



Director's Report Eastern & Midland Regional Assembly Draft Regional Spatial and Economic Strategy 2019- 2031

Prepared in relation to submissions received pursuant to S. 24 (1) of the Planning and Development Act, 2000 (as amended)



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

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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 consultation process of the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. 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 recommended amendments (if any) 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(8) of the Planning and Development Act, 2000, as amended.

The Report is structured in a similar manner to the published Draft RSES and so is formatted in the chapters of the Strategy as follows:

1. Introduction
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
12. Implementation and Monitoring
13. Appendices
14. SEA/SFRA/AA
15. Miscellaneous

This report has also considered submissions relating to Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Regional Flood Risk Assessment (RFRA).

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.

Current Consultation Process- Draft RSES

At the meeting of the 19th October 2018, the Eastern and Midland Regional Assembly (EMRA) prepared a draft Regional Spatial and Economic Strategy for the whole of the Eastern and Midland Region for the period 2019-2031, as required under section 24(4) of the Planning and Development Acts 2000-2018.

The Assembly gave notice that a draft Regional Spatial and Economic Strategy was available for Public Consultation, and that submissions are invited from interested parties from the 5th November 2018 to the 23rd January 2019 inclusive.

Consultation included the following:

- Press: An advertisement was placed in the Irish Independent on 5th November, 2018 notifying the public that the Assembly had considered a draft Regional Spatial and Economic Strategy for public consultation.
- The draft RSES together with associated documents was made available for viewing in the EMRA office and throughout the Local Authorities within the Region.
- The draft RSES together with other relevant documents was also placed on the Assembly website. During the public consultation period, the Assembly also engaged a social media strategy, mainly via Facebook and Twitter.
- The Assembly also held launch events of the draft Regional Spatial and Economic Strategy for local authority Councillors and separate events for Stakeholders in each of the Strategic Planning Areas (SPAs) in the region in Dublin on the 27th November, Tullamore on the 4th December and Naas on the 6th December.
- There was extensive engagement with interest and representative groups, stakeholders and local authorities; there were presentations at relevant events and local authority meetings and wider engagement to generate interest and encourage submissions to the draft RSES.
- 316 submissions were received during this public consultation process, of which 3 were late submissions.

Further detail on the submissions received is outlined below in this report and a full list of submissions can be found in the appendix.

The Assembly wishes to express its appreciation to those who made submissions. The high volume and detailed nature of the submissions received highlights the significant level of interest in the RSES plan making process.

This Public Consultation process was preceded by an initial public consultation on the Issues Paper of the Regional Spatial and Economic Strategy (RSES) which informed the formulation and preparation of the Draft RSES.

Chart 1: Submissions received categorised by Body/Organisation

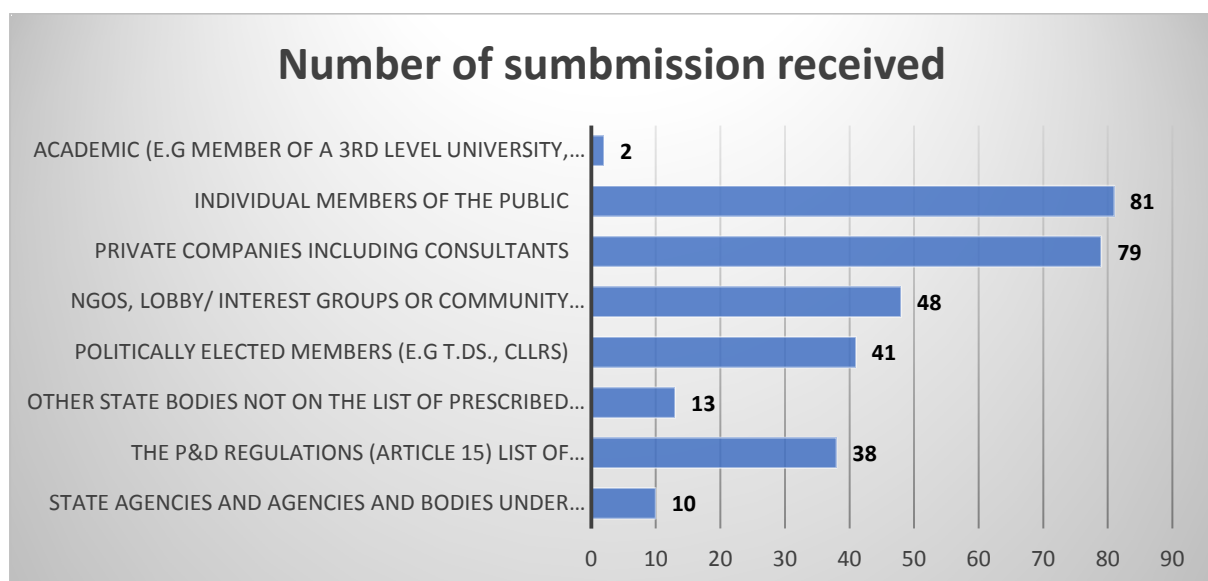


Table 1: Submissions Received categorised by Body/Organisation

Category of organisation	Number of submissions received
State agencies and Agencies and Bodies Under Aegis of the Department	10
The P&D Regulations (Article 15) list of prescribed authorities	39
Other State bodies not on the list of prescribed authorities (e.g LAs not within the region)	13
Politically Elected Members (e.g T.Ds., Cllrs)	41
NGOs, lobby/ interest groups or community group	51
Private companies including consultants	79
Individual members of the public	81
Academic (e.g member of a 3rd level University, IT or other college)	2
Total number of submissions received	316

Next Stages

Following consideration of this Director's Report, the Eastern and Midland Regional Assembly shall subject to any amendments that it considers necessary make the regional spatial and economic strategy.

Submissions From:

Minister for Transport, Tourism and Sport

Submission No:0184

Summary of Issues

The Department (DTTS) welcomes a comprehensive draft RSES and notes that many of their comments and inputs are reflected in the published document. The draft RSES is closely aligned with Project Ireland 2040 and sits well with the forthcoming Planning Land Use and Transport Outlook (PLUTO) 2040. The overall strategy and the MASP is also aligned with the NTA's Transport Strategy for the Greater Dublin Area.

The phasing element of the MASP is welcomed and it should be considered for the whole of the draft RSES. Where projects are listed beyond the NDP the scope for such developments between now and 2027 will be constrained by the Public Spending Code.

Public Transport

Page 48: The DART Expansion Programme is referenced as important to Drogheda and in the NPF. The RSES should reflect that the programme is also included in the National Development Plan.

In relation to the section on Rural Transport on page 152, the following additional text is suggested to reflect the role of the NTA in the provision of public transport services in rural areas and that the Local Link programme is one type of a range of public transport services in rural areas.

Page 152: Rural Transport – suggested additional text

In addition to public transport services in rural areas provided by State and commercial transport operators, the NTA provides rural public transport services through the Local Link Rural Transport Programme Strategic Plan 2018-2022. The key priorities of this programme continue to be directed at addressing rural social exclusion and the integration of rural transport services with other public transport services. The programme mission statement is 'to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs'. The services provided under the programme are therefore intended to fulfil a primarily social function, in meeting the needs of communities in towns, villages and rural areas.

RPO 8.11 should be titled Local Link Rural Transport Programme

It is suggested that Table 8.1 on page 143 refers to the Local Link Rural Transport Programme Strategic Plan 2018-2022 as this is the relevant strategic plan for the programme. Table 8.1 should also include PLUTO in the hierarchy of policies and plans at national level.

Sustainability and Climate Change

More focus on the importance of public transport as an environmentally friendly option it is more likely to help improve air quality in urban areas. In other parts of the region where there is not public transport the move away from petrol/diesel fuelled vehicles should be encouraged. The Strategy should include the accommodation of charging infrastructure and the transition to alternative fuels.

The role of local government in resilient critical infrastructure should include the need to consider climate adaptation in long term resource allocation and investment for local authorities.

The strategy should reference the importance of Shannon and Ireland West Airport Knock as being accessible from the Midlands.

Tourism

Suggested text additions to provide for the protection of natural, built and cultural assets through sustainable tourism.

Confusion between the definition of Greenways and 'trails' in the draft RSES. This should be clarified.

Director's Response

The Directors welcomes the support from DTTAS in their submission, this is reflective of the engagement and input from this department at Technical Working Group and as part of their role on the Senior Officials Advisory Group. The requested narrative changes are minor in substance and can be reflected in editing of the draft RSES.

Director's Recommendation

Change narrative text under Public Transport Sustainability and Climate Change and Tourism

Minister for Education and Skills

Submission No:0309

Summary of Issues

The Department uses data and GIS mapping to identify where additional primary and post primary accommodation is needed, these data inputs include local authority planning data and core strategy information contained in development plans. DES requests access to data to be prepared under the RSES in likely completion dates of sites and the Housing Need Demand Assessments. There is also a request to amend RPO 9.16, 4.6 and 6.21.

Director's Response

The Director welcomes the support from DES and recognises its role in the planning of provision for education and skills. The Assembly will work with the Department during the implementation of the RSES.

Director's Recommendations

Change narrative and include revisions to RPOs as requested.

Minister for Housing, Planning and Local Government

Submission No: 0285

Summary of Issues

The DHPLG welcomes the draft RSES as a clear strategic direction for the formulation of city / county development plans that will ensure a strong and consistent alignment between national and local level planning policies. The draft is a comprehensive framework for the future development of the Region that reflects the diversity of pressures and opportunities in different parts of the region.

The settlement strategy provides a strong regional structure that has avoided excessively dispersed regional pattern and has identified an appropriate number of regionally distributed centres (Key Towns).

With regard to the future county population growth figures as per the 'Implementation Roadmap for the National Planning Framework', for clarity it is requested that RPO 4.1 includes the reference to the infill / brownfield targets set out in the NPF.

The text on the approach to 'Headroom' should be tailored to the EMRA area and avoid references outside of the Region.

The integration of the MASP with the Transport Strategy for the Greater Dublin Area is welcomed. As is the emphasis on planned and sequential development of settlements with the focus on regeneration of underutilized areas and sites.

The Strategy should include further supports for opportunities for rural employment and economic development in the areas of agri-business, energy, tourism, forestry, enterprise which can underpin balanced population growth.

RPOs 7.29 and 7.30 seek to assign responsibility to CAROs where they have no remit and require revision in conjunction with DCCAE and others.

RPO 7.39 should include a timeline to 2020 for the implementation of the Energy Performance in Buildings Directive.

The Growth Strategy map would be enhanced with some regional assets included and the terminology 'outer region' and 'second cities' are too Dublin focused and require revision.

The EU flag or logo should not be on the document as the EU play no role in the preparation of the RSES.

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 requested narrative changes are minor in substance and can be reflected in editing of the draft RSES including those related to the Growth Strategy.

Director's Recommendations

Change narrative text under Growth Strategy including the Outer Region terminology to 'Gateway Region'.

Add narrative under rural development.

Omit RPOs 7.29 and 7.30

Minister for Business, Enterprise and Innovation

Submission No: 0263

Summary of Issues

The Department commends the draft RSES and states that implementation of the strategy can help drive a step-change in the economic development of the region. There is a support for the 'placemaking' focus as a driver of economic development and enterprise investment, and it is contended that this could be given even more prominence.

There is support for the approach in the RSES to draw and assist in accessing a wide range of government supports and interventions to build the enterprise ecosystem.

The use of 'strategic specialisation' in the strategy is not used as a concept in national enterprise policy and the use of terminology should be clear.

A number of new national policy initiatives should be incorporated into the RSES as should the highlights of the relevant Regional Enterprise Plans for the Region.
The number of RPOs should be reduced and rationalised.

Director's Response

The general support in this submission is reflective of the engagement and input from DBEI both at the Senior Officials Advisory Group and the TWG level in the process of formulating a draft RSES.

'Placemaking' is a key concept of the RSES and is embedded throughout the strategy this can be given greater prominence in the Growth Strategy as part of the RSES.

There have been strong linkages between the RSES and the Regional Action Plan for Jobs the final strategy should reflect this with the refreshed plans – Regional Enterprise Plans.

Director's Recommendations

Amend the narrative in the Growth Strategy and the Economic Strategy to emphasise 'placemaking' as a key concept and driver of the strategy.

Include the new national policy initiatives from the Regional Enterprise Plans in the Economic Chapter.

Minister for Communications, Climate Action and Environment

Submission No:0119

Summary of Issues

DCCAIE welcomes a strong emphasis on climate action throughout the draft RSES, and states that it is essential that there is appropriate coordination and coherence through the various offices and planning processes at national, regional and local level.

The RSES should reflect the NPF with high level objectives in relation to climate mitigation which will help to promote the required coherence.

Any role for the DCCAIE funded CAROs in the RSES must reflect the role envisaged for the CAROs within the SLAs and their annual work programmes.

Director's Response

The support and commentary on the emphasis of climate in the RSES is welcomed and demonstrated the key principle of climate action that is cross cutting in the RSES.

It is noted that the draft RSES includes RPOs that place a commitment on the CAROs to deliver aspects under RPOs 7.29 and 7.30 that are not in the current work plan of these offices and is further commented upon in their submissions.

Director's Recommendations

No action.

The issue of RPOs 7.29 and 7.30 is addressed under section 7.8.

NTA

Submission no. 0246

Statement of Consistency

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. As such, the Draft RSES is consistent with the Transport Strategy as required under Section 23 (7) (c) of the Planning Act.

Director's Response

There is a statutory requirement for the RSES to be consistent with the Greater Dublin Area Transport Strategy. The Assembly considered that the draft was consistent before it was prepared for public consultation at the EMRA meeting of October 2018. It is welcome for the NTA to also consider that the Strategy is consistent.

Director's Recommendations

No action

The other issues in the NTA's submissions are addressed in the relevant sections.

Chapter 1 Introduction

Submission Number(s)

0013, 0014(Dublin Port Company), 0109(Wicklow County Council), 0146 (Laois County Council), 0224 (Offaly County Council), 0248 (EPA)

1.1 Vision

1.2 Eastern and Midland Regional Assembly

1.3 Regional Spatial and Economic Strategy

Summary of Issues

No submissions received under Sections 1.1, 1.2 or 1.3.

Director's Recommendations

No change recommended.

1.4 Spatial and Economic Policy Background

Summary of Issues

A request for a schematic showing the linkages between the RSES and other key regional and national plans would be useful.

Director's Response

The RSES covers a wide spectrum of policy agendas at international, European, national and regional level this is further lengthened by the statutory requirements of the planning and development act 2000 (as amended), and the context of the existing local county and regional policy in the eastern and midland region. This leads to a significant number of plans and policy document, to present these in a schematic would prove problematic, an example of this is Appendix D of the draft RSES that is just a list of the environmental legislation and policy that was taken into consideration, it was so extensive that it had to be referenced as an appendix to the strategy.

Director's Recommendations

No change recommended.

1.5 Process to date

Summary of Issues

No submissions received.

Director's Recommendations

No change recommended.

1.6 Regional Profile

Summary of Issues

Reference should be made to imports as well as exports through Dublin Port.

Population figures in Figure 1.5 are labelled as 2011.

There should be a one-page section giving a profile for each county in the region, including demographics, housing, key economic sectors, environmental assets, infrastructure assets and a vision.

There should be a map showing the functional urban areas for the regional growth centres and key towns in the region not just Dublin / the GDA.

Director's Response

Imports are also an important aspect of the national economy and account for more volume than exports through Dublin Port, this should be recognised in the narrative.

The reference to 2011 in Figure 1.5 is incorrect it should be 2016.

As part of the formulation of the RSES and to inform the first stage of public consultation there was an extensive socio-economic profile carried out of the region that formed part of the Initial Public & Stakeholder Consultation Issues Paper. This Paper was accompanied by an extensive baseline report that covered all areas of the region and contained extensive data and profile from a national, regional, SPA, county, ED, Small Area and settlement level. This information is still available on www.emra.ie/maps and a few key aspects have been reflected through the draft RSES to give a context to the policy in the Strategy. It is not considered prudent to reproduce this again in the RSES rather to recognise it as a key input to the formulation of the Strategy.

There needs to be clearer mapping of what the functional urban areas of high functioning urban settlements in the region to demonstrate the areas of urban influence in the region. Furthermore there should be a context and profile piece on the key data drivers of living and working in the region, this would further enhance the approach to cross boundary functional urban areas with more positive terminology to reflect strategic locational assets and drivers for growth for all parts of the region.

Director's Recommendations

Include reference to imports as part of the narrative in section 1.6.

Amend Figure 1.5 to refer to population as 2016.

Figure 1.10 to be augmented with a map of the functional urban areas of Dublin, the Regional Growth Centres and the Key Towns. Additional narrative to be included to give analysis to this approach in the RSES with more positive terminology to describe all parts of the region.

Chapter 2 Strategic Vision

Submission Number(s)

0002, 0089, 0146 (Laois County Council), 0194, 2035, 0248 (EPA), 0315

2.2 Vision and Guiding Principles

Summary of Issues

There is wide support for the three key principles in the RSES and in particular widespread support for the prominence of Climate Action which is cross cutting throughout the strategy.

2.3 Regional Strategic Outcomes

Summary of Issues

In submissions it is stated that the Regional Strategic Outcomes should be linked to the relevant UN Sustainable Development Goals to demonstrate how the RSES aligns with the UN2030 Sustainable Development Agenda. Another submission gives support for the strong linkages to the UNSDGs and which has led to much closer alignment to these goals than if just the NSOs were used to craft the RSOs. Finally, it is requested that the RSES should set out how the 'outcomes' will be delivered.

The vision of the Wicklow PPN across 5 municipal districts and the County of Wicklow should be included in the RSES and RSOs.

There should be specific reference to the proposals for the J17 National Enterprise Park to augment the Regional Strategic Outcomes.

RSO 3 should reflect NSO 3 – 'Strengthen Rural Economies and Communities' and it should state the key roles of existing towns and village network.

RSO 5 should state the importance of the Public Realm in creating successful places and that it is the responsibility of the private and public sector.

RSO 9 should require that the region must secure economic benefit and employment potential from the transition to a low carbon economy. Including the current transition from peat extraction and the urgency in creating replacement enterprise.

In general submissions support the commitment to healthy communities as a Regional Strategic Outcome (RSO 4) of the RSES. The promotion of healthy environments and the health of communities should be at the centre of the RSES with specific related RPOs. Submissions highlight the need for good planning and urban design to create healthy built environments and recommending specific Guidance and Regional Policy Objectives (RPOs), which are addressed under Chapter 9 Quality of Life.

Director's Response

The Regional Strategic Outcomes have been clearly informed by the National Strategic Outcomes of the National Planning Framework. It is evident that the RSOs are also linked to the UN sustainable Development Goals, this was an intent of the members and the Director in the formulation of the strategy.

Many of the aspirations and goals in the vision for County Wicklow can be found in the RSES vision for the region, the 3 key principles of healthy placemaking, climate action and economic opportunity and the 15 Regional Strategic Outcomes are closely aligned with wise use of resources, care for our environment and enabling people to live healthy and sustainable lives.

The Regional Strategic Outcomes are high level ambitions for the RSES and the region, they are aligned with the UN SDGs and the NPF NSOs, there should not be site specific requirements as part of these high level ambitions, they are the outcomes from which the strategy is to be measured.

The Regional Strategic Outcomes have been strongly influenced by the National Strategic Outcomes of the National Planning Framework and RSO 3 has been tailored to reflect the urban generated pressures a lot of the rural parts of our region face. However the RSO should reflect the need to strengthen rural areas and their existing structures, enhance their vibrancy and strengthen their communities.

The role of public realm in the promotion of creative places is recognised, however there are many element to make a successful creative place and listing them in a strategic outcome would dilute the high level desired outcome.

RSO 9 seeks to harness the potential for transition to a low carbon economy, implied within this is the realisation of economic benefit – the nature of this benefit cannot be explicitly stated in an RSO.

Healthy placemaking is a cross cutting key principle of the RSES ‘to promote people’s quality of life through the creation of healthy and attractive places to live, work, visit and study in.’ This informs 5 regional strategic outcomes, one of which is RSO 4 ‘Healthy Communities’. The Directors considers RSO could be further strengthened by reference to the importance of the built environment as well as the natural environment in the promotion of active lifestyles that support human health.

Director’s Recommendations

Amend RSO3 to reflect a need to strengthen rural, networks, economies and communities.

Amend the narrative under 4. Healthy Communities to include” Protect and enhance the quality of our built and natural environment to support active lifestyles including walking and cycling, ensure clean air and water for all and quality healthcare and services that support human health.”

Chapter 3 Growth Strategy

Submission Number(s)

0016 Transport Infrastructure Ireland (TII), 0094, 0106 (Wicklow County Council), 0115 (Westmeath/Roscommon County Council) 0117 South Dublin County Council, 0120 Westmeath County Council, 0123 Louth County Council, 0127 Department of Infrastructure Northern Ireland (DfI), 0128, 0130, 0141 (Southern Regional Assembly), 0143, 0144 (Department of Rural and Community Development (DRCD)), 0145 (Longford County Council), 147 (Eastern and Midland CARO), 0155, 0161, 0166. 0178, 0192 (Kildare County Council), 0201. 0208, 0221, 0224, 0227, 0245 (Meath County Council), 0246 (NTA), 0248 (EPA) ,0263,0265,0266 (Wexford County Council), 275, 285 (Department of Housing, Planning and Local Government), 0291, 0293, 0303, 0307, 0312, 0314, 0315.

Summary of Issues

A number of submissions expressed general support for the growth strategy, in particular the focus on quality of life and place making, strong support is also expressed for the focus on sustainable settlement patterns, compact growth and urban regeneration, sequential development, integrated transport and land use and enhanced Green Infrastructure. A recurring theme is need for a positive vision and expanded Growth Enablers for all parts of the region, and avoid negative terminology such as ‘hinterland’ or ‘outer regions’.

A number of key issues to be addressed include:

Alignment with other policy, plans and programmes

DHPLG submits that the RSES accords with national planning policy suggesting that the strategy map would benefit from inclusion of regional assets.

There is a need for greater consistency between the strategies of the three Regional Assembly Areas.

There should also be good alignment with NPF/ NDP and investment funds, Enterprise Strategy (DBEI/IDA/EI/LEO), NTA Transport Strategy, Irish Water’s Capital Investment Plan, and with climate and environmental policy, including the need for collaboration with Regional Climate Action Regional Offices (CAROs).

In particular there is a need for further integration of the economic and spatial elements of the strategy is needed to better reflect the economic and sectoral employment opportunities of the region, including integration of 14 new regional enterprise plans and expansion of ‘smart strategies’ to more settlements in the region.

A number of submissions highlight specific key infrastructure required to support envisioned growth, including digital infrastructure / broadband plan, a regional solution for the strategic energy grid, the Celtic and North/South Interconnectors, regional freight strategies, waste water and water supply project for the Eastern and Midlands.

Global and inter-regional connectivity

A number of submissions highlight the need for the RSES to recognise wider regional accessibility and global connectivity as a key theme and to ensure that future growth is sustainably managed within the capacity of existing national assets and resources, including the national roads and the rail network.

It is recognised that the Dublin-Belfast Economic Corridor on the east coast complements the Atlantic Economic Corridor on the west coast, which extends across Northern and Western and Southern regions. However, there is a need for more focus on inter-regional connectivity to the west and south and for a

common approach between regional assemblies with an emphasis on the TEN-T network to support access to Ports, improved inter-regional rail and strategic connectivity. There is strong support for developing the cross border network of Drogheda, Dundalk and Newry, it is also submitted that Stamullen in Meath has significant employment potential leveraging its strategic position in the corridor.

The Eastern Seaboard corridor is identified in Northern Ireland and Southern Regional Assembly strategies extending from Larne (via the Belfast and Dublin Metropolitan Areas) to Rosslare Europort in Wexford, also highlighting the importance of sea port access to the island in a post Brexit scenario. The Dublin-Rosslare Corridor links the towns of Bray, Wicklow and Arklow, extending south Gorey, Enniscorthy and Wexford in the Southern Region.

The growth map would be enhanced by the development of a 'corridor' approach showing regional links between Key towns and Regional Growth Centres, strategic inter-regional corridors and improvements are proposed. Suggested corridors include Dublin-Belfast to Rosslare, Dublin to Waterford, Dublin to Cork and Limerick, Dublin to Galway and Sligo and Dublin to Cavan. Some references are also made to national secondary roads. There is an opportunity to amend the Growth Strategy narrative, maps and RPOs in this regard.

Growth Enablers

Submissions were received in support of the identified Growth Enablers; however, it was also submitted that they should more positively describe different parts of the region and avoid negative terminology such as 'hinterland' or 'outer regions'. It is also submitted that the Growth Enablers do not provide sufficient details and should be expanded as follows;

To ensure protection and enhancement of national assets such as ports and the roads network.

Expanded enablers for the Outer region including tourism amenities, infrastructure and energy. More focus on the challenge faced by the Midland Region with the acceleration of decarbonisation by Bord na Mona. Specific reference should be made to the preparation of Urban Area Plans for Regional Growth Centres in collaboration with transport agencies.

Clarification of compact growth targets. Need population targets in the hinterland and outer regions.

Concern that strategy is too focussed on Dublin and does not properly address all parts of the region, with a number of submissions highlighting the need for more focus on the Midlands as a 'region within a region', rural areas and parts of Meath and West Wicklow in particular. Need more focus on balanced regional development and rural areas.

A number of submissions are concerned that NPF population targets will place an artificial cap on development in the region. Conversely other submissions welcome the focus on compact growth and better alignment between living and working, and the need of 'catch up' investment in local employment, services and amenities in many fast-growing areas.

Clarification of whether Celbridge is in the metropolitan or hinterland area.

Consideration should be given to developing the built-up area to counter "the donut" effect where retail development has taken place on the outskirts of towns, leaving the centre hollowed-out and lacking key services. There is a need to redefine the concept of 'growth' and in some cases to plan for shrinkage.

Guidance for Local Authorities

DHPLG submits that the RSES has successfully avoided an excessively dispersed regional pattern and is critical to the efficient use of development land and services.

It is submitted that the RSES does not provide a sufficiently clear framework for the review of Core Strategies of Development Plans, to support translation into land use zoning requirements and housing

need at a local level. It is also submitted that the methodology for preparing plans should be more properly framed by the upcoming Ministerial plan preparation guidelines.

There were requests for more clarity on the methodology used in the development of the growth strategy, including integration of environmental assessment and the 'asset-based /health place check list', how this informed the identification of key towns, and to clarify how this will in turn inform Development Plans. Suggestions are made as to certain indicators that would be suitable in conducting an asset test at settlement level. There is a need for clarification, in the asset-based Table 3.1 in relation to the 'availability of strategic sites' criteria, and it is suggested that the focus should be on deliverability of serviced sites.

Submissions welcome the focus on achieving compact urban development targets as a key growth enabler in the region but also highlight the need for more urgency in addressing the housing crisis and emphasise the need for greater recognition of the long lead in time and challenges involved in the development of infill and brownfield sites. The regeneration of derelict sites should be expanded and policy included for a review of the vacant site levy.

There is some concern about the 'cut off' point of identifying Regional Growth Centres and Key Towns, and that the strategy does not designate lower tier settlements, with a number of submissions referencing the need for additional designated towns, in line with the RPGs policy. There were requests for more direction as to where development should occur at the Medium to Large town level. Clarification is also requested if Local Authorities' can designate additional Key Towns in their Development. There should be an RPO for each settlement typology to guide consistency in CDPs.

Environmental Assessment

To strengthen the link between the SEA and the RSES, criteria in Table 3.1 'Natural Capital' could be amended to ensure proper integration of the recommendations and measures, arising from the SEA/AA/FRA into local land use planning.

The inclusion of RPO 3.4, requiring Local Authorities to promote an ecosystem services approach to the preparation of statutory land use plans is welcomed and could be further strengthened at project level. It is also submitted however, that this section on eco-system services should be relocated to Chapter 7- Environment, to provide a more coherent policy context.

Director's Response

The Growth Strategy in the RSES should provide high level intent of the Strategy in spatial policy and economic policy and demonstrate the convergence of both into a coherent Strategy. In general, the Growth Strategy chapter would benefit from further editing and reorganisation with simplified narrative to clearly explain the development of the growth strategy. It is noted that a number of issues raised are dealt with in more detail in other chapters, however it is accepted that the Growth Strategy would benefit from greater integration and cross referencing of key policies contained throughout the RSES;

Director's response is dealt with under the relevant issues;

Alignment: The Director also welcomes DHPLG support for the regional spatial strategy and notes that upcoming Ministerial Guidelines will set statutory guidelines for the preparation of City and County Development Plans. The Regional Assembly is committed to the further development of an evidence led asset base approach in collaboration with local authorities and regional stakeholders as part of the implementation of RSES (Chapter 11 refers). No further amendment is therefore proposed to the growth strategy.

Strategic Connectivity: It is proposed to include an additional subsection 'Strategic Connectivity' and updated Growth Strategy map to highlight the strategic cross border/inter-regional linkages with a focus

on the strategic TEN-T national road, rail and port network. Further detail to be addressed in Chapter 8 – Connectivity and Chapter 11- All Island Cohesion. The Director welcomes positive joint working between the planning authorities in Northern Ireland and the Republic of Ireland, which will continue as part of the Cross-Border Development Plan Working Group, to be addressed in Chapter 11- All Island Cohesion.

Growth Enablers: It is proposed to refine the narrative with expanded growth enablers with better integration of regional enterprise opportunities and more positive terminology to describe all parts of the region including strategic locational assets, as follows;

- Dublin city and Metropolitan Area
- Core Region (formerly ‘hinterlands’)
- Gateway Region (formerly ‘outer’)

Guidance for Local Authorities: it is proposed to refine the narrative in the Growth Strategy to provide for greater clarity on the integration of asset-based approach in the development of the strategy, and better integration into Chapter 4 – People and Place (Settlement Strategy) and Chapter 9 Quality of Life (Housing and Regeneration)

Having regard to the central importance of achieving compact growth and regeneration as a key National and Regional Strategic Outcome, it is considered appropriate to relocate the compact growth section from Chapter 9 –Quality of Life (Section 9.5 Regeneration refers) to Chapter 3 – Growth Strategy.

The identification of derelict and vacant sites and application of the vacant site levy is considered to be a matter for local authorities and is directed by national legislation, however it is considered appropriate to include additional guiding principles to reflect the wider complexities of developing infill and brownfield lands in addition to a focus on brownfield remediation.

It is also proposed to expand Guiding Principles for Core Strategies - to be addressed in Chapter 4 – People and Place.

Environmental Assessment: The Director welcomes comments in relation to SEA/AA/FRA, which will inform the ongoing environmental process and are addressed in further detail in Chapter 14 of the Directors Report. The Growth Strategy currently sets out policy to promote an ecosystem services approach in the preparation of statutory land use plans by Local Authorities. It is recommended that this section be relocated to Section 7.5 Biodiversity and Natural Heritage to provide a better policy context. It is proposed, however to amend Table 3.1 ‘Asset Based Criteria’ as requested to ensure the proper integration of the recommendations and proposed mitigation measures arising from SEA/AA/SFRA. No further changes are recommended to Table 3.1, however it is proposed to refine the narrative in the Growth Strategy to provide for greater clarity on the integration of environmental assessment in the development of the strategy.

Director’s Recommendation

Refine narrative on Section 3.1 ‘Developing a growth strategy for the region’

Update Table 3.1 ‘Natural Capital’ column to read; “Integration of recommendations and proposed mitigation measures, arising from SEA/AA/FRA underpinned by a regional Green Infrastructure and ecosystem services approach”.

Relocate eco-systems approach to Chapter 7 -Environment

New subsection ‘Strategic Connections’

Update Growth Strategy Map ‘Overview of Growth Strategy’ (see below)

Expanded Section 3.2 'Growth Enablers for the region', including 'Compact Growth - Guiding Principles for Infill and Brownfield' (relocated from Section 9.5) (see below)

Overview of Growth Strategy (amended)

The Growth Strategy will;

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** by targeting a greater proportion of future housing development, up to 50% of housing built in in Dublin and up to 30% of housing built in other settlements, to be accommodated within and close to the existing built up footprints.
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 moderate growth.
9. Focus on **consolidation and targeted 'catch up' investment** to support self-sustaining local employment and in services 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.

‘Strategic Connections; (New)

The Growth Strategy for the region is underpinned by a settlement strategy (set out in Chapter 4) and an integrated land use and transportation strategy (Chapter 8) which seeks to protect and enhance global connectivity and regional accessibility, including the Trans European TEN-T road, rail and port network. Investment in sustainable mobility will be delivered through Local Transport Plans (LTPs), to be prepared by local authorities in collaboration with transport agencies, to include, but not limited to, Athlone, Dundalk, Drogheda, Portlaoise, Mullingar, Tullamore, Longford, Balbriggan, Navan, Naas, Newbridge, Wicklow-Rathnew, Ashbourne, Arklow and within the Dublin Metropolitan Area.

The RSES seeks to protect and enhance strategic connections in the region, including;

Eastern Economic Corridor; Dublin - Belfast - Rosslare Europort

Cross boundary coordination is a significant element of the strategy and will be even more so with the onset of Brexit, playing a critical role in supporting economic growth and competitiveness. The Dublin to Belfast Corridor is the largest economic agglomeration on the island of Ireland with the cities and towns along the corridor home to a population of around 2 million. The Corridor also connects the large towns of Drogheda, Dundalk and Newry by high-capacity national road and rail links, major airports of Dublin Airport, Belfast International Airport and Belfast City Airport and Belfast and Dublin Ports, with complimentary ports along the corridor, extending south to Rosslare Europort, which is an important economic and transport link, particularly in the post Brexit scenario. The RSES supports a feasibility study for high speed rail between Dublin and Belfast and enhanced rail services on the south-eastern line to include the extension of DART services to Drogheda.

Strategic connections to the Northern and Western Region

Athlone is strategically located in the centre of Ireland as a gateway to the west between Dublin and Galway. Cross border co-ordination of future development will be supported by investment in sustainable mobility including increased recreational use of the Grand Canal and completion of the Dublin to Galway Greenway which is designated as a trans-European Eurovelo Route. Longford is strategically located as portal to the northwest on the Dublin to Sligo rail corridor, also serving the key towns of Mullingar and Maynooth. Planned upgrades to the M/N4 motorway, enhanced rail services on the Dublin-Sligo line including DART to Maynooth and increased recreational use of the Royal Canal as part of a Dublin to Westport Greenway, will improve northwest connectivity. Dublin to Cavan generally follows the N/M3 and rail route, while development of the cross border A5 motorway connecting to the N2/M2 will improve connectivity between Dublin and the border counties to Derry and Letterkenny.

Strategic connections to the Southern Region

The Dublin to Cork rail corridor is strategically important linking the two largest cities in the State, and part of the EU TEN-T core network, which aims to protect and enhance strategic international connections between Belfast, Dublin and Cork. The Dublin to Cork rail corridor also provides commuter rail services to the Dublin hinterlands. The RSES supports a feasibility study for the provision of high-speed rail links between Dublin and Limerick/Junction Cork and enhanced rail services including the extension of the DART to Cellbridge/Hazelhatch in north Kildare. There is potential to promote links between the Grand Canal, the Barrow Line and to further develop the Barrow Blueway connecting Carlow- Graiguecullen on the boundary with Southern Region and extending south to Waterford.

3.2 Growth Enablers for the Region

Dublin City and Metropolitan Area (Amended)

With a total population of nearly 1.2 million people (Census 2016) Dublin city and suburbs accounts for about half of the region's population or a quarter of the national population, as well as being the largest economic contributor in the state. As Ireland's only international city of scale, Dublin acts as the global gateway to Ireland and its influence extends well beyond its administrative boundaries.

The wider Dublin Metropolitan Area (DMA) metropolitan area, home to 1.4 million people, covers the continuous built up city area and includes the highly urbanised settlements of Swords, Malahide, Maynooth, Leixlip, Celbridge, Bray and Greystones, which have strong connections with the city.

Dublin plays a key role in attracting internationally mobile talent and investment and combines vibrant urban living, a rich heritage and character and access to nature including Dublin Bay, the coastline and Dublin-Wicklow mountains. The Metropolitan Area Strategic Plan (MASP) in Chapter 5 sets out a strategy to achieve growth of 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031 through the delivery of large-scale strategic development areas.

Key Growth Enablers for Dublin City and Metropolitan Area (See also Section 5.3) include;

- 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.
- 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 and a target of 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life
- 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 for housing.
- To increase employment in strategic locations, with a focus on re-intensification and regeneration of lands within the M50, a limited number of people intensive hubs in accessible locations, building commercial and research synergies in proximity to large employers and activating strategic sites to strengthen the local employment base in commuter towns.
- 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 to include district heating and water conservation.
- 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 the Dublin-Belfast Corridor.

Core Region (Amended)

The Core Region includes the peri-urban ‘hinterlands’ in the commuter catchment around Dublin, which covers the Mid-East counties of Louth, Meath, Kildare and Wicklow, extending down the East Coast and into parts of the Midlands. The Mid-East has seen the highest growth and highest internal migration of our population and includes some of the youngest and fastest growing towns in the state. The Core Region enjoys access to a high-quality environment, rich heritage and key tourism assets and attractions such as the coastline, the Royal and Grand Canals, the Boyne and Barrow Blueways, Tayto Park, UNESCO site at Bru na Boinne and Wicklow Mountains National Park.

The Core region contains a strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations but a wider catchment area. These include Arklow, Balbriggan, Drogheda, Navan, Naas, Newbridge and Wicklow. These towns have capacity for continued commensurate growth to become more self-sustaining and to attract high quality knowledge-based employment at strategic accessible locations.

Some areas in the core region have emerged mainly as commuting towns, experiencing high rates of population growth but with a weak level of services and functions for their resident populations. These towns will require ‘catch up’ investment in local employment and services in order to become more self-sustaining and to improve sustainable mobility, particularly in those places where there are high levels of car dependency.

Key Growth Enablers for Core Region include;

- 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.
- 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 Corridor, driving synergies between the Drogheda-Dundalk Newry cross border network.
- 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 built, within the existing built up area of settlements.
- ‘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.
- Diversification and specialisation of local economies with a focus on 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.
- 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.

Gateway Region (Amended)

The Gateway Region includes the midlands and border areas which act as interregional gateways to the rest of the island, and parts of southwest Wicklow, where over 400,000 people reside. This region includes the regional growth centres of Athlone and Dundalk, as well as an extensive network of county and sub county towns and small towns and villages, which support the wider rural and agricultural area where the population is more dispersed. The area contains many key natural resources and tourism assets, under the Hidden Heartlands brand including the River Shannon and inland waterways, Carlingford and the Cooley Peninsula, Slieve Blooms, Lakelands and peatlands including Lough Boora.

The location of the Midlands is strategically important, with an influence that extends to all three Regional Assembly Areas. Towns that straddle regional boundaries and act as gateways to the south, west and northwest include Carlow-Craigucullen, Athlone and Longford. Like Mullingar, Portlaoise and Tullamore, these towns provide functions at a much higher level than their resident population, providing key employment and services for their own extensive hinterlands.

