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Eastern & Midland Regional Assembly,
3rd Floor North,
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Ballymun,
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11 April 2019

TII18-102716

Re: Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region

Dear Mr Conway,

TII wishes to acknowledge receipt of the material amendments to the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region. TII notes that a significant amount of work has been undertaken to improve the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region to facilitate a realistic development framework for the Region for the implementation of the Government's Project Ireland 2040. The following comments are provided for the consideration of the Assembly:

A. ROAD SCHEMES

M50 Dublin Port South Access

Under amendments 70 and 114, it is also observed that the M50 Dublin Port South Access scheme has been omitted.

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

The M50 Dublin Port South Access Scheme (previously referred to as the South or Southern Port Access Route) will be progressed through pre-appraisal and early planning in accordance with the requirements of Project Ireland 2040.

The following national, regional and local policies relates to the M50 Dublin Port South Access Scheme:

1. Project Ireland 2040's National Planning Framework recognises under National Strategic Outcome No. 6: *High-Quality International Connectivity* the need to improve land transport connections to the major ports and airports and includes the following infrastructure objective:
*"Improve land transport connections to the major ports including:
Facilitating the growth of Dublin Port through greater efficiency, limited expansion into Dublin Harbour and improved road access, particularly to/from the southern port area;.."*

This infrastructure objective is supported by the provisions in the National Development Plan (Page 41) under NSO2 “Enhanced Regional Connectivity” which identifies the M50 Dublin Port South Access Road as a project to be brought forward through the pre-appraisal and early planning phases.

2. The following references are made in respect of the Eastern Bypass in Section 5.8.1. “National Roads” of the NTA Transport Strategy for the Greater Dublin Area 2016-2035:

*“Development of a road link connecting from the southern end of the Dublin Port Tunnel to the South Port area, which will serve the South Port and adjoining development areas;.....
.....In the case of the Eastern Bypass, while the section of the route from the Dublin Port Tunnel to the South Port area is included for delivery in this Strategy, the remainder of the route is not proposed for development during the Strategy period. However, the retention of a route corridor for this scheme is recommended, to facilitate the possible future use of the corridor for transport provision.”*

3. The Dublin City Development Plan (2016- 202) includes the following objective in respect of the Eastern Bypass within Chapter 8 Movement & Transport:

“MTO32: To protect the routes of the proposed Eastern By-pass from Dublin Port existing Tunnel to Poolbeg, and in the longer term to provide a route corridor between Poolbeg and the Southern Cross/South East Motorway (in accordance with the NTA Study for the Greater Dublin Area 2016-2035) , also referred to as the Southern Port Access Route. The preferred route for DCC is by means of a bored tunnel, under Sandymount Strand and Merrion Strand.”

This objective is further expanded upon in Chapter 15 Strategic Development and Regeneration Areas: Guiding Principles for Development. Section 15.1.1.7 states the following under the Movement / Transport heading:

“To allow for the extension of the Luas, the eastern bypass and southern port access route (in accordance with NTA Transport Strategy for the Greater Dublin Area 2016- 2035) and provision of regular bus service from the city to the Docklands area including out to the Poolbeg Peninsula.”

4. TII would also refer to the need to protect road schemes in accordance with Section 2.9 of the DOECLG’s Section 28 Statutory Guidance Spatial Planning and National Road Guidelines for Planning Authorities 2012. The Guidance indicates that development objectives must not compromise the route selection process, particularly in circumstances where road scheme planning is underway and potential route corridors or upgrades have been identified and brought to the attention of the planning authority. This is especially important with regard to overall policies and priorities which have been determined by Government, in the NDP and other relevant official policies.

Taking account of Government, NTA and Dublin City Council policies highlighted, Transport Infrastructure Ireland is of the opinion that the omission of the M50 Dublin Port South Access within the Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy is at variance with:

- i. Project Ireland 2040’s National Planning Framework and National Development Plan,
- ii. DOECLG Section 28 Statutory Guidance Spatial Planning and National Road Guidelines for Planning Authorities 2012,
- iii. NTA’s Transport Strategy for the Greater Dublin Area 2016 – 2035,
- iv. Dublin City Dublin City Development Plan (2016- 2022).

The resolution of this issue should be addressed prior to the adoption of Regional Spatial and Economic Strategy for the Eastern and Midland Region to meet these policy requirements.

Non Project Ireland 2040 Road Schemes

TII notes a number of road schemes identified in the Regional Spatial and Economic Strategy for the Eastern and Midland Region are not included in the Project Ireland 2040 National Development Plan nor in the NTA's Transport Strategy for the Greater Dublin Area. TII advises that clarification is required for the status and nature of these schemes prior to the adoption of Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Recommendation Road Schemes: Amendments 70 and 114.

It is recommended that the list of all road projects included in the text be reviewed, and checked within the context of the delivery of the National Development Plan and also the NTA's Transport Strategy for the Greater Dublin Area. This would involve correction and further clarifications in the final text.

