruse framework plan for the peatlands and related infrastructure as it states:

*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. In keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive afteruse framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.*

The reference to Bord na Mona Regional Transition Team needs to be slightly modified in the current RPO for consistent legibility.

Director's Recommendations

Accept the material amendment with minor modification to read as follows;

Support enterprise agencies, RAPJs, LECs, Regional Skill fora and local stakeholders on their introduction of contingency plans and pilot projects based on the strengths of the Region to counteract the effects from industrial decline and potential external shocks in the Region. This may include lifelong learning programmes, appropriate business supports and upskilling to facilitate moving to alternative sectors in the locality or region, for example the Bord na Mona Regional Transition Team for a comprehensive afteruse framework plan for the peatlands.

## **Chapter 7 Environment**

### **Submission Number(s)**

063 (Gas Networks Ireland), 064 (EPA), 068, 074 (Laois County Council), 075 (Meath County Council), 081 (DCHG), 082 (South Dublin County Council), 089 (Offaly County Council), 092 (Irish Water), 095, 096 (DHPLG), 103, 106 (Westmeath County Council)

### **92. Amend RPO 7.5 – Fisheries and aquaculture**

#### Summary of Issues

No submissions were received with direct comment on the above amendment.

#### Director's Response

It is considered that the proposed amendment is acceptable.

#### Director's Recommendations

Accept the proposed material amendment

### **93. Amend RPO 7.10 – Water Quality**

#### Summary of Issues

No submissions were received with direct comment on the above amendment.

#### Director's Response

It is considered that the proposed amendment is acceptable.

#### Director's Recommendations

Accept the proposed material amendment.

### **94. Amend RPO 7.11 – Water Quality**

### Summary of Issues

No submissions were received with direct comment on the above amendment.

### Director's Response

It is considered that the proposed amendment is acceptable.

### Director's Recommendations

Accept the proposed material amendment.

## **95. Amend RPO 7.18 – Biodiversity and Natural Heritage**

### Summary of Issues

The EPA supports the recommendation to prepare management plans for the Wicklow and Slieve Bloom Mountains, to assist in managing tourism (and recreation/amenity activity in these sensitive areas) over the lifetime of the RSES. The requirements of the SEA and Habitats Directives should be taken into account, as appropriate.

Laos County Council in their submission states that they are disappointed that an earlier suggested RPO has not been included to facilitate cross boundary co-ordination between local authorities and the relevant agencies of the region to provide clear governance arrangements and coordination mechanisms to continue to promote the development of improved visitor experiences and facilities in the Slieve Bloom Mountains

### Director's Response

Any future management plan to assist in managing tourism and recreation/amenity activity will be subject to environmental assessment as affirmed in RPO 3.2.

This RPO has been expanded in its proposed amendment to reference the Slieve Bloom Mountains in promoting the development of improved visitor experiences and facilities.

### Director's Recommendations

Accept the proposed material amendment.

## **96. Amend RPO 7.20 – Biodiversity and Natural Heritage**

### Summary of Issues

A submission supports the proposed amended RPO.

### Director's Response

It is considered that the proposed amendment is acceptable.

### Director's Recommendations

Accept the proposed material amendment.

## **97. Amend Table 7.1 Strategic Natural, Cultural and Heritage Assets**

### Summary of Issues

The DCHG raises concern that inclusion of a number of these proposed greenways as Heritage Assets may be premature and misleading given that they have yet to go through the planning process including associated environmental assessments. It is suggested that such proposed, and not yet existing greenways, are clearly demarcated as such.

Laois County Council support the inclusion of Abbeyleix Bog to the table.

South Dublin County Council (SDCC) request that Table 7.1 be extended to include the assets of strategic importance within the South Dublin County. They request the inclusion of the regional parks Dodder Valley Park, Griffeen Valley Park and Corkagh Park. The heritage Sites of Clondalkin (Clondalkin Round Tower), and Rathfarnham (Rathfarnham Castle). They have also requested the inclusion of the Canal loop Greenway (linking the Grand and Royal Canals) and the Dublin Mountains Way. South Dublin County Council are concerned that lack of clarity on this issue will have the unintended consequence of creating a hierarchy of strategic natural, amenity and cultural heritage assets.

Irish Water in their submission note that Vartry Reservoir is a man-made structure and not a 'natural' facility as such and raises concerns regarding unintentional implications that this may have on the management of the reservoir and request that the description be expanded, for example, to say the walks around the reservoir.

A submission highlights a typo "Baltinglass Hillfort Structure" and requests to add "contains a unique cluster of nine known hillforts"

### Director's Response

In response to DCHG concerns it is intended that in the final document the existing national greenways will be listed first and an asterisk and footnote will indicate the greenways that are proposed to be developed or under development.

The Director welcomes the requests for additions to Table 7.1. To clarify it is considered that table 7.1 Strategic Natural, Cultural and Heritage Assets in the Region, by virtue of being strategic, are not intended to be a complete list of the assets in the Region. However, it is considered appropriate to add these regional assets to Table 7.1.

The text relating to Vartry Reservoir can be amended to state the ‘walks around the Vartry Reservoir’

The reference to Baltinglass can be amended to “The Baltinglass cluster of hillforts”.

#### Director’s Recommendations

Accept the proposed material amendment with minor modifications to include the additional assets:

- Maritime towns and beaches: Wicklow town
- Lakes, Rivers and Canals: Lough Tay – Lough Dan on the Cloghoge River, walks around the Vartry Reservoir, River Slaney and tributary Derry River.
- Greenways / Blueways: Liffey Valley, Dodder, Lakelands Greenway, Newgrange to Newbridge Greenway, Blessington Greenway, Coastal Greenway from Wicklow to Greystones, Arklow – Shillelagh recreation trail, Canal loop Greenway (linking the Grand and Royal Canals), the Dublin Mountains Way, Green & Silver triangular navigation route encompassing Dublin Royal Canal, River Shannon and Grand Canal.
- Bogs and Peatlands: Abbeyleix Bog
- National and Regional Parks: Dodder Valley Park, Griffeen Valley Park and Corkagh Park. Avondale and Kilmacurragh. Lough Ree and Mid-Shannon Wilderness Park and Lanesborough Commons North Park, Curragh Plains
- Medieval, Historic and Walled Towns: Kildare, Naas
- Heritage sites: Curragh Plains, Baltinglass cluster of hillforts, Clondalkin (Clondalkin Round Tower), and Rathfarnham (Rathfarnham Castle)

## **98. Amend Guiding Principles for Green Infrastructure**

### Summary of Issues

A submission supports the proposed amendment and notes that there is significant potential in the region for additional carbon sequestration.

### Director’s Response

It is not considered that any further modification of the proposed material amendment is required.

### Director’s Recommendations

Accept the proposed material amendment.

## **99. New RPO**

### Summary of Issues

The DHPLG submission states that any such guidance would be prepared by the relevant national agencies and Departments with input from appropriate stakeholders and suggests that the RPO be re-worded to read as follows “support the development of guidance for assessment of proposed...”

The EPA submission supports the proposed new RPO.

