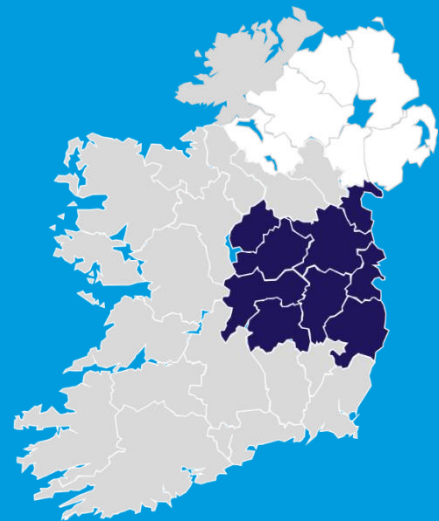




**Planning a better region:
It's everyone's business**
**Response to the proposed
material amendments to
the Draft EMRA Regional
Spatial and Economic Strategy**



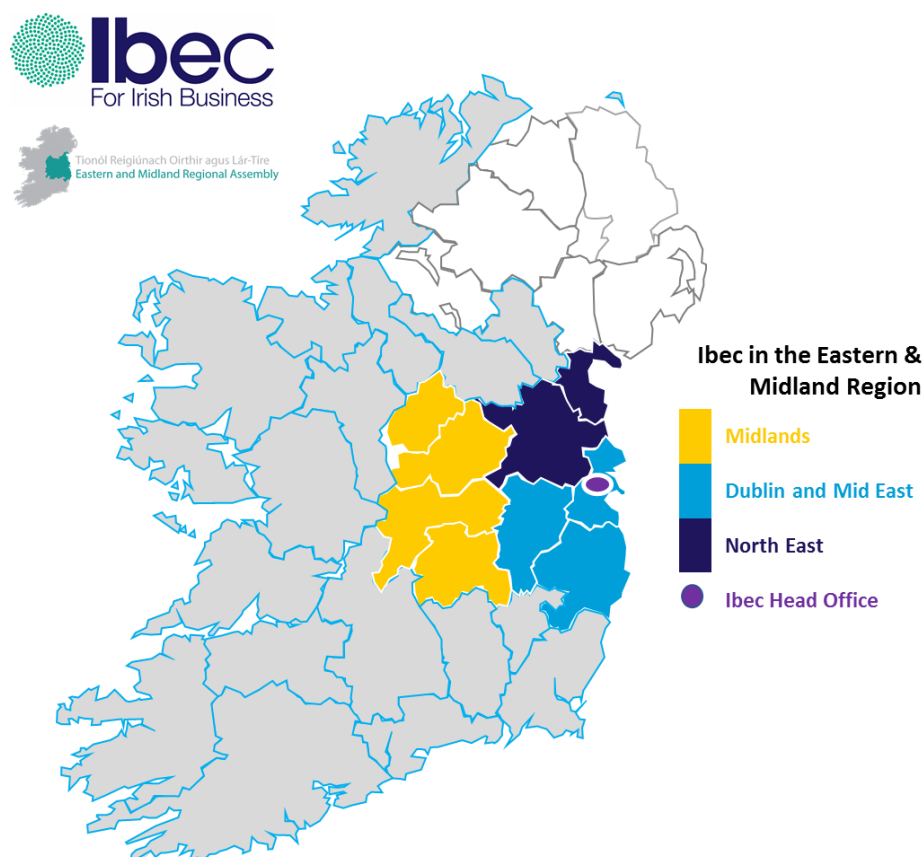
April 2019

Introduction: Ibec in the Eastern and Midland Region

Ibec is a national organisation with a strong regional structure. This includes a network of eight regions, with members supported by six Ibec offices across the country. Ibec's regional network ensures that members are serviced regionally in addition to Ibec's national and international services.

A key driver of regional business priorities are the Ibec Regional Executive Committees. Ibec Regional Executive Committees are made up of nominees from Ibec member companies operating within the regions including both multinational and indigenous companies and reflect the diversity of business in terms of business sectors and company size. The committees work to shape, guide and influence business policy priorities for the regions that contribute to sustainable economic growth and employment. Ibec Regional Executive Committees are led by a Regional President. Regional Presidents are also members of the Ibec National Council which provides an important point of contact between the organisation and the respective regions.