The northeast includes County Louth and parts of Meath, which are strategically located in proximity to the Dublin- Belfast cross-border network, focussed on Drogheda, Dundalk and Newry and which is the largest economic agglomeration on the island of Ireland, home to a population of around 2 million people and will become more important post Brexit, acting as national entry point to the island through its airports and ports.

Key Growth Enabler for the Gateway region are;

- 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
- Support compact growth in the regional growth centre of Dundalk to grow to city scale, capitalising on its location on the Dublin – Belfast Corridor to drive the linkage between Dundalk and Newry to strengthen cross border synergy in services and functions.
- ‘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.
- 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.
- Diversification and specialisation of local economies 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 managed transition and realise the benefits of green technologies.
- 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.

Compact Growth (Relocated from Chapter 9 and Guiding Principles Expanded)

A vital element of achieving compact growth is the regeneration of infill and brownfield sites. The importance of the role of regeneration in the delivery of Project Ireland 2040 is acknowledged by the

provision of the Urban Regeneration and Development Fund and Rural Regeneration and Development Fund. Achieving this target will require active land management responses to ensure that land and building resources within existing settlements are used to their full potential.

Guiding Principles - Urban Infill and Brownfield Regeneration:

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;

- 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.
- 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 development² and to integrate principles of good urban design and placemaking.¹
- 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.
- 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

¹ DEHLG 'Urban Design Manual Best Practice Guide' Companion Document to the 'Guidelines for Sustainable Residential Development in Urban Areas', 2009
UCD Urban Institute 'Green City Guidelines' 2008
DTTS, DECLG 'Design Manual for Urban Roads and Streets' 2013

Chapter 4 People and Place

Submission Number(s)

0006, 0003, 0008, 0009, 00010, 0015, 0017,0018, 0020, 0022, 0075, 0087, 0092, 0094, 0095, 0096, 1011, 0104 (Irish Water), 0105 (Roscommon County Council), 0106 (Wicklow County Council), 0112, 0115 (Westmeath/Roscommon County Council), 0116 (Department of Culture, Heritage and the Gaeltacht), 0117 (South Dublin County Council) 0120 (Westmeath County Council), 0123 (Louth County Council), 0124, 0125,0129, 0132, 0133, 0135 (Minister for Justice and Equality), 0136 (Kildare County Council), 0137, 0138, 0139, 0140, 0141 (Southern Regional Assembly), 0142 (Northern and Western Regional Assembly), 0143, 0144 (Department of Rural and Community Development), 0145 (Longford County Council), 0146 (Laois County Council), 0148, 0149, 0153, 0154, 0155, 0156, 0158, 0159, 0160, 0161, 0162, 0166, 0167, 0168, 0174, 0178, 0180, 0182 (National Asset Management Agency), 0187, 0189, 0191, 0192 (Kildare County Council), 0193, 0199, 0210, 0203, 0204, 0210, 0211, 0212, 0213. 0217, 0219, 0220, 0222, 0223 (Failte Ireland), 0224 (Offaly County Council), 0227, 0228, 0230, 0232, 0234, 0236, 0237, 0240, 0245 (Meath County Council), 0247, 0251, 0252, 0253, 0254 (Dun Laoghaire Rathdown County Council), 0257, 0258, 0260, 0265 (An Taisce) 0267, 0269 (Fingal County Council), 0273, 0274, 0277, 0280, 0281, 0282, 0284, 0285 (Department of Housing, Planning & Local Government), 0287, 0288, 0291, 0292, 0294, 0295, 0298, 0299, 0300, 0301, 0302, 0304, 0309, 0313, 0314, 0315, 0316.

4.2 Settlement Strategy

Summary of Issues

A number of submissions recommend the provision of an additional settlement typology, 'Moderate Sustainable Growth Towns' as per the RPGs for the Greater Dublin Area. This includes modifications to Tables 4.1, 4.3 and a new section 4.7. Enfield is explicitly indicated as being suitable for said designation as is Laytown/Bettystown/Donacarneym/Mornington and Stamullen.

A number of submissions were received in relation to Enfield and its status, primarily in the context of the Meath County Development Plan, some request that it is designated a key town. References are made in relation to its capacity for employment and the need for a second level school and improvements in the town centre and community facilities aswell as addressing employment uses, public transport, the toll plaza etc Likewise, a Stamullen related submission also advocates for the importance of this settlement and sets out the assets and potential of this settlement.

A further issue raised by a separate submission relates to the definition of Medium to Large Towns being too narrow and not account for large sized towns with a strong employment role and higher order functions/infrastructure that serve a wide geographical area and population (example of Arklow is used). The description is indicated as not reflecting the capacity of some towns to grow and be important providers of housing in the region.

It is requested that a further settlement hierarchy be included in Figure 4.2. Also clarity is requested in terms of what is meant by the term 'consolidation' under Medium to large settlements in terms of % growth. The lack of identification of towns in the tier below key towns is also identified as an issue in several submissions.

Several submissions also request RPO 4.2 to be amended in relation to capacity for services, indicating a suggested wording of 'is or can be made available through appropriate measures'

One submission has requested that the settlement strategy should use a corridor approach with suggested corridors being:

- Dublin-Rosslare
- Dublin-Waterford
- Dublin – Cork & Limerick
- Dublin – Galway & Sligo
- Dublin - Cavan

It has been submitted that the population threshold for small towns and villages in the 'outer region' be reduced from 1500 to 800. The case of Granard is made that, with a population of 900 it would not qualify as a small town or village despite having a function in excess of its population and a level of services that supply a wide rural catchment.

Director's Response

Section 4.2 of the draft RSES clearly indicates that the settlement hierarchy indicated in the Strategy identifies settlements at Regional Growth Centre and Key Town level. Below this level it is appropriate for Local Authorities to identify their medium to large towns and small towns and villages within the context of the principles and guidance set down in the RSES such as in Table 4.3 and the guiding principles for Core Strategies set out in section 4.3. It is at this level, i.e. Development Plan or Local Area Plan that the issues relating to traffic, employment opportunities, town centre improvements, services, community facilities etc. can best be addressed and the correct policy responses applied to these settlements.

With regard to the selection of settlements for key towns in the RSES the strategy sets out the asset and evidence-based approach that was taken to the application and designation of these key towns, this is further addressed in chapter 3 Growth strategy (Table 3.1 Asset Based Criteria refers) and in Appendix A which is considered to be a working document on the approach taken to the assets of settlements to determine the designation. Additional information on the application of an asset test for the location of residential development is also recommended for inclusion in Chapter 9 -Quality of Life (Housing).

This approach and the data and methodology behind this approach will be available to the local authorities to assist in the preparation of the core strategies of the development plans, that have to be reviewed after the adoption of the Strategy. The Assembly commits to having this in place and available for local authorities before the adoption of the Strategy. This approach involved the key stakeholders in the Technical Working Groups and has been validated by the DHPLG in the Minister's submission to the draft RSES.

In relation to the provision of an additional settlement typology between Key Town and Medium to Large Towns, 'Moderate Sustainable Growth Towns', it is considered that the existing hierarchy contained in the RSES is adequate and that the provision of an additional typology between Key Towns and Medium to Large towns is not necessary. However clarity is required as to the context and nature of the settlements through the region that are Medium to Large. There are some that require the consolidation approach as detailed in table 4.1 and others that can sustain a moderate level of growth and would be expected to have similar policies as 'Moderate Sustainable Growth Towns'.

Local authorities, when assessing the development potential and requirements of their medium to large towns will have regard to the policy context set down in section 4.2 which will allow such towns to develop according to their potential having regard to existing and planned infrastructure, population capacity etc.

In relation to the requests for the RSES to identify and designate the Medium to Large Towns in the region, it is considered that this level of decision making should be applied at county level in the core strategies of the relevant development plans. The local authority can determine if a settlement should be designated a moderate (Moderate Sustainable Growth Town) or consolidation policy approach using the approach in table 4.1 and the asset approach set out in the strategy.

In relation to RPO 4.2 it is considered that it should be amended to take account of planned service capacity.

In relation to the request for the reduction from 1500 to 800 population threshold for small towns and villages, it is considered that this population threshold based on the CSO definition of rural, applied here is too crude to allow for the differing nature and context of the assets of small towns and villages across the region and should not be applied in this nature.

Director's Recommendation

*Amend RPO 4.2 to read: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available **or planned** to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.*

Amend table 4.1 under medium to large towns to i) Moderate Growth Towns and ii) Consolidation Towns
Edit narrative accordingly throughout the strategy to reflect this change.

In table 4.1 remove the population thresholds for small towns and villages

4.3 Defining a Settlement Typology

Summary of Issues

Population and Headroom

A number of submissions have been received indicating concern at the lack of ambition being proposed by the population projections contained in Appendix B both for the region and for specific settlements. Arguments are presented that the population targets as NPF policy based on the ESRI econometric modelling are conservative with regard to migration rates, natural increase and rates of past population growth in the region to date. References are made to the fact that the NPF targets are lower than the targets in current Development Plans and that they are already out of date. There are also numerous submissions questioning the level of population growth of various settlements including all of the Regional Growth Centres and most of the Key Towns, the majority of these submissions are seeking increased targets.

A number of submissions were received in relation to population targets and the function and application of headroom, including requests for additional headroom to be explicitly identified in the County Population Tables in Appendix B. Clarity has been requested in relation to whether headroom relates to population or should also apply to landuse zoning aswell, Clarity has also been requested as to whether

the additional 25% applies for only the transition period or should be applied to all of the growth targets contained in the RSES. Clarity has been requested in relation to which local authorities areas in the region that can avail of the 25% headroom and has requested an additional column in the County Population Table in Appendix B

There was a request for clarity on the issue of headroom and the NPF Roadmap Statement in relation to 'Cumulatively...provision for 50% more growth than is required to 2026 has effectively been accounted for at national level.'

The omission of Longford and Offaly from having the scope for headroom as set down in the NPF Roadmap is highlighted as a serious concern.

One submission indicates support for population targets rather than caps.

A further query relates to the level of transfer from Dublin City to the other MASP settlements as suggested under NSO 68 in the NPF, with a request that the RSES provides the level of transfer and determine the population targets for the MASP settlements outside of the city. It was also indicated that the transfer of projected growth from the city and suburbs should be subject to comprising compact development, such as infill or a sustainable urban extension, served by high capacity public transport and/or significant employment and amenity provision as per the NPF.

A request has been made that a population projection for the Dublin Metropolitan Area and for the Dublin City and Suburbs be included.

Clarity is also requested in relation to whether population growth targeted for the Metropolitan Key Towns can be transferred to other areas in the event that additional growth from Dublin City and Suburbs is transferred to Bray, Swords and Maynooth.

A submission was received in relation to Dunshaughlin in the context of the allocation of headroom and its capacity for growth. A request is made that the RSES explicitly recognises the potential of Dunshaughlin to accommodate a higher growth trajectory during the transitional period.

Potential conflict has been indicated relating to the discussion of towns in the lower tiers between the statement relating to natural increase and that population targets be reflective of local conditions and place potential.

Director's Response

Project Ireland 2040 and the National Planning Framework set out new national spatial planning policy. As part of this national policy an approach was taken to adopt policy that would attempt to rebalance growth in Ireland so that the growth of the other two regions (Northern and Western and Southern) would equal the growth of our region. There was also a focus on the five cities with 50% of all population growth to be focused on the cities of Dublin, Cork, Limerick, Galway and Waterford. This is national policy and the Regional Spatial and Economic Strategy is required to be consistent with national policy. The National Planning Framework and the associated documents sets out the rationale and evidence behind the policy decisions taken at national level by the government.

Following on from the adoption of Project Ireland 2040, the DHPLG published circular a Roadmap for the Implementation of the National Planning Framework, which included population targets by county for 2026 and 2031. These population targets are replicated in Appendix B of the RSES. Furthermore the Dublin target is broken down for the four Dublin local authorities based on their existing proportion of the population of County Dublin.

The RSES sets a population target for Dublin City and suburbs of 1.4m to 2031 (stated in NPF), and of 1.65m in the MAPS to 2031. Chapter 4 also gives targets of 50,000 for both Drogheda and Dundalk and 30,000

for Athlone, to 2031 these targets will be further refined in the Urban Area Plans that are to follow the adoption of the RSES as part of the Development Plan reviews. The issue of population transfer from Dublin to Key metropolitan settlements is addressed in Chapter 5 – MASP.

However the application of population targets to Key towns, Medium to Large towns, small towns and the other parts of counties are a matter for the core strategy of development plans. The RSES does not determine, and nor should a strategic regional plan determine the growth potential of these areas. Furthermore the methodology applied in core strategies previously to apply population targets to houses to zoned land will not apply in the new revision of development plans. DHPLG have stated that they will produce revised section 28 development plan guidelines that will set out the methodology to be applied in core strategy preparation.

The RSES takes a few steps towards this methodology by the narrative on pages 42 and 43 that set out taking account of existing plans, headroom and measuring delivery through active land management. This narrative should reflect some of the comments in submissions and be edited to reflect our region and not parts of other regions.

In relation to concern over the lack of access to headroom for some parts of the region, this situation is determined by the Roadmap Circular and it is not within the purview of the RSES to amend same.

It is recommended, however that the Guiding Principles for enabling growth in the region, to be considered by Local Authorities in developing their Core Strategies and settlement hierarchies should be expanded to give further clarity for development plans in the region.

In relation to the submission on potential conflict relating to natural increase and local place potential, it is considered that the natural growth is indicated as being to provide commensurate population and economic growth having regard to capacity of public transport, services, infrastructure etc. and that this naturally accords with local conditions and place potential.

Dunshaughlin is not identified as either a Regional Growth Centre or Key Town in the RSES. It is therefore appropriate that any such issues relating to capacity and phasing of development for Dunshaughlin is dealt with at the appropriate scale, being the relevant county development plan.

Director's Recommendation

Amend RPO 4.1 to include the following additional sentence:

Core Strategies shall also be developed having regard to the infill/brownfield targets set out in National Planning Framework National Policy Objectives 3a-3c.

Under Headroom, amend the narrative to remove the sentence referring to Clare and Kilkenny and have reference to the NPF in relation to transfer of projected growth.

Expanded Guiding Principles, 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;

- i. **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.
- ii. **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.

- iii. **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 in 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.
- iv. **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.
- v. **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.
- vi. **Dublin Belfast 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.
- vii. **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.
- viii. **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.
- ix. **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 maritime spatial plan for the region and for the preparation of Local Transport Plans and Urban Area Plans (UAP).

4.5 Regional Growth Centres

Summary of Issues

Athlone

Several submissions give general support for the designation of Athlone as a Regional Growth Centre and welcome the coordination approach between local authorities and regional assemblies to the delivery of a regional growth centre.

Submissions have indicated that the RSES for the two relevant regions should accord with each other with regard to how they address their regional growth centres. Some of these state that it is key that there is

consistency between the regional assemblies in the policy focus of these settlements to ensure a balanced application of national policy at regional level. There is concern expressed at the enhanced level of policy provision of some regional growth centres in relation to Athlone and that the role of the RSES is to address the high level strategy approach to the future of each of these centres, and should state a strategic vision, profile and strategic needs for these centres

One submission has indicated concern in relation to the population provision for Athlone and the ability of the town to function as a Regional Growth Centre. Further headroom for the overall county is indicated as necessary. Specific to Athlone it is indicated that the population target of 30,000 should be frontloaded for inclusion as a target for the joint UAP. It is further stated that not enough ambition has been provided for Athlone as a regional driver. A number of proposed RPOs for Athlone are included in the submission addressing issues such as:

- Prioritising infrastructural investment for Athlone
- Ensuring water supply and wastewater needs are met by national projects
- Designation of an SDZ at Creggan to include AIT campus
- Recognising FDI presence in Athlone and to promote it as the focus for same in the Midlands region
- Support for research, innovation and EU funding opportunities
- Support an open space strategy
- The provision of Regeneration Masterplans
- The preparation of a joint transport study
- Smart City concept for Athlone
- Maximisation of tourist potential of River Shannon and Lough Ree

A submission supporting the identification of the Golden Island site in Athlone was received.

A submission was received in relation to lands in the proximity of Athlone at Barrymore but was widened to address all Regional Growth Centres, requesting that a specific objective be included in the RSES stating that a mix of low-density residential developments will be acceptable in areas where low density development is prominent in close proximity to Regional Growth Centres.

Failte Ireland's submission requests that an RPO be provided to address the Shannon Tourism Masterplan and to amend RPO 4.7 to remove 'Lakelands'.

The Department of Culture, Heritage and the Gaeltacht has indicated that the RPOs for Athlone should take account of its location in proximity to sites of international nature conservation.

A submission was received in relation to RPO 4.5 proposing the inclusion of the Irish Manufacturing Research be included as a regional stakeholder.

Drogheda

Submissions were received indicating that the population target for Drogheda is too low and reflects a lack of ambition and calling for Drogheda to be supported in its future regional role. A significant number of calls have also been made for Drogheda to receive city status, this has been argued with the surrounding settlements forming part of the town to surpass a population of 50,000.

A submission also indicated concern in relation to the lack of acknowledgement of the importance of the Southern Environs of the town and the lack of reference in this section. To that end there are suggested amendments to RPO 4.8 for Drogheda that addresses the Southern Environs.

The issue of split of population targets between Louth and Meath county councils being commensurate with existing population levels was indicated as being of concern in a number of submissions, with an increase on both sides being advocated.

Another submission states broad support for how the RSES addresses Drogheda. A request for the amendment of RPO 4.8 to incorporate the Urban Design Framework for the Heritage Quarter has been made.

A number of submissions were made in relation to the inclusion of specified landbanks in the Drogheda area to be identified for future development. The landbanks identified were:

- Lands at Drogheda Northern Environs
- Lands at Drogheda Southern Environs
- Lands at Newton, Marsh Road

Requests were also made for an RPO relating to the Port Access Northern Cross Route (PANCR) to be included and for the PANCR to be delivered immediately.

A further submission related to the inclusion of RPO 4.8 relating to the provision of an employment hub at McBride station and environs and requesting that this is changed to residential / mixed use.

A submission indicates support for the protection of the role of Drogheda port and its relocation, with a request that the resulting town centre site be delivered as a business park.

Numerous submissions called for an RPO supporting the delivery of a regional hospital for the north-east in Drogheda, and in some submissions not to be supported in Navan.

A submission indicated concerns that the joint UAP can be delivered by the relevant two local authorities.

RPO4.11 is identified as problematic as Drogheda is indicated as not having IDA, Enterprise Ireland or LEO offices and there is a need for an IDA business park.

In the context of RPO4.12 it is indicated that Drogheda requires a Failte Ireland office and that the town centre should be developed as a cultural, historic and arts town centre.

A submission requests for Drogheda to have a third level institution and for Dundalk I.T. to be recognised as an RPO for Drogheda aswell, given the remit of Dundalk I.T, covering all of county Louth.

Submissions indicated that a similar RPO to RPO 4.17 be included for Drogheda.

Dundalk

There has been broad support in submissions for how the RSES addresses Drogheda. A request for the amendment of RPO 4.15 to incorporate the Dundalk Urban Design Framework (2009) or a revised version be included.

A submission queries the lack of Key Towns to support the Regional Growth Centre of Dundalk. It also requests a new RPO to actively support housing initiatives, particularly student type accommodation for the town.

A submission indicates the need for the consideration of a light rail system for Dundalk aswell as for the need for Coastal Zone Management Plan to be delivered as a companion piece to the UAP.

A request was received for a specific landbank at Haynestown to the south of Dundalk and lands at Blackrock Road to the southeast of Dundalk to be included in RPO 4.15

Another site specific submission was received in relation to lands at Rath, Dundalk, looking for a zoning change for residential zoned lands in terms of phasing.

A further site specific submission was received in relation to lands at Dundalk Grammar School in relation to the provision of regional school sports/leisure and recreational facilities and a request for a specific RPO to provide for same.

Naas

Submissions were received calling for Naas to be afforded status as a Regional Growth Centre as a counter balance for the lack of same south of Dublin.

Director's Response

Athlone

Project Ireland 2040 – NPF, NPO 7 identifies the regional centres of Athlone, Sligo and Letterkenny and the Letterkenny – Derry and Drogheda – Dundalk – Newry cross border networks. This is reflected in the designation of these settlements as regional growth centres. It is key that there is consistency between the regional assemblies in the policy focus of these settlements to ensure a balanced application of national policy at regional level.

The role of the RSES is to address the high level strategy approach to the future of each of these centres, and should state a strategic vision, profile and strategic needs for these centres. It is contended that the RSES for the both the EMRA and the NWRA should reflect this requirement in addressing the needs of the designated regional growth centres by providing a policy response at the relevant strategic scale befitting an RSES which is a strategic plan for the region.

The NPF identified a 'strategic plan' for these centres which is addressed in the provision for joint urban / local area plans utilising the existing Local Area Plan legislation (both the NPF and the Implementation Roadmap circular refer). They are intended to be (jointly) prepared after the approval of the RSES, by the relevant local authority, through LAP legislation prior to determination by the full Council(s).

In relation to the request for additional RPOs for Athlone, the RSES prioritises Athlone by way of its designation as a regional growth centre and the policy focus it enjoys. It is considered that the majority of the areas outlined are covered either by existing RPOs relating to Athlone in this chapter or by RPOs in the wider document e.g. Chapters 6 (research and innovation, smart city), 8 (local transport plan) and 10 (water and wastewater). However there can be RPOs to support the existing economic activity and regeneration plans considered for inclusion.

In relation to the request for an SDZ at Creggan to include AIT campus it is considered that the designation of an SDZ is a function of government and is determined at cabinet level by way of a statutory instrument. This SDZ proposal at this location was an unrealised objective of the Midland RPGs and should not be repeated in the RSES.

In relation to the request for and objective to accommodate low density residential development in close proximity to Regional Growth Centres, it is not considered appropriate for the RSES to identify that low density development is appropriate proximate to Regional Growth Centres which are seen as key elements in the delivery of higher density development. It may be the case that on an individual planning basis that

lower density residential development may be appropriate in certain locations but this issue is best considered at local authority or planning application level.

In relation to the request for a Shannon Tourism Masterplan related RPO, it is considered that RPO 4.7 can be amended to include same.

In relation to the Department of Culture, Heritage and the Gaeltacht's submission, it is considered reasonable to incorporate reference to sites of international conservation interest.

The proposal for inclusion of the state funded technology centre – Irish Manufacturing Research (IMR) should be included as a key stakeholder would further strengthen this RPO.

Drogheda

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. 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.

Having regard to the issue of proportionate split of population between Louth and Meath, it is indicated that although it should in the first instance be commensurate with existing population levels, however this is a matter to be agreed by both local authorities during the joint Urban Area Plan process coordinated by the Regional Assembly and will therefore need to be done on an evidential and planning basis.

In relation to issues with the delivery of the joint UAP, it is envisaged that EMRA will have a co-ordinating role in the delivery of the joint UAP and therefore it is considered that this is not an issue of concern.

In relation to RPO 4.11, it is considered that the lack of IDA, Enterprise Ireland or LEO offices does not preclude the RSES supporting the promotion of self-sustaining economic and employment based development opportunities in Drogheda.

Likewise, in relation to RPO 4.12, it is not considered necessary for Drogheda to have a Failte Ireland office in order to promote tourism in the area and the delivery of Drogheda town centre as a cultural, historic and arts town centre can be achieved without the requirement for an underlying RPO.

In relation to supporting Dundalk I.T. with an RPO for Drogheda, it is considered that this is reasonable. This could be tied in with general support for the exploration of other third level opportunities for Drogheda.

In relation to the request for RPO 4.8 to be amended to address the Southern Environs, it is considered reasonable to include as part of the RPO.

It is considered that RPO 4.8 could be amended to incorporate the Urban Design Framework for the Heritage Quarter.

In relation to the submissions relating to the inclusion of specified landbanks in the RPOs for Drogheda, including the delivery of a town centre business park, it is not considered necessary to identify further specific landbanks to support the development of Drogheda as a Regional Growth Centre. The joint Urban Area Plan to be prepared for Drogheda will address the identification and delivery of strategic sites and regeneration areas. It is not practical nor appropriate for the RSES to identify all such sites and reference to named sites in the Strategy is not an exhaustive list.

In relation to the designation of an employment hub at McBride Station and environs, the specific requirement that these are employment lands should not curtail other sustainable development at this transport node and as such this should be revised.

In relation to the PANCR, it is considered that the RSES satisfactorily supports the delivery of same under RPO 4.9.

In relation to the provision of an RPO supporting the delivery of a regional hospital there is a current proposal for such a facility in Navan and the RPO under the Key town reflects this, if this is to change then the RSES should be flexible to adapt.

In relation to the issue of a similar RPO to RPO 4.17, relating to the Dublin-Belfast Economic Corridor, it is considered that this is a reasonable request and that the Regional Growth Centre of Drogheda has significant potential as an employment centre on the economic corridor.

Dundalk

It is considered that RPO 4.15 could be amended to incorporate the Dundalk Urban Design Framework (2008).

In relation to the lack of a supporting Key Town for Dundalk, it is not considered that Regional Growth Centres require a supporting Key Town. Regional Growth Centres are large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area. As such, they are not dependent on a Key Town being within their catchment or in their proximity.

In relation to the request for a new RPO relating to housing, it is envisaged that the Urban Area Plan set out under RPO 4.15 will address issues such as housing demand for Dundalk.

In relation to the consideration of a light rail network for Dundalk, it is not considered that this proposal merits inclusion at this time in the RSES. At current or planned levels the Regional Growth Centre would not have the critical mass of population or demand to justify a high capacity high frequency public transport infrastructure, such as light rail. Chapter 8 outlines the key transport infrastructure projects for the Region, having regard to the commitments contained in the National Development Plan and a light rail network for Dundalk is not identified in this capital programme.

In relation to the request for RPO 4.15 to be amended for Dundalk in relation to lands at Haynestown and Blackrock Road, it is not considered necessary to identify further specific landbanks to support the development of Dundalk as a Regional Growth Centre. The joint Urban Area Plan to be prepared for Drogheda will address the identification and delivery of strategic sites and regeneration areas. It is not practical nor appropriate for the RSES to identify all such sites and reference to named opportunities in the Strategy is not an exhaustive list.

In relation to the other site specific submissions for Rath and Dundalk Grammar School, it is considered to be a land use zoning issue for the local authority and is not appropriate for an RSES.

Naas

In relation to the designation of Naas, the identification of Regional Growth Centres was set out in the National Planning Framework and as such it is not within the remit of the RSES to designate additional Regional Growth Centres. It is considered that the designation of Naas as a Key Town is sufficient for the purposes of developing a strategic settlement strategy for the EMRA Region and the lack of a Regional Growth Centre south of Dublin is not considered a concern from a strategic planning point of view.

Director's Recommendation

Athlone

Include narrative on the preparation of a joint local transport plan.

Amend RPO 4.4 to include the following text at the end of the first paragraph:

whilst taking account of the proximity of sites of international nature conservation interest.

and include

the provision of regeneration masterplans

Amend RPO 4.5 to include the following bullet point:

Irish Manufacturing Research technology centre

Amend RPO 4.7 to include the following bullet point:

The provisions of the forthcoming Shannon Tourism Masterplan

Amend RPO 4.7 to remove 'Lakelands' from Failte Ireland bullet point.

Drogheda

Amend RPO 4.8 to include the following bullet points under Future development required to achieve the growth vision for Drogheda included in the Joint UAP shall:

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 an employment hub and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs

Support the implementation of the Urban Design Framework Plan for the Heritage Quarter

Insert new narrative section under paragraph 5 on page 48

Dundalk Institute of Technology can develop can develop as a centre for excellence for education and there is the potential for other third level opportunities for Drogheda to be delivered, enhancing the educational offer in the area.

Insert new RPO under RPO 4.11:

RPO: Enhance Drogheda's role as a strategic employment centre on the Dublin-Belfast Economic Corridor and provide for employment opportunities through identification of suitable sites for new industry including FDI.

Dundalk

Amend RPO 4.15 to include the following bullet point

Support the implementation of the Dundalk Urban Design Framework Plan (2008) or any update thereof

4.6 Key Towns

Summary of Issues

Support is expressed for the designation of key towns, with a number of significant submissions recommending additional narrative and RPOs, to promote development opportunities and support investment in key towns.

General Designation of Key Towns

A submission has indicated that the description of Key Towns at p39 and p41 are not the same in relation to employment on the one hand being strategic to the region and on the other being related to the more immediate locality. It indicates that it is their interpretation that local authorities can designate additional Key Towns in their area.

Swords

A number of submissions were made in relation to expanding the narrative for Swords Key town having regard to its status and role and the future expansion of Dublin Airport, the Metrolink etc. Additional RPOs relating to underutilised sites, public realm enhancement, enabling infrastructure, airport related economic development and a transition to low carbon transport were received.

Maynooth

Submissions relating to Maynooth have raised a number of requests for additional infrastructure such as a second interchange off the M4, a ring road / outer orbital road, the provision of a community centre, a garda station a primary health care centre, childcare and education. It was also indicated that the development of Maynooth Environs is a natural extension of the town of Maynooth.

A submission seeks to have specific lands at Moygaddy included in section 4.6 of the RSES, identifying the lands as being strategically suitable for employment, residential and complementary uses and allowing for the delivery of the Maynooth outer orbital route.

Two site specific submission relating to lands at Moygaddy were received requesting that certain lands be included in the narrative set out in section 4.6 for residential and student housing purposes, which would require a change in zoning and that wider lands (including the above specific lands) be explicitly referenced in section 4.6 and Table 5.1 of the draft RSES.

Bray

A number of submissions were made in relation to expanding the narrative for Bray Key town having regard to its status and role. Additional RPOs relating to public realm enhancement, enabling infrastructure, economic development and a transition to low carbon transport were received.

Navan

It is submitted that the narrative fails to reflect the importance or potential of Navan as a centre for growth. To that end, a submission has provided additional suggested narrative for Navan as well as a number of suggested RPOs relating to the Navan Rail line, employment lands on Trim Road and an amendment of RPO 4.29

A site specific submission was received in relation to lands in proximity to Navan at Kilcarn. The submission requests the identification of the lands as being suitable for development for housing.

Another site specific submission relates to a site on located to the west of Academy Street, to the south of Navan town centre. The submission requests that currently Phase II lands contained in the Navan Development Plan be released for residential development.

Submission were received requesting that the support for a regional hospital in Navan be modified such that a new assessment be carried out for a potentially alternative location for a regional hospital in one instance and in another specifying Our Lady of Lourdes Hospital in Drogheda as a location.

Naas

An extensive submission to the RSES includes a detailed section on Naas Key Town with elements to be included in a narrative and new suggested RPOs.

A submission relating to Naas indicates concern at the lack of certainty and ambition in relation to population provision for the town, with a request for a target population of 40,000 to be identified in the RSES.

A submission relating to lands at the Naas Northwest Quadrant seek to provide for a mixed residential settlement.

Wicklow-Rathnew

There have been detailed proposed revisions in relation to Wicklow-Rathnew Key Town submitted. This includes more detailed narrative, amendments to RPOs and the insertion of a new RPO relating to rail infrastructure.

Longford

In response to Longford Key Town a submission to the draft RSES provides additional narrative/context and suggested RPOs. The RPOs address issues such as tourism, education, community development and social inclusion, provision of hotel/conference/event facilities, employment

A submission in relation to Longford indicates that a new RPO relating to employment be included, relating to the development of Longford Town as a strategic employment hub. The submission further indicates that RPO 4.40 should be modified to reference Longford town as a key axis point for regional tourism trails. A further amendment to RPO 4.41 is suggested that would reference 'new communities'.

The Department of Culture, Heritage and the Gaeltacht has indicated that there are sites of international nature conservation in close proximity to the settlement that are not addressed.

Mullingar

It is stated that more emphasis should be placed on the role that Mullingar plays in the region by way of policy which promotes economic development and employment creation, supports the development of the town's assets in built and natural heritage, encourages continued investment in arts, culture and outdoor recreational activities and for the continued development of the tourist economy. Concern is raised at the lack of population targets for Mullingar in the context of ensuring that the RSES does not artificially constrain growth in Mullingar. A number of proposed RPOs for Mullingar are provided addressing issues such as:

- Employment and economic development
- Foreign direct investment
- Midlands regional hospital
- Infrastructure investment
- Economic development and regeneration of the town centre
- The development of Regeneration Master Plans
- Enhancing the base of indigenous and international companies
- Support the development of Transport study
- Improvement of connectivity to the lakes

- Development of innovative initiatives for smart deliver of business and service solutions
- Tailored policy associated with the town’s potential for tourism and eventing

A submission requests the inclusion of the National Science Park within the RPOs for Mullingar.

Another submission has indicated that there are sites of international nature conservation in close proximity to the settlement that are not addressed.

Tullamore

A detailed submission in relation to Tullamore was received, including suggested inclusions to the narrative and suggested additional RPOs. The suggested RPOs related to:

- Supporting Tullamore as an employment centre
- Support accessibility to Tullamore
- The provision of an energy retrofitting centre of excellence
- Support me-tech centre at the IDA business park in Srah
- Support application for URDF for the town’s regeneration sites
- Amendment of RPO 4.46 in relation to whiskey and other recreation areas
- Support designation of a Tullamore Regional Hospital as a major trauma centre
- To support proposals for a university in the Midlands.

Another Tullamore specific submission indicates broad support for the vision for Tullamore. The submission indicates that RPR 4.46, relating to Tullamore’s role as a tourism hub should be expanded beyond what is proposed by including whiskey tourism.

Portlaoise

One submission has requested additional RPOs in relation to Portlaoise Key Town

Graigucullen- Carlow

A submission has proposed RPOs for Graigucullen- Carlow. They relate to sustainable transport, a Local Transport Plan, lands along the River Barrow and the role of Key Towns. An amendment to RPO 4.49 is also provided, with the modification relating to the use of the term ‘combined urban area’ instead of ‘town’

Requests for Key Town status

Several submissions have requested Dunboyne be included as a Key Town and have provided a suggested narrative and RPO to that effect.

Submissions indicate concern that Newbridge is not included as a Key Town and have provided a section of detailing why in their opinion Newbridge should be afforded Key Town status, identifying its scale, transport infrastructure, regional scale employment and retail provision. It is indicated that a joint Key Town designation with Naas would also be acceptable. This is also identified in other submissions on the issue of Newbridge.

Other Newbridge specific submissions were received in relation to its lack of Key Town status and the lack of general mention of Newbridge in the Strategy. Reference to the better suitability of Newbridge as a Key Town compared with Naas has been made and that the lack of designation as a Key Town is a downgrade from the designation as a Large Growth Town II under the previous Regional Planning Guidelines. The various infrastructure elements and capacity that Newbridge has were offered as a reason for its designation as a Key Town.

It is also requested that Leixlip be identified as a Key Town, indicating the significant employment provision and the transport infrastructure in the town as justification for same

Submissions were also received requesting Arklow, Ashbourne, Greystones/Delgany, Stamullen and Dunboyne receive Key Town/Growth town status, with Arklow being identified by Wicklow County Council members.

Director's Response

The narrative on key towns should better reflect opportunities for regeneration, residential and economic development and for enabling infrastructure, along with more strategic RPOs to support the leveraging of funding and investment in key towns. Given the nature and quality of comments received in submissions it is considered that the narrative can be increased to provide a page in the document on each key town.

General Designation of Key Towns

In relation to the interpretation that Key Towns can be designated at county level by local authorities, this is not correct and it is not clear how this interpretation is arrived at. The RSES has designated 'Key Towns' and that is a function of the regional strategy.

Swords

It is considered that the general narrative for Swords can be expanded to take account of the submissions received. Likewise, additional RPOs can be inserted.

Maynooth

In relation to Maynooth, it is not considered necessary to include a list of infrastructure elements in order for the settlement to reach its potential as a Key Town. Rather the RSES sets out a few strategic drivers for the key towns that will enable significant potential of the key town to be unlocked.

In relation to including Moygaddy in section 4.6, and having regard to the Maynooth and Environs Local Area Plan, it is considered reasonable to include the Moygaddy lands in the narrative for Maynooth – this is also referenced in Chapter 5 – MASP.

In relation to the specific mention of lands at Moygaddy for residential and student accommodation, it is not considered necessary to list further areas than those already outlined. The future development of Maynooth will be guided by the RPOs contained in the RSES and by land use zonings developed by the local authority. It is indicated in the submission that the landowners intend making a submission in relation to the landuse zoning of their site to the draft Meath CDP 2019-2025 Review process seeking a change to the zoning of their lands and it is considered that this is the appropriate avenue to pursue said changes.

Bray

It is considered that the general narrative for Bray can be expanded to take account of the submissions received. Likewise, additional RPOs can be inserted.

Navan

It is considered that the narrative for Navan can be expanded to take account of submissions. In relation to the suggests RPOs, it is considered that the RPO relating to the rail line is addressed under Chapter 8 but that it can be included in the narrative, and that the RPO relating to employment lands and the modification of RPO 4.29 are acceptable.

In relation to the site specific requests for lands in proximity to Navan, it is considered that the zoning of lands, or identification of lands as suitable for development is not generally appropriate at the scale of an

RSES. This is a function for the local authority set within the context of the strategic guidance and policies set down in the RSES.

In relation to the issue of the support for a regional hospital in Navan, it is considered that this recommendation was arrived at through a due process that the RSES is not in a position to question and therefore it is recommended to retain support for the regional hospital in Navan under RPO 4.31.

Naas

It is considered that additional information can be inserted into the narrative for Naas Key town and that the RPOs provided will serve to enhance the consideration of Naas Key Town in the RSES.

In relation to the request for a population target of 40,000 to be identified for Naas in order for it to capitalise on investment in infrastructure and in the context of the current housing crisis, it is considered that the RSES adequately provides for the local authority to deliver Naas as a Key Town and it should be noted that the policy response for Key Towns is set out in Table 4.3, indicating commensurate population and employment growth, on high quality public transport corridors coupled with investment in services, amenities and sustainable transport. The identifying of a population target for the key towns is a matter for the county development plans. The RSES is not intended to artificially constrain the growth of Key Towns in the Region.

In relation to the site specific requests for lands in proximity to Naas, it is considered that the zoning of lands, or identification of lands as suitable for development is not generally appropriate at the scale of an RSES. This is a function for the local authority set within the context of the strategic guidance and policies set down in the RSES.

Wicklow-Rathnew

In relation to the suggested narrative, it is considered that this provides additional clarity in relation to the role of Wicklow-Rathnew and the majority of this can be included in the RSES. Likewise, the amendments to RPO 4.36 is considered acceptable. In relation to the suggested new RPO relating to rail infrastructure, it is not considered necessary to include same in this chapter as the general rail network is addressed in Chapter 8 and also highlighted in the proposed narrative change for Wicklow-Rathnew.