The SEA report highlights the addition of the RPO as positive in terms of alignment with other related environmental legislation including Water Framework Directive, Habitats Directive and Floods Directive and reference should be made to the forthcoming River Basin Management Plan (RBMP) Guidelines

#### Director’s Response

The Director supports the Department’s clarification that any such new guidance would be prepared by the relevant national agencies and Departments with input from appropriate stakeholders. With respect to referencing forthcoming guidelines on RBMPs, the preparation of new guidance will require consultation on all related environmental legislation and guidelines and it is not considered necessary to state any individual guidelines as part of the new RPO.

#### Director’s Recommendations

Accept the proposed material amendment with the following minor modification to read as follows:

Support the development of guidance for assessment of proposed land zonings in order to achieve appropriate riparian setback distances that support the attainment of high ecological status for water bodies, the conservation of biodiversity and good ecosystem health, and buffer zones from flood plains.

### **100. Amend RPO 7.23 – Greenways, Blueways and Peatways**

#### Summary of Issues

A submission opposes the amendment contending that numbers would be controlled resulting in users being turned away. Adequate protection of ecology is clearly implied by ‘sustainable’ in the first line.

A submission raises concern that the new statement added is too broad and will impede the proper development of Greenway facilities in the way that is not intended. The new line is requested to be removed and replaced with “Where there is concern in relation to ecological sustainability an appropriate cost/risk/benefit analysis be completed and used to modify the design or ameliorate to allow the project to proceed”.

The SEA report regards the amended wording as positive with clarification on ‘carrying capacities’.

#### Director’s Response

The RSES sets out Guiding Principles for Local Authorities in the preparation of Green Infrastructure Strategies (Chapter 7) including the following statements “consideration of the ecological impacts of greenways” and “ensuring appropriately designed infrastructure to reduce the impact on the natural



environment.” The amended wording reflects and supports these Guiding Principles and should therefore be retained as proposed.

#### Director’s Recommendations

Accept the proposed material amendment.

### **101. Amend RPO 7.27 – Landscape**

#### Summary of Issues

Offaly County Council in their submission have concerns regarding the limited references to the Transition Team and partnership approaches to integrated peatland management. In particular, concerns have been raised that the Landscape chapter is not the correct place to contain an important RPO with respect to the future of peatlands and it remains weak and not reflective of the NPF aspiration or that of the current Midland RPG’s.

It requests that a more comprehensive RPO be included in the Rural Areas or the Low Carbon Economy and Circular Economy Sections and should state “having regard to section 5.4 of the NPF, to support the preparation, in the short term and the development 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 the areas, also demonstrating leadership in climate change mitigation and land stewardship. Also to lead on the sourcing of EU funding to support the transition of the industrial peatlands to sustainable afteruses” and that the Assembly to support 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.” The Council also strongly considers that the issue be dealt with in RSO 9 as requested in their previous submission to the Draft RSES.

#### Director’s Response

The inclusion of narrative with respect to the afteruse of Peatlands will be provided within the final RSES document. In terms of the significance of peatland afteruse for the Eastern and Midland Region a New RPO under the Rural Areas chapter (Amendment 67) provides the required support for a comprehensive afteruse framework plan for the peatlands and related infrastructure as it states:

*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. In keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive afteruse framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.*

The reference to Bord na Mona Regional Transition Team needs to be slightly modified in the current RPO for consistent legibility.

#### Director's Recommendations

Accept the material amendment with minor modification as follows:

Support collaboration between Local Authorities, the Bord na Mona Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management for a just transition that incorporate any relevant policies and strategies such as the Bord na Mona Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats.

### **102. Omit RPO 7.29– Climate Change**

#### Summary of Issues

The SEA recommends that this RPO not be omitted as without generating an inventory in the first place it will not be possible to carry out RPO 7.30 which is based on that inventory. If the CARO is not the correct owner of the action to generate the inventory, then the policy should be amended to clarify who and how it is to be generated.

#### Director's Response

EMRA are committed to carrying out a regional emissions inventory and an amendment to RPO 7.30 will include this initial step of generating an inventory.

#### Director's Recommendations

Accept the proposed material amendment.

### **103. Amend RPO 7.30 – Climate Change**

#### Summary of Issues

The DCHG submission states that in terms of a regional emission inventory and sectoral emissions reductions targets, the DCCAIE is currently addressing this matter and, as such considers that it is beyond the remit of the RSES to assign sectoral emissions reductions targets and, in addition, there are no regional decarbonisation plans that would support this amendment. The Department recommends that the proposed amendment be deleted.

#### Director's Response

The Director welcomes clarification from DHPLG that DCCAE are currently addressing sectoral emissions reductions targets and accepts that it is beyond the remit of this RSES to assign “sectoral” emissions targets.

It is considered appropriate therefore, that the wording of this RPO be amended to remove reference to assigning “sectoral” targets, but that the RPO can also be further strengthened so that following the initial regional emissions assessment (RPO7.28 refers) EMRA will also compile and publish an emissions inventory, and in collaboration with the relevant Departments and agencies shall agree emissions reductions targets, in accordance with upcoming national sectoral plans for climate adaptation and to support achievement of emissions reduction targets in the EU 2030 Framework.

This will set a regional framework to ensure the implementation and monitoring of climate action, which is one of three overarching principles in the RSES, and which is consistent with and can be implemented and monitored in collaboration with the relevant agencies

It can include reference to the initial step of carrying out a regional emissions assessment as per EMRA’s previous commitments in this area (RPO 7.28 refers) and will address the need for the SEA concern regarding omitting the previous RPO.

It is recommended that the

#### Director’s Recommendations

Accept the proposed material amendment with minor modifications to read as follows:

Within 1 year of carrying out a regional emissions assessment, EMRA shall compile and publish an emissions inventory and, in collaboration with the relevant Departments and agencies, agree emissions reductions targets in accordance with agreed national sectoral plans and to support an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework.

### **104. Amend RPO 7.31 - Climate change**

#### Summary of Issues

No submissions were received with direct comment on the above amendment.

#### Director’s Response

It is considered that the proposed amendment is acceptable.

#### Director’s Recommendations

Accept the proposed material amendment.

## **105. Amend RPO 7.32 – Climate change**

### Summary of Issues

No submissions were received with direct comment on the above amendment.

### Director’s Response

It is considered that the proposed amendment is acceptable.

### Director’s Recommendations

Accept the proposed material amendment.

## **106. Amend RPO 7.34 –Decarbonising Electricity Generation**

### Summary of Issues

A submission highlights that the Draft RSES commitment to develop a Regional Landscape Character Assessment following the adoption of the National Landscape Character Assessment is a sensible approach (RPO 7.25). The development of a National Landscape Character Assessment will help ensure greater alignment and consistency in the development of regional and local landscape character assessments. However, there is no agreed timeline for the completion of this work and therefore it is vital that energy projects and the identification and creation of Strategic Renewable Energy Zones are not hindered or delayed by this process. The submission recommends that the wording “should” be replaced by “could” to remove any reliance.

### Director’s Response

The Director acknowledges the need to establish a consistent regional landscape strategy to support the delivery of projects within Strategic Renewable Energy Zones. It is also acknowledged that this is predicated on the delivery of a national landscape strategy and character assessment as outlined in RPO 7.25. It is agreed that these national landscape documents should not hinder the delivery of the identification of Strategic Renewable Energy Zones in our region and the wording should be amended as suggested by the submission.

### Director’s Recommendations

Accept to amend RPO 7.34 with minor modification as follows:

EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are

addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.