With regard to these current amendments this would involve the correction of amendments 70 and 114 to include M50 Dublin Port South Access in accordance with existing national policy, official statutory guidelines, the NTA Transport Strategy and local authority development plan policy.

Resolution of the foregoing should be addressed prior to the adoption of Regional Spatial and Economic Strategy for the Eastern and Midland Region.

B. URBAN AREA PLAN (UAP) IN REGIONAL GROWTH CENTRES

TII notes the inclusion of amendments in the preparation of Urban Area Plans (UAP) within Regional Growth Centres. With regard to the preparation of these plans, the Draft RSES is unclear with regard to the status of these plans, in particular, to the statutory basis, and stakeholder engagement. Given the importance, complexity and requirements for the Regional Growth Centres and key towns, it would be expected that these plans would form part of a statutory plan to inform the relevant development, local area plans, retail strategies, etc. required for these critical centres.

TII would also highlight in relation to national roads, that engagement with the Authority to facilitate appropriate transport assessment and inform planning objectives would be critical to the Urban Area Plans concerned. TII, therefore, request written clarification in the finalised RSES addressing the preparation and subsequent status of these plans and proposals to ensure the integration of land use and transport planning in their preparation.

The following provides TII's text suggestions (in red) which are considered non-material:

Recommendation: Urban Area Plan (UAP)

- Requirement to define Urban Area Plan (UAP) to indicate statutory status, stakeholder/statutory consultee engagement, public consultation and inputs into future plans.

Amendment no: 6. Amend New Growth Enablers for the Region....

.....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 **statutory** Urban Area Plans (UAPs).

Amendment no 17. Amend RPO 4.4 – Athlone

A **statutory** cross-boundary Joint Urban Area Plan (UAP) shall be prepared by Westmeath County Council and Roscommon County Council in collaboration with the two Regional Assemblies to provide a coordinated planning framework for the future physical, economic and social development of Athlone **consistent with official policy objectives**. The Joint UAP shall.....

Amendment no 23. Amend RPO 4.8 - Drogheda

A **statutory** cross-boundary Joint Urban Area Plan (UAP) shall be prepared by Louth County Council and Meath County Council to provide a coordinated planning framework to identify and deliver strategic sites.

Amendment no 25. Amend RPO 4.15 – Dundalk

A **statutory** Urban Area Plan (UAP) shall be prepared by Louth County Council for Dundalk to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of the town to ensure targeted compact growth of a lands..

Amendment no 61. Amend RPO 4.49 – Graiguecullen-Carlow

A cross-boundary Joint Local Area Plan (LAP) shall be prepared for Carlow by Carlow County Council and Laois County Council having regard to its location within the combined functional area of both local authorities. The Joint **UAP LAP** shall provide a coordinated planning framework areas for the future physical, economic and social development of Carlow/**Graiguecullen** to ensure

C. MINOR CLARIFICATION ISSUES

The following changes in **red** represent minor changes to the text for clarification purposes for consideration:

Recommendation Athlone : Amendments 22 New RPO – Athlone

Support the development of joint statutory Economic, Transport and Retail plans by Westmeath County Council and Roscommon County Council in collaboration with the relevant **state** agencies to facilitate the growth of Athlone as a regional economic driver and to realise its status as a Regional Growth Centre.

Recommendation Swords : Amendments 29

Clarification wording required to facilitate schemes and action associated with Dublin Airport Ten-T access:
Support Swords-Dublin Airport as a key location for airport related economic development and employment provision linked **to the need for the** protection and enhancement of access to Dublin Airport lands including the delivery of Metrolink.

Recommendation Maynooth : Amendments 33 New RPO Maynooth

Clarification wording required:
A cross boundary Joint Local Area Plan (LAP) shall be prepared by Kildare County Council and Meath County Council **consistent with official policy objectives** to provide a co-ordinated planning framework for the Maynooth area.....

Recommendation Bray : Amendments 35 and 38

Clarification wording required to reflect the NTA Bray and Environs Transport Study, road improvement requirements and involvement of Dún Laoghaire-Rathdown County Council :

Amendment no 35. Amend RPO 4.28 – Bray

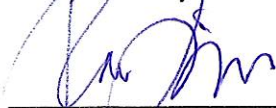
Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour along with increased employment opportunities and co-ordination between Wicklow County Council and transport agencies to facilitate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

Amendment no. 38 New RPO – Bray

To support ongoing investment in public transport infrastructure, including the appraisal, planning and design of the LUAS extension to Bray, to ensure its continued renewal maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity. The development of Bray-Fassaroe should be undertaken in collaboration between Wicklow County Council, **Dún Laoghaire-Rathdown County Council** and the transport agencies to ensure the delivery of enabling transportation infrastructure.

TII is available to discuss the issues outlined in this correspondence to assist the Regional Assembly in the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Yours sincerely



Tara Spain

Head of Land Use Planning