Longford

It is considered that the provision of some of the additional narrative and RPOs for Longford Key Town would be a positive addition to the RSES and should be incorporated.

In relation to Longford, it is considered that a modification of RPO 4.40 is not necessary. In relation to the proposed employment related RPO, it is considered that such an RPO may serve to support the existing role of Longford as a key employment centre and therefore should be incorporated. In relation to the proposed amendment to RPO 4.41, this is not considered necessary.

In relation to the Department of Culture, Heritage and the Gaeltacht's submission, it is considered reasonable to incorporate reference to sites of international conservation interest.

Mullingar

In relation to the lack of population targets for Mullingar, it is considered that the RSES adequately provides for the local authority to deliver Mullingar as a Key Town and it should be noted that the policy response for Key Towns is set out in Table 4.3, indicating commensurate population and employment growth, on high quality public transport corridors coupled with investment in services, amenities and sustainable transport. It is therefore clear that the RSES is not intended to constrain the growth of Key Towns in the Region rather prioritise them to fulfil their potential.

In relation to proposed additional RPOs, it is considered that there is merit in including a number of additional RPOs as set out below. In relation to other areas that RPOs are requested for, including the provision of regeneration masterplans, it is not considered that RPOs are necessary to provide for same having regard to the existing RPOs for Mullingar or to the wider RPOs contained in the RSES relating to smart enterprise, local transport plans, green infrastructure etc.

Having regard to the location of the National Science Park it is not considered necessary to name check the National Science Park as an RPO for Mullingar having regard to the proposed new RPO relating to Mullingar's role as an employment hub

In relation to the Department of Culture, Heritage and the Gaeltacht's submission, it is considered reasonable to incorporate reference to sites of international conservation interest.

Tullamore

In relation to Tullamore, a submission includes positive elements that could be incorporated into the narrative in the RSES. In relation to the suggested RPOs, it is considered that a number of them relating to site specific infrastructure or projects are not necessary but RPOs relating to the support for examination of a university and support for Tullamore as an employment hub could be incorporated. Likewise, it is considered reasonable to include the local distilling history as part of the RPO for Tullamore having regard to current trends in whiskey tourism and to the association of the town with distilling.

Portlaoise

It is considered that the submission contains a number of proposed RPOs that should be incorporated in the RSES.

Graigecullen- Carlow

It is considered that some of the RPOs should be incorporated. It is further noted that RPO 4.49 erroneously refers to the settlement as being a Regional Growth Centre and this should be corrected.

Requests for Key Town status

With regard to the selection of settlements for key towns in the RSES the strategy sets out the asset and evidence based approach that was taken to the application and designation of these key towns, this is further addressed in chapter 3 Growth strategy and in Appendix A which is a working document on the approach taken to the assets of settlements to determine the designation. This approach and the data and methodology behind this approach will be available to the local authorities to assist in the preparation of the core strategies of the development plans that have to be reviewed after the adoption of the Strategy. The Assembly commits to having this in place and available for local authorities before the adoption of the Strategy. This approach involved the key stakeholders in the Technical Working Groups and has been validated by the DHPLG in the Ministers submission to the draft RSES.

In relation the request that Dunboyne is identified as a Key Town, the Assembly engaged in a significant exercise of asset based assessment in relation to the development of the settlement strategy and the identification of Key Towns in the region. To that end, Dunboyne was not considered to meet the criteria for a Key Town as set down in Table 4.1 and 4.3. However, Dunboyne is an important part of the MASP strategy and therefore is addressed in Chapter 5.

In relation to the submissions looking for Newbridge to be a Key Town, it is considered that the designation of Naas as a key town has been adequately demonstrated and whilst Newbridge has the potential for growth in line with the policies set down in sections 4.2 and 4.3 of the draft Strategy, this level of growth will be a decision to be made at County Development Plan level.

In relation to Arklow, Ashbourne, Leixlip and Dunboyne, the RSES is a high level strategic plan and it is not feasible nor appropriate to set out development goals for all of the settlements within the Region. It is

considered that the Settlement Strategy, in the identification of Regional Growth Centres and Key Towns is the appropriate scale for the RSES to identify specific high level strategic policy responses. Below this level it is appropriate for Local Authorities to select their medium to large towns and small towns and villages within the context of according with the principles and guidance set down in the RSES such as in Table 4.3 and the guiding principles for Core Strategies set out in section 4.3. It is at this level, i.e. Development Plan or Local Area Plan, that the issues relating to traffic, services, social developments etc. can best be addressed.

The asset-based approach was used by EMRA to identify Key Towns, being large economically active services and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. It is considered that the list of Key Towns identified by the RSES satisfies this approach and it is not intended or necessary to add any other settlements in at this level of the settlement hierarchy in order to support the Growth and Settlement Strategy set out for the Region.

Director's Recommendation

Swords

Update narrative and insert the following new RPOs for Swords Key Town:

RPO: Support the continued development of Swords as a vibrant Key Town with a thriving economy; an integrated public transport network; an attractive and highly accessible built environment with the highest standards of housing, employment, services, recreational amenities and community facilities

RPO Support the regeneration of underused town centre lands along with the planned and sequential infill opportunities to provide for high density and people intensive uses in accessible locations that are accessible to high quality transport, existing and planned, and to support the preparation of a Local Area Plan for the strategic landbank at Lissenhall for the longer-term development of Swords.

RPO Facilitate the strategic regeneration of Swords to build on the resilience of the local economy and provide for an enhanced urban environment with a particular focus on the development of Swords Civic Centre and Cultural Centre, the delivery of the conservation plan for Swords Castle, and the delivery of an enhanced public realm in the town centre and to promote recreational and amenity uses in accordance with a healthy placemaking strategy.

RPO Support Swords-Dublin Airport as a key location for airport related economic development and employment provision linked to the protection and enhancement of access to Dublin Airport lands including the delivery of Metrolink.

RPO Encourage transition towards sustainable and low carbon transport modes in Swords through the provision of high quality walking and cycling permeability offering direct routes to local destination and public transportation hubs.

Maynooth

Update narrative and insert new RPOs for Maynooth Key Town

RPO: Support the continued development of Maynooth, co-ordinated with the delivery of strategic infrastructure including pedestrian and cycle linkages within the town and to the Royal Canal Greenway, DART expansion and road linkages forming part of the Maynooth Outer Orbital Route in a manner which supports future development and population growth and builds on synergies with Maynooth University promoting a knowledge-based economy.

RPO: Support Maynooth as a key town to act as an economic driver for north Kildare and provide for strategic employment at key locations to improve the economic base of the town and provide for an increased number of local jobs.

RPO: A cross boundary Joint Urban Area Plan (UAP) shall be prepared by Kildare County Council and Meath County Council to provide a co-ordinated planning framework for the Maynooth area. The Joint UAP shall identify a boundary for the plan area, strategic housing and employment development areas and infrastructure investment requirements and promote greater co-ordination and sequential delivery of serviced lands for development.

RPO: To promote the consolidation of the town centre with a focus on the regeneration of underused buildings and strategic sites and the establishment of residential uses to encourage greater vibrancy outside of business hours and the enhancement of the public realm.

Bray

Update narrative and insert new RPOs for Bray key Town;

RPO 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 harbor along with increased employment opportunities and co-ordination between Wicklow County Council and transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links.

RPO Support the development of Bray as a strategic employment location with a particular focus on attracting high value investment in 'people' based industries at accessible locations, along with the development of the strategic IDA site at Greystones, in order to increase the number of local jobs.

RPO To promote the consolidation of the town centre with a focus on placemaking and the regeneration of strategic sites to provide for enhanced town centre functions and public realm, in order to increase Bray's attractiveness as a place to live, work, visit and invest in.

RPO To support ongoing investment in public transport including the appraisal, planning and design of the LUAS extension to Bray, and the continued renewal, maintenance and improvement of transport infrastructure to provide for high quality services.

RPO Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance.

Navan

Insert the following narrative under the first paragraph dealing with Navan on p56:

Whilst the industrial and business parks in the town are performing well outbound commuting for employment remains an issue in Navan. It is promoted as a strategic centres for employment in the county to address this issue and improve the ratio of jobs to resident workers.

In addition to economic growth, there is also a need to create a modern and attractive urban environment in the town. This will be delivered through the implementation of the Public Realm Strategy 'Navan 2030' and the Active Land Management Strategy for the town. The funding recently allocated to Navan through the Urban Regeneration and Development Fund will assist in the rejuvenation of the urban core and built fabric of the town. Key parts of the town that have suffered from under investment and have high levels of vacancy will be targeted for renewal and regeneration. This will make town centre living a more attractive options, will improve vibrancy in the urban core, and will assist in the creation of a more compact settlement

Provide additional narrative in relation to:

- Regeneration
- Residential Development
- Economic Development
- Enabling Infrastructure

Amend RPO 4.29 to read:

RPO 4.29: Support the delivery of a network of distributor roads and bridges to release strategic residential and employment lands for development and improve connectivity and the efficient movement of people and services in the town

Insert the following RPO:

*RPO: Support the development of strategic employment lands on the Trim Rd in Navan.
Naas*

Insert the following text under the first paragraph on Naas Key Town:

There is potential to capitalise on the significant infrastructure investment which has taken place in Naas, to further strengthen the local employment base, promote regeneration and consolidation of the town centre and surrounding residential and employment areas, with improved permeability and sustainable transport links and to build on assets including the historic centre, Naas Racecourse and Grand Canal

A key priority for Naas is the regeneration of the historic town centre with enhancement of retail and commercial functions and consolidation of strategic development areas including the Castle Quarter, Devoy Quarter, Corban's Lane and the Canal Quarter, along with the further development of Millennium Park in the Northwest Quadrant and the regeneration of industrial lands in the north east of the town.

There is a need to redress past legacies of rapid housing growth to ensure the delivery of further appropriately and easily accessible social, education, recreation, sports and amenity spaces to ensure that facilities grow to meet the needs of the increasing population and keep pace with development.

Naas has high levels of car dependency, congestion and commuting to Dublin along with a strong interrelationship of services, employment and education between the settlements of Naas, Sallins and Newbridge. Further investment is needed in public transport and active travel connections within the town linking to the Sallins-Naas Railway Station. Through targeted investment, the town can achieve a walkable and cycle friendly connected environment underpinned by a sustainable transport network

Provide additional narrative in relation to:

- Regeneration
- Residential Development
- Economic Development
- Enabling Infrastructure

Insert the following new RPOs for Naas Key Town:

RPO: Regeneration and consolidation of the historic centre to improve the retail and commercial functions of the town core, with enhanced permeability and sustainable mobility within the town centre and improve links between the core and surrounding residential and employment areas through the further development of walking and cycling routes and improved public transport.

RPO: Strengthen the local employment base 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.

RPO: Support the delivery of a dedicated public transport interchange in Naas with associated Park and Ride

RPO: Support the development of the Grand Canal for amenity, recreation and sustainable transport purposes including the Naas to Sallins and Naas to Corbally harbour greenways and linking these to the national Grand Canal Greenway.

RPO: Support an enhanced role and function of Naas as the County town of Kildare, particularly as a hub for high quality employment, residential and amenities.

Wicklow-Rathnew

Delete the second paragraph on p57 and insert the following new text:

Wicklow-Rathnew is a key settlement within the hinterland of the Region. The town has a strategically important location on the M/N11 and rail corridor, at the centre point of the coastal area of Co. Wicklow. It is an economically active town that provides higher order services and facilities for the residents of the town and its catchment.

Wicklow has an important position as the County Town. It provides a significant role in the provision of administrative services, delivering the functions of local government from Wicklow County Council, the provision of tertiary educational facilities at the Wicklow County Campus at Rathnew (in conjunction with Carlow IT) and higher order health facilities at Wicklow Hospital and Knockrobin Primary Health Centre.

In terms of economic function, the settlement aims to capitalise on its existing assets such as the commercial port, a third level college campus at Rathnew-Clermont as well as its location on the M/N11 corridor. There is potential for the town to promote economic development associated with the expansion of port and harbour activities and the town benefits economically from proximity to nearby Ashford studios.

The town would benefit from improvements in public transport such as additional rail and bus services.

The town is situated at an attractive coastal location between the protected conservation sites of the Murrough CSAC/SPA and Wicklow Head SPA. While the ecological protection of these sites is a priority, there is potential to expand the range of recreational and tourist facilities associated with its coastal location. In addition, the town centre has an attractive streetscape, rich in Victorian architectural heritage with amenities including Wicklow Gaol and the Abbey Grounds.

Provide additional narrative in relation to:

- Regeneration
- Residential Development
- Economic Development
- Enabling Infrastructure

Amend RPO 4.36 to read:

Support Wickow-Rathnew's role in the provision of third level education **at the Wicklow County Campus Rathnew** (in association with Institute of Technology Carlow) *and in particular, to support the development of the campus as a hub for the Film Industry and Screen Content Creation Sector.*

Longford

Insert the following text under Longford Key Town:

Longford acts as a key employment centre with strong retail, administrative and service functions that serve a wide catchment. The town has a young, diverse and growing population of 10,000 people and a growth rate of 13% in the ten years to 2016. Key priorities are to promote compact growth and the regeneration of town centre and to expand Longford's role as a hub for enterprise, employment and tourism.

Longford has a number of strategic sites within the northern end of the town including the Connolly Barracks, Shopping Centre, Albert Reynolds Peace Park and adjacent areas. These can act as regenerative catalysts to increase the residential and leisure potential of the town centre, address vacancy and derelict buildings and create a vibrant town centre. The Longford Flood Relief Scheme will address flood considerations and support appropriate use of riverside locations. There are opportunities to improve links between both ends of the town and enhanced connections between the Royal Canal Greenway and the former location of the canal harbour around the Market Square. Other strategic and Brownfield sites outside the town core provide the catalyst for regeneration

There is also potential to build on significant investment in the nearby flagship Center Parc's holiday village and the investment by the Local Authority in tourism and recreational infrastructure. The Upper Shannon Erne Future Economic Project, provides an opportunity to deliver cross regional economic projects

Provide additional narrative in relation to:

- Regeneration
- Residential Development
- Economic Development
- Enabling Infrastructure

Insert new RPOs under Longford Key Town:

RPO: Support the plan-led development and regeneration of publicly owned land banks in the town for residential, employment, education, community, cultural and recreational opportunities and the consolidation of the town centre and the enhancement and linking of Brownfield and outlying sites to the town centre, with a focus on the regeneration of underused buildings and strategic site.

RPO: 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; and due to its proximity to the regional growth centre of Athlone.

RPO: To ensure that the future strategic development of Longford takes account of the close proximity of sites of international nature conservation interest.

Mullingar

Provide additional narrative in relation to:

- Regeneration
- Residential Development
- Economic Development
- Enabling Infrastructure

Amend RPO 4.44 to read: Promote the plan led development and regeneration of publicly owned land banks in the town for employment, education, community, cultural and recreational opportunities *and to support the economic development and regeneration of the town centre.*

Amend RPO 4.45 to read: Support the development and expansion of the Midlands Regional Hospital *including any necessary supporting infrastructure.*

Insert new RPOs under Mullingar Key Town:

RPO: Support Mullingar's role as an important employment hub by promoting economic development and clustering of related enterprises

RPO: To ensure that the future strategic development of Mullingar takes account of the close proximity of sites of international nature conservation interest.

Tullamore

Amend the narrative to include references to the natural amenity provisions in proximity to Tullamore and to reference framework plans for the town. Provide additional narrative in relation to:

- Regeneration
- Residential Development
- Economic Development
- Enabling Infrastructure

Amend RPO 4.46 to read:

Support Tullamore's role as a tourism hub *and development as a Tourism Destination Town* having particular regard to its *distilling heritage and industry*, accessibility to key tourist destinations including proximity *and accessibility* to key tourist destinations, natural amenities and recreational opportunities including the Grand Canal Greenways and , *Lough Boora Discovery Park, Slieve Bloom Mountains. Also to support Tullamore as a hub for the 'Midlands Cycle destination – Offaly'. Further, to recognise Tullamore's potential as a conferencing and event hub, given the town's central location, accessibility and experience*

Add the following RPOs:

RPO: Support the role of Tullamore as a major employment centre with key assets being its existing positive jobs to resident employees ratio, excellent quality of life and future strategic development sites. Also to support infrastructural development to facilitate this role.

RPO: To support the examination of a University in the Midlands and in particular Tullamore's and Co. Offaly's role in its provision.

Portlaoise

Provide additional narrative in relation to:

- Regeneration
- Residential Development
- Economic Development
- Enabling Infrastructure

Insert the following RPOs under Portlaoise Key Town:

RPO: Support the vision and objectives of the J17 National Enterprise Park Masterplan 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

RPO: Support the development and expansion of the Midlands Regional Hospital to be a centre of excellence for Portlaoise and its catchment area

Graiguecullen-Carlow

Provide additional narrative in relation to:

- Regeneration
- Residential Development
- Economic Development
- Enabling Infrastructure

Amend RPO 4.49 to read: A cross-boundary Joint Urban Area Plan (UAP) 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 UAP 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/Craiguecullen* 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* to ensure that it has the capacity to grow sustainably and secure investment as a *Key Town*. The Joint UAP 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

Insert New RPO:

RPO: Support development of underused lands along the River Barrow.

4.7 Other Towns

Summary of Issues

It is requested that clarity should be provided in relation to what the Medium/small/rural towns are for the Region

Concern has been raised that the identification of settlements that have recorded high population growth but low employment levels infers that such settlements are unimportant in relation to the attraction of new employment uses. A suggested element to insert in the narrative is provided.

Director's Response

In relation to the request for the identification of the Medium/small/rural towns to be included in Table 4.1, this will be a function for the relevant local authorities to determine and identify and therefore is not included in the RSES. It is also accepted that the differing nature of Medium to Large Towns is not clear in this chapter and so the 2 types should be called Moderate Growth Town and Consolidation Town for clarity.

In relation to the interpretation of the lack of importance of employment for certain named settlements, Table 4.3 of the RSES clearly indicates that the policy response for medium to large sized settlements is 'Consolidation coupled with targeted investment where required to improve local employment, services and sustainable transport options and to become more self-sustaining settlements' Thus there is an acknowledgement that an appropriate policy response for local authorities may be to target investment in employment services in such settlements.

However, it is considered that the proposed narrative insert provided can be included in the RSES to further highlight this.

Director's Recommendation

Insert Medium to Large Towns title under main title

Amend paragraph on p61 as follows:

A number of settlements within the Metropolitan, Hinterland *and at the eastern fringes of the Outer Region* areas have undergone rapid commuter-focused residential expansion over the recent decade, without equivalent increases in jobs (i.e. settlements characterised by a low ratio of jobs to resident workforce) and services

Amend narrative and table 4.1 to reflect the terminology 'Moderate Growth Town' and 'Consolidation Town' for different Medium to Large Growth Towns.

Insert the following text to section 4.7 p61 above paragraph starting 'As indicated in Table 4.2':

Nevertheless, it should also be noted that such towns are important employment and service centres. In addition some of these settlements, such as Ashbourne and Ratoath have the potential to strengthen their employment base and develop as important centres of employment due to their strategic location, connectivity with surrounding settlements, and the availability of a skilled workforce.

4.8 Rural Areas

Summary of Issues

A submission indicates that the use of the CSO definition of 1,500 population threshold for rural areas is not appropriate and should be omitted.

Support has been indicated for the commitment to the management of urban generated growth in rural areas under strong urban influence and has requested that a visualisation/map of the zones of urban influence in the region be provided, including the urban influence exerted by larger towns outside the EMRA region. Further support to the objective of strengthening the fabric of rural area and the rejuvenation of towns and villages. A submission raises concern that there is no definition of economic need in RPO 4.53.

Suggested additional RPOs are provided relating to support for sustainable declining industries and support for the roll out of programmes to develop new homes in small towns and villages.

A submission for a regionally coordinated approach to rural housing was received indicating that this approach should use 'environmental constraints and evidence based data' although does not clarify what the evidence based data should be.

Water supply to rural towns and villages as being an issue and the necessity to require the support of Irish Water in relation to such infrastructural deficits has been highlighted

One submission indicates that there is insufficient emphasis placed on the role that other towns play in the region. Examples are provided under headings of economic viability, healthy communities, collaboration and creative places. The submission provides a number of suggested RPOs. It should be noted that the submission indicates that these RPOs should be under 4.7 Other Towns but, having regard to the nature of the submission and the proposed RPOs, it is considered that they are more appropriate for insertion under section 4.8 Rural Areas.

A submission was received relating to the need for the provision of housing for the retired in rural areas, indicating the need for the provision of housing that would ensure that populations are not displaced.

Submissions were received in relation to the need for the protection of rural housing having regard to Laois County Council's policy of local rural housing need.

A submission indicates that the term 'ready-to-go' should be deleted from RPO 4.50 by virtue of the Rural Regeneration and Development Fund not only relating to ready to go projects but also potential projects.

A submission relating to RPO 4.51 was received, indicating that more flexibility needs to be provided in relation to villages that can perform an enhanced role although another submission indicates support for the RPO as is.

A submission relating to RPO 4.52 indicated that rural economic diversification should be incorporated into the RPO and the need for additional policy support for rural areas was also highlighted.

Serious concern has been indicated with regard to RPO 4.55 requiring development that is urban in nature being located in the first instance in urban areas, citing this to be in conflict with the NPF objective to support the diversification of rural economies.

A submission was received requesting that the RSES supports the RIAI's town and Village Toolkit, which aims to inform, support and inspire the future development of Irish towns.

A submission was also received advocating the provision of footpaths and lighting in rural areas.

A request for additional focus on the regeneration of brownfield sites in small towns and villages as an attractive option for rural living was received.

Director's Response

In relation to the definition of rural areas and the omission of the 1500 population threshold, it is considered reasonable to omit same in the interests of consistency with national approach to rural development.

In relation to RPO 4.53 and the issue of economic need, the RPO indicates that there must be a demonstrable economic or social need to planning authorities and it is therefore considered that the onus would be on the applicant to demonstrate such need rather than have the RSES attempt to provide a comprehensive list of what is, by its nature, a complex and multi-faceted issue.

In relation to the submission on water infrastructure deficits, it is considered that although RPO 10.9 addresses this, RPO 4.51 could be amended to take account of this situation.

It is considered that the facilitation of the provision of retirement accommodation in rural areas is a matter principally for local authorities and that strategic nature of the RSES does not lend itself to such levels of detail. However, it is considered that there is nothing in the draft RSES that precludes a local authority from pursuing such an objective.

In relation to the submission regarding the provisions of Laois County Council's rural housing policy, the RSES accords with national policy in relation to rural housing and does not further amend or develop same and as such, it is considered that no further change is necessary.

In relation to RPO 4.51, the submission appears to infer that RPO 4.51 will allow for only single serviced sites as an alternative to one off housing. This is not the case. The RPO is designed to have local authorities to identify serviced sites to deliver housing and there is no restriction to the type of housing identified nor the capacity of individual sites to be limited. The suggested revised RPO is acceptable and should replace the existing RPO 4.51.

In relation to RPO 4.52, it is considered that the additional of a clause in relation to rural economic diversification would be an additional to the RPO.

In relation to the concerns with RPO 4.55, it is considered reasonable and proper planning practice that economic development that is urban in nature should in the first instance locate in urban areas. In association with amendments proposed in to the draft RSES it should be noted that such urban locations can be located in rural areas. It is therefore not considered necessary to amend this RPO.

In relation to the support for the RIAI's toolkit for Towns & Villages, it is considered that a specific RPO is not necessary for this but that it could be referenced in the text as a support tool that local authorities can use in terms of addressing the development of rural towns and villages.

In relation to the provision of footpaths and lighting in rural areas, it is considered primarily a matter for local authorities to provide for the level of footpaths and lighting it deems necessary.

In relation to the issue of regeneration of brownfield sites, it is considered that RPO 4.51 addresses this issue satisfactorily.

In relation to the request for a visualisation of the zones of urban influence in the region be provided, including the urban influence exerted by larger towns outside the EMRA region this has been addressed under chapter 1 Introduction in this report.

In relation to the requested RPO relating to rural industry, it is considered that the industry related RPO is acceptable and should be included.

In relation to the RPO for support for the roll out of programmes to develop new homes in small towns and villages, it is considered that RPO 4.51 of the draft already addresses this issue.

In relation to the requested RPOs relating to other towns, it is considered that there is merit in including a number of these in the RSES.

Director's Recommendation

Omit reference to 1500 population in the definition of rural areas

Insert the following text into section 4.8

The RIAI's Toolkit for Towns and Villages offers useful advice for local authorities in relation to rural regeneration.

Amend RPO 4.50 by the deletion of the term 'ready-to-go'

Replace RPO 4.51 with the following;

RPO: Development Plans should support the development of a "New Homes in Small Towns and Villages" initiative which would augment the delivery of actions by Local Authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create "build your own home" opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.

Amend RPO 4.52 by the insertion of the following additional text following '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, forestry enterprise.

Insert the following RPOs:

RPO: Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the Core Strategies of the County Development Plans

RPO: 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

Chapter 5 MASP

Submission Number(s)

0001, 0014 (Dublin Port Company), 0016 Transport Infrastructure Ireland (TII), 0023, 0094, 0101, 0103, 0104, 0106 (Wicklow County Council), 0107, 0108, 0109, 0110, 0112, 0114, 0117 (South Dublin County Council), 0118, 0128, 0131, 0132, 0132, 0149, 0151, 0153, 0155, 0157, 0160, 0162, 0192 (Kildare County Council), 0195, 0196, 0203, 0209, 0219, 0223, 0226, 0231, 0232, 0236, 0241, 0245 (Meath County Council), 0248 (EPA), 0250, 0254 (Dun Laoghaire Rathdown), 0269 (Fingal County Council), 0270, 0273, 0275, 0276, 0279, 0280, 0293 (Kildare County Council), 0295, 0299, 0303, 0310, 0311, 0314.

5.1 Introduction and Context and Section 5.2 Vision

Summary of Issues

Dublin Metropolitan Area Boundary

It is submitted that Ashbourne, Dunshaughlin and Ratoath in South East Meath have transitioned to metropolitan status and should be included within the Dublin Metropolitan boundary.

It is also submitted that the metropolitan area should follow town boundaries with specific reference to the inclusion of Greystones.

Clarification is sought as to the location of Celbridge within the metropolitan area.

A review of the Metropolitan boundary is requested prior to the mid-term review of the strategy.

Vision

A number of submissions are received in support of the shared vision of the MASP, and in recognition of the collaborative approach to facilitate its co-production.

It is submitted, however that overtly negative references should be omitted, to present a more positive vision for the metropolitan area.

It is also suggested that delivery of the MASP should support an improvement in Dublin's position in global quality of life rankings

Directors Response

DHPLG Circular FPS04/2018 – Implementation Roadmap for the National Planning Framework, Appendix 4 - defines the boundary for the Dublin Metropolitan Area (DMA). The established DMA policy boundary in the Regional Planning Guidelines (RPGs) for the Greater Dublin Area aligns with the NTA Strategy for the Greater Dublin Area 2016 – 2035. The Director does not recommend any further amendments to the DMA boundary, however a note on the definition of the boundary should be included as an Appendix for clarity. It is intended that all maps will also be made publicly available on www.emra.ie/maps post adoption.

In this regard it is confirmed that Cellbridge is located within the DMA and that the existing continuous built up area of Greystones is also fully located within the DMA.

The Director welcomes submissions received in support of the shared vision of the MASP, and recognises the key role played by the seven local authorities and relevant agencies in facilitating the co-production of the metropolitan area plan.

The Director recommends minor amendments to the narrative of 5.2 Vision to present a more positive vision that seeks to improve quality of life in the metropolitan area. Following adoption of the RSES, EMRA will establish an implementation group to oversee progress on the implementation of the MASP (RPO 12.1 refers) including consideration of quality of life indicators.

Director's Recommendation

Update narrative in 5.2 Vision to present a more positive vision for the Metropolitan Area.

Include a note on the Definition of the DMA in Appendices, to read as follows:

The Metropolitan Area includes all of Dublin City Council, South Dublin and Dun Laoghaire County Council and certain EDs (Electoral Districts) in the surrounding four local authorities as follows;

The EDs from Fingal included in the Metropolitan Area are the Airport, Baldoyle, Balgriffin, Blanchardstown (Abbotstown, Blakestown, Coolmine, Corduff, Delwood, Mulhuddart, Roselawn, Tyrrelstown), Castleknock (Knockmaroon, Park), Donabate, Dubber, Howth, Kilsallaghan, Kinsaley, Lucan North, Malahide (East and West), Portmarnock (North and South), Sutton, Swords (Forrest, Glasmore, Lissenhall, Seatown, Village), The Ward, Turnapin.

The EDs from Kildare included in the Metropolitan Area are Celbridge, Donaghcumper, Kilcock, Leixlip, Maynooth, Straffan.

The EDs from Meath included in the Metropolitan Area are Dunboyne and Rodanstown.

The EDs from Wicklow included in the Metropolitan Area are Bray No.1, Bray No. 2, Bray No. 3, Rathmichael, Delgany, Greystones, Kilmacanogue and the following townlands in Kilcoole ED:

- Stilebawn
- Farrankelly
- Charlesland

5.3 Guiding Principles for the growth of the Dublin Metropolitan Area

Summary of Issues

A number of submissions welcome and support the Guiding Principles, in particular the promotion of Dublin as a global city region, support for cross boundary collaboration and metropolitan scale planning and for compact urban growth facilitated by increased densities and co-ordination of enabling infrastructure. It was generally suggested that Guiding Principles should be more strategic, with the following issues also raised;

International /national assets

One submission emphasises the need to not only improve but to maintain the national roads network and to ensure that future growth in the metropolitan region is sustainably managed within the capacity of the light rail network, and to protect and improve access to Dublin Port and Airport.

Another highlights the need for more policy support for airport growth in the MASP including key enabling access infrastructure and to designate Dublin Airport as an Airport Economic Zone.

Another submission was also received in relation to the western expansion of Dublin Airport to provide a third terminal, see section 5.6 strategic sites.

Compact urban development

Submissions are generally supportive of the focus on compact urban development. Some submissions highlight the need for stronger policy to promote the development of brownfield and infill lands as the primary areas for consolidated growth, rather than greenfield lands, along with the need for an evidence-based assessment of brownfield/infill sites. The inclusion of greenfield lands in MASP is also queried, with specific reference to Dunsink.

Conversely, other submissions highlight the realities and constraints of developing infill/brownfield sites, which should be recognised. The RSES should not unnecessarily prevent the development of fully serviced greenfield development sites on existing/planned public transport corridors at the edge of the existing built up area, with specific references to the north, west and south fringe of Dublin city.

Economic development

The focus on the strategic location of employment generating activities in MASP is welcomed, its further suggested that there could more specific policy in relation to future high intensity employment (HIE) growth locations across the region and to strengthen RSES policy with specific reference of NPF policy to 'relocate less-intensive uses outside the M50'

Co-ordination

Achieving compact growth will require effective governance structures. The RSES should contain specific information on how collaboration and coordination in the implementation of MASP is to occur. It is submitted that engagement should extend to business sectors and key landowners within the MASP who will be influential in the delivery of development

Director's Response

The establishment of effective collaboration and co-ordination will be agreed post-adoption in consultation with the MASP implementation group (RPO 12.1 refers).

Guiding Principles should be updated to reflect the complexities involved in the re-development of brownfield sites, this can be addressed in Chapter 3 - Growth Strategy. As well as promoting the

development of infill/brownfield lands linked to the provision of enabling infrastructure, the RSES fully supports the development of identified urban fringe greenfield lands in recognition of their key role in accelerating housing delivery in Dublin. No further amendment is proposed.

Update Guiding Principles to make them more strategic, to emphasise the need to protect and enhance national assets, and to plan for increased employment densities in the right locations.

Director's Recommendation

Update 5.3 Guiding Principles to read;

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 with 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 in Dublin, and at least 30% in other settlements. To support a steady supply of sites to accelerate housing supply and 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, including district heating and water conservation measures.
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.

5.4 Metropolitan Area Strategy

Summary of Issues

Submissions generally welcome the focus on delivery of strategic development areas in tandem with enabling infrastructure. A number of submissions highlight the following issues;

Population growth

It is submitted that the MASP could provide for a longer-term horizon in identifying strategic reserves to better coordinate future infrastructure delivery.

There is some concern that NPF population targets will place an artificial cap on development in the region worsening the housing crisis in the metropolitan area. Conversely other submissions welcome more focussed compact growth, highlighting legacy issues including an under provision of jobs, services and amenities in certain places that experienced rapid growth.

A number of submissions highlight the need for more recognition and increased investment to serve fast growing young populations, with specific reference to towns in South East County Meath.

Key Metropolitan Towns

Support is expressed for the designation of Swords, Bray and Maynooth as key metropolitan towns, with a number of Local Authorities recommending additional narrative and more strategic RPOs.

Request for inclusion of Dunboyne and Enfield as Key Metropolitan Towns. However, there was also an objection to high density development in Dunboyne as detrimental to the village character and submitting that Dunboyne North (Pace) is unsuitable due to its remoteness from established services.

It is also proposed that Greystones-Bray should be recognised as a cluster for increased densities.

Map

More clarity highlighting development areas on the map of the Dublin MASP. Include a colour coded legend for corridors. There is unnecessary repetition of narrative about the corridors on the map and across the page. It is submitted that the MASP strategy map does not accurately represent the LUAS Red line to the south of the M7.

Director's Response

The Director notes and welcomes the submission of the DHPLG which states that the RSES is aligned with national policy in the NPF, and that a more focussed settlement pattern is critical to the efficient use of development land and services. No further amendment is therefore proposed to the population targets or the designation of Key Towns in the Metropolitan Area.

The MASP strategy map could be updated to better reflect the rail corridors as key drivers for sustainable growth. Corridor narrative on map to be retained, omit repeated narrative over page.

The inclusion of additional narrative and strategic RPOs would be beneficial in highlighting positive opportunities for key metropolitan settlements

Director's Recommendation

Include new narrative and RPOs for Bray, Maynooth and Swords- see Chapter 4 – People and Place.

Update MASP map to reflect rail corridors

5.6 Integrated Land Use and Transportation

Summary of Issues

Submissions generally welcome the integration of transport and land use in the MASP. It is submitted that the RSES is consistent with transport policy and that they support the integration of transport and land use in the MASP. A number of amendments are requested to clarify that development at locations not directly served by existing or planned rail, can be accommodated by their connection to high capacity bus and implementation of demand management measures. Development at Fassaore should also be undertaken in collaboration between Wicklow County Council and the transport agencies, to facilitate public transport links between Bray and Fassaroe.

Transport investment

Submissions welcome the focus on improved sustainable transport, and suggest the need for greater legibility of the public transport system and improved ease of movement around the city for visitors and residential alike.

It is proposed that the reappraisal of the Duboyne/M3 rail line to Navan should be carried out prior to the mid term review of the GDA Transport Strategy and prior to the mid-term review of the RSES.

A number of submissions request clarification on the timing of delivery of key enabling transport infrastructure, along with stronger policy supports for specific infrastructure projects, inter alia; DART Underground, alternative routes for the Metrolink, Maynooth Outer Orbital Route, Swords Western Distributer, Dublin Airport East-West Access, Bus Rapid Transit /Orbital routes as part of Bus Connects, Park & Ride at M4 Leixlip junction, LUAS extension to Finglas.

More focus needed on prioritisation walking and cycling, providing cycling parking and facilities and the promotion of shared mobility and smart technology to bring about modal shift.

It is recommended that car parking maximum standards be accessibility based and embedded within an integrated mobility strategy.

Strategic Corridors

A number of amendments are proposed in relation to Table 5.1 that include;

- there is no requirement for transport infrastructure for the development of the city centre
- Metrolink is scheduled for completion in 2027 which would make it a medium-term project
- decouple growth in Cherrywood, Ballyogan and Kiltiernan-Gelnamuck from the Metrolink
- 'Luas extension' should be amended to 'DART expansion' in Northwest corridor
- Dublin Enterprise Zone and Lissenhall are not directly served by existing or planned rail and will require improve bus connections and demand management measures

Other submissions highlight the need for the RSES to explicitly adopt a polycentric development approach, with improved public transport links in the towns surrounding Dublin.

A new corridor is proposed for 'Ashbourne, Ratoath & Dunshaughlin with Dunboyne/Clonee/Pace'

It is proposed to remove reference to the Park and Ride in M3/Pace.

It is proposed to remove reference to phasing at North Dunboyne.

Request that 'M50 Dublin Port South Access' be changed to 'Dublin Port Southern Port Access Route'

Consistency in terminology throughout the document when referred to 'Naas Road/Ballymount' lands and 'Grange Castle Business park'.

Naas Road/Ballymount lands description to more accurately reflect their cross-boundary location, predominantly within the M50 and potential for residential and employment/mixed use development. SDCC has identified the need for a new Luas stop as a key medium-term infrastructure requirement.

Strategic Sites

Submissions for the inclusion of additional sites and development areas, which include;

- Adamstown Propose specific reference be made to the potential for additional development at lands in Adamstown proximate to the SDZ and the Kildare Rail corridor on the route of the permitted Celbridge Link road.
- Castleknock. Proposed development of open space zoned lands at Collegewood/ Collegefort, which are serviced and located east of the M50 within walking distance of Castleknock village
- Cellbridge Road East Omission of Cellbridge Road East site in Leixlip even though it was raised as part of the Flood Risk Appraisal Report. Issues of groundwater and flood risk, poor connectivity to Leixlip and increased traffic volumes from the development of the site at The Wonderful Barn and the change in business type of the Hewlett Packard site are therefore not addressed.
- Central Park, Leopardstown. Proposal for rezoning of lands from office and enterprise to allow for mixed use including residential development as Central Park, which is located in proximity to the Central Park Luas stop on the Green line
- Clonee Request for the identification of lands at Clonee, Co.Meath for an Eco SDZ (Strategic Development Zone) including a Central Business District and mixed use development to be served by a proposed new rail station and having regard to their proximity to the Hansfield SDZ. Infill opportunities are also identified in Clonee
- Dublin Airport Western Campus Extension to the west of Dublin Airport to facilitate a third terminal in the Western Campus to address capacity constraints and allow Dublin Airport to act as a global aviation hub, linked to improved access by public transport and road including the delivery of East-West access
- Finglas Industrial Park A process of site acquisition has commenced leading to feasibility and preliminary development plans to consolidate Finglas Town Centre and provide for significant residential as part of a mixed use 'Fingal Urban Quarter'
- Glenamuck South. Proposed rezoning to facilitate the development of Open Space/Rural and Agriculture zoned lands, which are located adjacent to the Kiltiernan/Glenamuck LAP and in proximity to the Luas line and public transport.
- Maynooth Environs in Meath More recognition of the Environs in county Meath as an extension to the town, including lands at Moygaddy in proximity to Carton House Demesne which are primarily zoned for employment, linked to the delivery of the Maynooth Outer Orbital Route. A further submission proposes to partially rezone these lands for residential, student accommodation and commercial uses. Conversely, it is also submitted that these lands are unsuitable for development being rural in nature and remote from the town centre.
- Newlands Proposed strategic 'infill' landbank on the Naas Road at Newlands, served by a proposed new Station on the Luas Red Line and located within Dublin city and suburbs, which can provide for significant housing and employment/mixed uses, in conjunction with adjoining lands.
- Newtown. Support for the inclusion of agricultural lands at Newtown and for a southwest link road to facilitate the consolidation of Maynooth.
- Porterstown. Proposed development of open space zoned lands at Porterstown to the south of the Windmill residential development in Clonsilla and can provide for additional housing units whilst retaining sufficient open space to meet the requirements of the Windmill development.