### **107. New RPO – identification of projected climate impact areas**

#### Summary of Issues

Meath County Council supports any research into climate change and would welcome any guidance that would assist in the integration of climate change policy into the plan making process. However, there is a lack of detail in the RSES as to exactly what ‘Projected Climate Impact Areas’ are and how Local Authorities will be able to utilise this ‘designation’. It is therefore suggested that further detail is included in the RSES as to the provenance of such “Projected Climate Impact Areas”, the agency responsible for creating the designation, and the implication of such a designation on a settlement/location.

The SEA report states that the RPO would benefit from greater clarity on the scope and function intended. It is not clear if it is intended that the RSES will include such policies or if the intention is for the EMRA to prepare them in due course.

The DHPLG in their submission highlight that both DHPLG and DCCAE are working on proposals to develop national guidance related to climate change and emissions and it would be beyond the remit of the RSES and premature to develop specific policy responses in this area in the absence of national guidance.

#### Director’s Response

Having regard to a changing policy context and in recognition that there is no established methodology for the identification and mapping of ‘Projected Climate Impact Areas’, EMRA are currently unable to provide sufficient clarity on the scope and function in this area to warrant an RPO in the strategy. It is considered important, however, that reference be made in the narrative that EMRA will support possible forthcoming projects and related mapping in this area which, when developed, will provide a useful tool to inform future land use plans and policy.

#### Director’s Recommendations

Reject the proposed material amendment.

## Chapter 8 Connectivity

### Submission Number(s)

001, 002, 003, 004, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 015, 016, 017, 018, 019, 020, 021, 022, 023, 024, 025, 026, 027, 028, 029, 030, 031, 032, 033, 034, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 049, 050, 051, 052, 053, 054, 055, 056, 057, 059, 060, 064 (EPA), 065 (TII), 068, 069 (NTA), 070, 073, 074 (Laois County Council), 076 (Dun Laoghaire-Rathdown County Council), 077 (DAA), 082 (South Dublin County Council), 085 (Dublin City Council), 087 (Wicklow County Council), 089 (Offaly County Council), 090, 094 (Department Transport, Tourism and Sport), 095, 096 (DHPLG), 098, 100, 101, 103, 105, 106 (Westmeath County Council)

### 108. Amend Section 8.3 Guiding Principles for Integration of Land Use and Transport

#### Summary of Issues

The NTA submission supports the omission of the guiding principle to support reverse commuting, as it implies that investment in employment would be redirected away from higher order centres into other settlements which do not have the capacity to cater for such growth in any manner other than by car-based patterns of development. In relation to the second bullet point, the NTA reiterates their position on the assessment of the impacts of transport infrastructure on greenhouse gas emissions as stated in their recommendation on Amendment 10.

The NTA has some concern in relation to the manner in which the Maynooth Outer Orbital route and the Navan Distributor Roads are described as infrastructure which would support future development, without any reference to how the additional capacity provided by these schemes could be exploited for the improvement of the public transport, walking and cycling networks within the towns. The NTA recommends that additional text is added which states that *these road schemes would also provide opportunities for the reallocation of road space within Maynooth and Navan Town Centres, in accordance with Section 5.8.2 of the Transport Strategy.*

The NTA recommends that a guiding principle is inserted which states *where additional road capacity is provided within or around any town which has an objective to cater for traffic that currently uses the road network in central areas and their immediate environs, that this additional capacity would be used for the improvement of public transport, walking and cycling networks with the towns through the reallocation of road space to these modes.*

The NIR requires that the guiding principles for integration of transport planning and land use planning should explicitly reference the protection of the Natura 2000 networks and the ecological linkages which support it.

#### Director's Response

The Director considers that the request to encourage the release of additional road capacity to be directed to alternate transport modes through the allocation of road space is acceptable.

The Director acknowledges the concerns raised in particular with regards to the potential for negative and indirect impacts on environmental protection and sustainable transport. To address these concerns additional Guiding Principles should be added to the Guiding Principles for Integration of Land Use and Transport, which are aligned with the other policy areas in climate in the RSES. These new guiding principles will satisfy environmental protection requirements and in relation to promoting sustainable transport modes within towns and the assessment of the impact on reaching carbon reduction targets.

### Director's Recommendations

Accept the amendment with minor modification to read as follows;

The RSES provides the basis for the integration of land use and transport planning in the Region, informing the preparation and implementation of plans, programmes and projects at all levels. To achieve this the EMRA, in conjunction with Local Authorities, the NTA and other agencies, will seek to apply the following guiding principles in statutory land use plans, taking into consideration the requirements of both urban and rural areas across the Region.

- For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.
- City and County Development Plans shall undergo assessment of their impact on carbon reduction targets in their preparation, and shall include measures to monitor and review progress towards carbon reduction targets.
- Larger scale, trip intensive developments, such as high employee dense offices and retail, should in the first instance be focused into central urban locations.
- Within the Dublin Metropolitan Area, except in limited planned circumstances, trip intensive developments or significant levels of development should not occur in locations not well served by existing or proposed high capacity public transport.
- The strategic transport function of national roads and associated junctions should be maintained and protected.
- All non-residential development proposals should be subject to maximum parking standards;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.
- The management of space in town and village centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life. Accessibility by car does need to be provided for, but in a manner, which complements the

alternative available modes. Local traffic management and the location / management of destination car parking should be carefully provided.

- Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.
- Support the '10 minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.
- New development areas, including peripheral areas, should be permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken in existing neighbourhoods, in order to give a competitive advantage to these modes. Where possible, developments shall provide for filtered permeability.
- Proposals for right of way extinguishments should only be considered where these do not result in more circuitous trips for local residents accessing public transport, or local destinations.
- Cycle parking should be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided.
- Support investment in infrastructure and behavioural change interventions to encourage and support a shift to sustainable modes of transport and support the use of design solutions and innovative approaches to reduce car dependency. Development will have regard to the Design Manual for Urban Roads and Streets, where appropriate.
- Where additional road capacity is provided within or around any town which has an objective to cater for traffic that currently uses the road network in central areas and their immediate environs, that this additional capacity would be used for the improvement of the public transport, walking and cycling networks within the towns through the reallocation of road space to these modes.
- Ensure the protection of Natura 2000 networks and associated ecological linkages. Plans and projects that have the potential to negatively impact on Natura 2000 sites should be subject to the requirements of the Habitats Directive.

## **109. Amend RPO 8.1 - Integrated Transport and Land use**

### Summary of Issues

No issues have been identified with respect to the proposed material amendment.

### Director's Response

The proposed material amendment is considered acceptable.

### Director's Recommendations

Accept Amendment

## **110. Amend RPO 8.4 – Integrated Transport and Land use**



### Summary of Issues

No issues have been identified with respect to the proposed material amendment.

### Director's Response

The proposed material amendment is considered acceptable.

### Director's Recommendations

Accept Amendment

## **111. New RPO – Mobility management and travel plans**

### Summary of Issues

It is requested that it is expressly stated that these plans should include cycle and pedestrian routes aligned with the users desire line.

### Director's Response

A Mobility Management Plan (MMP) is a management tool that brings together transport and other staff and site management issues in a coordinated manner. It normally brings together a package of measures tailored to the needs of an individual work site or a collection of work sites. This package generally includes measures to promote and improve the attractiveness of using public transport, cycling, walking, carsharing, flexible working or a combination of these as alternatives to drive-alone journeys to work. It can consider all travel associated with the work-site, including business travel, fleet management, customer access and deliveries. A MMP is not a plan for physical transport infrastructure such as cycle and pedestrian routes.