Three of Ibec's Regional Executive Committees (Dublin & Mid East, Midlands and North East) match closely to the Eastern and Midland Region. Each Regional Executive Committee has actively participated throughout the development of the National Planning Framework. Our members views and experiences across each region have been developed for this response to the initial public and stakeholder consultation issues paper on the Regional Spatial and Economic Strategy. With this in mind, Ibec has compiled joined up regional analyses from our Regional Executive Committees to match for their respective Regional Assembly areas. Each offers opportunities to be capitalised on and challenges to be addressed.



Structure of the Response to the Proposed Material Amendments

The Regional Spatial and Economic Strategy (RSES) is a new and important concept in Irish planning. It brings together the spatial and economic factors necessary for sustainable regional in one all-encompassing strategy. Ibec welcomes the opportunity to respond to the proposed material amendments to the draft RSES published by the Eastern and Midland Regional Assembly

We have participated in the preparation of the document through our recent submission on the draft RSES in January 2019 and previously through submitting the views of business on the issues paper in February 2018. Prior to this, our members were actively engaged throughout the development of the National Planning Framework and the National Development Plan published as Project Ireland 2040.

Our response to the material alterations are set out in a sequential order following the layout and as they appear in the consultation document. We have structured this submission to provide our response to the material amendments proposed and recommendations specific to the proposed amendment. We have confined our response to priority areas requiring attention.

This submission consists of suggested amendments to the proposed material amendment. These are identified in green bolds text. We identify important changes that should be supported and we suggest areas that require specific clarification or additional supporting text to be included in the final RSES.

Ibec Response to the Proposed Material Amendments

Chapter 2 Strategic Vision

3. Amend RSO 15 Enhance Strategic Connectivity

Ibec response:

Enhanced connectivity will be critical to the region's productivity and a key part of a value proposition to attract and retain businesses and workers to the region. Commuting, mobility and accessibility impact on our quality of life. Improved connectivity, reduced congestion, integration of the public transport network and increased modal shift (e.g. public transport) and modal choice all contribute to local, regional and national economic development. Congestion and excessive commuting times are a symptom of an inadequate intra-urban public transport system. Congestion adds unnecessary time to the daily commute.

Recommendation

Amend as follows:

- Protect and enhance international connectivity, **inter-regional and intra-regional** and regional accessibility to support economic development, **better quality of life**, build economic resilience and support strengthened rural communities and economies including the blue-green economy and tourism.

Chapter 3 Growth Strategy

Section 3.1 Developing a Growth Strategy Section

4. Amend Overview of Growth Strategy

Ibec response:

A cleaner and more resilient environment brings both societal and economic benefits. We must climate-proof the RSES to allow the delivery of a low carbon, climate resilient, and environmentally sustainable economy. The theme of Irish energy policy over the next twenty years will be one of transition as the country follows through on its international commitments and targets the delivery of a low carbon, climate resilient, and environmentally sustainable economy. This includes an 80%-90% reduction in greenhouse gas emissions compared to 1990 levels by 2050. Meeting these objectives in the context of a growing economy and an increasing population while also addressing concerns around energy security and affordability will be one of the greatest challenges of our time. Appropriate focus on our decarbonisation agenda must be adequately incorporated into the RSES and delivered across the region. More effective land and marine planning and development will be needed to increase the region's resilience to climate change, reduce emissions and support the delivery of vital energy infrastructure.

Recommendation

Support amendment.

Section 3.2 Growth Enablers

6. New Growth Enablers for the Region

Ibec response:

Proper recognition of the Dublin-Belfast *Economic* Corridor is important for regional, national and all-island growth and development. Our ambition is for a fully connected all-island market that supports greater prosperity and employment through increased flows of people, goods, services, energy and investment. Cross border economic activity plays a significant role in driving growth in both Ireland and Northern Ireland. This approach to identifying the Dublin-Belfast *Economic* Corridor should be consistently applied throughout the RSES.

Recommendation

Support amendment.