Core Strategy

A number of submissions welcome the inclusion of narrative that identifies MASP population targets as opposed to projections which could result in the capping of development and/or zoned lands by local authorities. There is also support for the acknowledgement of the need for a level of flexibility to be retained by local authorities to respond to new and future development opportunities in the metropolitan area.

However, there is still some concern and greater clarification needed around proposed future prioritisation of zoned lands. It is submitted that the population projections in the NPF Implementation Roadmap are conservative and there is a need for a transitional period to allow for higher levels of growth in EMRA in the short to medium term pending investment in the other regions.

Planning Authorities should be required to undertake a review of current zoned lands, including underutilised open space and greenfield lands to ensure that sufficient land is zoned to meet existing and future demand. Recognition needs to be given to the longer lead in time for re-development of brownfield sites and that this be reflected in the quantum of lands zoned in the short to medium term

There is a need for clear quantification and breakdown of population projections in the NPF as they apply to Dublin City/County/MASP to assist in preparation of Development Plans and in planning for water and waste water infrastructure. Also, how it proposed to achieve and monitor compact growth targets, and to incentivise brownfield /infill in favour of greenfield lands.

Clarification is also sought on how the possible transfer of population targets from Dublin city to Key Metropolitan Settlements is to be distributed as per NSO 67. It is suggested that prioritisation of allocation could be made using a version of the 'health-place' check list. It is also queried whether additional transfer of population is then allowed from Key Metropolitan Settlements to other towns in the surrounding counties.

Director's Response

Amend reference to 'M50 Dublin Port South Access' to read 'Dublin Port Southern Access Route', to enable the development of strategic lands in Dublin's docklands.

The identification of strategic development areas in the MASP was carried out in collaboration with Local Authorities on the basis of agreed criteria including their capacity and potential to deliver compact sustainable growth and urban regeneration. The MASP does not identify all the development sites and opportunities in the DMA, rather it highlights strategic opportunities along identified corridors to demonstrate the potential of the city and the metropolitan area to meet national targets. It is considered that the identification and designation of additional sites and land use zoning is a matter for Local Authorities, and should be informed by a review of land use zonings to be carried out as part of the upcoming statutory review or variation of City and County Development Plans. The preparation of these Development Plans will be subject to upcoming Departmental Guidance, and no further amendment is proposed in this regard.

Key policy parameters for the RSES are set by national policy documents including the NPF, therefore the RSES must be consistent with NPF population targets. MASP target population figures are clearly identified as a statement of population capacity in strategic development areas and do not apply a cap on development in the Metropolitan Area.

It should be noted that transitional periods are already built into MASP to 2026 and 2031 with allowance for the phased transfer of 20% of targeted population growth in the city to the 3 Key Metropolitan Settlements as suggested by NSO 67. This is to allow for a phasing-in period of transition to achieving urban consolidation and brownfield targets in the city due to the longer delivery time. Further breakdown of the

distribution of population and transitional arrangements will be a matter for agreement in consultation with the MASP Implementation Group (RPO 12.1 Chapter 12 refers), after the adoption of the RSES.

The identification of a sequential approach to development in tandem with phased/ enabling infrastructure in the MASP was carried out in collaboration with infrastructure and transport agencies and is consistent with national policy. It is not intended to establish an exhaustive list of projects, however amendments to Table 5.1 to accurately reflect delivery and phasing of enabling infrastructure are warranted.

Further aspects are also addressed in Chapter 8- Connectivity.

Director's Recommendation

Amend reference to 'M50 Dublin Port South Access' to read 'Dublin Port Southern Access Route'.

Amend Table 5.1 Column on Phasing/Enabling Infrastructure as follows;

Within the M50

- **City Centre:** Short to Medium term; No requirement for infrastructure, Long term; capacity supported by DART Underground
- **Naas Road/Ballymount** (significant brownfield lands in South Dublin and Dublin City Council areas, with potential for residential development and more intensive employment/mixed uses) Medium to Long Term; include new Luas stop

North-South DART Corridor

- **Bray Fassaroe***: Short-medium term; High capacity bus between Bray and Fassaroe

North-West Corridor

- **Dublin 15 lands****; Short term; Improved Bus connections to Dublin Enterprise Zone
- **Maynooth**; Change 'LUAS extension' to 'DART expansion', include Maynooth Outer Orbital Route
- **Dunboyne**; Amend to "Sequential development prioritising zoned and serviced lands near the railway station and town centre ~~and followed by development~~ at Dunboyne North at M3 Parkway station"

Metrolink/LUAS Green line

- **DunLaoghaire Rathdown**; Short to medium term- Omit Metrolink
- **Swords-Lissenhall**;* Medium to Long Term; Improved bus connections

**Development at Fassaroe will be undertaken in collaboration between Wicklow County Council and transport agencies*

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

5.7 Housing Supply

Summary of Issues

There is general support for the focus on increased residential densities in proximity to public transport corridors and phased delivery of a steady supply of land for housing in the MASP. A number of issues were raised as follows;

Building Heights

MASP section should be reviewed to take into account the new Urban Development and Building Heights. Greater emphasis is needed to support increased building heights in central and/or accessible locations along public transport corridors and within town, district and neighbourhood centres, with specific reference also to Dublin Docklands in this regard.

Delivery

Submissions highlight the need for a timely supply of infrastructure to support the planned development of areas. It is recommended that local development plans should be reviewed as a priority to support higher densities along transport corridors and that any sequential approach to development on corridors should not impede the development of lands currently ready for development. Conversely other submissions support the emphasis on a sequential approach to future residential and employment development in the metropolitan areas.

There are concerns that elements of the strategy could curtail population growth, limit supply of land and require rezoning, which could introduce uncertainty in the housing market further dampening supply and increasing house prices.

There is a need for more specific models of delivery to be outlined, including revision of Part V to support achievement of increased densities and heights, including apartments.

Director's Response

In relation to building heights, RPO 5.4 should be updated to reflect the adopted status rather than draft status of Departmental guidelines 'Urban Development and Building Heights Guidelines for Planning Authorities, additional narrative can be included to take into account these new guidelines.

The RSES promotes a sequential approach to development with a primary focus on the consolidation of Dublin, supported by the development of metropolitan settlements that have the capacity for higher residential densities in tandem with the provision of public transport, infrastructure and services. It is clearly stated that the delivery of housing through the identified MASP development areas does not preclude additional capacity for increased residential densities being realised and delivered throughout the metropolitan area on other suitable sites. No further amendment is proposed in this regard.

Director's Recommendation

Amend RPO 5.4 to reflect the adopted status of Departmental guidelines 'Urban Development and Building Heights Guidelines for Planning Authorities.

5.8 Employment Generation

Summary of Issues

The focus on the strategic location of employment generating activities in MASP is welcomed, its further suggested that there could more specific policy in relation to future high intensity employment (HIE) growth locations across the region and to support re-location of low intensity uses outside the M50 and existing built up areas.

Conversely, there is need to highlight the role that freight and logistics play in supporting businesses and employment within the Dublin region as well protecting logistics land to ensure it is not moved further out of urban areas as this will create more journeys into the centre to make deliveries as businesses also negating the use of low/zero emissions vehicles due to longer journey times.

The economic benefits of Dublin Airport Central and high technology zoned lands should be noted.

One submission highlights the threat to tourism that is posed by an acute shortage of hotel rooms in Dublin.

Director's Response

Section 5.3 Guiding Principles are already proposed to be strengthened to promote employment density in the right places and to relocate less intensive employment uses outside the M50 ring and existing built-up areas. The narrative could be further strengthened in Section 5.8 Employment, with cross reference to the relevant guiding principles for the location of strategic employment in Chapter 6 – Economic Strategy.

Director's Recommendation

Insert following to read;

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);
- **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, emerging clusters or cross industry value chains),

See Section 6.3 for full list of Guiding Principles.

5.9 Green Infrastructure and Amenities

Summary of Issues

Submissions generally support the development of a regional GI policy in the Dublin Metropolitan area, RPO 5.7 refers, which is considered of critical importance to arrest the coalescence of metropolitan towns. RPO 5.7 could be further strengthened and should also be referenced in Section 7.6 Green and Blue Infrastructure.

Identification and mapping of GI requires an agreed definition of GI. Reference should be made to EC guidance in relation to differentiation of urban and landscape scales and to the existing GI and tree canopy mapping of the four Dublin Local Authorities.

Need guidelines to zone for high quality agricultural land in proximity to towns and villages with a focus on food production and security.

The effectiveness of a green belt policy is questioned.

Map

Review of Figure 5.5 as land use zoning for Green Infrastructure. Recommendation to create a new map based on a regional assessment of existing sites and include proposals where habitats could be recreated or enhanced to form new networks and connections.

Also submitted that Figure 5.5 should be enlarged to allow deficits in GI in the city centre to be identified, and more focus given to how decline in GI is to be addressed. It is submitted that the zoned lands for green infrastructure and green belt are the GI baseline, not 'suggested', as they are legally designated in Development Plans.

Heading 'Non-designated Sites' should be changed as both the National Park and the UNESCO Biosphere have designated Natura 2000 sites. The designation of the Phoenix Park should also be included and National Special Amenity Areas in Dublin due to their benefits for nature conservation.

Greenways

Greater clarity needed between GI, trails and Greenways. Canals are physical features, also regional parks and agricultural lands have limited range of habitats and should not be classed as natural assets

Request for the inclusion of Greenways / Blueways: Liffey Valley, Dublin Mountains, Dodder Valley, and Grand Canal within the Metropolitan Greenway Network.

Also submitted was extension of Liffey Greenway to Cellbridge and Dublin Port Greenway overlooking the Tolka Estuary, linking into the Sutton to Sandycove Route. Reference was made to the proposed Coastal Greenway pedestrian/ cycle route from Wicklow to Greystones.

The term 'flagship greenways' needs to be defined. Greenways for Dublin Mountains should be developed in conjunction with groups such as the Dublin Mountains Partnership. Suggestion for the metropolitan greenway network to be included on a separate map to Figure 5.3

Director's Response

There should be more alignment between GI strategy in the MASP and for the region as set out in Chapter 7 this involves changes to both chapters to ensure alignment and that the correct assets are identified.

It is noted that Greenways are already dealt with in a separate Section 5.6 Integrated Land Use and Transport in recognition of the difference between GI and Greenways. It is recommended that a separate

map showing greenways only is prepared for inclusion in this section 5.9 Green Infrastructure. Minor amendments are proposed to allow for potential extensions to the metropolitan greenway network.

It is recommended that RPO 5.7 be strengthened to identify, manage, and develop and protect regional green infrastructure and to develop a GI policy in the Metropolitan Area. The review of the GI map and development of GI policy will be addressed post adoption by the MASP Implementation Group – See Chapter 12.

Director’s Recommendation

Update RPO 5.7 and include definition of Green Infrastructure as follows;

‘Green Infrastructure can be broadly defined as a strategically planned network of high quality natural and semi-natural areas with other environmental features, which is designed and managed to deliver a wide range of ecosystem services and protect biodiversity in both rural and urban settings.’

RPO 5.7 Co-ordinate across Local Authority boundaries to identify, manage, and develop and protect regional green infrastructure, to enhance strategic connections and develop a Green Infrastructure policy in the Dublin Metropolitan Area.

Chapter 6 Economy and Employment

Submission Number(s)

0010 (Longford County Council), 0088, 0099, 0100 (Meath County Council), 0105 (Roscommon County Council), 0106 (Wicklow County Council), 0115 (Joint submission Westmeath and Roscommon County Councils), 0117 (South Dublin County Council), 0120 (Westmeath County Council), 0122, 0128, 0130, 0132, 0134, 0143, 0145 (Longford County Council), 0146 (Laois County Council), 0153, 0157, 0161, 0165, 0171, 0178, 0184 (Department of Transport, Tourism and Sport), 0190, 0192, 0200, 0215 (Dublin City Council), 0221, 0223 (Fáilte Ireland), 0224 (Offaly County Council), 0227, 0230, 0237, 0239, 0245 (Meath County Council), 0247, 0248 (Environmental Protection Agency), 0252, 0254 (DLR County Council), 0255, 0256, 0257, 0262, 0263 (Department of Business Enterprise and Innovation, Enterprise Ireland and IDA Ireland), 0264, 0265, 0266 (Wexford County Council), 0274, 0275, 0279, 0281, 0282, 0284, 0286, 0291, 0296, 0297, 0299, 0309 (Department of Education and Skills), 0310 (Dublin City Council), 0311, 0312, 0313, 0314, 0316.

6.1 Introduction

Summary of Issues

A large number of submissions were received in support of the economic strategy, welcoming for the first time a combined spatial and economic strategy for the region, and the collaborative approach taken by the Assembly in its preparation.

A wide range of expectations from stakeholders can be appreciated of what the RSES – in particular the Economic Strategy - can do or it cannot do. Submissions put forward different approaches to the economic strategy this reflects the convergence of approaches of bottom- up and top-down policy approaches. On one hand, Local Authorities expressed concerns that there is no sufficient detail in data, analysis, identified issues, and not enough number of RPOs to reflect their respective nature and challenges to each locality. On the other hand, national departments, agencies suggest that the details and number of RPOs should be limited and rationalised.

The NPF gave a target of 320,000 additional people in employment in the Region up to 2040. There is a request that the midlands be given special designation from the NPF and that specific employment targets are expressed for the Midlands, and some counties / settlements within. Other submissions counter that targeted employment is difficult and it is nation policy to promote jobs in the country no matter the location, and the focus should be on enablers for employment.

There should be more focus on the role of Failte Ireland as an enterprise agency that supports the development of the tourism industry in Ireland.

Director's Response

The role of the RSES.

The formulation of the RSES is a complex, thorough and comprehensive process that intends to capture the needs of our wide range of regional stakeholders and players. As part of the iterative process in preparing an RSES is required to achieve the right balance between strategic and specific and create policy at the regional scale. The RSES would benefit from greater clarity as to how it site in enterprise policy in Ireland.

The EMRA RSES aligns itself to national policy as stated in the NPF. For example Chapter 4 presents the approach to the settlement hierarchy to be aligned to the NPF. There is no requirement to disseminate employment targets to sub regional level. Instead one of the key drivers of the RSES is to create the right ecosystem for enterprise to flourish across the region.

Failte Ireland is a key player and indeed its role to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination need to be acknowledged.

Director's Recommendation

Amend narrative accordingly to highlight the role and nature of the RSES in respect to the overall policy hierarchy.

Amend narrative to highlight the role of Failte Ireland

6.2 Profile

Summary of Issues

One submission finds Figure 6.1 irrelevant. The figure refers to the Eastern & Midland Region Total Employment by Goods, Services, Public sector and unclassified sectors.

Director's Response

As already mentioned in the draft RSES, Figure 6.1 provides insights of tangible and intangible economic activity with implications to the type of infrastructure required. The figure aims to inform the strategy and guide key players in the implementation phase post-RSES adoption with regards to the type of infrastructure needed for the whole region.

Director's Recommendation

No change recommended.

6.3 Economic Strategy: Smart Specialisation, Clustering, Orderly Growth and Placemaking

Summary of Issues

Support towards Economic Strategy.

Submissions mainly from the Business community and think tanks are positive and offer support towards the Economic Strategy that sets out policies and objectives to promote smart specialisation, clustering, orderly growth and place-making.

Recognition of wider range of stakeholders.

There is a proposal to **rephrase RPO 6.1** to recognise the wider range of stakeholders who may be involved in the Economic Strategy. Proposal suggest replacing first line, for: "**Support the national economic agencies, Local Enterprises Offices, Regional Enterprise Plan Steering Committees, Local**

Authorities and other relevant stakeholders, with their plans for job creation and enterprise development...”.

Terminology

Smart Specialisation (S3) is not referred to in the National Enterprise Policy, and the strategy needs to avoid unclear definitions.

Emerging policy and economic assets.

There is need for updating the economic strategy in light of new developments in national policy and results of competitive funds related to public investment in enterprise development managed and lead by National Departments and Agencies. This is the case of emerging national policy initiatives, such as “*Future Jobs Ireland – Preparing Now for Tomorrow’s Economy*”, the update and refresh of the Regional Action Plan for Jobs (now known as Regional Enterprise Plans), and investment approval by government competitive funds for new enterprise development and innovation assets (e.g. business innovation centres/hubs) that are underway, such as those in Longford and Edgeworthstown.

In a similar vein another submission requests the clear display of economic assets (Figure 6.5) in Mullingar: “*It is important to note that Figure 6.5 EMRA’s Enterprise Development and Innovation Assets Map at page 92 whilst highlighting the presence of IDA Parks and Sites, indicates 1 no. site as opposed to the 2 no. sites present. Additionally, there is no reference to the National Science Park or the Advanced Manufacturing Research Centre and in line with the presence of a number of privately owned and developed business parks and locations*”.

It is pointed out that there is no Local Enterprise Office in Drogheda.

On Figures 6.5 and 6.6 the sites which are identified as Enterprise Ireland ‘Innovation Centres’ should properly be referred to as ‘Incubation Centres’. These are campus-based incubation centres for fledgling enterprises or products.

In a number of submissions, it was highlighted the need to promote the economic assets already built that are underutilised and have large spare capacity, such as IDA parks.

Implementation.

One submission welcomes and it is supportive of the Economic Strategy statement for the region that includes: Competitiveness, place-making, and clustering. For them “*...An economic environment of smart specialisation and orderly growth are also important business environmental factors which will help to shape a more competitive tourism sector within the region.*” However, concern expressed to the necessary structures and processes to ensure a cohesive and integrated implementation.

Business cases for investment in economic assets.

There is a request for the construction of an Advanced Manufacturing Training Centre in the Dublin-Belfast region, and therefore include it in the stock of economic assets (Figures 6.5 and 6.6).

Guiding principles locations for strategic employment.

There is support for the location of space-extensive employment uses at suitable locations outside of the M50 Ring proximate to the national road network and existing settlements. In addition, a submission identifies seven strategic locations in Kildare for strategic employment development.

Data centres - Guiding principles for investment prioritisation in place-making for enterprise development.

There is a suggestion with regards to new data centres that requirements for any new data centre development to be directly linked to the provision of new equivalent total renewable additional renewable energy capacity to the grid.

Director's Response

Support towards Economic Strategy.

The support from some business networks and think tanks towards the Economic Strategy is acknowledged and welcomed.

Recognition of wider range of stakeholders.

Suggestion is appropriate. RPO 6.1 should be amended accordingly.

Terminology.

Although Smart Specialisation is not referred to in the National Policy, it is an established policy framework that is clearly identified in territorial policy by EU, UN, OECD

“Smart Specialisation is part of the EU’s cohesion policy and the Europe 2020 strategy that focuses on each region’s strengths and the activities that support these strengths. From an international perspective, smart specialisation – regional strategic development and renewal that focuses on special regional strengths – is one policy that will help Europe and its diverse regions remain competitive in a global marketplace.

On the regional level, smart specialisation can be understood as representing part of a regional innovation policy that guides and focuses resources to the themes that contain the most potential for the future of the region. Smart Specialisation choices can help prioritise the region’s key areas of expertise and research and innovation-oriented strengths as well as apply them for the needs of the region’s business sector. Smart specialisation is an operating method that helps seek out financial benefits and create a competitive edge for the region. The focus is especially on supporting the commercialisation of the expertise of such fields that contain opportunities for creating international business. The goal of smart specialisation is to facilitate the creation of products, services and solutions that will stimulate the region’s growth.

Smart Specialisation is a method that aims for economic change by combining the expertise of the region’s business and research sectors that will help improve the region’s success factors. Instead of solely focusing on strong individual fields, it is essential to assess the top expertise of different fields that can be utilised in a more widespread sense or combined in novel ways. It is also essential to focus this assessment on the fields and themes that are in global demand”.

Emerging policies and economic assets.

The Regional Assembly will continue to work with DBEI and the other enterprise agencies to align with emerging and evolving policy, this is a demonstration of the flexibility and adaptiveness of the Strategy.

The resolution and aggregation level of the map makes difficult to accurately pinpoint all economic assets. Indeed, there are two IDA sites in Mullingar, but these are overlapped giving the impression of only one. The map is intended as contextual snapshot of the region and not a comprehensive list. In a more comprehensive way, there is the opportunity to link the enterprise development and innovation assets map (Figure 6.5) with the regional infrastructure plan (RPO 6.27), to capture changes, evolution and trajectory of the inventory of economic assets during the RSES timespan and this will form part of the monitoring of the RSES.

As for the absence of a LEO in Drogheda, this should be a matter for the relevant local authority in conjunction with DBEI.

Label of Enterprise Ireland 'Innovation Centres' should be replaced for '*Incubation Centres*'.

The underutilisation of economic assets throughout the region is an issue that merits full consideration and it needs to be addressed by the RSES. It is a key driver of the RSES to use existing and planned infrastructure and capacity to maximise the return on state investment, this is demonstrated in the Growth Strategy with the prioritisation of Regional Growth Centres and Key Towns and in the main policy driver of compact growth and consolidation.

The appropriate channel to present business cases for new economic assets to be delivered in the region is through the competitive funds identified in Chapter 12 such as the Regional Enterprise Development Fund. For the formulation of the Business Case, any proposals would benefit from consideration of the guiding principles for locations for strategic employment development, and for investment prioritisation in place making for enterprise development to strengthen the business case to submit to the relevant competitive funds.

Implementation.

Supports towards the Economic Strategy that enables the further development of the Tourism industry is noted and welcome. With regards to the concerns around coordination in implementation, the RSES will work with national departments and agencies, and other relevant stakeholders to ensure delivery. Chapter 12 offers the opportunity of a platform that enables such necessary coordination.

Guiding principles locations for strategic employment.

There is a need to strengthen the relocation policy of less intensive economic uses that is stated in the national planning framework and this should be reflected in this chapter and in the MASP chapter.

Director's Recommendation

Amend text and narrative accordingly.

6.4 The Region's Economic Engines and their sectoral opportunities

Summary of Issues

Dublin-Rosslare Corridor.

The emerging importance of the Dublin – Rosslare Corridor in light of BREXIT has been stressed in a large number of submissions. One submission specifically labels an "Eastern Economic Corridor", which includes Dublin-Belfast and Dublin-Rosslare Europort (Wexford).

Specific locations along Dublin-Belfast corridor.

Several submissions highlight the importance of specific locations along the Dublin – Belfast Corridor, such as Meath, Drogheda, Ardee, Ashbourne, Trim, and Gormanstown.

Sectoral Opportunities.

One submission list strategic objectives for the region

- 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 Agri-food sector in the Mid-East
- Develop a network of innovative co-working spaces in the region to mitigate long commuting times, promote remote working opportunities and life-style benefits.

In terms of sectoral opportunities to the region’s economic engines, several submissions stressed and identified additional sectoral opportunities they would like to see reflected in the RSES. For instance although Fintech is already recognised as opportunity for the Dublin-Belfast Corridor, a submission requests explicit recognition in the RSES of specific projects around this: "*The www.M1PaymentsCorridor.com project, with management from Drogheda, should be specifically highlighted as a priority for regional development, as per the current NorthEast Action Plan for Jobs.*" The potential of the area of the Cooley and Mourne Mountains plus Sliabh Gullion near Dundalk for tourism has been stressed.

More on rural areas.

Several submissions request that development of rural areas should be stressed. It stresses the need for further education and training in rural areas and it highlights “Community Education”. **Additional RPOs** are proposed, for instance

“1) Encourage, enable, support, facilitate and promote the provision, development and expansion agri-tourism including farmhouse accommodation, open/pet farms and horse trekking centres”.

2) “Ensure that all built elements of agri-tourism protect and conserve the landscape and the natural environment and are appropriately located, screened, designed and satisfactorily assimilated into the landscape and do not have an unduly negative impact on the visual/scenic amenity of the countryside or natural heritage and that they will not take away from the rural character and appearance of the area. Buildings in visually sensitive areas must address the surroundings”.

3) “Prohibit developments and other activities associated with tourism which are incompatible with the enhancement, preservation, and protection of the environment”.

4) “Development of new or enhanced tourism infrastructure facilities should include and assessment of the environment sensitivities of the area including an EIA in order to avoid adverse impacts on the receiving environment. Ensure that effective monitoring protocols are put in place to monitor and assess the ongoing effect of tourism on sensitive features with particular focus on natural and archaeological assets”.

5) “Further develop diversification into Marine, Forestry, Peatlands, Renewable Energy, Tourism and Heritage”.

Tourism in rural communities.

RPO 6.8 is welcome by several submissions. Such RPO supports the development of rural economies through initiatives to enhance a number of sectors. However, tourism is not one of the sectors recognised. They feel that given tourism is so intrinsically linked to rural areas and the link between tourism and the other sectors e.g. Agriculture and forestry, this link needs to be highlighted in a revision

to the wording of this objective. There is support that the tourism sector is duly recognised as being a significant sector within the region and the inclusion of a number of tourism specific regional policy objectives which reinforce this. *“A key motivator for our visitors in choosing to come to Ireland is our landscape and scenery, and access to this is imperative to support the work that Fáilte Ireland, tourism stakeholders and the industry is undertaking to both maintain and grow the tourism sector in Ireland. Therefore, we very much welcome the policy objectives to increase access to the countryside and coastal areas and to enhance access to state lands and attractions managed by stage agencies”.*

There is a suggestion on the following minor **additional text** in relation to Tourism, p. 99:

- *“A safe, clean environment, scenic landscapes and rich heritage contribute greatly to our cultural identity and quality of life, and are key attractions for overseas visitors to the island of Ireland. The Government’s Tourism Policy Statement People, Place and Policy Growing Tourism to 2025 sets the Government’s primary objectives for tourism i.e. to increase overseas visitors and revenue and the associated employment whilst protecting our natural, built and cultural assets. The Action Plan for Rural Development Realising our Rural Potential highlights the potential of activity tourism to contribute to economic growth in rural areas.”*
- *“The Department of Transport, Tourism and Sport Policy Document People, Place and Policy Growing Tourism To 2025 makes a number of policy proposals that are relevant to the planning of tourism, namely; -*
 - *“Protecting heritage assets through sustainable tourism*
 - *“Targeting high growth potential areas*
 - *“Incorporate Cultural and Sports-based Offerings*
 - *“Respecting Brand Architecture and the Environment*
 - *“Need to optimise Air and Sea Connections*
 - *“Need to facilitate inter-modal transport transfers*
 - *“Support for Cross-Border Tourism”*

Sectoral Opportunities for Midlands.

An updated list of prioritised sectoral opportunities in six Strategic Objectives for the Midlands is provided, namely: renewable energy, Big Data and Data analytics, Advanced Manufacturing, Tourism, and Food and Beverage Industry. Another submission similarly emphasises renewable energy, big data /data analytics.

Natural resources industry.

The potential employment and sustainable development benefits of the natural resources industry to rural communities is highlighted.

Director’s Response

Dublin Rosslare Corridor.

The Dublin – Rosslare corridor (also referred as Dublin-Wexford Corridor) has gained considerable attention as means to counteract the likely negative effects from the UK withdrawal from the EU. Its inclusion into the Growth Strategy results convenient and reasonable. A potential use of the label ‘Eastern Economic Corridor’ seems appropriate, and its constituent parts (Dublin-Belfast, and Dublin-Rosslare) should be highlighted. This is further addressed in Chapter 3 Growth Strategy and 11 All Island Cohesion.

Specific locations along Dublin-Belfast corridor.

The merits of each mentioned locality will be reviewed and taken into consideration under the asset-based approach as per Chapter 3 and Chapter 4. However the key strategic nodes of Drogheda and Dundalk-Newry are identified in the NPF for prioritisation and this is reflected in the strategy.

Sectoral Opportunities.

Additional sectoral opportunities identified by stakeholders that operate on the ground (bottom-up) are welcomed. The inclusion of specific projects in the RSES will be assessed. **The area of the Cooley and Mourne Mountains plus Sliabh Gullion for tourism will be highlighted in RPO 4.17**

More on rural areas.

Several measures, such as diversification of the rural economic base to related and unrelated markets, and upgrading to higher value-added activities represent an opportunity to strengthen the rural development as per RPOs 6.7 and 6.8. An **additional RPO** could be added **around RPOs 6.5-8.**

Community Education:

- *“RPO – Support community and adult education providers who are already providing formal and non-formal education to targeted disadvantaged groups and who have already identified the barriers to participation in lifelong learning, such as childcare, transport and rural isolation to increase participation rates and support progression into further education and employment”.*

Tourism in rural communities.

The wording of RPO 6.8 stressed the *“...importance of maintaining and protecting the natural landscape and built heritage”* as key element for tourism industry development. However, it is noted that development of tourism is not explicit in the RPO. In addition, the support towards the RPOs supporting Tourism is noted and welcome. Submission suggests five specific changes to make the RPOs clearer:

- Page 97 – ***“RPO 6.8, list tourism as a sector along with the other sectors listed in this objective.***
- Page 100 - ***“Insert an additional RPO at the beginning of this section: RPO 6.14: To support the sustainable development of tourism in the Midlands in line with the strategic objectives of both the Ireland’s Ancient East and Ireland’s Hidden Heartlands experience brand propositions.***
- Page 100 – ***“Strengthen RPO 6.16 to read “Support the maintenance of, and enhanced access to state lands such as National Parks, Forest Parks, Waterways, etc., together with Monuments and Historic Properties, for recreation and tourism purposes”.***
- Page 100 – ***“Bottom paragraph left column – remove wording “a breath of fresh air” and replace with the following wording “Surprising by Nature”***
- Page 100 – ***RPO6.15 – “Add the following text to the objective after the word network “and to seek to develop and add to the offer where appropriate”.***

DTTS suggestion is pertinent. A summary of such proposed additional text can be included.

As mentioned earlier, the area of the Cooley and Mourne Mountains plus Sliabh Gullion for tourism will be highlighted in RPO 4.17

Sectoral Opportunities for Midlands.

Sectoral opportunities included in the list of prioritised Strategic Objectives for the Midland’s Regional Enterprise Plan to 2020 that are highlighted by its chair are welcome. Some of the sectoral opportunities are already included in the “Sectoral Opportunities Midlands (including Athlone)” subsection, p. 95. However, it is noted that renewable energy and big data / data analytics were not included. The current

list presented in p.95 can be adapted to reflect the prioritisation proposed by the submission. To be noted, strategic objective 4 highlighted in the submission “*Enhancing the collective offering of the Midlands as a place to live, work, and invest in*”, is embedded in the economic strategy that focuses on competitiveness, smart specialisation, clustering, place-making and orderly growth.

Natural resources industry.

The significance and importance of the natural resources industry to rural communities as posed by the some submissions is acknowledged. “**Quarrying and Mining**” will be included in to RPO 6.8.

Director’s Recommendation

Include Dublin-Rosslare corridor into the Growth Strategy All Island Cohesion and in the list of regional economic engines.

Insert strategic objectives for the region as an RPO;

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

- *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 Agri-food sector in the Mid-East*
- *Develop a network of innovative co-working spaces in the region to mitigate long commuting times, promote remote working opportunities and life-style benefits.*

Amend narrative to include the additional sectors

Amend narrative to include the additional text on rural areas

Insert RPO

“RPO – Support community and adult education providers who are already providing formal and non-formal education to targeted disadvantaged groups and who have already identified the barriers to participation in lifelong learning, such as childcare, transport and rural isolation to increase participation rates and support progression into further education and employment”.

RPO – “To support the sustainable development of tourism in the Midlands in line with the strategic objectives of both the Ireland’s Ancient East and Ireland’s Hidden Heartlands experience brand propositions.”

Amend

RPO6.15 – “and to seek to develop and add to the offer where appropriate”.

RPO 6.16 to read “Support the maintenance of, and enhanced access to state lands such as National Parks, Forest Parks, Waterways, etc., together with Monuments and Historic Properties, for recreation and tourism purposes”.

Amend RPO 6.8 to include “Tourism” “Quarrying and Mining”

6.5 Specific Sectors: Retail, Tourism, Marine, Agriculture and Low Carbon Economy

Summary of Issues

Specific Sectors rationale.

A rationale for the selection of the specific sectors is requested to avoid misinterpretations.

There is a submission that stresses that jobs in these sectors “...are very often minimum wage jobs, precarious hours and seasonal”, and there should be a focus on quality of jobs.

Retail.

Concerns expressed as to the status of the Retail Strategy for the GDA 2008 and that it should be reviewed and replaced as quickly as possible as it was prepared over 10 years ago. It is suggested that any review should take account of the new National Planning Framework population targets. Also that any retail strategy should address issues of restrictive car parking standards, inflexible zoning, floor space caps, delivery restrictions and access.

There are calls for prioritising the implementation of RPOs 6.9 and 6.10. The importance that an appropriate level of flexibility is incorporated into the RSES in terms of the designation of settlements, allocation of growth and the designation of hierarchies is stressed, in order to respond to potential changes in the economic environment which may impact upon retailers. The requirements of retailers must be taken into consideration in terms of the location of commercial uses, inconsistent car parking standards as well as matters such as deliveries and distribution not being adequately considered.

Several submissions request modifications to Table 6.1 Retail Hierarchy for the EMRA, to reflect the existing retail provision or retail potential of these centres, requesting inclusion of Granard and Enfield.

It is requested that **RPO 6.39** includes that this will be ‘completed within 2 years of the adoption of the RSES.’ In particular, another submission suggests a Collaborative Town Centre Health Check to “...**be carried out in all towns before any additional grocery/convenience or other retail floorspace is considered in or on the edge or outskirts of the towns**”. Another submission suggests that retail strategies are better prepared on a county level, as it finds unclear benefits derived from a retail strategy for the EMRA region as a whole.

Tourism.

A few submissions request the inclusion of their respective key towns, such as Bray, Dun Laoghaire, Trim, and Portlaoise as destination towns. Development of the Boyne Greenway in Drogheda is requested.

Another submission suggests the inclusion of a large, detailed and localised number of RPOs related to Tourism. In particular, there is strong support for RPO 6.17, and it also suggests the following addition to RPO 6.16: “...*access should be planned and managed in a manner that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism.*”

Another submission request to cite the potential of whiskey tourism for Tullamore in the Regional Policy Objectives in Section 4.6. and the development of Durrow Abbey as a Heritage Tourism destination as a RPO in Section 4.6. Similarly the distillery in Kilbeggan in County Westmeath is highlighted with potential for further development. It is also stressed the need to include an RPO to address the shortfall of tourism accommodation in the region by supporting the development of all types (Hotel, B&B, Self-catering, Tourist Hostel and touring campsite. A submission suggests that RPO 6.17 accounts for the need that

“tourism strategies that cut across Local Authority boundaries be more conducive to promotion of coherent visitor experiences based on themes”.

Suggested inclusion/modifications of RPOs

- For the tourism development (‘Natural and Cultural tourism assets’, p. 100) in the Midlands region, two new RPOs:
 - *“Support the local strategies which are already in place to link the River Shannon Blueway, the Royal and Grand Canal Greenways and the proposed Barrow Blueway right across the Midlands, incorporating the towns of Longford, Athlone, Mullingar, Tullamore and Portarlington. These links are almost overwhelmingly on public lands. Such a network presents an international scale walking and cycling offer which is recognised by the ‘Outdoor Recreation Plan for State Lands and Waters (2017)’”.*
 - *“Support Offaly County Council, Bord na Mona and Coillte in the development of the ‘Midlands Cycling Destination – Offaly’ which represents a potential national scale walking and cycling product almost exclusively on public lands. This project is a priority of the ‘Outdoor Recreation Plan for State Lands and Waters (2017)’”.*
- Addition to RPO 6.18:
 - *“EMRA will work with Local Authorities and Fáilte Ireland to identify a network of destination towns within the Region for the prioritisation of investment and supports to drive tourism growth in the Region, to spread the benefit of tourism throughout the region and to encourage the increase of tourism product development”.*

Low carbon economy

- In the Low carbon economy and circular economy additional RPOs are suggested:
 - *“To ensure that settlement patterns at all scales have sufficient regard to the need to minimise energy use for transport and heating.”*
 - *“Having regard to section 5.4 of the NPF, to support the preparation, in the short term, of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the Midlands and adjacent parts of the North West and Southern Regions which meets the environmental, economic and social needs of communities in these areas, also demonstrating leadership in climate change mitigation and land stewardship. Also to lead on the sourcing of E.U. funding to support the transition of the industrial peatlands to sustainable after uses. The assembly supports in principle the examination of the potential for a Strategic Development Zone or zones in the Midlands to act as a catalyst for job creation to replace such jobs and to act as an economic ‘pull’ into the midlands SPA.”*
- Addition to RPO 6.20:
 - *“Support enterprise development agencies, Local Authorities, Communities and LEOs on the development of industries that create and employ green technologies and take measures to accelerate the transition towards a low carbon economy and circular economy”.*

Marine.

A number of submissions requests clarification of how the Marine Economy will grow.

Agriculture.

It has been pointed out that the Section does not provide RPOs for Agriculture.

Director's Response

Specific Sectors rationale.

This is not the case, the main Economic Strategy is explained in Section 6.3 that puts forward: Smart Specialisation, Clustering, Orderly growth and Place making. In particular the subsection 'Developing a competitive and resilient Economic Base' delivering high quality jobs. It seems that a rationale for the selection of the specific sectors will clarify the issue avoiding misinterpretations. Therefore, text can be included: ***"The following specific sectors - as labour intensive economic activities - are of particular interest for EMRA, given their sensitivity for job creation, maintenance and sustainability"***.

The specific sectors that the strategy focuses on are for several reasons, retail is a significant employer in the region and retail planning policy is a long established regional policy area and the RSES reflects and updates this policy. Tourism is another significant employer, that also generates a significant additional enterprise and jobs, but it is a sector where spatial planning policy and prioritise investments can have a significant impact and it is for these reasons that it is included. Marine is a significant area of economic potential, where there is emerging national policy and the RSES can be directional and influential in that area, this is also combined with section 7.2. Finally agriculture is another significant sector that involves a huge area of the region, is an indigenous rural sector that the RSES should promote and is a sector that will also benefit from regional spatial policy.

Agriculture it is addressed in Section 7.7 however due to its significant economic nature it is welcomed that the economic aspects be addressed in this section.

Retail.