### Director's Recommendations

Accept amendment.

## **112. New RPO – Regional strategy for freight transport**

### Summary of Issues

One submission expresses support for this proposal.

The EPA recommends that SEA and AA be considered for regional freight transport strategy.

The NTA recommends that the RPO is amended to state that EMRA will *support* the preparation of a regional strategy for freight transport.

### Director's Response

This proposed amendment was in order to be consistent with the other Regional Assemblies draft RSEs that have been published. Given the comments from the agencies it is considered prudent to modify the amendment as requested.

## Director's Recommendations

Accept with minor modification to read as follows;

To support the preparation of a regional strategy for freight transport in collaboration with the relevant transport agencies and the other Assemblies.

### **113. Amend Table 8.2 Rail Projects for the Region**

#### Summary of Issues

Numerous submissions supported the provision of a metro to South Dublin, including Terenure, Knocklyon, Firhouse, Ballyboden, and Rathfarnham and the proposal for a south orbital LUAS from Booterstown to Tallaght and extending the Red line from Saggart to Hazelhatch.

The NTA in their submission recommend that the following changes to the material amendment are required in order to ensure consistency with the Transport Strategy:

- (i) Remove reference to the electrification of the rail line further north of Drogheda and further south of Hazelhatch;
- (ii) Alter the reference to the Navan Rail line from "implementation" to "investigate the feasibility";
- (iii) Remove reference to a Mid Term Review of the Transport Strategy;
- (iv) Remove reference to underground rail links to UCD and Knocklyon;
- (v) Remove reference to Luas network expansion to Hazelhatch, Booterstown and Blessington;
- (vi) Remove reference to an evaluation of underground metro routes inside the M50

Department of Transport Tourism and Sport also raise concerns in relation to the material Amendments to implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy. The Department considers that the text in the previous draft RSES is more consistent with the NDP and should be retained as follows:

*Reappraisal of the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy.*

DTTS notes that the NTA has published the MetroLink "Preferred Route" for public consultation on 26th March, 2019 which now proposes a number of changes to the previous route. The NTA/TII proposal is now to develop MetroLink from Charlemont to Swords also completing the Green Line Capacity Enhancement Project already underway. It is now proposed to defer the proposed tie-in between the Metro with the existing Luas Green Line and extend Metro services southward along that line. The Department considers that the Amendment should be modified to ensure consistency with the NTA Strategy, Project Ireland 2040 and the MetroLink preferred route, to refer to

- "Complete construction of Metrolink"

- “LUAS Green Line Capacity Enhancement”

The Department of Housing Planning and Local Government (DHPLG) has raised concerns relating to this amendment, which proposes additional rail projects that go beyond the scope of the Transport Strategy for the Greater Dublin Region 2016-2035, the National Planning Framework and, the National Development Plan 2018 – 2027 including the construction of Metrolink to include underground extensions to UCD and Knocklyon and the expansion of the LUAS network to include Hazelhatch, Booterstown and Blessington.

A submission refers to Section 8.3 of the Draft RSES where it is stated *“The RSES is required by legislation to be consistent with the NTA’s Transport Strategy for the Greater Dublin Area 2016-2035”* while page 114 of the Director’s Report on Submissions Received states *“The route selection process for Metrolink is ongoing and being delivered by TII and NTA, and any policy position on this route in the RSES would be prejudicial to that process and therefore the RSES should not support such a proposal”*. On the basis of these imperatives it follows:

- The proposal to *“Implement the extension of the Dunboyne/M3 Parkway line to Navan ...”* should be omitted as it is not in the NTA’s Transport Strategy.
- The references to underground extensions of the Metrolink to *“... UCD and Knocklyon from Charlemont”* should likewise be excised as they do not accord with NTA strategy.
- The proposal *“... to carry out an evaluation of underground metro routes within the M50’* does not align with the current NTA Transport Strategy and is, in any event, far too premature at this juncture and should therefore be omitted. There may indeed be a case to revisit this in the RSES mid-term review (c.2025/2026) but the inclusion now simply raises unrealistic expectations.
- Based on the same set of principles the proposed Luas network expansion to *“.. Hazelhatch, Booterstown and Blessington”* has no status in either the NTA Strategy of the national Development Plan and should, therefore, be omitted.

A number of submissions don’t support these additional projects and state that the inclusion of these proposed amendments that have no support in national plans and policies would merely delay and prejudice the RSES as a whole and would furthermore undermine key projects which are supported by national plans and policy and are rightly included within the RSES.

Another submission calls for the omission of the bullet point; *“In principle there is a need to carry out an evaluation of underground metro routes within the M50”*.

A submission welcomes the additional support for Phase 2 of the Navan Rail Project as it is the only County town / Administrative Capital in the region currently without a rail link to Dublin city.

Another submission requests under ‘DART expansion’ program reference to improved services on the south-eastern line as far as Greystones.

A few submissions have called for increased level of services on the western rail lines in particular the Dublin – Galway line with requests for increased level of service, a high speed and high frequency service and twin track in locations.

### Director's Response

There is a statutory requirement for the RSES to be consistent with the Greater Dublin Area (GDA) Transport Strategy. The GDA strategy provides the statutory framework for the planning and delivery of transport infrastructure for the region, and for which Project Ireland 2040 included the funding to progress these projects. While certain additional projects may be of future merit, they are somewhat premature within the period of this RSES at this point, and would serve to undermine the delivery of the Strategy.

There are extensive submissions from government departments, state agencies and local authorities that are all stating that the additional rail projects included in the proposed amendments should be rejected and not included in the RSES.

On foot of this and given the intrinsic links with proposed amendment no. 69, It is recommended that Amendment 69 be revised as follows, in order to ensure consistency with national transport, spatial development, and public investment policy;

- (ix) Remove reference to the electrification of the rail line further north of Drogheda and further south of Hazelhatch;
- (x) Alter the reference to the Navan Rail line from "implementation" to "Reappraisal";
- (xi) Remove reference to a Mid Term Review of the Transport Strategy;
- (xii) Alter the reference to Metrolink to "Complete construction of Metrolink"
- (xiii) Alter the reference to LUAS Green Line to "LUAS Green Line Capacity Enhancement"
- (xiv) Remove reference to underground rail links to UCD and Knocklyon;
- (xv) Remove reference to Luas network expansion to Hazelhatch, Booterstown and Blessington;
- (xvi) Remove reference to an evaluation of underground metro routes inside the M50

### Directors Recommendation

Accept amendment with minor modifications to read as follows;

- Delivery of DART Expansion Programme - delivery of priority elements including investment in new train fleet, new infrastructure and electrification of existing lines. Provide fast, high-frequency electrified services to Drogheda on the Northern Line, Celbridge-Hazelhatch on the Kildare Line, Maynooth and M3 Parkway on the Maynooth/Sligo Line, while continuing to improve DART services on the South-Eastern Line as far south as Greystones
- Provide for an appropriate level of commuter rail service in the Midlands and South-East
- Complete the construction of the National Train Control Centre
- New stations to provide interchange with bus, LUAS and Metro network at including Kishoge, Heuston West, Cabra, Glasnevin, Pelletstown and Woodbrook
- A feasibility study of high-speed rail between Dublin Belfast, Dublin Limerick Junction/Cork will be carried out
- New stations to provide interchanges with bus, LUAS and Metro network including at Kishoge, Heuston West, Cabra, Glasnevin, Pelletstown and Woodbrook

- Reappraisal of the extension of the Dunboyne/M3 Parkway line to Navan
- Complete construction of Metrolink
- LUAS Green Line Capacity Enhancement; and
- Appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan and Poolbeg

#### **114. Amend Table 8.4 Road Projects for the Region**

##### Summary of Issues

The NTA in their submission recommend that the following change to the above material amendment is required in order to ensure consistency with the Transport Strategy:

- (ii) Include M50 Dublin Port South Access”

The Department of Housing Planning and Local Government (DHPLG) and Transport Infrastructure Ireland (TII), also support the inclusion of the Dublin Port Southern Access Route project.