7. Amend Growth Enablers for Dublin City & Metropolitan Area

Ibec response:

It is important to have consistency when referencing the Dublin-Belfast Economic Corridor throughout the RSES. This can be secured by the inclusion of “economic” in the specific sub-regional growth enabler for the Dublin City & Metropolitan Area.

There must be a focus on re-intensification of existing business locations. This strategy aims to create the right conditions for enterprise to thrive, to create wealth and improve quality of life for all. Key aspects are orderly growth, placemaking, smart specialisation and clustering.

The emergence of new opportunities should be facilitated through providing a favourable ecosystem for innovation and entrepreneurship. This includes a framework to stimulate the bottom up dynamics seen in clusters and cluster initiatives within the region.

Recommendation

Amend as follows:

1. To sustainably manage Dublin’s growth as critical to Ireland’s competitiveness, achieving growth of 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031.
2. To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin and a target of 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life
3. To deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites for housing.
4. To increase employment in strategic locations, with a focus on re-intensification and regeneration of lands within the M50 and providing for people intensive employment at other sustainable locations near high quality public transport nodes, **industry clusters and smart specialisation**, building on commercial and research synergies in proximity to large employers and activating strategic sites to strengthen the local employment base in commuter towns.
5. Enhance co-ordination across Local Authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of

infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability to include district heating and water conservation.

6. Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the region and to serve the Nation, and safeguard and improve regional accessibility and service by rail, road and communication, with a key focus the Dublin-Belfast **Economic** Corridor.

8. Amend Growth Enablers for the Core Region

Ibec response:

It is important to have consistency when referencing the Dublin-Belfast Economic Corridor throughout the RSES. This can be secured by the inclusion of “economic” in the specific sub-regional growth enabler for the Core Region.

There must be a focus on re-intensification of existing business locations. This strategy aims to create the right conditions for enterprise to thrive, to create wealth and improve quality of life for all. Key aspects are orderly growth, placemaking, smart specialisation and clustering.

The emergence of new opportunities should be facilitated through providing a favourable ecosystem for innovation and entrepreneurship. This includes a framework to stimulate the bottom up dynamics seen in clusters and cluster initiatives within the region.

Recommendation

Amend as follows:

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

9. Amend Growth Enablers for the Gateway Region

Ibec response:

There are three designated Regional Growth Centres in the Region. However, the proposed growth enablers are explicit in the ultimate objective for only two of these centres. Drogheda and Drogheda are to “realise” their “potential to grow to city scale”. This should also be extended to Athlone as the

third Regional Growth Centre. Otherwise it conveys a statutory message that not all Regional Growth Centres are equal. It demonstrates a lack of ambition for Athlone, which is well placed to reap the benefits of agglomeration. This must be revisited in the final RSES. Otherwise it will simply serve to widen existing regional inequalities. It is likely to exacerbate the two-speed development occurring between the eastern half of the EMRA area and the Midlands.

It is important to have consistency when referencing the Dublin-Belfast Economic Corridor throughout the RSES. This can be secured by the inclusion of “economic” in the specific sub-regional growth enabler for the Gateway Region.

There must be a focus on re-intensification of existing business locations. This strategy aims to create the right conditions for enterprise to thrive, to create wealth and improve quality of life for all. Key aspects are orderly growth, placemaking, smart specialisation and clustering. The emergence of new opportunities should be facilitated through providing a favourable ecosystem for innovation and entrepreneurship. This includes a framework to stimulate the bottom up dynamics seen in clusters and cluster initiatives within the region.

The RSES must recognise the Gateway Region, particularly the Midlands, as a key contributor to overall national economic growth. Its central position enables the region to become a hub of regional connectivity, growth, and development, working in all directions and empowering all regions. In particular, a key growth enabler should be added recognising the strategic advantage of the Gateway Region as a transport and distribution hub for the country with regional and national benefits.