The retail hierarchy for the EMRA in Table 6.1 reflects the current status of all the city / county development plans and the existing retail hierarchy in the region. It follows on from the hierarchy established in the Regional Planning Guidelines for the Midlands and the Greater Dublin Area. It does not contain all the retail designations in each county, rather it sets the higher levels of retail centres in the region level 2 and level 3 as the policy level of a strategic plan should. It is recognised that the designation of lower order retail centres level 4 and level 5 is a matter for each individual development plan.

The draft RSES commits to the preparation of a retail strategy or strategies for the region, there is already an established format of a regional level strategy for the GDA and there may not be a requirement to extend this to other parts of the region. This is a matter for the local authorities in conjunction with the Assembly who will coordinate this decision and the production of resulting strategy / strategies. There is a benefit to regional scale retail strategy which can take into account regional scale influence of higher order centres (especially on comparison goods).

Any new strategy / strategies will involve (amongst other aspects) a review of the existing retail strategy, a floor space survey, existing and projected spend and floor space requirements, an analysis of current retail requirements and a future proof of future requirements. It should also introduce new tools which could include the use a "Collaborative Town Centre Health Check".

Tourism.

Destination town designations will be addressed by the respective National Agency. With respect to the large, detailed and localised number of proposed RPOs from submission, these cannot be taken verbatim, however they are condensed in the draft RSES at a higher level.

Low carbon economy.

The issues of the peatlands Suggested change to RPO 6.18 seems pertinent.

Marine.

Marine development is addressed not only on page 102, but in Chapter 7 pp. 112-113, and reference is being made to the forthcoming National Marine Spatial Plan being developed by the Department of Housing, Planning and Local Government. Once the Plan is public, the RSES will review and update accordingly.

Agriculture.

This sector requires attention and needs to be addressed in the RSES, and link to RPO 6.8. The following additional text and RPO addresses this key sector:

“Agriculture is intrinsically linked to our national identity and the agri-food and drink sector accounts for 7.6% of Irelands economy-wide GVA (DAFM, 2014), nearly 11% of exports and over 8% of total employment (DAFM 2015). The latest Agricultural census show that the Eastern Midlands Region has 24,849 farms, which accounts for 18% of the total number of farms in the state.

“Agricultural production, sustainability, food security and health are closely linked and there is a growing recognition on the value of agricultural land, particularly in areas that are experiencing strong urbanisation pressures. There is a need to ensure both the protection of the agriculture industry and the rural landscape that supports it. This includes recognising the value of horticultural land, protecting the resource productivity of agricultural land and addressing development pressures and the potential impact that Brexit will have on agriculture and food exports throughout the region.

“Agriculture is both highly exposed to and is a significant contributor of Climate Change. Current quantity and export driven Irish agriculture targets are set out in Food Harvest 2020 and Food Wise 2025. There is a need to align to our climate targets and to the future proofing the agricultural economy needs. Agriculture currently accounts for 33% of national emissions and is currently increasing by 2.9% per annum.

RPO 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 adaptation measures.”

This will be cross referenced to RPO 7.26 “Work with Local Authorities and relevant stakeholders, to identify areas of high value agricultural land and to ensure food security in the Region and to promote sustainable farming practices that maintain the quality of the natural environment, protect farm landscapes and support the achievement of climate targets”.

There are expectations for timelines and measurable actions at regional level in the Draft RSES to integrate food production and processing with measures to enhance cultivation and diversity of plant based food and local food production networks, and reduce production of animal agriculture Regional agriculture, forestry, and rural development policy needs to support the effective, timetabled actions to move habitats and species with current bad and unfavourable status to favourable. This would include controls on bovine agriculture through the planning system.

Director’s Recommendation

Insert text on the Specific Sectors rationale.

Include in RPO 6.16: “...access should be planned and managed in a manner that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism.”

Amend text on Tourism accordingly

Insert new RPOs

RPO "Support the local strategies which are already in place to link the River Shannon Blueway, the Royal and Grand Canal Greenways and the proposed Barrow Blueway right across the Midlands, incorporating the towns of Longford, Athlone, Mullingar, Tullamore and Portarlinton.)".

RPO "Support Offaly County Council, Bord na Mona and Coillte in the development of the 'Midlands Cycling Destination – Offaly'"

Addition to RPO 6.18:

"EMRA will work with Local Authorities and Fáilte Ireland to identify a network of destination towns within the Region for the prioritisation of investment and supports to drive tourism growth in the Region, to spread the benefit of tourism throughout the region and to encourage the increase of tourism product development".

Amend text on Agriculture accordingly.

Insert RPO

RPO "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 adaptation measures."

6.6 Drivers for resilient and sustainable economic growth

Summary of Issues

Regional Investment Plan.

Although there is mention to a Regional Investment Plan (RPO 6.27) to coordinate with National Departments and Agencies in the delivery of infrastructure development in the region, more detail is requested nor indication of the level of influence it would have in the delivery. Some submissions request at least a list of investment in the pipeline.

Skills and Talent.

Department of Education and Skills acknowledges that the draft RSES is underpinned by Skills, Talent and Innovation capacity as key strategic pillar identified in the National Planning Framework. In this line, it suggests the inclusion of Higher Education Institutes in RPO 6.21 as that as part of the ecosystem addressing skills shortages and life-long learning needs. In addition, the following paragraph could enrich the section of skills and talent development from a spatial perspective, p. 103:

- "In line with the National Strategy for Higher Education to 2030, higher education infrastructure in Ireland is planned on a regional basis. Higher Education Institutions have come together in regional clusters in order to collaborate to maximise their impact. This clustering allows higher educational infrastructure to be shared, rather than duplicated, across regions, thus allowing institutions to reach a critical mass and act as drivers of growth and development for their regions."

The shortage of professional drivers as challenge to the logistics industry is highlighted.

There are also concerns on what is the vision to expand third level education in Wicklow.

Social Enterprise.

The importance of Social Enterprise for economic and social inclusion and community development has been stressed in a submission. The submission also highlights that a National Social Enterprise Policy is currently being drafted by the Department of Rural and Community Development.

Smart City.

There is strong support for RPO 6.24 (and 10.14 Smart Grids). There are recent developments in Smart City initiatives. Some submissions highlight that there is an emerging Smart Towns and Villages concept being developed by the European Union through the Committee of the Regions which may support the development of 'smart strategies' for other key towns and rural areas across the region. In addition, of relevance to the Eastern and Midland Regional Assembly is the addition of Newry as a partner to the All-Ireland Smart Cities Forum as of January 2019.

Local Public Banking.

There is a proposal for the introduction of a Local Public Banking Model in Ireland (similar to the German Sparkassen model) as banking model for people alternative to traditional pillar banks. *"This model of banking covers the 26 counties nationally and works on a regional basis following key principles of the 'Framework for the Development of Regional Enterprise Strategies'. The model is not based on a theory but on an existing regional working banking model bringing prosperity by creating a virtuous cycle of money circulating in the local economy. The concept proposal makes provision for inclusion of post offices and credit unions as part of invigorating local communities particularly in the area of SME's and the Agri sectors that allow commerce to thrive".*

Small and Medium Enterprise.

The need to explicitly support SMEs is highlighted.

Branding.

There is a proposal for wording in RPO 6.28 to allow for a full consideration of options and existing regional brands in deliberation with the relevant stakeholders. Suggestion: *"EMRA will explore strategic approaches to regional branding and messaging that is consistent with..."*

Director's Response

Regional Investment Plan.

The regional investment plan aims to be a comprehensive one that includes all relevant infrastructure required for the progress and achievement of the RSES. The design and development of such a plan requires a closer and intense collaboration and coordination of the Regional Assembly and Local Authorities with National Departments and infrastructure agencies, especially the Department of Public Expenditure and Reform (DPER). Several National Departments are developing their own infrastructure investment decision frameworks, for instance the Department of Transport, Tourism And Sport with its framework of Planning Land Use and Transport – Outlook 2040 (PLUTO).

Skills and Talent.

The need for make explicit Higher Education Institutes in the RPO 6.21 is noted and its inclusion is pertinent. Also, the clarification of provision of education infrastructure in regional clusters seem appropriate for inclusion providing stakeholders a guidance in their collaboration to enhance skills and talent development. In terms of specific shortages in the logistics industry, RPO 6.21 addressed this issue. EMRA will highlight this issue before the Regional Enterprise Plans Steering Committees and Regional

Skills Fora. With regards to the situation of higher education in county Wicklow, Education regional planning falls into the remit of the Department of Education and Skills (DES). The RSES aims to provide a framework for players such as DES and many other relevant stakeholders to coordinate and collaborate accordingly.

Social Enterprise.

Indeed, social enterprise is not a new concept and current development – in Dublin city council as pointed out by the submission – show and stress the benefits emerging from it. More importantly, in reflection it becomes evident the need to include the adjective ‘inclusive’ in the heading 6.6 to read: “Section 6.6 - Drivers for resilient, sustainable *and inclusive* economic growth”. In this vein, a brief sub-section and RPO will be included in this section to reflect the forthcoming policy and current works being developed by local authorities to ensure in this respect.

Additional text and RPO:

“Social enterprises trade for a social/societal purpose, earn at least part of their income from trading activity, they are separate from government, and re-invest surplus to pursue the social objective. They assist with addressing social, economic and environmental challenges while fostering inclusive growth, shared prosperity, social inclusion, training and job creation often for marginalised people. They represent an opportunity to deal with endemic unemployment blackspots. They operate in what is known as the Third sector or the social economy and seek to address challenges which the private sector may not see a viable or profitable opportunity in and in which the public sector may struggle to provide effective service delivery. They typically embrace and embed collaboration, solidarity, pluralism and sustainability leading to integrated economic and community development in their respective setting or concerning their social objective.”

RPO – Support Local Authorities in the design, development and roll-out of social enterprise practices, with a strong emphasis on collaboration.

Smart City.

These Smart cities emerging developments are very important to ensure our RSES is up-to-date, therefore the inclusion of these developments in the RSES is pertinent.

Local Public Banking and SMEs.

This proposal merits consideration given that the concept makes provision for inclusion of post offices and credit unions as part of invigorating local communities particularly in the area of SME's and the Agri sectors that allow commerce to thrive. Sub-section “Our Enterprise Ecosystem - stimulating a pipeline for growth” could include an additional text on finance support for SMEs

Similarly, Although Section 6.5, subheading “Our Enterprise Ecosystem - stimulating a pipeline for growth” aims to create the supporting conditions to all industry, it is evident that explicit support to SME is required.

Director’s Recommendation

Text amendment accordingly under skills and talent

Amend section heading and insert text under social enterprise

Amend text accordingly on smart cities.

Amend text accordingly on Local Public Banking and SMEs.

6.7 Capacity Building: Bidding capacity, shared evidence base, future proof, and anticipating economic structural changes

Summary of Issues

Widespread support for section.

Several submissions praise and support this feature in the RSES. In particular national department and enterprise development agencies support RPO 6.29, and will they look forward to engagement in the implementation phase.

Open Data.

There is a proposal to ensure that RPO 6.30 on Common and shared evidence base is published as open data.

Economic Risk Management System.

A submission rises questions as to how this system will operate and who would be tasked for it, RPO 6.31.

Pivot Strategies.

There is a submission proposing an additional RPO linked to the economic risk management system. Such new RPO should refer to the need to “...*facilitate potential ‘pivot strategies’ for BREXIT affected business, including relocations and rezonings of land within urban centres provided the re-zoning is to a use typical of a ‘town centre’ and in line with overall objectives of county development plans*”.

Bord na Mona.

A couple of submissions highlight the lack of recognition from the RSES on the unique challenge faced by the Midland Region with the acceleration of decarbonisation by Bord na Mona.

Director’s Response

Widespread support for section.

This support is welcome and reinforces our proactive approach to build the necessary institutional capacity, including strong and effective coordination and collaboration with all stakeholders and key players that will make the RSES a reality. Stakeholders highlight and acknowledge the need for greater coordination and development of capacities in and across our organisations to meet the RSES objectives. EMRA poses itself as a natural platform for coordination and champions the building of the necessary institutional capacity.

Open Data.

Suggestion to highlight that RPO 6.30 on Common and shared evidence base should be published as open data is acceptable as the Assembly is a public body and most of its work is publically available.

Economic Risk Management System.

This activity is a fundamental part of the implementation and monitoring. A brief clarification and a cross-reference to Chapter 12 should be included.

Pivot Strategies.

Pivot strategies as a potential tool can be reference in the narrative.

Bord na Mona.

Chapter 7 p. 128 already highlights the developments on peatlands and the role of Bord na Mona in this regard. RPO 7.27 addressed this issue. With regards to the recently established Bord na Mona Regional Transition Team, RPO 6.32 aims to provide a framework to bring together key stakeholders and face economic structural changes. This example, can be included as part of the RPO 6.32.

Director's Recommendation

Widespread support for section.

None.

Open Data.

Amend text and narrative accordingly.

Amend RPO 6.32 to include reference and support for the *Bord na Mona Regional Transition Team*

Chapter 7 Environment

7.1 Introduction

7.2 Integrated Land and Marine Planning

Submission Number(s)

0012, 0014, 0075, 0100, 0106 Wicklow County Council, 0117 South Dublin County Council, 0120 Westmeath County Council, 0125, 0126 Department of Housing, Planning and Local Government, 0134, 0142 Northern and Western Regional Assembly, 0143, 0145 Longford County Council, 0146 Laois County Council, 0147 Eastern and Midland CARO, 0151, 0153, 0154, 0155, 0157, 0163 Gas Networks Ireland, 0169, 0172, 0174, 0175, 0176 Dublin Metropolitan CARO, 0184 Department of Transport, Tourism and Sport DTTS, 0192 Kildare County Council, 0194 Bord na Móna, 0198, 0202, 0203, 0206 OPW, 0213, 0214, 0216, 0221, 0224 Offaly County Council, 0225, 0229, 0233, 0235, 0238, 0239, 0243, 0245 Meath County Council, 0247, 0248 Environmental Protection Agency, 0252, 0257, 0259, 0265 An Taisce, 0270, 0271 Department of Communications, Climate Action and Environment, 0272, 0274, 0277, 0278, 0283, 0284, 0285 DHPLG, 0286, 0288, 0289, 0292, 0293, 0296, 0299, 0303, 0305, 0306, 0310 Dublin City Council, 0312, 0313, 0315, 0316.

Summary of Issues

A number of submissions welcomed the prominence of the marine section in the Draft RSES. This is timely as the process of developing Ireland's first National Marine Planning Framework (NMPF) commenced in December 2017 with the publication of a roadmap document 'Towards a Marine Spatial Plan for Ireland' setting out general arrangements and timelines for development of the plan by end-2020. The preparation of the first draft of Ireland's first National Marine Planning Framework is intended to be published in mid-2019 for a further round of consultation. A request for the Regional Assembly to actively engage with the Marine Spatial Planning Stakeholder Advisory Forum.

A request was made to consider the Biosphere in section 7.2 Integrated Land and Marine Planning. The Biosphere designation was planned in part to implement objectives for Integrated Coastal Zone Management in the Regional Planning Guidelines.

A number of submissions expressed support for RPO 7.1 and 7.2.

In relation to growth of the marine economy, a request was received for further certainty with regards to the marine economy and conservation of a marine environment. In relation to continued growth of fisheries and aquaculture, a request to identify risk-based analysis for the continued growth of the marine economy and subsequent mitigation and adaptation measures for this industry.

The requirement for a proper Coastal Zone Management Strategy underpinning any coastal development which appears in both the Draft and the accompanying Environmental Assessment document is to be welcomed.

Request to amend RPO 7.5 to include a reference to on-shore aquaculture as follows;

"EMRA shall work with coastal stakeholders to support the sustainable development of the national Fishery Harbour Centre in Howth and the sustainable growth of the seafood and **on-shore aquaculture** sector in the Region, and to ensure that marine resources are sustainably managed and that planned activities on land do not adversely affect the marine economy and environment."

Request that in order to achieve RSO no. 7 and RSO no. 11, there is a need to apply an effective timetable for achievement of standards and targets.

One submission welcomes the recognition of the rich maritime underwater cultural heritage with the draft plan. However, they feel that the numerous maritime villages and towns in the region also play an integral part of the region's built and cultural maritime heritage.

Director's Response

The Director welcomes the update on the Marine Spatial Plan for Ireland and support from DHPLG in their submission. The Regional Assembly will liaise with the DHPLG in the preparation of Ireland's first National Marine Planning Framework.

The Dublin Bay Biosphere is considered in Biodiversity and Natural Heritage Section 7.5, however, a reference to the Dublin Bay Biosphere in section 7.2 is a useful addition.

Risk-based analysis for the continued growth of the marine economy and mitigation and adaptation measures are a matter for Harnessing Our Ocean Wealth – An Integrated Marine Plan for Ireland (HOOW), which sets out the National Policy for growth of the marine economy. The plan sets out three high level goals of equal importance, one of which is achieving healthy ecosystems that provide monetary and non-monetary goods and services.

In relation to the request for a timetable for the achievement of standards and targets for RSO no. 7 and RSO no. 11. The RSOs are high level strategic outcomes which link with National Strategic Outcomes and with the UN Sustainable Development Goals, RSOs are not designed to contain a timetable for the achievement of standards and targets.

In the section on maritime heritage include a reference to the role of maritime villages and towns as an integral part of the region's built and cultural maritime heritage.

Director's Recommendation

Insert a reference to the Dublin Bay Biosphere in section 7.2 Integrated Land and Marine Planning.

Request to amend RPO 7.5 to include a reference to *on-shore aquaculture* as follows:

“EMRA shall work with coastal stakeholders to support the sustainable development of the national Fishery Harbour Centre in Howth and the sustainable growth of the seafood and on-shore aquaculture sector in the Region, and to ensure that marine resources are sustainably managed and that planned activities on land do not adversely affect the marine economy and environment.”

Insert a reference to the important role of maritime villages in relation to the region's built and cultural maritime heritage.

7.3 A Clean and Healthy Environment

Air Quality, Noise and Light Pollution RPO 7.7

Summary of Issues

In relation to air quality, a request to consider the benefits of Compressed Natural Gas (CNG) commercial vehicles alongside electric vehicles as a means of improving air quality relative to diesel powered vehicles.

In terms of noise pollution, a request to include a specific reference to the NPF's National Policy Objective 65 on noise.

A submission strongly welcomes the references to natural capital in the draft RSES. . Suggest that climate resilience and transitioning to a low-carbon economy has the potential to enhance natural capital. Acknowledging that natural capital can be seen as a solution to climate change.

Request to change the definition of Natural Capital on page 115 from 'The stock of living and non-living resources that combine to yield a flow of benefits to people.' To 'our stock of renewable and non-renewable resources (e.g. plants, animals, air, water, soils, minerals) that combine to yield a flow of ecosystem services that provide benefits to people. These benefits include clean air and water, a stable climate, protection from floods, food to eat, the resources we use for fuel, building materials, clothes and medicines, recreation and a sense of peace and wonder, as well as habitat for wildlife. Managing natural capital so that it can continue to deliver the ecosystem services that give us these benefits is important in order to ensure sustainable development. Unmanaged natural capital risks the continued degradation and depletion of these assets, and in turn, of their capacity to provide the economy and society with the ecosystem benefits that they depend on'

Request that the RSES include a commitment to develop Ecosystem Accounts.

Director's Response

Compared to petrol or diesel powered vehicles Compressed Natural Gas benefits air quality due to reduced emissions of particulate matter. Although Compressed Natural Gas is a fossil fuel it does emit less carbon dioxide than diesel or petrol engines.

Noise pollution is dealt with in the draft RSES in RPO 7.8 in terms of incorporating the objectives of the EU Environmental Noise Directive in the preparation of strategic noise maps and action plans.

The Director welcomes the submission relating to the definition of natural capital. National agencies such as the Central Statistics Office (CSO) and the Environmental Protection Agency are the most appropriate bodies for development of Ecosystem Accounts, the CSO publishes a set of Environmental Indicators for Ireland every two years, which can be used for the purpose of monitoring of the implementation of the RSES.

Director's Recommendation

Include a reference to the benefits of Compressed Natural Gas (CNG) commercial vehicles alongside electric vehicles as a means of improving air quality.

Include the detailed definition of natural capital.

Water Quality, Integrated Catchment management

Summary of Issues

A number of submissions highlight the importance of water conservation and sustainable urban drainage, and in particular water conservation through the use of rainwater harvesting.

The importance of achieving good environmental status of water bodies in compliance with the Water Framework Directive and the need for adequate waste water treatment were highlighted, and the need to adopt circular economy thinking in the water sector.

A number of submissions support the Eastern and Midland Region Water Supply Project as currently proposed, represents the best available option identified by extensive analysis and stakeholder consultation.

A submission highlighted the lack of targets and timelines for RPOs 7.10 and 7.11 relating to Water Quality, the Strategy should set out how the Water Framework Directive obligations are to be implemented.

Requested amendment to RPO 7.11 as follows:

“For water bodies with ‘high ecological status’ objectives in the Region, Local Authorities shall incorporate measures for both their continued protection and to restore those water bodies that have fallen below high ecological status and are ‘At Risk’ into the development of local planning policy and decision making any measures for the continued protection of areas with high ecological status in the Region and for mitigation of threats to water bodies identified as ‘At Risk’ as part of a catchment-based approach in consultation with the relevant agencies. This shall include recognition of the need to deliver efficient wastewater facilities with sufficient capacity and thus contribute to improved water quality in the Region.”

Request to amend RPO 7.10 “Local Authority *land use Development Plans*” to account for local area plans, masterplans etc.

Request to amend the subsection on Integrated Catchment Management (pg.117 second paragraph):

“The Local Authority Waters Programme has been set up to assist the process and comprises of the Communities Office and the Catchment Assessment Team. The Communities Office is responsible for driving public engagement and consultation with communities and stakeholders and co-ordinating these activities across all local authorities, while the Catchment Assessment team is responsible for carrying out scientific assessments and driving implementation of measures in the 190 Areas for Action as outlined in the River Basin Management Plan. There are two regional committees supported by the Local Authority Waters Programme in the Eastern and Midland Region which include the Border, and the Midlands and Eastern regions”

Similarly, paragraph three of this subsection could be amended as follows:

“The regional committees are currently developing a Regional Integrated Catchment Management Programme for the period of this RBMP (2018– 2021) which will set out evidence-based measures to target pressures impacting water bodies identified as being ‘At Risk’ in Areas for Action prioritised under the RBMP. A key aim of Integrated Catchment management is to facilitate the movement and sharing of data and information between Local Authorities, the EPA and other relevant public authorities at the water-body and catchment scale.”

Request for the section on Integrated Catchment Management to the draft ‘*Water Services Guidelines for Planning Authorities*’ being prepared by DHPLG which should assist planning authorities in implementing the requirements of the Water Framework Directive. Once finalised, the Guidelines will be issued under section 28 of the Planning and Development Act 2000 (as amended).

Request to refer to the transition zone of Dublin Bay UNESCO Biosphere in relation to protecting water quality of the wetlands of Dublin Bay.

Director's Response

The Director welcomes the numerous submissions and acknowledges that the RSES will address water quality for the region.

The Director supports efforts to conserve water such as rainwater harvesting. Rainwater harvesting is an effective technique for collecting, storing, and using rainwater for purposes such as landscape irrigation. The Director acknowledges the need to embrace circular economy thinking in the water quality sector in the Region.

The Director welcomes the support for the Eastern and Midland Region Water Supply Project.

The Director welcomes the suggested amendment to the subsection on Integrated Catchment Management pg.117 second and third paragraphs, and the inclusion of text on the draft '*Water Services Guidelines for Planning Authorities*'.

The Dublin Bay UNESCO Biosphere already has a dedicated text in section 7.5 Biodiversity and Natural Heritage.

Director's Recommendation

Include a narrative on support for efforts to conserve water such as rainwater harvesting, and a narrative supporting the circular economy in the water quality sector on page 116.

The Director welcomes the suggested amendments to RPO 7.10 and RPO 7.11. Amend RPO 7.10 "Local Authority *land use Development Plans*" to account for local area plans, masterplans etc.

Amend the subsection on Integrated Catchment Management (pg.117 second and third paragraphs). Include text on the draft '*Water Services Guidelines for Planning Authorities*' as follows:

'The draft '*Water Services Guidelines for Planning Authorities*' is being prepared by DHPLG and should assist planning authorities in implementing the requirements of the Water Framework Directive. Once finalised, the Guidelines will be issued under section 28 of the Planning and Development Act 2000 (as amended). The Guidelines were prepared in consultation with Irish Water and the local authority sector.'

7.4 Flood Risk Management

Flood Risk Management

Summary of Issues

One submission welcomes the publication of the Strategy that has been supported by a Regional Flood Risk Assessment (RFRA).

Climate change may increase flood risk in the future, future planning and development decisions as a result of the RSES should take such future risk into account.

The submission expresses support for RPO 7.13 in terms of working with local authorities and Departments and agencies to ensure that flood risk management policies and infrastructure are progressively implemented.

The submission welcomes the requirement to undertake Strategic Flood Risk Assessments and Site-Specific Flood Risk Assessments as appropriate.

The need to carefully manage consolidation of growth in urban areas, further concentration of population through regeneration or infill development in areas prone to flooding needs to be carefully managed.

Director's Response

The Director welcomes the submission on flood risk management and the support for the RPOs.

The issues raised are central to sustainable development of the region, and will assist with the sustainable management of flood risk in future.

The Director notes the need for careful management of infill and brownfield development to take into consideration the risk of flooding. Climate change is likely to exacerbate flood risks in urban areas, it is noted that climate change will likely increase flood risk in future.

Director's Recommendation

No changes recommended.

7.5 Biodiversity and Natural Heritage

Designated sites

Summary of Issues

In considering the designation of a national park for the Midlands peatlands area (RPO 7.19), the National Peatland Strategy should be taken into account as appropriate. A commitment to prepare a management plan for the park, in collaboration with the NPWS, Irish Peatlands Conservation Council and other relevant stakeholders, should also be considered.

The following policy objectives are suggested:

'Support coordination between the region's Local Authorities in terms of their measures to survey invasive species in their counties and coordinate regional responses.'

'Encourage greater awareness of potential threats caused by invasive species and how they can be spread.'

'The management of invasive species where there is a corridor such as hydrological connections to European Sites shall be carefully considered and implemented in order to prevent the spread of invasive to sensitive sites.'

Support the implementation of the All-Ireland Pollinator Plan 2015 – 2020. Local Authorities should incorporate the actions of the All-Ireland Pollinator Plan 2015-2020 when managing their parks, open spaces, roadside verges and all vegetation in a way that provides more opportunities for biodiversity, while being cognisant of the threat of the spread of invasive species.

Suggested RPO amendments;

RPO 7.18: The production of an updated Management Plan for Wicklow Mountains National Park should be the objective of this to include all aspects of park management, not just visitor management and tourism aspects.

RPO 7.20: Request to change the text to state that this should be done in cooperation with the Dublin Bay UNESCO Biosphere Partnership.

Director's Response

The National Peatlands Strategy is described in detail under the Peatlands sub section of section 7.7. The Director acknowledges that the designation of a National Park in the Peatlands will require extensive stakeholder engagement and a cross-cutting policy response.

The Assembly will take consideration of policy surrounding invasive alien species. Invasive alien species are referenced throughout section 7.5 of the draft RSES, RPO 7.17 highlights the need for management of invasive alien species.

The Director acknowledges the importance of the All-Ireland Pollinator Plan 2015 – 2020 which is referenced in section 7.5.

The Director welcomes the recommended amendment to RPO 7.18 to refer to all aspects of park management, not just visitor experiences and facilities, and to RPO 7.20.

Director's Recommendation

Amend RPO 7.18 to refer to all aspects of park management, not just visitor experiences and facilities.

Amend RPO 7.20 to state that activities should be conducted in cooperation with the Dublin Bay UNESCO Biosphere Partnership.

Biodiversity and climate change

Summary of Issues

Laois County Council request an additional objective to promote the development of improved visitor experiences and facilities in the Slieve Bloom Mountains:

'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.'

In relation to Biodiversity a request that the Draft RSES should set out the basis on which land use and spatial planning will play its part in halting and reversing biodiversity loss. A request for additional recommendation on financial investment in biodiversity is included.

In relation to the section on the status of designated sites, a number of submissions referred to the need for a baseline of the condition or conservation status for each of the Natura sites. And the need to discuss the specific threats to the sites within the EMRA region.

The UNESCO Biosphere zonation also includes marine core, buffer and transition zones in addition to the terrestrial ones mentioned in the RSES. RPO 7.20: This should state that it will be done in cooperation with the Dublin Bay UNESCO Biosphere Partnership.

Suggestion that the heading 'Non-designated Sites' be changed as both the National Park and the UNESCO Biosphere have designated Natura 2000 sites within them. Reference to Special Amenity Areas and the Phoenix Park.

Recommend additional text in relation to the designation of a National Park in the Midlands; 'A further opportunity is for a National Park based on the central bogs of the Midlands in order to incorporate sustainable afteruses and provide a valuable amenity and tourism asset for the country and a rural escape for the planned 1.65 million people in the Dublin Metropolitan Area.' Requested amendment to RPO 7.19 as follows; "Support the consideration of designating a National Park or parks for the peatlands

area in the Midlands, based on the Lough Ree and Mid Shannon “Wet and Wild Lands - A Shared Ambition” and the central bogs of the Midlands.

Request that a paragraph be added after the Dublin Bay Biosphere as follows: Geological Heritage – Eiscir Riada To support the consideration by Westmeath and Offaly County Councils, in consultation with the National Parks & Wildlife Service, the Geological Survey of Ireland and others, the potential designation of the south Westmeath / Northwest Offaly esker landscape as a UNESCO geo-park, to promote the unique geological heritage of the area.

Director’s Response

The Director welcomes the submissions supporting the promotion and development of improved visitor experiences and facilities in the Slieve Bloom Mountains and enhancement of biodiversity.

The NPWS deal with reporting on the conservation status and habitats and species listed under the Habitats Directive.

Special Amenity Areas and the Phoenix Park are referred to in section 5.9 of the draft RSES.

The basis on which land use and spatial planning will play its part in halting and reversing biodiversity loss are dealt with as part of RPO 7.16; ‘supports the implementation of the Habitats Directive in order to improve the conservation status of protected species and habitats in the Region, and ensure alignment between the EU Birds and Habitats Directives and Local Authority Development Plans.’

The National Parks and Wildlife Service in association with local authorities, landowners and other key stakeholders would need to lead on the designation of a National Park for the Midlands.

Designation of UNESCO geo-parks is not a function of EMRA.

Director’s Recommendation

Include a reference to promoting the development of improved visitor experiences and facilities in the Slieve Bloom Mountains in RPO 7.18 as follows;

‘Work with Local Authorities and state agencies to promote the development of improved visitor experiences and facilities in the Wicklow National Park *and the Slieve Bloom Mountains.*’

At the end of the paragraph on ‘Status of designated sites’ on page 120 insert a reference to Appendix F which lists all designated sites in the Region.

Amendment to RPO 7.20: Promote the development of improved visitor experiences, nature conservation and sustainable development activities *in cooperation with the Dublin Bay UNESCO Biosphere Partnership.*

Remove the heading ‘Non-designated Sites supporting biodiversity’, move the paragraph to the end of the section on ‘Status of designated sites’. Amend the text in the paragraph on ‘Non-designated sites supporting biodiversity’ as follows;

~~Non-designated sites supporting biodiversity~~

~~In addition to sites that are designated under the Birds and Habitats Directives, other Biodiversity supporting sites in the Region (which may contain designated sites within their area) include national parks (Wicklow Mountains) and UNESCO biosphere reserves (Dublin Bay), where environmental conservation is combined with visitor management strategies to support the development of unique educational, cultural and recreational opportunities. Biodiversity can also be found on the edges and~~

right in the centre of high density urban areas; in parks, hedgerows, graveyards, rivers and gardens, allowing urban populations to connect with nature in our cities and towns (see Section 7.6 Green and Blue Infrastructure).

Include (on page 121) a reference to the UNESCO Biosphere containing marine core, buffer and transition zones in addition to the terrestrial ones mentioned in the draft RSES.

7.6 Green and Blue Infrastructure

Development of Greenways, Blueways and Peatways

Summary of Issues

Request that the Baltinglass Hillforts Structures be recognised of national heritage importance.

A submission requests a correction to the Green Infrastructure and Amenity map Figure 7.3, there is no land zoned for GI in County Wicklow.

Request to revise the reference to the Wicklow Mountains National Park sharing a visitor centre with the nearby monastic site of Glendalough, revise to state that the National Park Information Centre is located close to the upper lake, 2km from the OPW Glendalough Visitor Centre.

In relation to RPO 7.23; Request that the capacity of a greenway be limited to what is ecologically sustainable.

A number of submissions called for the inclusion of a definition of Green Infrastructure. Request that the concept of Green Infrastructure be reflected throughout the draft RSES. Request for the inclusion of a Green Infrastructure strategy for the region and its preparation to be included as an RPO.

The importance of adequate green space in future planning was highlighted. Recommendation for draft RSES to outline optimal levels of recreation and amenity space, which can be used as a means of measuring quality of living standards within settlements.

Request for a map of the Core Regional Greenways (proposed and existing). Request for RPO 5.7 to also be referenced in Section 7.6 Green and Blue Infrastructure.

Clarify that the list of assets in Table 7.1 is indicative and not exhaustive. Request the inclusion of a short section on key environmental features and assets for each county in the Region. Request to define the term 'strategic assets'

In Table 7.1 a number of submission relate to inclusion of 'strategic assets' as follows:

- Request for Boyne Greenway, Lakelands Greenway, Newgrange to Newbridge Greenway to be included in Table 7.1
- Request to highlight the use of the Royal Canal for tourism and sustainable transport.
- Request to reference the East Coast Greenway and Blessington Greenway in Table 7.1.
- A number of submissions referenced the proposed Coastal Greenway pedestrian/ cycle route from Wicklow to Greystones. This project is currently the subject of a comprehensive feasibility study funded by Wicklow County Council which is expected to be completed by April 2019.
- The importance of delivery of the Boyne Greenway, further development of the Boyne Greenway from the source of the Boyne to the estuary, and the Newgrange to Newbridge Greenway were highlighted.
- Amendment to Table 7.1 to include Kildare town under heading of Medieval, Historic & Walled Towns, in both medieval and walled categories. To include the Curragh Plains in appropriate category Heritage sites/ National Parks.

- Request for the inclusion of Greenways / Blueways: Liffey Valley, Dublin Mountains, Dodder Valley, and Grand Canal.
- Request that the Arklow – Shillelagh recreational trail be included in the draft RSES.
- Wicklow be included under ‘Maritime towns and beaches’
- Under ‘lakes rivers and canals’ Lough Tay – Lough Dan on the Cloghoge River, Vartry Reservoir, River Slaney and tributary Derry River.
- Under ‘National and Regional Parks’ include Avondale and Kilmacurragh.
- Request to refer to the Green & Silver Route – a triangular navigation route encompassing Dublin, Royal Canal, River Shannon and Grand Canal.
- Spelling correction of Corlea under ‘Greenways, Blueways and Peatways’
- Under ‘National and Regional Parks’ reference to Lough Ree and Mid-Shannon Wilderness Park and to Lanesborough Commons North Park.
- Recommend to link the Royal Canal Greenway with Dublin with Mayo and/or Sligo.
- Table 7.1 should be amended to include “Abbeyleix Bog” under Bogs and Peatlands.
- The proposed Midlands Cycling Destination – Offaly.

In relation to Blueways, submissions noted that Blueways were primarily focused on navigation and water sports without reference to water quality, fisheries and ecological habitats.

The potential for coastal Blueways should be acknowledged for activities such as kayaking and snorkelling.

Section 7.6, include an additional RPO that provides for the protection and enhancement of areas of local ecological value.

Director’s Response

It is considered that the inclusion of the Baltinglass site under Heritage sites would be appropriate.

The Director welcomes the wide range of submissions with requests for additions to Table 7.1. 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.

The draft RSES is a strategic plan and investment framework to shape the future development of our region to 2031 and beyond. The draft RSES identifies regional assets, opportunities and pressures. As the draft RSES is a regional strategic approach and does not provide a detailed analysis of the assets in each county.

The Director welcomes the proposed greenway connecting Wicklow Town to Greystones.

Submission calls for a reworking of the Green Infrastructure and Amenity map Figure 7.3, map will be replaced with a new map of GI and assets in the Region.

Sustainable transport modes are an important part of the draft RSES. RPOs 8.1-8.4 deal with integration of transport and land use planning, and RPO 8.5 deals with local transport plans.

RPO 7.19 supports the consideration of designating a National Park for the peatlands area in the Midlands.

Clarify the term ‘ecosystem’ and make it clear where the term is being applied to biological communities or economic or interconnected systems.

Revise the reference to the location of the Wicklow Mountains National Park Visitor Centre.

The draft RSES recognises the importance of the Royal Canal as a flagship Greenway in the Region. There are 2 RPOs devoted to development of Greenways, Blueways and Peatways, as follows:

'RPO 7.23 Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and /or linked with local Greenways and other cycling and walking infrastructure.

RPO 7.24: Support Local Authorities and state agencies in the delivery of sustainable strategic Greenways, Blueways, and Peatways projects in the Region under the Strategy for the Future Development of National and Regional Greenways.

Reframe the reference to publicly owned peat extraction.

Include a reference to the Wicklow Town to Greystones greenway in the RSES.

Director's Recommendation

Include Baltinglass Hillforts Structure under Heritage Sites in table 7.1

Insert the EU definition of Green Infrastructure as follows; 'Green Infrastructure can be broadly defined as a strategically planned network of high quality natural and semi-natural areas with other environmental features, which is designed and managed to deliver a wide range of ecosystem services and protect biodiversity in both rural and urban settings.'

Include a reference on page 121 to the Wicklow National Park Information Centre is located close to the upper lake, 2km from the OPW Glendalough Visitor Centre.

In relation to RPO 7.23 include a reference to the capacity of a greenway being limited to what is ecologically sustainable.

Insert the EU definition of Green Infrastructure as follows; 'Green Infrastructure can be broadly defined as a strategically planned network of high quality natural and semi-natural areas with other environmental features, which is designed and managed to deliver a wide range of ecosystem services and protect biodiversity in both rural and urban settings.'

Update Table 7.1 to reflect the requests listed in the summary of issues bullet points.

In relation to the section on Blueways on page 126, include a reference to the importance of Blueways for water quality, fisheries and ecological habitats, and for activities such as kayaking and snorkelling.

7.7 Landscape

Summary of Issues

A number of submissions welcome the delivery of a regional landscape character assessment, within a set timeframe following adoption of the national landscape character assessment as described in RPO 7.25.

A number of submissions welcome how climate awareness is threaded throughout the draft RSES.

A number of submissions relate to designations of local, regional and national parks.

A policy to identify and develop national and regional parks for an increasing population should be included. An assessment of need of regional parks/accessible open space should be undertaken based on best practice.