DHPLG notes that the NTA clarified within their strategy that while the section of the route connecting the southern end of the Dublin Port Tunnel to the South Port area is included for delivery in their Transport Strategy, the remainder of the route was not proposed for development during the Strategy period. Therefore, reference to this portion of the Southern Access Route project should be included within the RSES.

TII have recommended that the M50 South Port Access Scheme (referred to as the South or Southern Port Access Route) should be included in the final RSES as it is part of national policy in Project Ireland 2040 – NDP: is consistent with DOECLG Section 28 Guidelines Spatial Planning and National Road Guidelines for Planning Authorities 2012; part of the NTA’s Transport Strategy for the Greater Dublin Area 2016-2035 and the Dublin City Development Plan 2016-2022. They state;

‘Due to the required tie-in with the Dublin Tunnel (M50) and the long term Eastern Bypass project, TII advises that careful coordination between TII, NTA, DCC and the Dublin Port Company in the planning of the future M50 Dublin Port South Access Scheme. In the interim, TII’s Dublin Eastern Bypass Corridor Protection Study Sector A: Dublin Tunnel to Sandymount Strand 2014 affords protection for the M50 Port South Access with the overall Eastern Bypass corridor until a decision is made on the preferred solution for the future M50 Port South Access Scheme.’

Another submission states that the current Dublin City Development Plan 2016-2022 supports the protection of the ‘Southern Port Access’ (see objective MTO32) and is clearly referred to in the Poolbeg West Planning Scheme (recently approved) where one of the modifications of the scheme by ABP states that DCC works with TII and NTA ‘to refine the route of the South Port Access / Eastern Bypass Corridor reservation.’ And that this scheme should not be removed from the RSES.

DHPLG also make observations in relation to the inclusion of the N81 Tallaght to Hollywood road scheme, including linkage roads from Baltinglass and Dunlavin to N9 from N81, which goes beyond the scope of national transport policy as set out in the Transport Strategy for the Greater Dublin Region 2016-2035, the National Planning Framework (NPF) and the National Development Plan (NDP). The Department of Transport Tourism and Sport (DTTS) further note that the NDP provides the investment framework for the national and regional roads programme from 2018 to 2027 and that where a national road project is not identified in the NDP either for development or appraisal, it falls outside the current scope of the NDP.

Another submission refers to The Director's Report which states *"The N81 Tallaght to Hollywood is not supported in national investment plans under the NDP or the NTA's Transport Strategy...and as such it should not be in the RSES"*. The N81 project should, logically, be omitted.

A submission supports the inclusion of the N81 upgrade as it is the only main artery out of Dublin that has not been upgraded, it has a high traffic count, also the linkages to the M9 and old N9 should be examined.

TII also state that a number of road schemes are identified that are not included in the NDP nor in the NTA's Transport Strategy, and that they should be checked with the context of these documents before inclusion.

The Department of Transport, Tourism and Sport state that the National Development Plan 2018-2027 provides the investment framework for the national and regional roads programme. Where a national road project is not identified in the NDP for development or appraisal, it falls outside the current scope of the NDP.

A submission supports the inclusion of the N80 improvements included inter regional and intra regional accessibility, as it is important to the towns along this route and facilitates further connectivity of the south and eastern and midland regions. A further submission requests the inclusion of the N52 and N56, important regional routes (eg. R420) and connections to the Ports of Bellview and Rosslare.

A number of submissions requests the inclusion of road proposals in this list of road projects that are not the subject of the proposed material amendments these include; the Drogheda Port Access Northern Route, Dublin Airport Western Access, the N55 upgrade, the N62 upgrade.

#### Director's Response

There is a statutory requirement for the RSES to be consistent with the Greater Dublin Area (GDA) Transport Strategy. It is therefore recommended that Amendment 70 be revised to include reference to the M50 Dublin Port South Access Route, for which a section of the route from the Dublin Port Tunnel to the South Port area is included for delivery in their Strategy.

The RSES should also be consistent with Project Ireland 2040 – the National Planning Framework and the National Development Plan (NDP), which provides the investment framework for the national and regional roads programme from 2018 to 2027. In this regard it is noted that the N81 Tallaght to Hollywood is not included as a national road project for development or appraisal in the NDP.

On foot of the above it is considered that the road projects be updated as follows to accurately reflect and be in line with national transport, spatial development, and public investment policy;

- (i) Include M50 Dublin Port South Access
- (ii) Omit N80 Improvements including inter regional and intra regional accessibility
- (iii) Omit N81 Tallaght to Hollywood scheme including linkage roads from Baltinglass and Dunlavin to N9 from N81

While certain additional projects may be of future merit, they are somewhat premature within the period of this RSES at this point.

#### Directors Recommendation

Accept amendment with minor modifications to read as follows;

- M7 Naas to Newbridge bypass widening, Osberstown Interchange and Sallins Bypass
- N2 Slane Bypass
- N2 Rath Roundabout to Kilmoon Cross
- N2 Ardee to south of Castleblaney
- M4 Maynooth to Leixlip
- N4 Mullingar to Longford (and Sligo)
- M11 from Jn 4 M50 to Kilmacanogue
- N3 Clonee to M50
- N52 Ardee Bypass
- N52 Tullamore to Kilbeggan
- M50 Dublin Port South Access

#### **115. Amend Park and Ride.**

##### Summary of Issues

No issues have been raised with respect to proposed amendment no. 115.

##### Director's Response

The proposed amendment is considered acceptable.

##### Director's Recommendations

Accept Amendment

#### **116. Amend RPO 8.15 – Dublin Airport**

##### Summary of Issues

A submission has requested adjustments to include reference to studies and guidance by the Department of transport, Tourism and Sport; reference to new terminal facilities and infrastructure.

##### Director's Response

This proposed amendment was on foot of a submission from the DAA and has received support from the DAA and the DTTAS, the Director considers that it does not warrant further modification.

### Director's Recommendations

Accept Amendment

## **117. Amend RPO 8.16 – Dublin Airport**

### Summary of Issues

One submission offers support for a mobility management plan for Dublin Airport.

The NTA state;

“The following change to the above material amendment is required in order to ensure consistency with the Transport Strategy:

- (i) Remove reference to heavy rail access to Dublin Airport”

Another submission requests reference to a new road access from the west and north.

### Director's Response

The reference to heavy rail access to Dublin Airport was a request of an agency during the public consultation of the Draft RSES, given the statement from the NTA however it is considered prudent to remove this reference. The remainder of this RPO is supported by the NTA, DAA and DTTAS and does not warrant further modification.