Recommendation

Amend as follows:

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

Chapter 4 People and Place

Section 4.2 Settlement Strategy

12. Amend Guiding Principles for Core Strategies

Ibec response:

The RSES must make the Eastern & Midland Region a better place to live and work. Talent is mobile. It is not just businesses that invest in an area, people do too. The region must offer strong quality of life and employment opportunities. For prosperity and quality of life go hand in hand, the region must be effectively supported to achieve ambitious economic and population growth. It must fully leverage the assets on hand from a strong enterprise base, education and skills, culture and natural heritage. This must be planned and supported by infrastructure and housing provision. Sustainability must be at the core of the plan to deliver compact, smart growth. The region must strive to be amongst the most liveable regions in the world.

The Dublin metropolitan area, the three regional growth centres (Athlone, Drogheda and Dundalk) and the region's other 'key towns' must become more competitive, resilient, and inclusive. These urban areas are more than just places where people work. It is time to correct past mistakes and turn them into the region's competitive advantage. Enabling them to become better functioning, more sustainable and vibrant will ensure economic growth and social advancement.

Employment and population centres across the region must be better connected. The RSES should be more ambitious in developing a network of strong urban centres along the Dublin-Belfast Economic Corridor, which in effect stretches from Larne to Rosslare. It should also connect to other emerging inter-regional corridors such as the Atlantic Economic Corridor. The Gateway Region, and Midlands in particular, can be the lynchpin for strategically connecting these corridors north and south, east and west. These will have to be supported through enabling infrastructure such as new road projects and upgrading existing roads. Networked initiatives such as these are critical to growing the region and the wider economy.

The RSES must deliver an adequate supply of commercial and residential property, attractive areas to live, a skilled local talent pool, underpinned by sustainable development. The RSES must support the requirements of traditional sectors and innovative business sectors, whether indigenous or foreign-owned. Regional economic success needs sectors such as biopharma, IT, financial services, medical technology, business services, tourism, aviation and transport services, agriculture and aquaculture, forestry, food and drink, and manufacturing to continue to grow, creating quality local employment opportunities. The RSES must effectively connect the importance of education and lifelong learning to sustaining economic success and building strong communities. Innovation is essential to boosting regional productivity and the RSES should exploit the opportunities in the green, blue and circular economies.

The RSES must not be undermined politically or poorly implemented. It is vital that sufficient attention is given to the mechanisms to ensure that the strategy is adopted, rolled-out and capable of evolving and not being undermined over its timeframe. A clear implementation strategy must be developed, with performance monitoring, with clear metrics and milestones, put in place. The SRA must encourage and support local authorities to maximise all sources of funding to meet RSES objectives. Investment has often failed to materialise in the past, so it is vital that commitments made in the NDP are delivered with urgency. Successful implementation is crucial to sustaining our economic and social progress as the country faces new challenges. The RSES must meet the Brexit challenge head-on and evolve over its lifetime.

Recommendation

Amend as follows:

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

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

13. Amend Section 4.3

Ibec response:

Increasing availability of zoned and serviceable land will be essential to the provision of homes to house the growth projections set out in NPF and by extension, the draft RSES. Phasing periods for sequential land development are assumed to be the timeframe of the core strategies: 2026 (short term), 2031 (medium term) and 2040 (long term). Given the current demand for housing, it is important that short-term is sub-divided into immediate development and near-term development, allowing recognition that not all developments occur within the lifetime of a development plan.

Recommendation

Amend as follows:

Core Strategies should apply prioritisation measures rather than de-zoning of land where a surplus of lands is identified in existing plans with regard to the NPF Implementation Roadmap up to 2031. In preparing Core Strategies account should also be given to the consideration of sequential lands which are suitable for the delivery of housing but may not be forthcoming in the Plan period having regard to 2031 Roadmap targets, subject to proper planning and sustainable development. **Local authorities shall undertake strategic land reserve assessments identifying existing residential zoning, level of serviceability and reality of projected yields across short, should be undertaken by all local authorities.**

14. Amend RPO 4.1 Settlement Strategy

Ibec response:

A core objective of the NPF is to achieve compact, urban growth through urban infill. This must be strongly reflected throughout the RSES. It is important that sustainable growth targets are restated as a regional policy objective. This will better inform local active land management strategies. Transport infrastructure, the cost of living, sustainability, and the built environment are all affected by how well space is utilised and they play a role in determining the quality of life.

Recommendation

Support amendment.