Request to include a reference to urban landscapes as they are a dominant landscape character type in the region.

Request that more effort is needed in relation to making the most of tourism and heritage sites.

Suggestion to work with local authorities to identify sites for food production in urban areas to increase food security.

Proposed amendment to RPO 7.27: Request that Coillte and Dublin Mountains Partnership be included in the text on peatlands management. We also suggest that a reference be added to involvement of the National Parks and Wildlife Service who have responsibility for the management of peatlands and woodlands.

The importance of soils was highlighted in several submissions. Request for greater consideration of soils. Traditional farm landscapes are identified as an asset in the RSES request for more analysis. Involvement of agriculture in climate change adaptation through the European Innovation Partnership initiative, rainwater harvesting, support for bio-methane, and farm-based energy co-operatives.

Request for the Assembly to support a comprehensive afteruse framework plan for the industrial peatlands in the Midlands. The RSES should note and support the Transition Team in place to deal with both the immediacies of job losses and the longer term strategic planning for the 80,000+ ha, of peatlands. Request for increased emphasis on restoration of peatlands in the RSES. Refer to the threat of illegal dumping in peatlands and uplands. Request to investigate the role of peatlands to alleviate flooding.

More emphasis on the suitability of cutaway bogs for renewable energy generation. A significant portion of Bord na Mona's landholding has already been committed to a variety of future uses most notably renewable energy generation wind; solar; biomass; aquaculture; and nutraceuticals projects. Request for solar to be included as an alternative energy use for peatlands on page 128.

There is a need to consider carefully alternative social and economic functions for the peatlands. Emphasise the importance of conservation of peatlands and wetlands as well as forestry to absorb carbon, and important biodiversity resources.

Director's Response

RPO 7.27 deals with collaboration between stakeholders and local authorities and development of partnerships for integrated peatland management that incorporate relevant strategies such as Bord na Mona Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans.

The Director welcomes the submission commending the delivery of a regional landscape character assessment and of how of climate awareness is threaded throughout the draft RSES.

Designation of a local public park is not a function of the Regional Assembly but rather a function of a local authority. The National Parks and Wildlife Service in association with local authorities, landowners and other key stakeholders would need to lead on the designation of National and Regional Parks.

Identification of food production areas is more appropriate at the local authority level rather than at a Regional level.

Director's Recommendation

Amend text of RPO 7.27 to include the Transition Team as a stakeholder.

Include a reference to urban landscapes in section 7.7.

7.8 Climate Change

Support transition to a low carbon. Circular & climate resistant region

Summary of Issues

A number of submissions expressed support for the climate change RPOs, and how climate action is a cross cutting principle of the draft RSES. There was a general welcome for the fact that the draft RSES is based on the UN Sustainable Development Goals. Many submission reiterate the importance and urgency of decreasing greenhouse gas emissions across a variety of sectors. A number of submissions request for the Climate Change section to be even more ambitious, and the need for environmental indicators was stressed, the need for the RSES to set out the path to that decarbonised economy as it relates to spatial planning, land use and infrastructure. Request for a quantitative analysis of greenhouse gas emissions in the Region.

Some submissions support RPOs 7.28-7.30 in that they are quantitative and provide clear targets. However, local or regional annual emission inventories are difficult to complete using current methodologies. In relation to RPO 7.28 there have been some requests as to how and if this can be delivered.

A large number of submissions expressed concern in relation to RPO 7.29 and RPO 7.30 in that they seek to assign additional functions on local authorities for which they have no remit, and recommend to revise or omit accordingly.

There was a strong feeling in many submissions that that RPO 7.34 and 7.37 are for consideration of local authorities and not proposed as mandatory. National climate mitigation policy is continuing to develop in Ireland, due to the ongoing work finalising a work programme for the Climate Action Regional Offices for 2019, the RSES should include high level objectives in relation to climate mitigation.

Proposed rewording of RPO 7.31 as follows:

‘With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate adaptation strategies, which shall address issues including local vulnerability to climate risks and identify and prioritise actions, in accordance with the guiding principles of the National Adaptation Framework, National Mitigation Plan.’

Proposed rewording of RPO 7.32 as follows:

‘Climate Action Regional Offices shall provide support to the Local Authorities on the development, adoption and implementation of local climate adaptation strategies (which can address both adaptation and mitigation). Ongoing support should relate to the specific actions, and obligations and timescales for same that must be undertaken by the Local Authorities in accordance with local climate change adaptation strategies and compliance with national policy.’

Proposed new RPO:

‘Local Authorities in the Region shall, as part of the development plan process, consider the identification and mapping of Projected Climate Impact Areas. There should include areas subject to projected future climate change risks and related impacts, for example urban heating, urban cooling, coastal erosion, flooding, etc. Those areas identified as Projects Climate Impact Areas could be spatially represented by Local Authorities in County Development Plans, Strategic Development Zone Planning Schemes and Local Area Plans, as appropriate. The mapping of Projected Climate Impact Areas should directly inform the wording of policies, objectives, and development management standards to inform the planning consent process. The identification of Projected Climate Impact Areas will take into account environmental

safeguards and the protection of natural and built heritage features, biodiversity and views and prospects.’

General support in several submissions for RPO 7.29 and requests for the Regional Decarbonisation Plan to include ambitious measures and targets for various sectors to tackle climate change, and align with national, sectoral and local authority climate policy.

Reference to the impact of afforestation with an objective to establish regional fora to set up a framework for sustainable afforestation that addresses community concerns and perceptions. This may be worthy of consideration to the Eastern and Midland Regional Assembly and could be supported at a sub-regional level.

A submission calling for greater emphasis on the need to plant trees and protect mature trees in the section on climate change. Request to acknowledge the significant contribution which tree protection and planting in the region can make to climate change adaptation strategies.

A large number of submissions emphasise the importance and support for renewable energy in terms of meeting climate change obligations and providing an indigenous clean source of energy. The need for incentives to support micro-generation of renewable energy such as rooftop solar PV was emphasised in a number of submissions.

A large number of submissions relate to the role of peatlands, requesting action on peatland management. In relation to the Midlands peatlands, the need to manage carefully the transition from peat extraction to new enterprises and clean enterprise was highlighted. The importance that cutaway bogs in terms of renewable energy was outlined in a number of submissions. Request for a specific planning policy for renewable energy developments in the region.

The importance of the agriculture sector in terms of greenhouse gas emissions and the need to diversify the agriculture sector was highlighted. The need to consider support local and sustainable food production was also highlighted.

A number of submissions refer to anaerobic digestion of agricultural wastes produce biogas as a source of renewable energy. An alternative fuels infrastructure is required in order to facilitate the roll-out of agri-based anaerobic digesters. Anaerobic digestion of agricultural wastes can also benefit water quality and biodiversity.

The importance of the heat sector was emphasised. District heating was highlighted as an efficient means of heating and making use of waste heat, potentially reducing greenhouse gas emissions. The need to develop heat maps to determine viable areas for district heating in urban areas was stressed.

Attention was drawn to the potential contribution of the natural resources sector in Ireland to climate change in terms of development of the zinc and lithium prospects in the Region which can help to position Ireland as major international source of battery technology and raw materials.

In terms of waste, reduction and elimination are essential, however, certain wastes cannot be recycled and can be safely and effectively treated by the waste-to-energy (WtE) process which act as a key enabler of the bio-economy. The importance of better engaging in the circular economy was highlighted.

Submission stating that natural gas for power generation can be decarbonised through Carbon Capture and Storage (CCS). CCS is the process of capturing carbon dioxide from power stations or industrial emitters, transporting it via pipeline (or ships) and injecting it to an underground geological formation (such as a depleted gas field) for permanent storage, which stops it entering the atmosphere and increasing the effects of climate change. CCS and will be needed to provide essential system services to the electricity grid. Request for specific emphasis on carbon sequestration, whereby certain areas can be

considered as strategic and integral mechanism for the long term storage of carbon to mitigate the contribution of fossil fuels emission and combat climate change.

Director's Response

In relation to RPO 7.28 the Assembly welcomes the support to the delivery of this RPO. The Assembly is strongly committed to the principle of evidence-based policy making 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. There is a requirement for lead in time to specify and recalibrate the model for the regional scale and to determine the correct inputs and outputs that will deliver a robust assessment. Following adoption of the RSES it is recommended that the regional transport emissions assessment 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.

Due to the ongoing work finalising a work programme with the CAROs for 2019, the RSES should include high level objectives in relation to climate mitigation. The RSES should not place additional responsibilities on local authorities in relation to climate change, in a changing policy context. Therefore RPO 7.29 and 7.30 should be omitted.

The Director welcomes the proposed rewording of RPO 7.31 and RPO 7.32.

The forestry sector is another significant contributor to the economy. RPO 6.8 supports local authorities in developing sustainable and economically efficient rural economies through initiatives such as forestry.

The Director acknowledges the need to carefully manage the transition from peat extraction to the creation of new enterprises around renewable energy.

The Director supports the establishment of a framework for sustainable afforestation in order to address community concerns and perceptions.

Director's Recommendation

Removal of RPO 7.29 and 7.30.

Proposed rewording of RPO 7.31 as follows:

'With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate adaptation strategies, which shall address issues including local vulnerability to climate risks and identify and prioritise actions, in accordance with the guiding principles of the National Adaptation Framework, National Mitigation Plan.'

Proposed rewording of RPO 7.32 as follows:

'Climate Action Regional Offices shall provide support to the Local Authorities on the development, adoption and implementation of local climate adaptation strategies (which can address both adaptation and mitigation). Ongoing support should relate to the specific actions, and obligations and timescales for same that must be undertaken by the Local Authorities in accordance with local climate change adaptation strategies and compliance with national policy.'

Decarbonising Electricity Generation

Summary of Issues

‘Decarbonising Electricity Generation’ p.135:

Request to change the title of this section to ‘Decarbonising the Energy Sector’ or ‘Decarbonising Electricity and Heat’.

A number of submissions welcome RPO 7.34 and 7.35 and the need to establish a consistent approach to renewable energy development across planning authorities. Request for EMRA to lead in the identification of suitable areas for renewable energy investment to ensure a consistent approach across the Region. The Regional Assembly is best placed to lead on this rather than local authorities. Request for the proposed strategic energy ones to also accommodate energy storage solutions. Request that the strategic energy zones should remain flexible to accommodate a range of technologies which are currently under development.

However, a number of submissions request caution in relation to RPO 7.34 identification of Strategic Energy Zones, these Zones have not been included in the final NPF document and they could create different regimes across regions, the need to avoid ill-considered designations was highlighted.

Proposed revision to RPO 7.34

RPO 7.34: Local Authorities in the Region shall, as part of the Development Plan process, consider the identification and mapping of Strategic Renewable 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. Areas identified as Strategic Renewable Energy Zones could be spatially represented by Local Authorities in County Development Plans, Strategic Development Zone Planning Schemes and Local Area Plans, as appropriate. The mapping of Strategic Renewable Energy Zones should directly inform the wording of policies, objectives, and development management standards with regard to the planning consent process. A regional landscape strategy could be developed to support delivery of projects within the Strategic Renewable Energy Zones.’

Proposed revision to RPO 7.37 – Heat Mapping

Local Authorities in the Region shall consider the identification and mapping of District Heating Zones. These areas should include potential waste heat sources and adjoining / nearby sites considered suitable for connection to pilot / extension projects i.e high density residential, mixed use developments etc. Areas identified as District Heating Zones can be spatially represented in County Development Plans, Strategic Development Zone Planning Schemes and Local Area Plans, as appropriate. The mapping of District Heating Zones should directly inform the wording of policies, objectives, and development management standards with regard to the planning consent process. The identification of District Heating Zones will take into account environmental safeguards and the protection of natural and built heritage features, biodiversity and views and prospects.’

RPO 7.36 could be strengthened by including a stronger commitment and a timeframe for the plan.

Request for geothermal energy to be expanded as a means of decarbonizing electricity generation.

Request for additional emphasis on the electricity transmission and distribution network in facilitating electricity generation.

More guidance needed on where large Solar PV farms are located.

A number of submissions relating to the use of natural gas given its relatively low greenhouse gas profile and negligible levels of particulate matter - will play an important role in the transition. Biomethane grid injection meanwhile can help reduce the non-renewable carbon content of the fuel. The gas network can reduce carbon dioxide emissions from the residential sector while also improving the air quality in the region. Renewable Gas is biomethane (purified biogas) produced from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste.

Suggested changes to the paragraphs on District Heating and Waste Heat;
“energy from waste” should be changed to “industrial waste heat”;

“renewable energy solutions” should change to “renewable and low-carbon energy solutions”;

“Sources of waste heat include data centres” should change to “...include data centres, thermal power production and many large manufacturing facilities such as bakeries and cement production”.

“In response the draft Strategy seeks to support the micro-generation and storage of heat and energy” - suggested rephrase to “In response the draft Strategy seeks to support the use of District Heating systems to recycle and reuse waste heat resources in the Region”.

With respect to the paragraph on pg135:

“Local Authorities should harness the potential of renewable energy in the Region across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy.”

A request to reframe the reference to publicly owned peat extraction to ensure there is no discrimination against other areas that don't offer the direct local alternatives to peat extraction.

RPO 7.36 could mention renewable gas more explicitly that renewable gas can support the bioenergy plan for the region.

In relation to climate change it is suggested that RPO 7.37 is overly prescriptive in terms of the studies, actions and measures.

Director's Response

The Director welcomes the role of natural gas and biogas in terms of decarbonising energy.

The Director welcomes the role of micro generation of renewable energy in the Region. The role of geothermal energy is acknowledged, and the role of the electricity transmission and distribution network.

Reference the effects of climate change, increased air and sea temperatures.

Director's Recommendation

Change the section title to 'Decarbonising the Energy Sector'.

Reference heat in the section on decarbonising Electricity Generation' p.135:

Reference to support the micro-generation, geothermal energy, district heating, storage of heat and energy, and the role of the electricity transmission and distribution network.

Building standards Energy Performance

Summary of Issues

Request for every new building to have passive house standards and rainwater harvesting facilities.

Request for greater use of sustainable construction materials and alternatives to concrete.

Sustainable energy installations and rainwater harvesting should be required in new builds.

In relation to RPO 7.38, a request that this is already a national level requirement and is already carried out annually by all LAs in the Region.

A request to revise RPO 7.39 to include a reference to the timeline for implementation of the Energy Performance in Buildings Directive through revised building regulations i.e by 2020.

Request to support for the promotion of sustainable buildings that achieve certification under systems such as the Home Performance Index (HPI) and Leadership in Energy and Environmental Design (LEED). The need to comply with building standards such as the Nearly Zero Energy Building (NZEB) standard for new builds was highlighted. In addition further support for energy retrofit of existing homes is needed.

Submission received relating to the role of cement production for the long-term sustainable development of the region. Request that cement and concrete industries are recognised for their value in terms of ensuring the sustainable management of our natural resources, advising that the RSES support sustainability standards and regulations such as public procurement which are 'materially neutral' and take into account the performance of the whole building rather than its individual components.

Request for the draft RSES to follow a wood first policy, to encourage the use of wood as a primary building material.

Request that the draft RSES supports the use Life Cycle Analysis for construction materials on Local Authority procurement projects.

Request that the draft RSES supports commercial and large residential planning applications for rainwater harvesting.

Recommendation for the use of CEM III cement in Local Authority Procurement Projects.

Emphasise the importance of retrofitting homes for energy efficiency (0143).

Director's Response

The Director acknowledges the importance of building standards. The draft RSES supports and promotes the use of sustainable construction materials in the construction industry as outlined in RPO 7.40 'Support and promote structural materials in the construction industry that have low to zero embodied energy & CO2 emissions.' The draft RSES is committed to the use of sustainable construction materials. RPO 7.38, 7.39 and 7.40 promotion of energy conservation in public buildings, promotion of energy efficiency and promotion of building materials with low to zero embodied energy and CO2 emissions and retrofitting of energy efficiency measures in buildings.

Director's Recommendation

Insert a reference to the importance of the concrete industry in the sustainable long-term development of the construction industry, and the importance of wood in construction industry.

Decarbonising transport, sustainable settlement patterns and compact growth

Resilience of critical infrastructure

Summary of Issues

A number of submissions welcomed the prominent role given to sustainability and climate action and the close engagement by the Regional Assembly and support RPO 7.41 and RPO 7.42.

A number of submissions reiterate the importance of sustainable transport modes, and not just electric vehicles. In particular submission relating to the need to develop hydrogen fuelling stations. The need to maximise use of existing infrastructure, in particular rail infrastructure was stressed.

RPO 7.41 deals with decarbonising transport, request to see stronger prominence of electric vehicle charging infrastructure.

The importance of walking and cycling in terms of its contribution to reducing greenhouse gas emissions as well as alleviating congestion, contributing to cleaner air and improving health outcomes was stressed.

A number of submission state that for heavy duty vehicles (buses and trucks mainly) and vehicles that need to travel longer distances, Compressed Natural Gas (CNG) offers a decarbonisation solution. Submissions stating the potential for hydrogen to play a role in decarbonising transport in the Eastern & Midland Region.

Director's Response

The Director welcomes the submission The DTTS

Director's Recommendation

Include a reference to the use of Compressed Natural Gas in the transport sector.

Amend to provide stronger prominence of electric vehicle charging infrastructure, and the development of hydrogen fuelling infrastructure.

Refer to the importance of walking and cycling in contributing to reduced greenhouse gas emissions.

Chapter 8 Connectivity

Submission Number(s)

0002, 0006, 0011, 0013, 0014 (Dublin Port Company), 0016, 0019, 0021, 0024(Newry, Mourne and Down District Council), 0025, 0026, 0027, 0028, 0029, 0030, 0031, 0032, 0033, 0034, 0035, 0036, 0037, 0038, 0039, 0040, 0041, 0042, 0043, 0044, 0045, 0046, 0047, 0048, 0049, 0050, 0051, 0052, 0053, 0054, 0055, 0056, 0057, 0058, 0059, 0060, 0061, 0062, 0063, 0064, 0065, 0066, 0067, 0068, 0069, 0070, 0072, 0073, 0074, 0076, 0077, 0078, 0079, 0080, 0081, 0082, 0083, 0084, 0085, 0086, 0088, 0090, 0097, 0099, 0100, 0102, 0104, 0105(Roscommon County Council), 0106(Wicklow County Council), 0115 (Westmeath and Roscommon County Council), 0117 (South Dublin County Council), 0123(Louth County Council), 0125, 0134, 0136, 0141(Southern Regional Assembly), 0143, 0145 (Longford County Council), 0146, (Laois County Council), 0149, 0150, 0151, 0152, 0154, 0155, 0157, 0159, 0160, 0162, 0165, 0166, 0167, 0168, 0170, 0173, 0177, 0179, 0181, 0183, 0184 (Department of Transport, Tourism and Sport), 0185, 0188, 0192 (Kildare County Council), 0195, 0197, 0202, 0203, 0204, 0205, 0207, 0209, 0210, 0211, 0217, 0218, 0223 (Failte Ireland), 0224 (Offaly County Council), 0225, 0226, 0230, 0231, 0233, 0235, 0239, 0242, 0245(Meath County Council), 0246 (NTA), 0247, 0248, 0254(DLR County Council), 0256, 0257, 0259, 0261, 0265, 0272, 0274, 027, 0276, 0282, 0283, 0284, 0286, 0287, 0288, 0292, 0293, 0297, 0298, 0299, 0301, 0306, 0310(Dublin City Council), 0311, 0312Section 8.1 Introduction, 0314, 0315, 0316.

8.2 Transport Strategy

Summary of Issues

Support for the strategy and approach of better integration between transport, investment and land use, and a call for RSES to support Transport Orientated Development at rail nodes. Support for a rail based strategy that focuses development along rail corridors and at rail stations, support for the guiding principles and approach taken.

The RSES must reflect the long-standing policy consensus that growth should be directed to towns and neighbourhoods which have rail connections or which are going to be connected to the rail network. We need to ensure that we provide rail services to new development areas and that only areas with good rail links undergo large scale development.

A general request for greater investment in transport for Drogheda and Greystones.

The Strategy should indicate the benefits in carbon emissions from encouraging walking and cycling for short trips.

There are several submissions that have requested a greater emphasis on the decarbonisation of transport by transition to electric vehicles with requisite infrastructure as a requirement at key central locations, in new large scale developments and in Park and Ride facilities. Also there are requests to drive the transition of the bus, van and haulage fleet from diesel to bio fuels.

The draft Strategy refers to Smarter Travel, but it doesn't explain it or set out its targets or seek to implement it in the RPOs. There should be effective targets for decarbonisation of transport; new development; no increase kms travelled by the car fleet; increase modal share; increase cycle mode share. It is requested that there be a rethinking of the transport section of the RSES to be consistent with the Smarter Travel policy.

There were numerous submissions that highlighted public transport costs in the region, comparing these areas inside the short hop zone and those outside, for example the cost of rail fares from Drogheda to Dublin with Balbriggan (within the short hop zone) and Dublin. Some submissions contend that the short hop zone is based on the Dublin Metropolitan Area and combine this with a request to extend the Metropolitan Area accordingly.

Non work trips should be considered as part of the strategy

Director's Response

The general support for the approach to the transport strategy is welcomed.

The Director welcomes the update on the forthcoming plan 'Planning Land Use and Transport Outlook – PLUTO 2040', which will develop high level objectives for the development of road and public transport.

Drogheda is identified as a Regional Growth Centre in the RSES and is supported with prioritised investment in transport infrastructure which is also evident in the NDP. Greystones is identified for transport investment in the RSES, including the rail line and N11/M11 projects.

There is a section in Chapter 7 – Environment on Decarbonisation transport, sustainable settlements patterns and compact growth that deals with these issues.

With regard to Smarter Travel and the targets contained therein, this is referenced as the national policy in table 8.1, however the strategy would benefit from inclusion of some of the key policy targets of increase modal share; increase cycle mode share.

The National Transport Authority (the Authority) has statutory responsibility for securing the provision of public transport services as outlined in the Dublin Transport Authority Act 2008. The Act gives the Authority responsibility for setting the public transport fares. The NTA sets out the fares each year for all the main PSO public transport services namely bus, rail and Luas services. Fares determination adjusts fares both upwards and downwards ensuring that the travelling public pays a fare relative to the distance they travel such that the operators are in a position to provide a safe and reliable service. There is a short hop zone identified for Dublin which is not aligned geographically with the Dublin Metropolitan Area, for instance Balbriggan is located within this zone but not the DMA.

Director's Recommendation

In section 8.2 include a narrative on Smarter travel policy and the targets on increase modal share; increase cycle mode share.

Include a reference to the forthcoming plan 'Planning Land Use and Transport Outlook – PLUTO 2040' in Table 8.1.

8.3 Integrated Transport and Planning Framework

Summary of Issues

Interconnectivity with other regions is recognised and reflected in several RPOs and listed projects, other submissions request it to be stated and promoted as an RPO in this section.

Guiding Principles

The guiding principle to support reverse commuting for those living in urban centres and commuting to work elsewhere, implies that investment in employment would be redirected away from higher order

settlements into other settlements that may not have the public transport capacity to cater for high levels of employment growth. This principle does not align with the principles and objectives of the NPF and the NTA Transport Strategy. Other submissions support the principle and seek enhancement of this proposal to use existing public transport services and routes to attract workers to settlements where there are low job ratios and a high number of workers commuting outward, for example from Dublin to Kildare.

The Guiding Principle; *'The predicted impact of the potential land use and transport infrastructure on modal split and transport greenhouse gas emissions should be assessed to deliver on national and regional targets.'* Should not be included as there is no methodology established for carrying this out and any assessment as such should come from ministerial guidelines. Another submission states that;

- Road investment should be restricted to investments which can be demonstrated to lead to reductions rather than increases in greenhouse gas emissions.
- Provision for walking and cycling as the most cost-effective investments, and those with the greatest social and health benefits must be prioritised, using local authorities' own resources and development levy income as well as national funding.
- Public transport investments must be greater than those planned in the NPF and must be supported by development levy incomes including special development levies.
- Parking policies, standards, management and charges must support the modal shift in line with the Smarter Travel targets.

There should be measures to tackle legacy issues of poor walkability in existing settlements and areas, one submission requests that there should be an allowance for exceptional cases where badly designed pedestrian routes are causing anti – social behaviour issues. Another submission requests 'walkability audits'.

There should be a guiding principle to support non-nation routes that have become critical links, there should be a review of these roads and their status before any investment is considered.

A request for a graphic to demonstrate the primacy of walking / cycling in the transport modes and inclusion in the guiding principles.

Local Transport Plans

Reference should be made to who prepares Local Transport Plans (LTPs) and who provides guidance for them. It is suggested that Local Authorities prepare them in conjunction with NTA and TII, and should be subject to Area Based Transport Assessment, they should also be complimentary and inherent to the preparation of statutory land use plans. It is also requested that it is clarified where in the region they will be prepared and that they are prepared for Regional Growth Centres and Edenderry. One submission calls for all them to be prepared for all towns over 10,000 population.

A LTP should include the provision for infrastructure for electric vehicles.

Figure 8.1 EMRA Strategic Infrastructure – road rail and airport should include regional roads in the Midlands, key transport objectives including rail mapped.

Mobility management and travel planning should be emphasised and can bring about behavioural change to more sustainable transport usage, it should be supported and included in the strategy, with a funding source.

There should be a greater emphasis in walking and cycling provision between settlements.

There should be reference made to DMURS in the RSES, Chapter 9 Quality of Life also refers to DMURS.

Director's Response

Interconnectivity between the three regions is a policy area where the draft RSES would benefit from further enhancement, in particular in the overall growth strategy and under all-island cohesion, however there should be a note here to cross reference to those chapters.

In relation to the reference to DMURS in the RSES Chapter 9 Quality of Life section 9.4 on Placemaking also refers to DMURS.

Guiding Principles

The principle of reverse commuting is not well founded and there is little evidence to support this as a trend, it should not be a principle of the RSES.

The guiding principle of *'The predicted impact of the potential land use and transport infrastructure on modal split and transport greenhouse gas emissions should be assessed to deliver on national and regional targets.'* There is no established methodology for the carrying out of such assessments and local authorities have no resource or function to perform these assessments it should not be a requirement at local level, however, there is a commitment to carry out regional emissions modelling in collaboration with the NTA.

It is recognised that there is an issue of permeability and walking and cycling options that is hindering the ability to use more sustainable transport modes in existing settlements. This is acknowledged in the Guiding Principles where the *retrospective implementation of walking and cycling facilities should be undertaken in existing neighbourhoods, in order to give a competitive advantage to these modes.*

The Local Transport Plans are a function of the NTA and they currently operate closely with other transport agencies and local authorities in the preparation of these plans, it is expected that they will continue to do so in the preparation and roll out of these plans across the region. The list of settlements for LTPs include all the Regional Growth Centres and Key Towns in the region plus Newbridge, Balbriggan and Ashbourne and is not an exhaustive list.

Local Transport Plans are the responsibility of the NTA who are the lead transport authority, and will be prepared in conjunction with the relevant local authorities and will take account of the policies and objectives of the local authorities in their preparation. The 3 named Regional Growth Centres are included in the list of settlements for which these plans will be prepared, as are all the key towns outside of the metropolitan area.

Figure 8.1 demonstrated the strategic transport network at present with the motorways, national primary and secondary roads, rail network, and Dublin airport. It is not intended to be a comprehensive map of all transport infrastructure in the region, rather a context and reference for the chapter. Furthermore there is no intention to map transport objectives as some of those are still not fully permitted and require route finalisation, it would be premature to map these objectives in advance of these statutory processes.

Mobility management plans have proven in Dublin to bring about positive economic and environmental change as well as a transition to more sustainable transport modes. They have proven to work in areas of high intensity employment where behavioural changes can occur at the institutional or corporate level. That is why there is the inclusion of the guiding principle *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.*

There should be an RPO to prepare a regional freight strategy to give further options for mode of transport and for our supply chain to be more resilient to external events, also to be consistent with the Southern Regional Assembly draft.

DMURS should be referenced

Director's Recommendation

Interconnectivity between the three regions will be enhanced in the strategy under chapter 3 – Growth Strategy and Chapter 11 – All-Island Cohesion.

Omit the principle *'Support reverse commuting for those living in urban centres and commuting to work elsewhere.'*

Omit the principle *'The predicted impact of the potential land use and transport infrastructure on modal split and transport greenhouse gas emissions should be assessed to deliver on national and regional targets.'*

Include an RPO *'To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.'*

Include a specific RPO *'To prepare a regional strategy for freight transport in collaboration with the relevant transport agencies and the other Assemblies.'*

Include reference to DMURS in the guiding principles.

8.4 Transport Investment Priorities

Summary of Issues

Dublin Belfast corridor as 'internationally' important, not just nationally (p151 of draft)

There should be a prioritisation and numbering of specific walking and cycling projects.

Rail

Support for heavy rail priorities identified in the draft RSES, including DART expansion. DART underground should be referenced for delivery post 2020 as part of the DART expansion plan. There is also a request for electrification from Dublin to Belfast and in some submissions to Dundalk.

Several requests for more frequent service of the Belfast / Dublin Enterprise.

Kildare Route Project and extension of rail electrification as far as Sallins – Naas should be supported in the RSES

With the arrival of Metrolink to Swords there should be better connections with bus and road to Ashbourne.

Metro West should be included.

The provision of *an appropriate level of commuter service in the Midlands and South-East* is inadequate, the strategy should be more ambitious. There should be a second DART line or LUAS to Greystones.

There should be elevation of the status of inter-city rail to all the identified centres.

The Rail line to Drogheda should be electrified, there should be a rail connection between Navan and Drogheda. Rail park and ride in Laytown and Drogheda. New train station between Laytown, Bettystown and Mornington.

The southern Dart line should be improved including request for dual line to Greystones, electrified and to Greystones and Arklow.

There should be a second train station at Dundalk North and a station at Dunleer.

There should be an RPO for dual rail lines between Dublin and Sligo and Portarlinton and Galway. The rail line between Mullingar and Athlone should be reinstated.

Table 8.2 should include;

‘Provision of an appropriate level of commuter rail service in the Midlands and south-East. Commuter rail services should include ancillary infrastructure such as car parking due to the location of train stations on restricted sites in town centres, e.g Portlaoise.

- High speed rail link extended to Portlaoise;
- Optimisation of the existing rail network assets and the protection of these assets for our region’s transition to greater levels of sustainable mobility, use of rail and achievement of lower carbon emissions;
- Investment in upgrading and modernisation of fleet, rail infrastructure and passenger facilities;
- Investment in commuter rail stations and services, especially in cities, suburbs and metropolitan areas;
- Investment in park and ride and multi-modal transport interconnection facilities with rail networks;’

The delivery of Phase 2 of the Navan Rail Project is critical to Navan. Table 8.2 reference to Navan should be amended to ‘Reappraisal of the extension of the Dunboyne/ M3 Parkway line to Dunshauglin and Navan prior to the Mid Term Review of the GDA Transport Strategy and prior to the mid-term review of the Regional RSES.’

Extensive submissions have included proposals for the extension of Metrolink to serve South Dublin including Harolds Cross, Terenure, Rathfarnham, Knocklyon and Firhouse with an orbital LUAS line from Tallaght to UCD and Booterstown to link to the DART line. Proposals to link to Ballycullen. Requests for improved transport services in south Dublin area including Knocklyon, Rathfarnham, Stocking Lane, Harolds Cross, Ballyboden, Ternure, UCD, Ballycullen, Firhouse, Dublin Mountains. Further submissions request a northern extension from the Airport to Ashbourne, Ratoath and Dunshaughlin.

Proposal for a Drogheda Area Rapid Transit System (light rail).

There should be promotion of the rail network to provide for freight / cargo transport off peak and consideration of a Regional Freight Strategy.

Bus

Table 8.3 should include;

‘To support the development of local bus routes and supporting infrastructure in conjunction with the NTA and other key stakeholders within Key Towns and rural towns. Hybrid or electrical buses should be encouraged on these routes where feasible.’

There should be an enhanced bus service between Ashbourne and Swords to enable Metrolink access

A proposal for orbital bus route connecting up Dublin suburbs to Swords and wider out north Kildare and South Meath Towns.

RPO 8.11 should include the extension of the Local Link Rural Transport Programme to become a fulltime service not just pilot, and include tourism assets in rural areas.

Road

The toll on the M4 should be removed to improved East – West connectivity and the M1 toll at Drogheda should be removed as it divides access to the town.

A number of submissions query the table of significant regional road schemes and the criteria for schemes to be listed here and if the RSES is to list schemes numerous submissions have promoted various regional schemes for inclusion. Other comments are stating that the list is incomplete, it repeats some of the projects in Table 8.4, it should be merged with Table 8.4, and should be moved beside RPO 8.8. Several submissions have supported the projects listed in particular those in Table 8.4.

There have been a long list of road related requests as follows;

- ‘M50 Dublin Port South Access’ should be changed to ‘Dublin Port Southern Port Access Route’.
- Greater recognition of the role of the M6/N6 and support for enhanced road infrastructure to support the development of Athlone.
- The text in relation to the N80 should read; ‘Upgrades to the N80 to include the Bypass of Mountmellick and Carlow NRR extension completion should be highlighted as important due to the inter/intra regional aspect.’
- The Scheme ‘N81 Tallaght to Hollywood scheme including linkage roads from Baltinglass and Dunlavin to the M9/N9’ is incorrectly referenced and described, it is not included in the NDP or the NTA’s Transport Strategy for the GDA. Another submission states that it is a national road and should be included in table 8.4. The proposed linkage road from Baltinglass and Dunlavin to N9 / M9 would be a regional road proposal and is an objective of the Wicklow County Development Plan.
- The N55 upgrade should be included N61 from Athlone to Boyle should be upgraded
- The N52/N62/N80 should be upgraded at various locations.
- The N2 should be reappraised and upgraded.
- The N4 should be named M4/N4 Dublin / Sligo and placed at the highest priority, there are also requests for various parts of this road to be upgraded.
- The Drogheda Port Access Northern Cross Route (PANCAR) should be identified in section 8.4 as a critical road infrastructure to be delivered, it would support Drogheda Port and the Dublin – Belfast corridor.
- Laytown to Bettystown link road should be extended to Colpe Bridge
- There should be support for the East –West Distributor as part of the Airport Box.
- There should be proposals road and vulnerable users road projects in the Key towns of Naas and Maynooth.
- Request support for a second interchange on the M4 to the west of Maynooth. And for the Maynooth Outer Orbital Route to be supported
- The RSES should support the Celbridge Second Bridge Crossing and Newbridge Second Bridge Crossing.
- Request for a by pass for Julianstown, the Slane by pass and outer orbital route to be included, upgrades of the coastal roads in Meath
- Ring road for Athy
- Request for a dual carriageway from Swords to Dunshaughlin linking the M1, M2 and M3 and M4
- Request for street lighting on the Enfield Ring Road.

Park and Ride

Table 8.5 Strategic Park and Ride – Dunboyne should be omitted as it is constructed and operational. Another submission refers that Greystones and Carrickmines are already in place and the Table 8.5 be renamed ‘new or enhanced’ There should be additional and enhanced Park and Ride facilities at Maynooth, Lexlip, Kilcock and Celbridge, and Naas.

There is a request for a dedicated public transport interchange in Naas with an associated Park and Ride facility.

There should be a reference to Bus and Ride on national road corridors and in key towns, there is a pilot scheme for a facility on the N11 west of Wicklow and at Bray southern Cross. Another submission states there should be proposals for ‘Park and Pool’ at motorway junctions to encourage car drivers to transition to bus on motorway networks

There is support for EV facilities in RPO 7.41 and a request that they should be included in Park and Rides (cross over the RPO 7.41) and that there is a need for better infrastructure to supply demand from businesses.

There should be no charge for Park and Ride to encourage usage.

Director’s Response

The projects listed in this section are generally reflective of the current National Development Plan and other current sectoral investment plans, it does not attempt to prioritise within these current investment envelopes and it is considered that is a decision for the agency responsible. The RSES does indicate projects that should be included in future investment plans, some of these are spatially referenced under Chapter 4 people and place and Chapter 5 MASP and therefore are not replicated in this section.

Rail

The RSES reflects the current national development plan capital envelope and the committed to projects contained therein, with a few additional regional prioritisations. There is an extensive list of requested rail based projects for consideration. It is noted that the overall Growth Strategy for the Region and the MASP is generally underpinned by rail based development existing or proposed. In this regard any additional prioritisations by the RSES should be reflective of supporting and delivering on the rail based strategy. In this regard there is merit in being more ambitious on the extension of the Dunboyne / M3 Parkway to Dunshaughlin and Navan as Navan is designated as a Key Town in the region. Furthermore DART underground has the capacity to deliver a step change on the capacity of the whole network and unlock the potential of many of the objective of the Growth Strategy, in cross border, intercity, regional MASP and city scales.

With regard to the proposals for a new Metrolink route and orbital light rail connection, the Metrolink project is stated in Project Ireland 2040 as Sandyford to Dublin Airport and Swords, there is no reference to a revised route to the South of the city Dublin in national policy or are they sufficiently developed for inclusion in the RSES. The route selection process for Metrolink is ongoing and being delivered by TII and NTA, 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. PI 2040 also includes various LUAS lines and these are supported in the RSES, there is no current proposal for an orbital LUAS at this location and again the RSES should not support such a proposal.

A regional freight plan should be prepared and this should consider rail as well as road, air and sea.

Bus

The provision of bus routes and service is a matter for the national transport authority in conjunction with the bus service providers the RSES support infrastructure and policies to assist in the provision of supports for the theses services and for the overall process of Bus connects.

The Local Link Rural Transport Programme is operated by the NTA and operational aspects of the Programme including objectives are a matter for this operator.

The Rural Transport Programme should be supported in the strategy and this can be strengthened in the RPO.

Road

Tolling of national routes is a matter for the relevant transport agencies and should not be determined by the RSES

The draft RSES recognises the importance of maintaining, improving and protecting the strategic function of the key transport corridors including the imperative to improve and protect the strategic function of the Dublin to Belfast road corridor, which forms part of the TEN-T core network.

The RSES should only list nationally significant road schemes that are strategic for the region. It is not intended to establish an exhaustive list of schemes for development over the period of the draft RSES especially with regard to maintenance and management of the Region's roads network. In this regard the list of regional roads should be removed.

It is noted the strategy states that it is intended that road schemes are developed in accordance with Guidelines on a Common Appraisal Framework for Transport Projects and Programmes for the Department of Transport, Tourism and Sport in accordance with the general objectives of the draft RSES and the NTA's Transport Strategy for the Greater Dublin Area.

Only the existing list in this chapter should be addressed, whilst noting that other sections in the RSES have other projects that are considered drivers at the lower settlement scale and they should be referenced there, not in this chapter.

Public lighting is a function of the local authorities in the region and the decision to install public lighting on roads is a matter for these local authorities and not the regional assembly.