### Director's Recommendations

Accept amendment with minor modifications to read as follows;

Improved access to Dublin Airport is supported, including Metrolink and improved bus services as part of BusConnects, connections from the road network from the west and north. Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of car parking and car hire parking.

## **118. Amend RPO 8.17 – Dublin Airport**

### Summary of Issues

There is support for this amendment, and requests for further additions in the interests of aviation safety. This includes to protect the operation of Dublin Airport in respect to its growth and the safe navigation of aircraft from non-compatible land uses.

### Director's Response

This RPO can be further strengthened by way of a minor modification to include the requested requirements to further protect the national asset of Dublin Airport.

### Director's Recommendations



Accept amendment with minor modifications to read as follows;

*Spatial planning policies in the vicinity of the airport shall protect the operation of Dublin Airport in respect to its growth and the safe navigation of aircraft from non-compatible land uses. Policies shall recognise and reflect the airport noise zones associated with Dublin Airport. Within the Inner Airport Noise Zone, provision of new residential and/or other noise sensitive development shall be actively resisted. Within the Outer Noise Zone, provision of new residential and/or other noise sensitive development shall be strictly controlled and require appropriate levels of noise insulation in all cases.*

## Chapter 9 Quality of Life

### Submission Number(s)

073, 075 (Meath County Council), 078, 082 (South Dublin County Council), 084 (Fingal County Council), 095, 103, 106 (Westmeath County Council)

### 119. New Guiding principles for Healthy Placemaking

#### Summary of Issues

Submissions were received in support of the focus on Healthy Placemaking.

A submission was received that proposes to include additional placemaking principles to include the importance of economic growth, integration of good urban design, public realm, amenities and heritage in creating attractive communities to live, work, visit and invest in.

A submission was also received in relation to point 4, submitting that the proposed guiding principle relating to the location of fast food outlets in the vicinity of schools and parks is poorly defined and discriminatory against fast food outlets, which have a significant economic and social benefit providing employment and support a mix between residential, retail and other commercial or business activity.

#### Director's Response

The Director welcomes the support for the focus on healthy placemaking, which is reflected in its inclusion as one of three overarching principles in the RSES.

In response to the submission that wider principles of good urban design, economic growth etc should be included, it should be noted that these Guiding Principles for Healthy Placemaking are focussed on supporting active lifestyles, particularly for young people and to address childhood obesity and are not intended to address all factors of good placemaking.

Nevertheless, it is acknowledged that the Guiding Principles could be further strengthened by inclusion of an introductory point outlining the need for the integration of good urban design, with reference to existing national policy as set out in Departmental Guidelines 'Sustainable Residential Development in Urban Areas', which includes a companion document 'Urban Design Manual' (2009) and the 'Design Manual for Urban Roads and Streets (DMURS), 2013. This would also provide for good alignment with the proposed material Amendment 125 for a new RPO – Healthy Placemaking.

In response to the submission on the location of fast food outlets in the vicinity of schools and parks, it should be noted that the Guiding Principles, and in particular point 5, is informed by existing DHPLG Departmental Guidelines 'Local Area Plans – Guidelines for Planning Authorities' (section 5.2, p.32 refers) setting out factors to be integrated into plan making in order to promote active and healthier lifestyles. It is moreover considered that point 4 is not overly prescriptive and allows for flexibility in how it is integrated into local planning and decision making.

#### Director's Recommendations

Accept material amendment with minor modifications to read as follows;

*Guiding Principles for Healthy Placemaking, by ensuring that;*

- *Good urban design principles are integrated into the layout and design of new development, as set out in Departmental Guidelines 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)*
- *Future development prioritises the need for people to be physically active in their daily lives and promote walking and cycling in the design of streets and public spaces*
- *New schools and workplaces are linked to walking and cycling networks*
- *Exposure of children to the promotion of unhealthy foods is reduced such as the careful consideration of the location of fast food outlets in the vicinity of schools and parks*
- *Provision of open space should consider types of recreation and amenity uses required*
- *Public open spaces to have good connectivity and be accessible by safe, secure walking cycling routes*
- *Open space to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, green infrastructure and key landscape features in their design.*

## **120. Amend Guiding Principles for Urban Infill and Brownfield Regeneration**

### Summary of Issues

A number of submissions were received in support of the proposal to create a database setting out the location and status of all strategic brownfield and infill sites in the Region. It is also requested that clarification is provided as to who would be responsible for updating the database and in monitoring of targets for compact growth.

Some submissions highlight the complexities and long lead in time involved in developing brownfield sites and the need for flexibility at local level to ensure a shortage of other zoned lands does not prevail in the interim. Conversely, other submissions contend that compact growth targets and objectives are not ambitious enough, also that further detail is needed at county level to ensure implementation and assist monitoring.

Another submission requests the inclusion of text requiring the Regional Waste Management Office to undertake a demand review of the available capacity for soil waste treatment to meet RSES commitments.

The SEA report states that opportunities for biodiversity enhancement to improve ecological connectivity should be explored as part of urban re-intensification.

### Director's Response

In response to the request to set out a requirement for the Regional Waste Management Office to undertake a review of soil waste treatment capacity in the region, it is considered that this would be beyond the remit of the RSES and that the existing point 3 is adequate, in setting out the need for liaison with the Regional Waste Management Office in relation to site remediation requirements.

In response to the submission requesting further detail on infill/brownfield targets, it is considered that this issue is addressed in a number of other material amendments that refer to compact growth targets (see Chapters 3 and 4 in particular) with a recommendation that terminology be updated to achieve consistency throughout the RSES. The proposed Amended Guiding Principles for Urban Infill and Brownfield Regeneration do not refer to compact growth targets, and as such no further modification is recommended.

To ensure the proper integration of SEA in the RSES, it is recommended to include a new guiding principle, point 6, to explore opportunities for biodiversity enhancement to improve ecological connectivity as part of the strategic re-intensification of urban infill and brownfield sites.

#### Director's Recommendations

Accept amendment with minor modifications to read as follows;

*Local authorities, in the preparation of the Core Strategies of their Development Plans, shall consider the following Guiding Principles to deal with the complexities of brownfield and infill sites;*

- 1. The establishment of a database of strategic brownfield and infill sites as part of the active land management process, that identifies the development capacity and any constraints on sites that are zoned for development including potential contamination and incorporating other relevant databases such as the Derelict Sites Register and the Vacant Sites Register. The database should be spatially referenced and searchable to allow for regular updating and monitoring and so that brownfield re-use can be managed and co-ordinated across multiple stakeholders.*
- 2. Proposals for strategic brownfield and infill sites should be accompanied by a site brief and/or masterplan that sets out a phased programme for the regeneration of the site and demonstrates how the proposal will comply with National Guidelines that seek to achieve sustainable compact development<sup>2</sup> and to integrate principles of good urban design and placemaking.*
- 3. Local authorities should liaise with the Regional Waste Management Office when considering proposals for the development of brownfield sites that require the offsite disposal of contaminated waste, so that a programme for site remediation can be identified early and considered by all stakeholders. Proposals for brownfield regeneration in strategic locations should be accompanied by a site risk statement and waste plan and for the disposal of any wastes arising including any hazardous or contaminated material. Encourage pilot projects for the re-use of brownfield sites and encourage active temporary uses where feasible and as far as practicable to encourage activation of vacant sites that require longer lead in time regeneration processes.*
- 5. Set out measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres*
- 6. Explore opportunities for biodiversity enhancement to improve ecological connectivity as part of the strategic re-intensification of urban infill and brownfield sites.*

#### **121. Amend RPO 9.12 – Regeneration**

### Summary of Issues

Submissions were received in support of this Amendment. It is also submitted that regeneration density targets should take into consideration existing population densities and consider a target density rather than a percentage increase.