15. Amend RPO 4.2 Settlement Strategy

Ibec response:

The ultimate objective of the RSES must be to allow the entire region to develop to its full potential. This includes ensuring the region has the right enabling infrastructure and services to drive sustainable development, meet economic goals and improve the quality of life. Skills, talent, connectivity and quality of life are critical to the region's productivity and a key part of a value proposition to attract and retain businesses and workers to the region

Recommendation

Support amendment.

Section 4.5 Regional Growth Centres

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

Ibec response:

Due to its strategic location and scale of population, employment and services, Athlone has been designated a regional growth centre. It is an employment centre, an educational centre, an administrative centre, a retail centre, a transport centre and a tourism centre. It is a key regional centre of growth for the Midlands, whilst extending its influence into Roscommon and Galway.

Population projections for the Midlands must be revisited. The proposed regional population target to 2031 envisages the Midlands growing at two-thirds the rate it witnessed during the previous 15 years timeframe. The difference (22,000) equates to the total population of Athlone. Being too conservative with the national population forecasts should be underestimated.

Continuance of the housing shortage, at a local or regional level, is more likely using conservative assumptions. Population projections guide our plans to provide for the associated growth of demand for services such as regional hospitals, third level institutions, cultural and sporting institutions. Population projections impact on the provision of new homes and commercial property through zoning decisions. We need ambitious and more realistic population projections for Athlone as the Regional Growth Centre.

The population projection for Athlone as the Regional Growth Centre must better reflect its current growth rate. Indeed, the growth of Athlone and the wider Midlands region was sustained during the recession. Athlone will more than double in size over the lifetime of the NPF. The realistic population target to 2040 is for Athlone to grow to 50,000. The RSES must reflect this.

The projection of 30,000 must be the absolute minimum population growth to be achieved. Core strategies for Athlone and the Joint Urban Area Plan must be allowed to provide a headroom allowance of 50% so sufficient land is zoned for residential development. This would result in a revised target of approximately 35,000 inhabitants by 2031. The agglomeration effects between Athlone and the other 'key towns' within the Midlands clearly demonstrates that the Midlands region can sustainably grow at a faster rate than the projections set out. The cumulative population target for the counties constituting the Midlands should be increased to at least 65,000 people. Increase overall Midlands target from 45,000 to 65,000+ by 2031.

Recommendation

Amend as follows:

The RSES envisages an **absolute minimum** population target of 30,000 for the entire settlement of Athlone up to 2031. **The growth rate should allow for a 50% headroom supportive of a population growth of 35,000 and in excess of 50,000 by 2040.** This includes lands within the combined functional area of the two Local Authorities of Westmeath and Roscommon. The preparation and adoption of a Joint Urban Area Plan (UAP) shall be a priority for Westmeath and Roscommon County Council. The joint UAP under agreement of both local authorities is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population which should be generally in proportion to existing population levels in each local authority area. The Joint UAP should also support and provide for the following:

1. A strategic vision for the future development of Athlone as a Regional Growth Centre including the development of critical mass and reflect its role as a regional driver.
2. **The Joint UAP and core strategies should incorporate 150% headroom to ensure sufficient land is zoned for residential development for a population of at least 35,000 people.**
3. A boundary for the plan area to support the achievement of compact growth targets with a minimum of 30% of new homes to be built within the existing built up area, supported by

the large scale delivery of existing Local Area Plan (LAP) lands at Curragh Lissywollen, Cornamagh, Cornamaddy and Monksland / Bellanamullia