The Scheme 'N81 Tallaght to Hollywood scheme including linkage roads from Baltinglass and Dunlavin to the M9/N9' is not supported in national investment plans under the NDP or the NTA's Transport Strategy, nor is it a significant regional road scheme, and as such should not be in the Strategy.

The Park and Ride schemes listed in Table 8.5 are strategic to the region, in addition others may be developed in appropriate locations where the national road network meets the strategic public transport network. However existing park and ride facilities listed here should be noted.

Park and Ride

The list in Table 8.5 of Park and Ride is not exhaustive and does not preclude other proposals, rather the list in the RSES at present are those in operation or committed to being delivered. The table should be amended to reflect this.

There are other measures that can be introduced to encourage a mode change in commuter routes, this should be supported in the strategy such as the reference to other in appropriate locations where the national road network meets the public transport network.

Director's Recommendation

Include reference to DART underground in table 8.2

Include reappraisal of the extension of the Dunboyne / M3 Parkway to Dunshaughlin and Navan as part of the 2 year review of the RSES and to be promoted by the Assembly as part of the next review of the NTA Transport Strategy.

Remove the box 'Significant Regional Road Schemes' and all the schemes included within.

Amend Table 8.5 Strategic Park and Ride to be named 'new or enhanced.'

Include reference in the narrative to park and ride on bus routes.

8.5 International Connectivity

Summary of Issues

Airport

Reference should be made to a heavy rail connection to Dublin Airport as per the NPF.

The objectives supporting a second runway, improved terminal facilities, and improved access to Dublin Airport is supported. However additional facilities are requested to be included in RPO 8.15 and RPO 8.16 to be changed to;

RPO 8.15 Support the National Aviation Policy for Ireland and the growth of movements and passengers at Dublin Airport to secure its status as a secondary hub airport. In particular, support the provision of a second runway, increased permitted passenger throughput, efficient and effective airfield development, including improved taxiway system and additional aircraft stands and other essential airport services and facilities.

RPO 8.16 [Moved from RPO 8.15:] 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 and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification.

Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of short, medium, long term parking and car hire parking, recognising Dublin Airport serves a national catchment. Ensure access does not act as a barrier to airport growth.

Another submission supports that there should be no restrictions on night flights or time of flights for the second runway

At the end of RPO 8.17 include *and require appropriate levels of noise insulation in all cases.*

Additional RPO for Dublin Airport

Spatial planning policies in areas surrounding Dublin Airport will reflect the need to ensure the safe navigation of aircraft, in particular, to protecting against Bird Hazard, Glint and Glare Impact, intrusion into Obstacle Limitation Surfaces and/or interference with navigational aids. Careful consideration will be given to SUDS Drainage proposals in the vicinity of airports and requirement for wildlife buffer zones around watercourses on airport lands will be resisted. Wildlife buffers and open water proposals will be resisted where there is potential to attract wildlife which would pose a risk to aviation safety (passengers) and in order to make best use of national infrastructure.

Air freight is critical to business in Ireland, including the ability to have night flights, and should be supported in the strategy

There should be a reference to Ireland West Airport Knock and Shannon Airport given their proximity to the Midland part of the region.

Proposals for Westin Airport as an economic driver with diversified economic activities such as film making, concerts, exhibitions and other events that should be supported in the RSES.

Proposals for a new Airport and international trade and distribution zone in a super rural city in the Midlands (north of Tullamore) should be supported in the RSES with a specific RPO to examine its feasibility. Another submission requests an RPO to *'We welcome the private initiative to develop an International Trade & Distribution Zone centred on a new international Cargo and passenger airport located between Athlone and Tullamore (Moate and Kilbeggan) which will create a centre of excellence for international trade and distribution of goods in and out of Ireland in a Carbon Neutral and sustainable environment.'*

Ports

Reference should be made to Dublin Port Company's Masterplan 2040 (reviewed 2018) including a Southern Port Access Route. A reference to prioritising brownfield over greenfield port developments to minimise environmental impacts should be included. It is requested to update the statistics on Dublin Port.

Drogheda Port should be afforded the status of being part of the EU Core Port Network. It should be named as a Port of Regional Significance separate from other regional ports in the region.

There should be more support for regional ports as economic drivers, Greenore Port should be recognised and that relevant port infrastructure should be supported for the port as part of its location on the Dublin Belfast Corridor and that it is a deep water port.

There should be support for a possible deep sea port at Breamor / Gormanstown.

There is no reference to the Dun Laoghaire Harbour and its potential for development which is a significant asset in DLR.

Welcomes the support for a feasibility study on ports facilitating offshore wind energy.

There should be recognition of Rosslare Port and the corridor to the Euro port, to Cork port

Director's Response

Airport

Heavy rail connection to Dublin Airport is not currently listed in the NDP, however replication of the NPF policy for long term consideration can be included.

It is recognised that Ireland West Airport Knock and Shannon Airport given their proximity to the Midland part of the region have a catchment within the region.

The RSES offers strong policy support to Dublin Airport and its expansion to increase capacity, there is a requirement for a strategic document to list all the supporting infrastructure and assets that are required to delivery this increased capacity that is a matter for project specific proposals. Furthermore the restrictions currently conditioned or in future proposals are a matter for the planning authorities at project level and should not be determined in the RSES, including restrictions on non-compatible uses in the proximity of the airport.

The proposal for a new Airport and international trade and distribution zone in a super rural city in the Midlands are not included in any national policy or are they sufficiently developed for inclusion in the

RSES. The RSES does not preclude such a development occurring if they apply the Guiding principles to identify locations for strategic employment development.

Ports

The Southern Port Access Route is named correctly here and should be amended in the Chapter 5 MASP to align.

The RSES aims to promote brownfield and regeneration in all parts of the region and welcomes the prioritisation of this over greenfield development. The narrative on Dublin Port can be updated to reflect the focus on brownfield aspects and the statistics can be updated.

It is not a function of the RSES to alter EU or National ports policy and determine the status of ports within the region. However the strategy should clearly reflect this policy and the reference to ports should make clear those that are identified under these policies. The strategy should also state that all ports in the region or accessible from the region including Rosslare, Shannon Foynes, Cork, Warrenpoint and Larne are economic drivers and should be supported. This is stated in RPO 8.20 and 8.21.

There have been nascent proposals for a deep sea port at Breamor / Gormanstown in the past, however they are not included in the national ports policy or are they sufficiently developed for inclusion in the RSES.

Director's Recommendation

Amend RPO 8.15 to

Support the National Aviation Policy for Ireland and the growth of movements and passengers at Dublin Airport to secure its status as a secondary hub airport. In particular, support the provision of a second runway, improved terminal facilities and other infrastructure.

Amend RPO 8.16 to

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 and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification. Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of car parking and car hire parking.

At the end of RPO 8.17 include *and require appropriate levels of noise insulation in all cases.*

Insert on narrative on Dublin Airport reference to long term consideration for heavy rail link to Dublin Airport.

Insert narrative to include recognition that Ireland West Airport Knock and Shannon Airport given their proximity to the Midland part of the region have a catchment within the region.

Ports

Change reference to the relevant regional ports to identify those listed that are 'Port of Regional Significance' and those identified on the EU Core Port Network.

Insert on narrative on Sea Ports; In order to minimise potential impacts on EU protected habitats, brownfield port developments which maximise the capacity of existing port sites should be prioritised over greenfield developments.

Update Dublin Port statistics on page 156.

8.6 Communications and Digital Infrastructure

Summary of Issues

There should be greater detail and support in this section for the provision of Broadband in particular for those Counties / Areas that are currently poorly served.

RPO 8.23 should be reworded to 'To expedite the implementation of the National Broadband Plan (NBP).'

There is no need for planning guidelines to support the delivery of national broadband RPO 8.24.

There should be provision to encourage data centres in the Midlands

Director's Response

The delivery of the National Broadband Plan is a matter for the Department of Climate Communications Action and Environment, the Assembly and the RSES supports the delivery of next generation broadband to all parts of the region. The requirement for planning guidelines to facilitate the roll out and delivery of national broadband is a stated aim of Government and the Assembly supports any aspects that can ensure the delivery of this key asset for the region.

The RSES supports data centres at appropriate locations RPO 8.23 refers and this should be taken inconsideration with the Guiding principles for investment prioritisation in placemaking for enterprise development in Chapter 6.

Director's Recommendation

No change.

Chapter 9 Quality of Life

Submission Number(s)

0002, 0007, 0022, 0075, 0088, 0093, 0094, 0106 (Wicklow County Council), 0117 (South Dublin County Council), 0121 (Kildare County Council Parks), 0133, 0143, 0145 (Longford County Council), 0146 (Laois County Council), 0149, 0157, 0160, 0165, 0167, 0168, 0192 (Kildare County Council), 0203, 0215 (Dublin City LEO), 0223 (Failte Ireland), 0224 (Offaly County Council), 0245 (Meath County Council), 0265, 0270, 0273, 0275, 0277, 0278, 0279, 0284, 0286, 0293, 0299, 0392, 0306, 0308 (Land Development Agency), 0309 (Department of Education and Skills), 0310 (Dublin City Council), 0316.

Summary of Issues

It is noted that there are a number of overlaps between different sections and sub sections of Chapter 9 - Quality of Life and some further rationalisation of these sections would increase the legibility of this chapter

Director's Response

Healthy place making, Access to economic opportunity and Climate Action to transition to a more resilient environment are identified as Key Principles in the RSES, providing an essential link between spatial planning and improved quality of life. It is recommended that some refining and rationalisation of this chapter is required to better reflect how the achievement of Key Principles and Regional Strategic Outcomes (RSOs) in the RSES will support improved quality of life in the region.

Director's Recommendation

Proposed restructuring of Chapter 9 -Quality of Life as follows;

9.1 Diverse and Inclusive Region

(combining current Sections 9.1 Introduction and 9.2 Context and parts of Section 9.6 to cover demographics, age friendly, diversity, social inclusion)

9.2 Housing and Regeneration

(combine Section 9.3 housing and 9.5 Regeneration to include additional narrative on delivery models and an asset test for location of new housing, relocate Compact Growth and Guiding Principles for Infill/Brownfield lands to Chapter 3 – Growth Strategy)

9.3 Healthy Placemaking

(combine current Section 9.4 Placemaking with parts of 9.8 Healthy Communities to include principles of good urban design and placemaking, recreation and open space)

9.4 Social and Economic Opportunity

Update this section to include Social Enterprise and LECPs

9.5 Access to Services

(update 9.7 Social Infrastructure to cover healthcare, education and lifelong learning)

9.6 Arts, Culture and Heritage (covers arts, language, culture and heritage)

Submissions are dealt with under current Sections as follows;

9.1 'Introduction and Policy Context' and 9.2 'Context'

Summary of Issues

Demographics

The acknowledgement that a change in household mix and tenure will be required due to changing demographics and smaller household size, is welcomed – however It is submitted that greater focus is needed on planning for an increasing ageing population.

Consideration needs to be given for accommodation for downsizers needs to be accommodated within existing communities. Demographic and population projections highlight the potential threat to rural communities in particular. The locational preference of older persons to remain living in rural areas should be respected.

While the focus on the development of 'age-friendly' and 'family-friendly' strategies is welcomed, reference should be made in the RSES to the Age Friendly Programme.

It is submitted that the preparation and implementation of such strategies would be more appropriately integrated into the Local Economic and Community Plans (LECPs) or Community Development process rather than the Development Plan process, which can only address the land use related aspects of the needs of these groups.

Social Inclusion

The emphasis on social inclusion including those with disabilities, at risk of poverty and minority groups including non-Irish Nationals and Travellers is positive. It is submitted, however that more focus is needed on planning for those with disabilities.

More focus is also needed on the spatial dimension of social and economic disadvantage.

Irish Rural Link runs programmes focussing on digital skills for target groups and to improve representation of women in public life.

Director's Response

There are overlaps between these sections, which should be merged, with increased focus given to actions to reduce commuting in the region, to include reference to LECPs, the Age Friendly Programme and for greater emphasis on those with disabilities, cross referencing with 'Universal Access' principles in Chapter 8 – Connectivity and with Chapter 1 – Profile to expand the spatial dimension of disadvantage.

Update narrative to include case study on Irish Rural Link programme.

Director's Recommendation

Section 9.1. and 9.2 should be merged under 'Diverse and Inclusive Region', with narrative updated as set out above.

9.3 Housing and Section 9.5 Regeneration

Summary of Issues

A number of submissions support the focus on accelerated delivery of housing and opportunities for urban regeneration, in particular welcoming the launch of NPF/NDP Urban Regeneration funds (URDF), and also highlighting the need for further investment in social and affordable housing in the region.

Some key issues include;

Housing supply and affordability

Affordability must be recognised as a key driver of unsustainable settlement patterns in the region.

There is concern that conservative housing projections in the NPF could lead to capped population growth and dezoning, introducing uncertainty into the housing market and leading to further pressure on housing supply and affordability.

Heights and densities

Achieving increased densities will require higher levels of recreation and open space provision to ensure good quality of life. More focus needs to be put on delivery of increased heights and a mix of housing typologies including apartment living and new models of mixed use residential and commercial development.

Delivery

Submissions welcome the acknowledgement of a required change in both housing and tenure typologies, particularly in the area of affordable housing provision and the need to support new models of delivery and for active land management. It is recommended more focus is given to cost rental in the context of the pilot scheme (St. Michael's DCC) and Government's commitment to the publication of revised affordability regulations, which may include cost rental tenure.

Submissions also highlight a number of models for delivery which should be specified, from sustainable housing/community models to cost rental.

It is submitted that Local Authorities should be meaningfully involved in the provision of new homes.

The implementation of the Kenny Report would allow local authority to compulsorily purchase land at lower prices.

There also needs to be provision for schemes that allow for the development of serviced sites or affordable homes on state lands or in conjunction with delivery by Voluntary Housing Bodies. At the same time, it is also submitted that the focus on delivery should not be at the expense of ensuring a social mix.

Part V delivery needs to be delivered within the catchments of new development

HDNA

Further information is requested in relation to requirements for Local Authorities and the Dublin Region to carry out Housing Needs Demand Assessment (HDNA). It is noted that the RSES does not contain targets for housing construction outside of MASP, and it is submitted that MASP figures are less than required particularly when including pent up demand.

Different demographics - students, young professional, families and an older population all have different housing needs, which should be addressed in the Housing Need Demand Assessment.

Location of new housing

It is submitted that there is a need for measurable targets and timelines for the development and location of new housing including public transport and service accessibility and modal share, the 2002 National Spatial Strategy 'six local test requirements for new housing' is cited as a good example in this regard.

Regeneration

Submissions acknowledge the role of the RSES in supporting the Land Development Agency (LDA) in its function to enhance land delivery / assembly on a long-term basis, both in relation to state lands and the enablement of private lands, with a particular focus on residential delivery and urban regeneration. It is suggested that there is need for a detailed existing use analysis, for Local Authority land, but also wider state-owned lands in order to ensure best current usage for lands (e.g. industrial versus residential).

It is also submitted that the Land Development Agency should have a role in the future sustainable development of Bord na Mona peatlands landbank.

It is submitted that the strategy should be updated to reflect recently announced URDF funding for relevant projects.

Director's Response

Housing: In relation to the need for more guidance in relation to the location of housing, it is noted that there are overlaps with other chapters, for example 'Principles for integrated transport and land use' are set out in Chapter 9 – Connectivity and 'Asset Based Criteria' principles are set out in Chapter 3 – Growth Strategy. It is recommended however, that the RSES would benefit from better integration and re-framing of these principles to set out specific guidance in relation to an 'Asset Test' for the location of new housing.

It should also be recognised that the RSES cannot provide an immediate solution to the current housing issues in many parts of our region. The RSES sets out strategic long-term principles to ensure that the right type of housing is delivered in the right locations, to avoid a recurrence of these housing issues in the future.

Heights and densities; Include new RPO to reference national policy documents which address height and densities, including section 28 ministerial guidelines

Delivery: The RSES already identifies the need for change in both housing and tenure typologies, particularly in the area of affordable housing provision and the need to support new models of delivery and for active land management. The need for further analysis of local authorities lands as part of more active land management approach is addressed in Chapter 3 – Compact Growth (Infill and Brownfield lands) and will also be a matter for consideration by the RSES Implementation Group post adoption.

The consideration of wider state lands will need a whole government approach, which should be a matter for the RSES Implementation Group. In this regard the Director welcomes further engagement with the newly established Land Development Agency, which will play a key role the future delivery of housing and regeneration in the region, particularly on state lands. It is recommended that the narrative in this section be updated to reflect the stated functions and focus of the Agency and to highlight St Michaels House as a case study for cost rental delivery.

Regeneration; There may be potential to include case studies of URDF funded projects which are progressed to pilot and/or implementation stage. It is recommended that this be further explored. It should also be noted that the Directors Report recommends that increased emphasis is given to the identification of regeneration opportunities in Key Towns across the region – this is addressed in Chapter 4 – People and Place.

HDNA RPO 9.5 sets out that the Regional Assembly will support Local Authorities, either individually or combined, in the provision of Housing Demand Needs Assessment (HDNA), to inform housing policy in accordance with statutory guidance. It is recommended the Regional Assembly will support this process with further details to be agreed as part of the implementation of RSES – as set out in Chapter 11 Implementation. No further amendment is recommended in this regard.

Director's Recommendation

Update narrative and RPO as follows;

“The RSES sets out an asset-based approach to the strategic location of new housing in the region, targeting significant population growth in Dublin and the Regional Growth Centres, supported by balanced population and employment growth in Key Towns and a limited number of economically active moderate growth towns. Other towns will require targeted ‘catch – up’ investment to enhance local employment and services in rapidly growing commuter towns or to promote regeneration in rural towns and villages. In applying a tailored approach to the location of new housing and urban development, investment needs can be linked to the NPF/NDP Urban and Rural Regeneration and Development Funds.

Asset Test for the location of new housing development;

- SCALE - Is there potential for compact sustainable development, based on the settlements scale, rates of growth, local ambition and availability of serviced lands?
- FUNCTIONS - Is there a good level of local employment provision, based on its jobs ratio and net commuting flows, and/or potential to develop complementarities with other places?
- SERVICES – Will local services and amenities including community, education, health, leisure and retail be accessible as set out in the ‘10-minute settlement’ concept?
- PLACEMAKING - Will the development re-enforce a sense of place and character, and create a healthy and attractive environment in line with good placemaking principles?
- ECONOMIC– Is there potential for better alignment of housing and employment provision, to strengthen local economies or drive economic development opportunities?
- CONNECTIVITY – Is the development accessible to existing/planned public transport and is there potential to improve modal share of public transport, walking and cycling?
- ENVIRONMENT – Does the environment have the carrying capacity? Is there potential to enhance environmental quality and/or support transition to low carbon/climate resilience? ”

RPO Local authorities shall in their Core Strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sits in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’².

² DHPLG ‘Sustainable Residential Development in Urban Areas’ 2009, ‘Sustainable Urban Housing; Design Standards for New Apartments’ 2018 and ‘Urban Development and Building Heights’ 2018

9.4 Placemaking and 9.8 Healthy Communities

Summary of Issues

In general, there is support for the focus on increased quality of life in the region, in particular through promotion of sustainable development patterns and reducing unhealthy commuter behaviours which have an impact on health and wellbeing.

Placemaking

It is submitted that the promotion of health should be front and centre of the RSES, with specific reference to relevant national policies and additional regional policy objectives (RPOs) that would facilitate the achievement of the regional strategic outcome (RSO 4) to develop healthy communities, with a focus on children and young people and creating a healthy environment particularly around schools, to address obesity and support active lifestyles including walking and cycling, recreational use of open space, limiting access to fast food in the vicinity of schools and promoting healthy foods to address health inequalities.

A number of submissions highlight the key role of placemaking in creating a healthy environment. It is recommended that more explicit policy guidance be provided in the RSES regarding public realm combined with a stronger focus on active travel, which should be addressed by RPO as it is fundamental to sustainable development and will be the focus of many proposals under the urban and rural regeneration funds.

A number of local authorities have established teams to collaboratively drive town centre regeneration, which could be used as a model for placemaking in the region.

Recreation and open space

There should be an emphasis that recreational open space provision needs to be considered on the same terms within local authority planning as other infrastructure planning. Guiding Principles for recreation and open space could be strengthened to require local authorities to relate the provision and planning of open space in close alignment to new urban development, and to incorporate eco-system services and climate measures.

It is suggested that additional RPOs should be included requiring the preparation of open space and parks strategies for each local authority, also that local authorities should be supported in the provision of regional scale open space and recreational facilities particularly close to large or growing population centres.

It is submitted that local authorities should include local voluntary groups in the development, delivery and maintenance of civic spaces, also that there should be more targeted measures to increase open space provision in urban areas.

There is also a need to include specific reference to the proven links between Green Infrastructure supply and health outcomes in Ireland and elsewhere, particularly EMRA's joint research project 'GBI Health' (Foley et al 2018).

Connectivity

It is submitted that cycling offers the best and quickest return on investment of all transport expenditure and that significant growth in cycling mode share can be achieved with sufficient investment. Increased cycling can create better public places and also support improved psychological wellbeing.

It is also submitted that an increase in cycling and walking, as a switch from short trips by car, would have a significant positive impact on health and wellbeing as well as having environmental benefits. It is suggested that this transition should have greater focus across the strategy.

Additionally, electric bikes have significant potential to replace car use for longer and hillier journeys. Multi-modal trips which combine cycling with use of public transport need to be facilitated, and upgraded by provision of secure bike parking at train and bus interchanges and where possible by allowing the carriage of bikes on public transport at all times.

More emphasis needs to be placed on actions to reduce commuting and this should be addressed as a subsection within Chapter 9. Suggested measures include the promotion of second sites, digital hubs and co-working spaces to allow towns to become self-sustaining (overlap with Economic Strategy)

Director's Response

The Director welcomes the support expressed for the promotion of 'healthy communities' as a regional strategic outcome (RSO) and for the inclusion of 'healthy placemaking', as one of three key principles in the RSES, it is recommended that these two sections '9.8 Healthy Communities' and '9.4 Placemaking', be merged in recognition of the close synergies between the two themes.

It is noted that there are a number of existing plans and policy that set out a cross government approach to promoting healthy people and places. While it is not intended that the RSES replicate all aspects of existing government policy, it is recommended that reference should be made to relevant policy documents - 'Healthy Ireland: A Framework for Improved Health and Wellbeing'; 'The National Policy Framework for Children and Young people'; 'A Healthy Weight for Ireland: Obesity Policy and Action Plan' and the 'National Child Play Policy' in the narrative of this chapter.

The existing 'Guiding Principles for recreation and open space' in RSES should be further strengthened to address wider principles for the planning and design of healthy and attractive places and provision of recreation and open space - that support active lifestyles. Specific reference can be made for the inclusion of existing guidance from DHPCLG '*Local Area Plans – Guidelines for Planning Authorities*', which addresses the location of fast food outlets in the vicinity of schools and parks.

The promotion of walking and cycling is further addressed in Chapter 8 – Connectivity and the provision of Green Infrastructure addressed in Chapter 9 - Environment

Update narrative to include 'GBI Health' as 'Case Study' showing the link between access to open space and positive health outcomes.

Director's Recommendation

Integrate 'Section 9.8 Healthy Communities' and 'Section 9.4 Placemaking' into 'Healthy Placemaking'

Include additional narrative, Guiding Principles RPOs and as follows;

The focus on compact growth and increased densities in urban areas will require a greater alignment between the development of communities and the provision and planning of open space to provide for the recreational and amenity needs of communities. The RSES supports the preparation of open space and parks strategies by Local Authorities, and for enhanced cross boundary collaboration to provide for a hierarchy of open space provision including regional scale open space and recreational facilities.

Guiding Principles for the creation of healthy and attractive places by ensuring that;

- future development prioritises the need for people to be physically active in their daily lives and to 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;

- the provision of open space should consider the types of recreation and amenity uses required, age groups and existing amenity and recreational facilities, with play areas designed to encourage varied and physically active play;
- public open spaces should have good connectivity and be accessible by safe, secure walking and cycling routes;
- Open space should be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, green infrastructure and key landscape features in their design.

RPO “In planning for the creation of healthy and attractive places, there is a need to a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for ‘Healthy Placemaking’ and ‘Integration of Land Use and Transport’ as set out in the RSES and to national policy as set out in ‘Sustainable Residential Development in Urban Areas’ and the ‘Design Manual for Urban Roads and Streets (DMURS)’

RPO: To support Local Authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the region.

9.6 Social and Economic Opportunity

Summary of Issues

Having regard to the similar content relating to Sections 9.6 and 9.7, these were dealt with together.

Social Enterprise

While it is rightly stated in the RSES that access to services is key to addressing social exclusion and inequality, it is submitted that there is a fear that services are contracting in many areas. Social Enterprise can fill some of the gaps regarding local service provision and needs more focus in the RSES. A National Social Enterprise Policy is currently being developed and various other national policies include actions concerning social enterprise including Action Plan for Rural Development and Action Plan for Jobs.

A number of social enterprises are highlighted in Dublin city which have the potential to deliver further economic, community and policy benefits including the Abhaile Project, PACE and Third Space.

LECP

The LECP is the work of both the Local Authorities and the Local and Economic Development Committees (LCDC) and this should be reflected in the RSES

Failte Ireland

Facilities that are used by visitors play an important role in establishing and sustaining quality of life for residents and visitors alike. A strategic objective of Fáilte Ireland is to ensure that the economic benefits of tourism are spread regionally across the country, providing social benefits to local and rural communities.

Director’s Response

Update narrative to highlight LECPs and Social Enterprise, and to include a Social Enterprise case study.

Update RPO 9.14 to include reference to both the Local Authorities and the Local and Economic Development Committees (LCDC) in the implementation of LECPs.

Director's Recommendation

Update narrative and PRO 9.14 as follows;

Access to services is key to addressing social exclusion and inequality, and an increasing array of local support services are being developed in collaboration with Social Enterprise. Social Enterprises are defined as enterprises that; trade for a social/societal purpose; earn at least part of their income from trading activity; are separate from government; re-invest surplus to pursue the social objective (Forfas, 2013)

RPO 9.14 Support the implementation of Local Authority Local Economic and Community Plans, in collaboration with Local and Economic Development Committees (LCDs) and through the use of spatial planning policies, to seek to reduce the number of people in or at risk of poverty and social exclusion in the Region.

9.7 Social Infrastructure

Summary of Issues

A number of submissions highlight the need for investment in local services, amenities, schools, community facilities, education and skills.

Services and Amenities

Individual submissions make specific reference to the lack of key services, including childcare, schools, primary healthcare centres, garda stations, community centres and third level options in specific towns and parts of the region. Also, the need to protect established amenities such as open space and Golf Clubs from unsuitable development.

A number of submissions were received in particular that relate to a number of towns in the commuter catchment of Dublin, other submissions relate to service provision in the Midlands and more rural and peripheral areas where services are under threat.

It is submitted that the absence of a capital programme as part of RSES is a fundamental weakness with respect to ensuring adequate provision of services, in particular a front loading of social and community infrastructure.

Health

The delivery of the Regional Hospital in Navan should be a priority and its inclusion is welcomed in the strategy. Our Lady's Hospital should remain fully functional until this regional hospital is built. Other submissions content that the North East Hospital should be located in Drogheda.

The designation of Tullamore Regional Hospital as a major trauma centre should be supported, along with its development as a Teaching/University Hospital with potential for links to Medtech and research facilities. Also to support a regional hospice in this location.

Childcare

Access to quality childcare is correctly identified as an exclusion issue, an additional RPO 9.15 objective should recommend the co-location of childcare with other relevant and complimentary services that will enable both monetary and time efficiencies, ie schools and train stations. To facilitate delivery of this objective may require a review of zoning to include a special designation for social infrastructure to include Nursing Homes and Crèches.

Schools

The Department of Education and Skills (DES) welcomes the identification of “Improve Education, Skills and Social Inclusion” as one of the 16 Regional Strategic Outcomes. It is submitted that DES engage with Local Authorities to determine land use requirements in planning for schools in the medium to long term and that the collection of HDNA housing data would support their demographic analysis in this regard. It is recommended RPO 9.16 be changed to reflect this.

Local Authority submissions also highlight the need for engagement with DES in planning new schools.

A number of submissions highlight deficits in the provision of schools in certain towns in the region.

Higher Education, Skills and Lifelong learning

DES recommend additional policy support for the role of Higher Educational Institutes in addressing skills and lifelong learning needs and making the link between skills availability and economic growth.

Also highlighted is the Irish Rural Link digital skills programme aimed at target groups such as the unemployed, disadvantaged groups, persons with disabilities, small business and farmers.

A number of submissions support the focus on investment in higher and further education. A submission requests for Drogheda to have a third level institution and for Dundalk I.T. to be recognised as an RPO for Drogheda as well, given the remit of Dundalk I.T, covering all of county Louth.

It is submitted that there needs to be a greater focus on creating links between education and enterprise to address skills needs, also that there should be support for a university in the Midlands.

Other submission support Athlone I.T becoming a Technological University.

Director’s Response

The RSES supports the implementation of NPF which identifies Dublin as the lead settlement for the region, supported by a second tier of Regional Growth Centres; Athlone, Drogheda and Dundalk. The draft RSES identifies a third tier of 11 Key Towns which are large and/or county towns that have high quality public transport, employment and service functions. The designation of further tiers in a settlement hierarchy is a function for Local Authorities in the development of the Core Strategies of their Development Plans, as set out in Chapter 4 of the draft RSES.

Chapter 4 also addresses policy and objectives for targeted ‘catch up’ investment and sustainable development in places which have experienced rapid population growth.

Implementation and monitoring of RSES including improved quality of life is addressed in Chapter 12 where RPOs 12.4. and 12.5 commit to the establishment of an implementation group and for evidence-based monitoring.

The Director welcomes the submission of the Department of Education and Skills and recommends inclusion of additional narrative and RPOs in relation to the education sector as a key regional driver [with a focus on schools’ provision and promotion of higher education and skills development.](#)

In relation to specific requests for schools, education, health facilities and other community facilities and services to address deficits in the region, it is considered that this is a matter for the relevant Departments in collaboration with the local authority but nothing within the RSES would preclude the provision of same where it deemed appropriate.

Director’s Recommendation

Include additional narrative and RPOs to read:

School provision is a key part of social infrastructure to be provided in tandem with housing provision. The RSES will seek to prioritise the alignment of targeted and planned population and employment growth with educational investment, including the provision of new schools on well-located sites within or close to existing built-up areas that meet the diverse needs of local populations.

Amend RPO 9.16 'In areas where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations'.

Higher education institutions play a key role in driving sustainable regional development. Education Training Boards (ETBs) deliver labour-market focused programmes delivering key skills to employers, supported by the Regional Skills Fora. ETBs also deliver a range of part time adult and community education programmes that provide a key pathway to participation in society. The development of multi-campus Technological Universities will lead the development of skills and talent in the region. The RSES supports Athlone Institute of Technology in achieving its status as part of a Technological University by merging with a least one other Institute of Technology. The Technological University Dublin (TU Dublin) comprising Dublin Institute of Technology and the Institutes of Technology in Tallaght and Blanchardstown, will drive research and innovation in the Dublin Region.

RPO: *To support the role of Higher Education Institutions and Educational Training Boards in addressing skills shortages and life-long learning needs in the region, and to support the further development of multi-campus Technological Universities to drive research and innovation.*

9.9 Access to Arts, Culture, Language and Heritage.

Summary of Issues

The RSES should include and repeat specific references in the planning act to Gaeltacht Areas. There are two Gaeltacht districts within the Region, both in rural County Meath – Ráth Cairn and Baile Ghib. There is a need to promote employment with the support of Údarás na Gaeltachta.

There is also a need to recognise multiple languages in our region and an objective to support and promote the teaching of English (TEFL) to new members of our community should be included

Director's Response

The requirements in the planning act for Gaeltacht areas are related to site specific land use policy that would be included in development plans and other land use plans to protect "the linguistic and cultural heritage of the Gaeltacht, including the promotion of Irish as a community language". The RSES is not required to repeat all legislation, policy and guidelines that pertain to these land use plans, compliance with these is a matter for the planning authority when making such plans. The draft RSES includes references to the two Gaeltacht districts and RPO 9.27 supports the implementation of language plans in Gaeltacht areas and the identification of Gaeltacht Service towns Irish Language Networks in the region.

It is however, recommended to update the narrative to include reference to multiple languages in the region.

Director's Recommendation

No further amendment proposed.

Chapter 10 Infrastructure

Submission Numbers

0100, 0104 (Irish Water), 0106 (Wicklow County Council), 0116 (Dept Culture, Heritage and the Gaeltacht), 0123 (Louth County Council), 0145 (Longford County Council), 0146 (Laois County Council), 0163 (Gas Networks Ireland), 0165, 0172 (EirGrid), 0173, 0174, 0175, 0178, 0184 (Dept Transport, Tourism and Sport), 0192 (Kildare County Council), 0203, 0204, 0206 (OPW), 0217, 0223 (Failte Ireland), 0224 (Offaly County Council), 0225 (ESB), 0243, 0245 (Meath County Council), 0248 (Environmental Protection Agency) 0259, 0268 (Eastern Midlands Regional Waste Office), 0273, 0289, 0299, 0315.

General Submission

A general point was made by the Department of Transport, Tourism and Sport that the accommodation of charging infrastructure should have a stronger prominence in Chapter 10.

Director's Response

It is considered that the requirement under RPO 7.41 for local authorities to include measures for more recharging facilities is adequate and does not need an additional prominence in this chapter.

Director's Recommendation

No change necessary

10.1 Introduction

Summary of Issue Raised

The Department of Culture, Heritage and the Gaeltacht has indicated that the key driver of the chapter, indicated as climate action in the draft, should also incorporate the key principle of environmental sustainability.

Director's Response

It is considered that this element of the narrative can be amended to include reference to environmental sustainability.

Director's Recommendation

Amend the third paragraph under section 10.1 to read:

The key driver for this chapter is the key principle of climate action *and environmental sustainability generally*

10.2 Sustainable Management of Water

Summary of Issues Raised

Irish Water's submission has indicated a number of requests for modification or insertions to the RSES:

- a change to the description of the Water Supply Project for the Eastern and Midlands Region contained in Table 10.1 to reference The Greater Dublin Area and other communities in the EMRA Region and reference NSO 9 of the NPF
- reference to the National Water Resource Plan
- reference to Drinking Water Protection Plans
- guidance on RPO 10.9 and the selection of rural villages

There is support for Surface Water RPOs 10.10-10.12.

Submissions request the inclusion of Staleen Water Treatment Plant in the list of water infrastructure.

Concern has been raised in relation to RPO10.1 having regard to lack of Local Authority control over certain water infrastructure.

Other submissions indicate support for the projects outlined in Tables 10.1 and 10.2 and for the approach to ensuring that water infrastructure can serve future development.

A number of submissions have indicated that funding is a key issue for investment in rural water schemes with a suggestion that an RPO relating to funding for the servicing by Irish Water of serviced sites and rural villages is necessary. A suggestion is made that the encouragement of the development of a new rural settlement investment approach indicated in the narrative for the section could be a new RPO.

Further RPOs relating to examining new water sources and relating to water supply are suggested.

A submission indicates that water requirement for the RSES require further articulation.

A submission indicates that proper water and rainwater collection infrastructure be included in all road works and road upgrades and as a stand alone work.

Support was received for RPO 10.8 in relation to sludge.

One submission indicates that green infrastructure should be incorporated into the Guiding Principles relating to surface water and that the RSES should refer to the Water Environment (Abstractions) Bill 2018. In relation to wastewater, it is submitted to include a similar RPO to 10.5 relating to the Water Framework Directive quality standards with appropriate timelines.

Director's Response

In relation to Irish Water's submission, it is considered that Table 10.1 could be amended to reflect their requested wording in relation to the GDA and other communities but there is no need to reference the planning context for same i.e. the NPF. Table 10.1 is simply an indication of the strategic water services projects for the Region.

It is considered that the requests in relation to Drinking Water Protection Plans and the National Water Resources Plan are reasonable and should be accommodated in the RSES. In relation to the query about RPO 10.9 and the need for guidance, a cross reference to RPO 4.51 could be included in RPO 10.9

In relation to the submissions indicating that investment from Irish Water and Government will be required in order to service rural villages, this is acknowledged but it is considered that such a case can be made on the basis of RPO 10.9 and 4.51. However, it is considered that the development of a new rural settlement investment approach could be inserted as a new RPO and would help to address this issue.

It is also considered that the examination of new water sources could also be included as an RPO, likewise an RPO relating to water supply.

In relation to the request for the inclusion of Staleen Water Treatment Plan, this is not considered to be one of the strategic projects for the Region and work has already commenced on this project.

In relation to RPO 10.1 and the role for local authorities, it is considered that notwithstanding the local authorities no longer have a remit over the development of water services infrastructure, it is still appropriate for them to have policies relating to their efficient use and therefore no change is considered necessary.

In relation to the issue of water and rainwater collection infrastructure, the guiding principles for Development Plans and LAPs includes SUDS measures, as do RPOs 10.11 and 7.12 and this is considered satisfactory.

It is not recommended to include reference in Guiding Principles to the Water Environment (Abstractions) Bill 2018 as has not yet become legislation. In relation to the request for a timeline specific RPO for compliance with Water Framework Directive quality standards, this is considered to be addressed in Chapter 7 Environment (RPO 7.10 refers).

Director's Recommendation

Amend Guiding Principles relating to Surface Water (p178) by inserting the following text in the first bullet point after 'green space' *green infrastructure*

Insert the following text below the first paragraph of the Regional Context section on page 175:

EMRA supports the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, EMRA supports the inclusion of objectives in County Development Plans relating to the provision of mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans.

Insert the following text into the third paragraph of the Water Supply section on page 176:

It is noted that Irish Water's National Water Resources Plan is due to be prepared shortly and EMRA will engage fully with Irish Water in its preparation of same.

Amend description of Water Supply Project for the Eastern and Midlands Region contained in Table 10.1 to read:

The Water Supply Project for the Eastern and Midlands Region to supply water to *the Greater Dublin Area and other communities* in the EMRA including Athlone.

Amend RPO 10.9 to read:

EMRA supports the servicing of rural villages (serviced sites) to provide an alternative to one-off housing in the countryside, *in line with RPO 4.51.*

Insert new RPOs in section 10.2 under RPO 10.4 Water Supply:

RPO: Work closely with Irish Water to revise the Draft Investment Plan (2020- 2024) and subsequent investment plans to align the supply of water services with the settlement strategy and objectives of the EMRA Regional Spatial and Economic Strategy.

o Delivery and phasing of services shall be subject to the required appraisal, planning and environmental assessment processes and shall avoid adverse impacts on the integrity of the Natura 2000 network.

o Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Planning Authorities and demonstrate phased infrastructure led growth to meet demands on the water supply, suitability of new and/or existing drinking water sources (for example hydromorphological pressures) and prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.