### Director's Response

The Director welcomes submissions received in support of this amendment, which was included to reflect the adoption of new Departmental Guidelines to support the creation of sustainable residential communities and increased building heights and densities in urban areas.

In response to the submission received, it should be noted that the adopted national policy guidelines set out development management criteria to be considered at different urban scales and contexts, and it is not recommended to include supplementary guidance in this regard.

It is recommended to accept this proposed material amendment.

### Director's Recommendations

Accept proposed material amendment

## **122. Amend RPO 9.14 – Social Inclusion**

### Summary of Issues

No submissions were received in relation to this amendment.

### Director's Response

It is considered the proposed material amendment is acceptable.

### Director's Recommendations

Accept proposed material amendment

## **123. Amend RPO 9.16 – Childcare, Education and life long learning.**

### Summary of Issues

Submissions were received in support of this amendment. It was also submitted that a supplementary sentence be included to “Adopt a preventative approach to childhood poverty and low educational attainment in new communities using an early intervention programme such as The Genesis Programme (developed in Louth), which is an areas-based response to reduce the risk of childhood poverty and deprivation”.

### Director's Response

The Director welcomes submissions received in support of this amendment. In response to the proposed submission to include the need for preventative approaches with reference to the Genesis Programme, it is considered that actions to reduce the risk of poverty and social exclusion are more appropriately addressed, at a strategic level, through the implementation of Local Economic and Community Plans (RPO 9.14 refers). While it is not considered appropriate to highlight a specific

programme in this instance it should be noted that there is also scope to highlight certain projects and programmes as case studies in the final RSES.

It is considered the proposed material amendment is acceptable.

Director's Recommendations

Accept proposed material amendment

**124. New RPO – Childcare, Education and life long learning**

Summary of Issues

Submissions were received in support of this amendment.

Director's Response

It is considered the proposed material amendment is acceptable.

Director's Recommendations

Accept proposed material amendment

**125. New RPO – Healthy Placemaking**

Summary of Issues

Submissions were received in support of this amendment.

Director's Response

It is considered the proposed material amendment is acceptable.

Director's Recommendations

Accept proposed material amendment

**126. New RPO - Open Space and Recreational facilities**

Summary of Issues

A submission was received suggesting that the text be updated to include reference to "incorporating people centred, multi-use areas for sporting and health-development activities"

Director's Response

It is considered that the provision of multi-uses facilities is adequately addressed in the existing Guiding Principles for Recreation and Open Space (p.170 Draft RSES refers).

It is considered the proposed material amendment is acceptable.

Director's Recommendations

Accept proposed material amendment

### **127. New RPO – Protected structures**

#### Summary of Issues

A submission was received suggesting that the text be updated to include reference to “ providing practical guidance for planning staff and facilitating a pragmatic approach to re-use and protection of heritage structures’

#### Director’s Response

In response to the submission, it should be noted there is existing national policy ‘Architectural Heritage Protection Guidelines for Planning Authorities (DAHG, 2011)’ and it is not recommended that supplementary guidance be provided by EMRA in this regard.

It should also be noted that an existing RPO 9.26 also states that EMRA will support Local Authorities to work with local communities to ensure the sensitive re-use of protected structures

It is considered the proposed material amendment is acceptable.

#### Director’s Recommendations

Accept proposed material amendment

## **Chapter 10 Infrastructure**

### **Submission Number(s)**

092 (Irish Water), 095, 101, 103,

### **128. Amend Table 10.1 Strategic Water Services Projects**

#### Summary of Issues

Irish Water request rewording to

The Water Supply Project for the Eastern and Midland Region to supply water to the Greater Dublin Area and other communities in the Eastern & Midlands Region in accordance with the sustainable approach set out by National Strategic Outcome 9 of the National Planning Framework.

#### Director's Response

It is considered that the specific reference to Athlone is inequitable, as no specific beneficiary of this scheme should be highlighted by the strategy. There is no requirement to directly reference the National Strategic Outcome 9 of the National Planning Framework.

#### Director's Recommendations

Accept the proposed material amendment and minor modification to read as follows;

The Water Supply Project for the Eastern and Midland Region to supply water to the Greater Dublin Area and other communities in the Eastern & Midlands Region.

### **129. New RPO - Water Supply**

#### Summary of Issues

A submission requests that the water supply and waste water infrastructure up to 2040 and beyond should be policy. Another submission requests the insertion of 'Rollout' as part of this RPO.

#### Director's Response

The Director proposed this new RPO to reflect the capital investment plans of Irish Water and to enhance the impact of the RSES on the investment in water supply and waste water infrastructure in each capital investment period. It is not considered necessary to further state this as part of this amendment.

It is considered the proposed material amendment is acceptable.

#### Director's Recommendations

Accept proposed material amendment



### **130. New RPO - Water Supply**

#### Summary of Issues

No submissions have been indicated for the proposed amendment

#### Director's Response

It is considered the proposed material amendment is acceptable.

#### Director's Recommendations

Accept proposed material amendment

### **131. New RPO - Water Supply.**

#### Summary of Issues

Irish Water in their submission suggest this proposed RPO could be simplified to read;

Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Local Authorities and provide for phased infrastructure – led growth that is commensurate with the carrying capacity of water services in order to protect the environment and designated European Networks.

#### Director's Response

The Director considered that this RPO would benefit from some simplification in line with the submission received.

#### Director's Recommendations

Accept the proposed material amendment and minor modification to read as follows;

*Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Local Authorities and demonstrate phased infrastructure – led growth that is commensurate with the carrying capacity of water services and prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.*

### **132. New RPO - Water Supply**

#### Summary of Issues

No submissions have been indicated for the proposed amendment

#### Director's Response

It is considered the proposed material amendment is acceptable.

#### Director's Recommendations

Accept proposed material amendment.

### **133. New RPO - Water Supply**

#### Summary of Issues

Irish Water in their submission suggest this proposed RPO could be simplified to read;

‘Local Authorities and Irish Water should work together to ensure that future development and required water infrastructure are aligned, with Irish Water’s National Water Resources Plan, a critical component in this.’

#### Director’s Response

This is a change to the proposed RPO and does not address the matter of possible redundant water sources from the Water Supply Project. The proposed amendment should remain as published.

#### Director’s Recommendations

Accept proposed material amendment.

### **134. Amend RPO 10.9 – Waste Water Treatment**

#### Summary of Issues

No submissions have been indicated for the proposed amendment

#### Director’s Response

It is considered the proposed material amendment is acceptable.

#### Director’s Recommendations

Accept proposed material amendment

### **135. Amend Guiding Principles relating to Surface Water**

#### Summary of Issues

No submissions have been indicated for the proposed amendment

#### Director’s Response

It is considered the proposed material amendment is acceptable.

#### Director’s Recommendations

Accept proposed material amendment

### **136. Amend Guiding Principles relating to the provision of energy network**

#### Summary of Issues

There is support for this amendment and it is stated that it is vital that energy projects are not delayed due to the absence of national or regional landscape character assessment.

Director's Response

The Guiding principles in the RSES of local authority development plans to facilitate to provision of energy networks have been developed with key stakeholders in this policy area. The consideration of landscape is a key factor in the provision of energy networks, this is the reason for the proposed amendment. The director considers that is not prudent to further state the existing or future status of landscape policy as a consideration and the amendment should be accepted as published.

Director's Recommendations

Accept proposed material amendment

**137. Amend RPO 10.15 – Energy Infrastructure**

Summary of Issues

No submissions have been indicated for the proposed amendment

Director's Response

It is considered the proposed material amendment is acceptable.

Director's Recommendations

Accept proposed material amendment

**138. Amend RPO 10.20 – Waste Management**

Summary of Issues

No submissions have been indicated for the proposed amendment

Director's Response

It is considered the proposed material amendment is acceptable.

Director's Recommendations

Accept proposed material amendment

## **Chapter 11 All Island Cohesion**

### **Submission Number(s)**

080, 095, 097 (Monaghan County Council)

### **139. Amend RPO 11.1 – All Ireland Approach**

#### Summary of Issues

Submissions were received outlining support for the proposed material amendment. Monaghan County Council outlined that reference to collaboration with the Northern and Western Assembly should also be included as part of this policy.

#### Director's Response

The support for this proposed material amendment is welcomed. The inclusion of reference to the Northern and Western Regional Assembly is considered an appropriate addition.

#### Director's Recommendations

Having regard to the above, it is recommended that the RSES be made with the proposed amendment subject to minor modification and will read as follows;

*In co-operation with relevant departments in Northern Ireland, the Eastern and Midlands Regional Assembly, and where appropriate in association with the Northern and Western Regional Assembly, will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning, economic growth and related spheres.*

## Appendix 1

### List of Submissions on Material Amendments

Reference No.	Forename	Surname	Organisation
001	Eimear	Tester	N/A
002	Lynda	Irwin	N/A
003	Tara	Barry	N/A
004	Katharina	Cahill	N/A
005	Deirdre	Gaynor	N/A
006	Ollie	Dixon	N/A
007	Edward	McAuley	N/A
008	Jillian	Kennedy	N/A
009	Fergal	McDonnell	N/A
010	Pat	Brien	N/A
011	Gavin	Morrell	N/A
012	Aoife	Brien	N/A
013	Dawn	Keane	N/A
014	James	Mullan	N/A
015	Michelle	Harrison	N/A
016	Eoin	Casey	N/A
017	Louise	Purcell	Oakdale Residents Association
018	Marian	McAuley	N/A
019	Gloria	Mullan	N/A
020	Ryan	O'Donoghue	N/A
021	Joyce	Nolan	N/A
022	Karen	Caulfield	N/A
023	Dearbhla	Lawler	N/A
024	Karen	Kirwan	N/A
025	Lisa	Mullan	N/A
026	Corina	McNamara	N/A
027	David	McNamara	N/A
028	Deborah	Gil	N/A
029	Damien	Kirwan	N/A
030	Karen	McEvoy	N/A
031	Yukti	Batra	Google
032	Aibhín	Gildea	N/A
033	Cathal	Enright	N/A
034	Eimear	O'Donoghue	N/A
035	William	Ryan	N/A
036	Deirdre	Colwell	N/A
037	Brian	Lowe	N/A
038	Troy	Gogan	N/A
039	Ian	Prenty	N/A
040	Sarah	Curran	N/A
041	Kathryn	Doyle	N/A
042	Clíodhna	Smyth	N/A
043	Declan	Flynn	MCCP

044	Malia	Higgins	N/A
045	Anne	O'Toole	Knocklyon residents
046	Gordon	Smyth	N/A
047	Torunn	Stokke Griffin	N/A
048	Chloé	Smith	N/A
049	Mark	Dolan	N/A
050	Catherine	McAuley	N/A
051	Karl	Burden	N/A
052	Kieran	Browne	N/A
053	Pamela	Hutchinson	N/A
054	Lorna	Callanan	N/A
055	Anita	Mejalenko	N/A
056	Pablo	Ramos	N/A
057	Billy	Griffin	N/A
058	Charlie	Flanagan, TD	Minister for Justice & Equality
059	John	Kelly	N/A
060	Leanne	Saurin	From Leanne Saurin, Cllr. Kenneth Flood, Cllr. Joanna Byrne, Cllr. David Saurin and Deputy Imelda Munster
061	Roger	Garland	Keep Ireland Open
062	Tom	McNamara	Tom McNamara Partners
063	Eoghan	McCarthy	Gas Networks Ireland
064	Cian	O'Mahony	EPA - Environmental Protection Agency
065	Tara	Spain	TII - Transport Infrastructure Ireland
066	Georgina	Thurgate	DAERA
067	Clare	O'Hagan	Louth County Council
068	Billy	Timmins	N/A
069	David	Clements	NTA - National Transport Authority
070	Cllr. Francis Noel	Duffy	Green Party
071	Stephen	Blair,	John Spain Associates
072	Cllr. Mick	Cahill	Longford County Council
073	Breandán	Casey	The Mill – Drogheda's Enterprise Hub
074	Angela	McEvoy	Laois County Council
075	Louise	Heeney	Meath County Council
076	Irvine	Dave	Dun Laoghaire-Rathdown County Council
077	Linda	O'Grady	DAA
078	Hubert	Fitzpatrick	CONSTRUCTION INDUSTRY FEDERATION
079	Karina	Fitzgerald	Wexford County Council
080	Jennifer	Wallace	IBEC
081	Joanne	Lyons	Department of Culture, Heritage and the Gaeltacht
082	William	Byrne	South Dublin County Council
083	Dave	Lee	Tom Phillips Associates

084	Róisín	Burke	Fingal County Council
085	John	O'Hara	Dublin City Council
086	Paddy	Mahon	Longford County Council, Chief Executive
087	Sorcha	Walsh	Wicklow County Council
088	Rory	Kunz	John Spain Associates
089	Karen	Gray	Offaly County Council
090	Stephen	M. Purcell	Future Analytics Consulting
091	Veronica	Cooke	Kildare County Council
092	Niamh	McDonald	Irish Water
093	Cllr. Pádraig	McEvoy	Independent Councillor   Peace Commissioner, Maynooth Municipal District   Kildare County Council
094	Carol	O'Reilly	Department of Transport, Tourism and Sport
095	Aidan	Sweeney	Government, Enterprise, & Regulatory Affairs, Ibec
096	James	Fitzpatrick	Department of Housing, Planning and Local Government
097	Toirleach	Gourley	Monaghan County Council
098	Brendan	Murray	N/A
099	Marie	Moriarty	Northern & Western Regional Assembly
100	Michelle	Carney	Roscommon County Council
101	John	McGrath	Athlone Chamber of Commerce and industry
102	Tom	Halley	MH Planning, on behalf of Hallmark Building Services Ltd
103	Cormac	Bohan	Drogheda & District Chamber of Commerce
104	Brian	Hanratty	Drogheda City Status Group
105	Roy Harford	Roy Harford	N/A
106	Barry	Kehoe	Westmeath County Council