RPO: Encourage the development of a new rural settlement investment approach, coordinating Irish Water, Local Authority, developer and community led solutions to ensuring that sustainable water services solutions are progressively implemented

RPO: Local Authorities and Irish Water should work together to examine significant raw water sources which may be made redundant by the Water Supply Project for the Eastern and Midlands Region with a view to reserving and protecting them for future back up or 'windfall' type economic development opportunities where high water use is required.

10.3 Energy

Summary of Issues

The ESB has submitted support for RPOs 10.14-10.19. The ESB also indicates support for the guiding principles for the facilitation of the provision of energy networks. A further submission of support for RPOs 10.14-10.19 was received.

Support has also been provided for the identification of the key importance of the North-South Interconnector.

A submission indicates that RPO 10.14 should be expanded to ensure less developed rural and lower order towns should develop a smart grid plan. The submission also calls for the support for the SMART Villages initiative.

A submission has indicated that there should be reference to supporting Bord na Mona in their transition from peat with reference being made to biomass.

One submission contains suggested RPOs relating to wind energy and renewable energy.

A submission from Gas Networks Ireland requests an amendment to RP 10.15 to include gas networks in relation to renewable energy.

Eirgrid have submitted that the importance of the grid is acknowledged as a strategic issue, and to ensure that RSES policies and objectives will support a safe, secure and reliable supply of electricity.

Another submission queries RPO 10.14 and who will be responsible for the roll out of Smart Grids and Smart Cities Action Plan. In relation to Energy Infrastructure, it is suggested that the RPOs should be extended to include energy infrastructure other than electricity such as district heating.

A submission indicates that the implementation of the RSES will require significant energy supplies but that this is not articulated in the Strategy.

Another submission indicates that the RPOs under section 10.3 do not reflect different renewable technologies, only offshore wind.

A submission indicates that the Guiding Principles on p180 relating to the provision of energy networks should be amended to ensure that regard is had to any future National Landscape and/or Seascape Character Assessment in the development planning and implementation of energy networks. It is suggested that the guiding principles should incorporate climate resilience and issues such as biodiversity.

Director's Response

In relation to the submission on RPO 10.14 it is considered that stage agencies and local authorities are best placed to provide for the delivery of smart grid plans for rural and lower order towns but that the Assembly would support same. No amendment is recommended.

In relation to the submission about wind energy and renewable energy, it should be noted that this area is addressed under Chapter 7 and has appropriate RPOs. No further amendment is recommended.

It is recommended to include reference to gas networks in RPO 10.15

In relation to electricity supply, it should be noted that section 10.3 explicitly refers to EirGrid's Grid Development Strategy. No further amendment is therefore recommended to RPO 10.15.

To ensure support for the roll-out of Smart Grids and to support Smart Cities development, it is considered that the narrative could be updated and cross referenced with relevant policy supports in Chapters 6- Economic Strategy and Chapter 7 – Environment.

District Heating and Decarbonising electricity generation is also addressed in Chapter 7- Environment, and would benefit from cross referencing.

In relation to the lack of reference to other renewables under section 10.3, it should be noted this section relates to energy infrastructure in the context of supply and demand. RPO 10.17 identifies the linkages of infrastructure to renewable energy proposals and is considered acceptable. Section 7.8 deals with decarbonising electricity generation and should be cross- referenced.

In relation to ensuring that regard is had to any future National Landscape and/or Seascape Character Assessment in the development planning and implementation of energy networks, it is recommended that the Guiding Principles on p180 be amended to reflect this.

Director's Recommendation

Amend RPO 10.15 to read:

“Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity *and gas* transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process”

Amend Guiding Principles relating to the provision of energy networks to include the following bullet point

- regard for any National or Regional Landscape/Seascape Character Assessment

and to add the following text to the second bullet point:

“and address issues of climate resilience, biodiversity, impact on soils and water quality”.

10.4 Waste Management

Summary of Issues

The Eastern-Midlands Regional Waste Office indicated that section 10.4 should be moved to Chapter 7 having regard to the Circular Economy.

A suggested RPO is provided

‘Development plans shall support the transition to a circular economy by identifying how waste will be reduced and by facilitating the use of materials at their highest value for as long as possible, in line with the circular economy’

A new section 10.4 is suggested and areas to be covered identified as disposal/recovery capacity, recycling infrastructure (recycling banks), CA sites and storage facilities for household/commercial bins.

A submission has indicated that RPO 10.20, relating to reduction of waste etc. is better suited to a Waste Management Plan rather than a Development Plan

Another submission indicates that further thermal treatment capacity than that envisaged in the Eastern Midland Regional Waste Management Plan will be required in the future.

Director’s Response

In relation to moving section 10.4, it is recommended that the infrastructure chapter is an appropriate location for waste management, however cross reference should be made to Chapter 7 – Environment, which addresses Circular Economy.

In relation to RPO 10.20, it is considered that Development Plans should be required to address the issue of waste and therefore it is an appropriate RPO. It is considered however that it could be amended to better address the issue of the circular economy.

In relation to the need for further thermal treatment capacity into the future, the Eastern-Midlands Region Waste Management Plan will be updated post 2021 and this is the appropriate mechanism to address any future/update thermal treatment capacity issues. RPO 10.20 could be amended to reference the Eastern-Midlands Region Waste Management Plan, and any update thereof to address this issue.

Director’s Recommendation

Amend RPO 10.20 to read:

Development Plans shall identify how waste will be reduced, in line with the principles of the circular economy, *facilitating the use of materials at their highest value for as long as possible* and how remaining quantum of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food *and shall take account of the requirements of the Eastern-Midlands Region Waste Management Plan.*

Chapter 11 All Island Cohesion

Submission Number(s)

0024(Newry, Mourne and Down District Council), 0071, 0109(Wicklow County Council), 0123(Louth County Council), 0127 (Department of Infrastructure Northern Ireland), 0141(Southern Regional Assembly),0142 (Northern and Western Regional Assembly) 0145 (Longford County Council), 0146 (Laois County Council), 0242, 0249, 0259, 0266(Wexford County Council), 0299, 0314, 0315.

Section 11.1 Introduction

Summary of Issues

There should be greater reference to cross regional objectives to adjoining regions and narrative on important intra-regional connectivity for example reference to the N80, the Barrow blueway and Lisheen Mine.

Director's Response

The Director welcomes positive joint working between the planning authorities in Northern Ireland and the Republic of Ireland, which will continue as part of the Cross-Border Development Plan Working Group.

The Director also welcomes ongoing engagement between Regional Assemblies to achieve cross regional objectives and recommends inclusion of additional narrative to highlight strategic cross border/inter-regional linkages – this is also addressed in a new sub section in Chapter 3 – Growth Strategy ‘Strategic Connectivity’.

Director's Recommendations

Update narrative to highlight strategic cross border/inter-regional linkages.

11.2 All Island Cohesion

Summary of Issues

Wide support for the vision and prominence afforded the Dublin Belfast corridor including the cross-border network of Drogheda, Dundalk and Newry. It is submitted that strategic position of Stamullen in Meath should be reflect in the strategy. It is also submitted that the Corridor should be extended to the wider Eastern Seaboard corridor as identified in Northern Ireland and Southern Regional Assembly strategies; extending from Larne to Rosslare Europort in Wexford, also highlighting the importance of sea port access to the island in a post Brexit scenario. The Dublin-Rosslare Corridor links the towns of Bray, Wicklow and Arklow, extending south Gorey, Enniscorthy and Wexford in the Southern Region.

Wide support for the cross border collaboration in the strategy and the support for the Dublin – Belfast Corridor in light of BREXIT. However any collaboration requires engagement from communities on both sides of the border and they should be consulted in the process. The final RSES should include detailed plans on how precisely the required cooperation and interaction will be operationally achieved post Brexit.

Enhanced support for local cross border business will be especially important post Brexit, and can be greatly helped by more joint/joined up and on-going consultation by the three local authorities with them and their local/regional representatives.

There is a requirement for appropriate structures and funding programmes for North – South cooperation.

RPO 11.1 should be extended to include economic growth.

There are a range of submissions that support the Dublin to Rosslare Corridor as an Economic Corridor from Dublin to the Rosslare Europort as part of a wider Eastern Economic Corridor with the Dublin Belfast Corridor Policy. Some submissions refer to the transport elements of the N11/M11 and rail as part of TEN-T or UNECE Route E01 designation. There is also requests for towns on this corridor to be referenced namely; Arklow, Gorey, Enniscorthy and Wexford

Director's Response

In preparation of the draft RSES the Assembly engaged with local authorities, state agencies and interest groups on both sides of the border and also analysed the policies and objectives of land use plans on both sides of the border, this all assisted in the formulation of the draft RSES.

Given that the RSES is both a spatial and an economic strategy it is reasonable to have any RPOs relate to both spheres where relevant, in the case of RPO 11.1 this is considered prudent.

The Director recommends in Chapter 3 Growth Strategy that;

The key elements of the Growth Strategy are revised to clearly demonstrate the interregional and cross border connections and movement corridors. This will be further enhanced by new mapping and narrative and expanded Growth Enablers. These changes are proposed to be made to the Growth Strategy to recognise the importance of these links to all-island cohesion.

The Director also recommends amendments to;

The Settlement Strategy in Chapter 4 to reflect the settlements that are key nodes in all island cohesion

The Connectivity Chapter 8 to reference the TEN-T ports, rail and road network, in particular Dublin-Rosslare Europort and the significance of airports whose catchment extends into parts of our region.

Director's Recommendation

Amend RPO 11.1 to include 'economic growth'

Update narrative to reflect proposed recommendations in the Growth Strategy, Settlement Strategy and Connectivity Chapter.

Chapter 12 Implementation and Monitoring

Submission Number(s)

0088, 0117(South Dublin County Council), 0145 (Longford County Council), 0146 (Laois County Council), 0214, 0235, 0254(DLR County Council), 0278(DAA) 0279, 0316.

Summary of Issues

Monitoring of local authority performance in implementing RSES and the environmental impact should be part of the RSES. One submission suggests this could be performed by an environmental sub group of the Implementation Group.

Several agencies and interest groups have requested a place on the implementation groups, there is also a request for a representative of the other two regional assemblies on the implementation group.

The RSES implementation group should establish a set of metrics and parameters to monitor and measure the implementation of the RSES, suggestions include housing delivery, housing and commercial delivery on brownfield, job numbers, vacancy levels, transport emissions, transport mode share, journey times to work, percentage of brownfield and infill development and CSO environmental accounts.

No indicators are specified in the Strategy itself and those set out in the Strategic Environmental Assessment Report are poorly thought out and unclear. The SEA environmental report states “It is noted that this monitoring proposal will only be finalised following consultation to allow stakeholders the opportunity to suggest targets and indicators which they feel better represent the environmental receptor and/ or better track progress in achieving objectives.”

The MASP technical working group (TWG) that prepared the MASP with the regional assembly should continue, even on an interim basis and in advance of any implementation groups being established.

There should be a separate governance body for the delivery and implementation of the MASP for the Dublin metropolitan area.

There should be new or separate governance bodies for Drogheda, some suggestions are a recast Town Council on a cross regional city scale body.

Director’s Response

The Regional Assembly has a statutory function under section 22 of the Planning and Development Act on the reporting of development plan reviews and variations and this will be part of the function of implementation of the RSES over the first two years – ensuring consistency between city/county level and regional policy.

There is a statutory monitoring and reporting aspect of the RSES to occur two years after adoption, the RSES commits the Assembly to a more active monitoring role with the establishment of an evidence baseline that is regularly updated. It will be a function of the implementation group to establish the indicators for measurement that are aligned with the regional strategic outcomes of the RSES. This will follow on from the work carried out in the early stages of the RSES process including the socio-economic baseline reports. This will be performed in an iterative fashion with the SEA monitoring function.

The membership of the implementation group is a matter for the Assembly, it should contain representative from all the key stakeholders who are involved in the formulation of the RSES and more importantly in the implementation of the RSES.

The MASP TWG was tasked to assist the Assembly in preparing the draft MASP it is expected that all these stakeholders will have their organisations represented in the implementation group and play a key role in the delivery of the objectives of the MASP.

The governance matters for urban areas are not a function of the RSES, there are ongoing governance discussions at national level for the five metropolitan areas, and some of the regional growth centres. The Assembly will coordinate delivery and drive implementation through the existing structures of the Assembly and the proposed MASP and RSES implementation group.

Director's Recommendation

No further amendment is recommended.

13. Appendices

Submission Number(s)

0106 (Wicklow County Council), 0245(Meath County Council)

Appendix 2

Summary of Issues

Submissions call for the table for Strategic Planning Areas (SPAs) and County Population Tables to include an additional column where the 25% headroom is applied to the population figures.

Director's Response

The DHPLG Circular FPS04/2018 – Implementation Roadmap for the National Planning Framework, sets out the provision for headroom to be applied in certain cases. The application of this headroom is for local authorities in the preparation of the core strategy in their development plan and is not a function of the Assembly or the RSES.

Director's Recommendation

No further change recommended.

14. SEA/SFRA/AA

Submission Number(s)

0206(OPW), 0244 (Northern Ireland Environment Agency), 0235, 0248(EPA)

Summary of Issues

It is acknowledged the extent that the recommendations and mitigations of the SEA Environmental Report have been reflected in the RSES and the RPOs and RPO 3.4 in particular.

It is recognised that the draft RSES and the Regional Flood Risk Assessment has considered climate change may increase risk of flooding in the future and it is welcomed that this is demonstrated in the Option C of the Climate Scenarios in the preferred Growth strategy Scenario.

One submission contends that the Strategic Environmental Assessment (SEA) Environmental Report, in line with the obligations of both the 2015 Climate Act and the SEA Directive, must estimate the greenhouse gas emissions which will result from implementation of the Strategy. The work of the EPA on national emissions and of CODEMA on Dublin emissions make this practical. What is particularly important for giving effect to both legal obligations is the comparative analysis of different emissions levels which would result from alternative strategies or alternative elements of the Strategy.

The draft Strategy and SEA Report should carry out a quantitative analysis of greenhouse gas emissions from the Region and the different emissions levels which would result from alternatives.

Director's Response

The comments in submissions related to SEA/AA/RFRA will be included in the iterative environmental assessment of the formulation of the RSES for the region. In the event that material amendments are proposed, these will be subject to environmental assessment and there will be a further four-week consultation period for engagement on these matters. This is reflective of all stages of the RSES process which are fully compliant with the statutory requirements of Strategic Environmental Assessment (SEA) legislation.

The Assembly is strongly committed to the principle of evidence-based policy making 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. There is a requirement for lead in time to specify and recalibrate the model for the regional scale and to determine the correct inputs and outputs that will deliver a robust assessment. Following adoption of the RSES it is recommended that the regional transport emissions assessment 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.

It should be noted that the Director recommends amendments to the RSES Chapter 7 – Environment based on SEA submissions.

Director's Recommendation

No changes.

15. Miscellaneous

Submission Number(s)

0005, 0008, 0085, 0087, 0095, 0098, 0101, 0103, 0107, 0108, 0109, 0110, 0111, 0113, 0114, 0137, 0139, 0198, 0211, 0235, 0237, 0257, 0258, 0281, 0284, 0290.

Summary of Issues

Health and Safety policy should be embedded in planning policy and the RSES should include reference to COMAH Regulations, a list of notified establishments and consultation distances to these sites mapped.

The draft RSES should be in Irish and the final RSES should be published in Irish

That work on RSES be suspended pending outcome of BREXIT negotiations. In light of the significance being placed on the development of a Dublin Belfast corridor and the specific growth objectives outlined for Drogheda and Dundalk, it might be judicious to wait outcome of BREXIT negotiations in order that implications for this strategy can be assessed.

One submission challenges the performance of local authorities and An Bord Pleanála.

The recommendations of the Drogheda Boundary Commission should be continued in the RSES and a new governance structure set up for Drogheda.

Director's Response

Health and Safety policy requirements are related to site specific land use policy that would be included in development plans and other land use plans. The RSES is not required to repeat all legislation, policy and guidelines that pertain to these land use plans, compliance with these is a matter for the planning authority when making such plans.

The final RSES when it is adopted by the Assembly will be available in Irish

It is not the function of the RSES or the Regional Assembly to challenge the performance of planning authorities that will be fulfilled by the recently established Office of the Planning Regulator.

The governance for all the Regional Growth Centres is a matter for DHPLG and national government not the Regional Assembly.

Director's Recommendation

No change

Site specific submissions

Summary of Issues

Proposal for lands at Gormanstown to be rezoned from A2 to A in the Meath County Development Plan.

Proposals for lands at Walshestown, Newbridge to be zoned residential in the Kildare County Development Plan.

Proposals for a site at Kilcarn in Navan to be zoned residential in the Meath County Development Plan.

Proposals for lands at Carrick Road Dundalk to be zoned residential in the Louth County Development Plan.

Proposals for a Strategic Development Zone at Hilltown County Meath and subsequent zonings in the Meath County Development Plan.

Proposals for an SDZ in Drogheda

Proposals for lands at Kiltarnan to be zoned residential in the Dun Laoghaire Rathdown County Development Plan

Proposals for missed use and residential zoning on a site in Central Park Sandyford.

Proposals for sites at Sites in Carrickmines, Brennanstown Road to be zoned residential.

Proposals for lands in north Drogheda to be stated for development under Drogheda Regional Growth Centre

Proposals for lands in south Drogheda to be stated for development under Drogheda Regional Growth Centre

Lands in Termonfeckin County Louth for residential development (not services sites)

Lands at Newhall near the M7 junction, Naas to be zoned for space extensive less, intensive employment uses, relocated outside of the M50.

Lands at Barrymore Athlone in County Roscommon for a mix of low density residential development

Proposals for lands a newlands cross to be included in the MASP

Proposals for additional lands adjacent to and part of the Adamstown SDZ to be zoned for development.

Proposals for a site at Bettystown to be zoned residential in the Meath County Development Plan.

Proposals for a site Donnycarney Co. Meath

Proposal for lands at Kilcullen

Proposals for lands in Kilcock

Director's Response

In relation to the site specific requests for sites, opportunities or landbanks detailed above, it is considered that the zoning of lands, or identification of lands as suitable for development is not generally appropriate at the scale of an RSES. This is a function for the local authority set within the context of the strategic guidance and policies set down in the RSES and will be considered during the process of reviewing and / or varying development plans.

The designation of a Strategic Development Zone is a consideration by government that a site is of national economic or social importance to the state, it is not a function of the RSES to designate under this legislation.

Director's Recommendation

No changes.

Appendix 1 – List of Submissions received on draft RSES

Reference No.	Forename	Surname	Organisation
0001	Anthony	Tobin	None
0002	Kathryn	Reilly	Irish Heart Foundation
0003	Cllr Tommy	Cullen	Wicklow County Council
0004	Cllr Tommy	Cullen	Wicklow County Council
0005	Dr. Sharon	McGuinness	Health and Safety Authority
0006	Pauline	Byrne	Brady Shipman Martin on behalf of Drogheda Port Company
0007	Eanna	O Croinin	Comharchumann Ráth Chairn
0008	Fergal	MacCabe	None
0009	Noel	French	Local Representative
0010	Michael	Nevin	Longford County Council
0011	Owen	Byrne	None
0012	Brian	Gilmore	Cement Manufacturers Ireland
0013	Brian	Wylie	Iarnród Éireann
0014	Eamonn	O'Reilly	Dublin Port Company
0015	Dermot	Kelly	None
0016	Tara	Spain	Transport Infrastructure Ireland
0017	John	Conroy	Intel Ireland
0018	Tony	Buckley	None
0019	Colette	Colgan Fennessy	Firhouse Community College
0020	Ciaran	McPhillips	None
0021	Wes	Kenny	None
0022	Kevin	Mullan	Enfield Post Primary Group
0023	Barry	Healy-Cunningham	None
0024	Liam	Hannaway	Newry, Mourne and Down District Council
0025	Roisin	Bermingham	None
0026	Robert	Collins	None
0027	Deborah	Gil	None

0028	Simon	Jewell	Knocklyon Network
0029	Bernadette	Jermyn	Residents Association (KOBRA)
0030	Patricia	Barry	None
0031	Loretta	Fermor	None
0032	Sarah	McConnell	None
0033	Louise	Purcell	The Park Community Centre
0034	Brian	Ward	AIB
0035	Niamh	Murray	None
0036	Miriam	Faure	None
0037	Paddy	McDonnell	None
0038	Clare	McBride	None
0039	Anne	Woulfe	None
0040	Paula	Srivastav	None
0041	Gareth	Evans	None
0042	Roisin	O'Dea	None
0043	Sean	Jennings	Knocklyon Residents Association
0044	Aisling	Kenny	None
0045	Jonathan	Flood	Dodderbrook Residents Association
0046	Mairin	Carroll	None
0047	Simon	O'Riordan	None
0048	Niamh	Murray	None
0049	Kathleen	Duffy	None
0050	Cathy	Quinn	None
0051	Barbara	Murphy	Oakdale Residents
0052	Roisin	Barrett	None
0053	Maeve	Loughnane	None
0054	Alice	Manning	None
0055	Anthea	Lacchia	UCD
0056	Una	Hennessy	None
0057	Michelle	Harrison	None
0058	Carla		None
0059	Pat	Walsh	None

0060	Emma	Freeley	None
0061	Deborah	Gil Alvarez	None
0062	David	Gibbons	None
0063	Audrey	Caulfield	None
0064	Aisling	Quinn	None
0065	Sarah	Griffin	None
0066	Lynda	Irwin	None
0067	Sue	O'Grady	Knocklyon Network
0068	Carol	Gleeson	None
0069	Oliver	Allen	Knocklyon Residents Association
0070	Nikki	Condron	None
0071	Anthony	Soares	Centre for Cross Border Studies
0072	Michele	Crossan	None
0073	Cathy	O'Cleirigh	None
0074	Fergal	Scolard	None
0075	Cllr Enda	Flynn	Meath County Council
0076	Catherine	Harty	None
0077	Desiree	Bardini	None
0078	Jen	Sinnamon	None
0079	Kathy	Cahill	None
0080	Simon	Cahill	None
0081	Rita	Kelly	None
0082	Eimear	O'Callaghan	None
0083	Colette	Kinsella	None
0084	Iwan	Thomas	None
0085	Ann	Mulcrone	Reid Associates
0086	Lewis	Rainsberry	None
0087	David	Mulcahy	David Mulcahy Planning Consultants Ltd
0088	Adrienne	Michel-Long	None
0089	Helen	Howes	County Wicklow PPN
0090	Janet	Bolger	None
0091	Rhenda	Sheedy	None

0092	Aoife	O'Connor-Massingham	Declan Brassil & Company Limited on behalf of Westin Homes, Greenfield, Maynooth, Kildare
0093	Geraldine	Fahy	Ger Fahy Planning
0094	Hubert	Fitzpatrick	Construction Industry Federation
0095	Geraldine	Fahy	Ger Fahy Planning
0096	Padraig	Fleming	Laois County Council
0097	Tara	Spain	Transport Infrastructure Ireland
0098	Paul	Monahan	Monarch Properties
0099	Niall	Kierans	Love Drogheda
0100	Tom	Kelly	Meath County Council
0101	John	Spain	John Spain Associates on behalf on Hibernia REIT plc
0102	Mairead	Flanagan	Firhouse and Bohernabreena Community Network
0103	Geraldine	Fahy	Ger Fahy Planning
0104	Sean	Laffey	Irish Water
0105	Michelle C	Carney	On behalf of Chief Executive of Roscommon CoCo, Mr Eugene Cummins.
0106	Frank	Curran	Wicklow County Council
0107	N/A	Jackson	John Spain Associates
0108	N/A	Green Property REIT Ventures DAC	John Spain Associates
0109	N/A	Park Developments	John Spain Associates
0110	N/A	Ronan Group Real Estate and Colony Capital	John Spain Associates
0111	Rory	Kunz	John Spain Associates on behalf of David Hickey Properties
0112	N/A	Rockture 1 Limited	John Spain Associates
0113	N/A	Crylock Developments Ltd	John Spain Associates
0114	N/A	Hugh McGreevy & Sons and Tierra Ltd	John Spain Associates

0115	Pat Eugene	Gallagher Cummins	Westmeath CoCo/Roscommon CoCo
0116	Joanne	Lyons	Department of Culture, Heritage and the Gaeltacht
0117	Daniel	McLoughlin	SDCC
0118	Aoife	O'Connor	Declan Brassil & Co Chartered Planning Consultants on behalf of Westin Homes and the Estate of Peter Twomey
0119	Derek	Noonan	Department of Communications, Climate Action and Environment
0120	Cathaldus	Hartin	Westmeath County Council on behalf of Cathaoirleach, Cllr John Dolan and members.
0121	Simon	Wallace	Kildare County Council Parks Section
0122	Cllr Dolores	Minogue	Cllr for Ardee Co. Louth
0123	Terence	Loane	Louth County Council
0124	Andrea	McAuliffe	McCutcheon Halley Planning Consultants on behalf of Margaret Dineen and Gerard Greene
0125	Cllr Francis Noel	Duffy	Green Party Ireland
0126	Padraic	Dempsey	MSP Section Department of Housing, Planning and Local Government
0127	Angus	Kerr	Dept for Infrastructure NI
0128	Pat	O'Suilleabhan	Bray Chamber of Commerce
0129	Sean	Fleming TD	Public Representative
0130	Niall	Mulligan	Coughlan Engineering on behalf of Tullamore & District Chamber of Commerce
0131	Luke	Wymer	John Spain Associates on behalf of Kimpton Vale Limited
0132	Cllr Noel	French	None
0133	Raymond	O'Malley	Kiaran O'Malley & Co. Ltd on behalf of Ms. Jane Tripp and Ms. Rita Shah
0134	Mieke	Vanfleteren	None

0135	Charlie	Flanagan TD	Minister for Justice and Equality
0136	Cllr. Naoise	Ó Cearúil	Kildare County Council
0137	Judith	Horgan	Stephen Ward Town Planning & Development Consultants Ltd J. Murphy Developments/Ravala Limited
0138	Judith	Horgan	Stephen Ward Town Planning & Development Consultants Ltd J. Murphy Developments/Ravala Limited
0139	Judith	Horgan	Stephen Ward Town Planning & Development Consultants Ltd J. Murphy Developments/Ravala Limited
0140	Judith	Horgan	Stephen Ward Town Planning & Development Consultants Ltd J. Murphy Developments/Ravala Limited
0141	David	Kelly	Southern Regional Assembly
0142	Marie	Moriarty	Northern & Western Regional Assembly
0143	Louise	Lennon	Irish Rural Link
0144	William	Parnell	Department of Rural and Community Development
0145	Paddy	Mahon	Chief Executive Longford County Council
0146	Angela	McEvoy	Laois County Council, Aras An Chontae, Portlaoise, Co. Laois
0147	Alan	Dunney	Eastern and Midland CARO
0148	Sinead	O'Connor	Declan Brassil & Co Chartered Planning Consultants on behalf of Groveview Limited
0149	Mary	Molloy	None
0150	Fred	Logue	Julianstown and District Community Association
0151	Cllr. Gerry	Walsh	Greystones Municipal District
0152	Brian	Field	Knocklyon Network

0153	Judy	Osborne	Judy Osborne - Independent planner
0154	Cllr. Sharon	Tolan	Peace commissioner/Laytown-Bettystown Municipal District/Meath county council
0155	Cllr. Seamie	Moore	Kildare CoCo and Naas Municipal district
0156	Michael	Daly	None
0157	Cllr. Darren	O'Rourke	8 Sinn Fein councillors in Co. Meath
0158	Orala	Daly	None
0159	Cllr. Sean	Drew	Meath County Council Cllr.
0160	Cllr. Suzanne	Doyle	Kildare County Councillor
0161	Caroline	Creamer	International Centre for Local and Regional Development
0162	Cllr. Sarah	Reilly	Meath County Council Cllr.
0163	Ian	O'Flynn	Gas Networks Ireland
0164	Rory	Kunz	John Spain Associates on behalf of Glenveagh Properties Plc
0165	Gabby	Mallon	DLR Chamber of Commerce
0166	James	Leonard	Castlethorn Construction Unlimited Co.
0167	Mary	Collins	None
0168	Hugh	Clarke	None
0169	Janet	Perneel	None
0170	Cllr Damien	O'Reilly	Ratoath Municipal District, Meath County Council
0171	Barry	Heeney	Brock McClure Planning & Development Consultants on behalf of Swanhall Ltd
0172	Tomàs	Bradley	EirGrid Group
0173	Marlene	Mullen	None
0174	Joe	Corr	Irish Planning Institute
0175	Donna	Gartland	Codema, Dublin's Energy Agency

0176	Anthony	McNamara	Climate Action Regional Office - Environment & Transportation Dept
0177	Mudit	Kapoor	None
0178	Kevin	Dillon	Fianna Fáil
0179	Enrique	Hermo Echevarrieta	Green Party
0180	Angela	Smith	Enfield Development Group
0181	Aidan	Maher	None
0182	Deirdre	O'Connor	NAMA - National Asset Management Agency
0183	Tomas	Carthy	Firhouse CC
0184	Carol	O'Reilly	Department of Transport, Tourism and Sport
0185	Pat	McCormick	Dundalk Chamber of Commerce
0186	Matthew	McRedmond	Brock McClure Planning & Development Consultants on behalf of Makros Limited
0187	Alan	Bannon	McCarthy Keville O'Sullivan Ltd. Planning & Environmental Consultants on behalf of Mr. Tony Diskin
0188	Paula	Galvin	McCutcheon Halley Chartered Planning Consultants on behalf of Doyle Shipping Group
0189	Sinèad	O'Connor	Declan Brasil & Co Chartered Planning Consultants on behalf of Kingsbridge Consultancy Ltd
0190	Michael	O'Dowd	North East Regional Skills Forum
0191	Brian	Hughes	Brady Hughes Consulting on behalf of Shannon Homes (Drogheda) Ltd
0192	Peter	Minnock	Kildare County Council
0193	Paul	Monahan	Pantera holdings Ltd
0194	John	MacNamara	Bord NaMona
0195	Cllr. Gerry	O'Connor	Raoath Mucipal District, Meath County Council

0196	Emer	Sexton	McCutcheon Halley Chartered Planning Consultants on behalf of Hallmark Building Services Ltd
0197	Cian	Hunter	None
0198	Denis	Baker	IWAI Nav Watch Group
0199	Bronagh	Clarke	Stephen Ward Town Planning & Development Consultants Ltd on behalf of Dundalk Grammar School
0200	Caroline	Creamer	All Ireland Smart Cities Forum
0201	Kenneth Craig	Bishop	Wicklow Planning Alliance
0202	Philip	Connolly	ERVIA
0203	Paula	McCaul	County Meath Chamber
0204	Cllr. Kenneth	Flood	Drogheda Sinn Féin
0205	Patrick	Little	Midlands Airport Developments Ltd
0206	Mark	Adamson	OPW
0207	Arpita	None	None
0208	Conor	Patterson	Newry & Mourne Co-operative & Enterprise Agency
0209	Ambrose	McLoughlin	Ashbourne Branch Fine Gael
0210	Robert	Molloy	Technological University Dublin 1st Year Planning & Environmental Management Course
0211	Dr. Richard	Webb	Wicklow Planning Alliance
0212	Rory	Kunz	John Spain Associates on behalf of Davy Hickey Properties, 27 Dawson Street
0213	Allan	Shine	County Kildare Chamber
0214	Hannah	Hamilton	Irish Forum on Natural Capital Ireland
0215	Mary	Mac Sweeney	Dublin City Council
0216	Oonagh	Duggan	BirdWatch Ireland
0217	Meadhbh	Watson	None
0218	Mark	Mahon	Edenderry Municipal District , Offaly County Council

0219	Leah	Kenny	RPS Group Ltd. On behalf of Sky Castle Limited
0220	Jean	Dempsey	SteriPack Group Ltd
0221	Dr Anne	Cusack	Chair of the Steering Committee for Midlands Regional Enterprise Plan to 2020
0222	Michael	Higgins	RPS Consulting UK & Ireland on behalf of Millennium Properties Limited Partnership
0223	Shane	Dineen	Fáilte Ireland
0224	Tom	Shanahan	Offaly County Council
0225	Gerard	Crowley	Electricity Supply Board (ESB)
0226	Stephen M.	Purcell	Future Analytics On behalf of Tri-Aviation Project Co. Ltd
0227	Nathan	Smith	McCutcheon Halley CHARTERED PLANNING CONSULTANTS on behalf of Legendstar Ltd
0228	Peter	Monahan	dryiceenergyireland
0229	Donna	Gartland	Irish Distrit Energy Association - IrDEA
0230	Tom	Hyland	Mullingar Chamber of Commerce
0231	Regina	Doherty TD	Department of Employment Affairs and Social Protection
0232	Bruce	Crehan	KEAA (Kilcloon Environmental Action Association)
0233	Cllr Pàdraig	McEvoy	Independent Councillor & Peace Commissioner, Maynooth Municipal District, Kildare CoCo
0234	Cllr. Anne	Campbell	Louth County Council on behalf of Sinn Fèin Dundalk
0235	Eamonn	Ryan TD	Green Party Ireland
0236	Louis	Wildenboer	ERMS Planning Consultants on behalf of Patrick Molloy
0237	Stephen M.	Purcell	Future Analytics On behalf of Kayfoam Woolfson, trading as Kaymed
0238	Sinead	O'Malley	Coillte

0239	Roger	Garland	Keep Ireland Open
0240	Cllr Fiona	McLoughlin-Healy	None
0241	Leah	Kenny	RPS Group Ltd on behalf of Killeen Properties Ltd. and Sword Partnership
0242	Jennifer	Wallace	Ibec-CBI on behalf of the Joint Business Council
0243	David	Connolly	Irish Wind Energy Association
0244	Georgina	Thurgate	DAERA
0245	Louise	Heeney	Meath County Council
0246	Michael	MacAree	NTA - National Transport Authority
0247	Stephen M.	Purcell	Future Analytics On behalf of Destination Athlone
0248	Tara	Higgins	Environmental Protection Agency
0249	Lisa	O'Kane	Northern Ireland Local Government Association (NILGA)
0250	Stephen M.	Purcell	Future Analytics On behalf of FINGLAS MCKEE PROPERTIES/SIGMA GROUP, DAVID HAYDE PARTNERSHIP AND KSG GROUP
0251	Aidan	Browne	Dundalk Institute of Technology
0252	Breannán	Casey	The Mill – Drogheda's Enterprise Hub
0253	Peter	Andrews	RIAI – The Registration Body for Architects in Ireland
0254	Mary	Henchy	DLR County Council
0255	Simon	Bradshaw	GVA on behalf of Tesco Ireland
0256	Peter	Judge	Sinn Fein for Moate Local Electoral Area
0257	Geoff	Fitzpatrick	Love Drogheda (submission No 2)
0258	Nathan	Smith	McCutcheon Halley Chartered Planning Consultants on behalf of Ebbertson Ltd
0259	Catherine	Joyce O'Caollai	Indaver Ireland Ltd & UK
0260	Anthony	Moore	Fianna Fáil Local Election Candidate

0261	Sheila	Convery	UCD School of Architecture, Planning and Environmental Policy
0262	Eoghan	O'Mara Walsh	Irish Tourism Industry Confederation
0263	Joseph	Cummins	DBEI, Enterprise Ireland and IDA Ireland
0264	Tara	Buckley	RGDATA
0265	Doireann	Nì Cheallaigh	An Taisce - The National Trust for Ireland
0266	Deirdre	Kearns	Wexford County Council
0267	James	Byrne	Fianna Fáil
0268	Hugh	Coughlan	Eastern-Midlands Regional Waste Office c/o DCC Environment & Transportation Department
0269	Róisín	Burke	Fingal County Council
0270	Kevin J	Halpenny	Irish Landscape Institute
0271	Sean	O'Leary	Climate Adaptation, Soils, GMOs and Chemicals Division in the Department of Communications, Climate Action and Environment.
0272	Tony	Ewbanks	EHP Services
0273	Meadhbh	Nolan	Future Analytics On behalf of Cairn PLC
0274	Fiona	O'Loughlin TD	Public Representative
0275	Helen	Rice	Celbridge Community Council
0276	Jane	Roche	DAA plc
0277	David	Howard	Property Industry Ireland
0278	Colm	Ryder	Cyclist.ie
0279	Fergus	Sharpe	Dublin Chamber of Commerce
0280	Cllr Maria	Murphy	Member Meath County Council
0281	Brian	Hughes	On behalf of Drogheda City Status Group
0282	Fergus	O'Dowd TD	Public Representative
0283	Karen	O'Reilly	SSE
0284	Cormac	Bohan	Drogheda Chamber of Commerce

0285	Maria	Graham	Department of Housing, Planning & Local Government
0286	Thomas	Byrne TD	Public Representative
0287	Cllr Paddy	Meade	Meath County Council - Elected Member
0288	Cllr Mark	Dearey	Member Louth County Council
0289	Tina	Raleigh	Statkraft Ireland
0290	Jim	Keogan	McCutcheon Halley Chartered Planning Consultants on behalf of McGarrell Reilly Group (Kilcock and Environs, County Meath)
0291	Cllr Rob	Power	Member Kildare County Council
0292	Martin	Heydon TD	Chairman Fine Gael Parliamentary Party
0293	Cllr Brendon	Young	Kildare County Council
0294	Jim	Keogan	McCutcheon Halley Chartered Planning Consultants on behalf of McGarrell Reilly Group (Stamullen, County Meath)
0295	Nathan	Smith	McCutcheon Halley Chartered Planning Consultants on behalf of Codliss Developments Ltd
0296	Koen	Verbruggen	Geological Survey Ireland
0297	Stephen M.	Purcell	Future Analytics On behalf of Weston Airport
0298	Brian	Hanratty	Drogheda City Status Group (DCSG)
0299	Aidan	Sweeney	Ibec
0300	Shona	McManus	Osborne
0301	Cllr Colm	Markey	Member Louth County Council
0302	Kenneth	Russell	None
0303	Cllr Alan	Tobin	County Meath Councillor representing the Ashbourne Municipal District & Chairperson of the Planning, Economic Development and Enterprise SPC
0304	Cllr Paul	Bell	None

0305	Gilbert	Power	The Fingal Council Climate Action Team
0306	Joe	Buckley	North Kildare Branch of the Green Party
0307	Pranash	Ramanundh	Lioncor Developments
0308	John	Coleman	LDA - Land Development Agency
0309	Jill	Fannin	Department of Education and Skills
0310	John	O'Hara	Dublin City Council
0311	Sarah	Bell	UPS
0312	Declan	Breathnach TD	Public Representative
0313 Late submission	Sonja	Maurus	Department of Agriculture, Food and the Marine
0314	Aoife	O'Connor	Declan Brassil & Co. Chartered Planning Consultants on behalf of Meath South East Chamber
0315 Late Submission	Richard	Manton	Engineers Ireland
0316 Late Submission	Louise	Lennon	Irish Rural Link