4. Preparation of a joint Economic Strategy to promote increased employment and enterprise opportunities in Athlone, and to facilitate enhanced co-ordination between local authorities, enterprise agencies and regional stakeholders to support the phased delivery of serviced employment lands at Garrycastle IDA, Blyry, Creggan and Monksland.
5. The regeneration of underused, vacant or derelict town centre lands and the consolidation of retail and commercial functions in line with a joint Retail Strategy to be prepared by the local authorities.
6. Identify infrastructural investment priorities and promote a joined-up approach to the delivery of key enabling infrastructure to facilitate the sequential delivery of strategic residential, employment and regeneration development areas
7. Support the upgrading of the Water Supply and Treatment System to meet the growth targets set in this strategy.
8. Promote Athlone as a sustainable transport hub, of national and regional importance and support the preparation of a joint Local Transport Plan between Westmeath and Roscommon County Councils in collaboration with transport agencies and key stakeholders to improve sustainable mobility in the town.
9. Support the proposal to make AIT a Technological University and for the development of a 'smart cities' approach to drive research, innovation and EU funding opportunities in Athlone.
10. Support the development of a cross sectoral approach to maximise the tourism potential of the River Shannon and Lough Ree, involving Westmeath, Roscommon and Longford County Council and relevant stakeholders.
11. Support the implementation of the Athlone Waterfront Strategy Support to provide for public realm and amenity enhancements and tourist related developments along the waterfront
12. Support ongoing implementation of flood risk management and flood alleviation measures to facilitate the growth of Athlone subject to the outcome of appropriate environmental assessment and taking account of the proximity of sites of international nature conservation interest
13. Support the development of an Open Space Strategy with provision for a public park in Monksland and the provision of sustainable transport, recreation and amenity spaces to support existing and future populations.

17. Amend RPO 4.4 – Athlone

Ibec response:

Sufficient emphasis must be placed on Athlone to secure the critical mass and strong urban economy of scale required to contribute to national development and competitiveness. It must satisfy Athlone's potential and aspirations to grow into a city region of scale. The Joint Urban Area Plan (UAP) establishes a cooperative framework for the two constituent local authorities. The proposed amendment should be supported by appropriate detail regarding the development, implementation and monitoring of the UAP. Specific future physical, economic and social development initiatives with clear timelines are required. Further detail on the role of the proposed Urban Area Committee for Athlone in terms of developing and implementing the UAP would also be welcome.

Recommendation

Support amendment with inclusion of specific details in the RSES on the development and implementation of a cross-boundary UAP including specific Local Authority development initiatives with timelines.

18. Amend RPO 4.5 – Athlone

Ibec response:

Athlone is the designated a regional growth centre for the Midlands in the National Planning Framework. The promotion of clustering and smart specialisation would underpin economic development across the region and prioritising key enabling infrastructure. Athlone’s enterprise ecosystem must be more competitive, innovative and resilient concentrating on certain domains of knowledge or expertise. Championing clusters and smart specialisation better captures the evolutionary nature of Athlone and the wider regional economy.

Recommendation

Amend as follows:

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

19. Amend RPO 4.7 – Athlone

Ibec response:

Tourism is as a significant economic activity for the region and a key growth sector for the Midlands. The RSES must support Athlone to further exploit the opportunities presented by the recently launched *Hidden Heartlands* branding proposition and other strategies. As part of their economic development remit, local authorities now have a central role” in tourism and must play a role in making Athlone and the wider Midlands a top-quality accessible destination. It is important that the RSES supports the leveraging placed-based assets across the region, improved connectivity and development of new infrastructure assets (e.g. greenways and blueways).

Recommendation

Support amendment.

20. New RPO – Athlone

Ibec response:

Athlone as a regional growth centre is to play an important role in delivering the objective of compact, urban growth. The NPF states that this is to be achieved through urban infill and brownfield development. Future housing development should be based on sustainable travel patterns, infrastructure provision, employment and educational locations. It is right to prioritise urban regeneration, infill and better use of under-used land. However, the population target should be better tailored to Athlone to allow it to be ambitious, if demonstrating that additional growth can be achieved sustainably.

Recommendation:

Support amendment.

22. New RPO – Athlone

Ibec response:

The RSES must recognise the Midlands as a key contributor to overall national economic growth. Its central position enables the region to become a hub of regional connectivity, growth, and development, working in all directions and empowering all regions. In short, a mechanism must be established to allow for the involvement of all five Local Authorities in the Midland region in the development of a cross-boundary regional vision for the Midland, to ensure national and regional objectives can be achieved.

Recommendation

Amend as follows:

Support the development of joint Economic, Transport and Retail plans by Westmeath County Council and Roscommon County Council in collaboration with the relevant agencies to facilitate the growth of Athlone as a regional economic driver. **and †To realise its status as a Regional Growth Centre, Westmeath County must work with the other local authorities in the Midlands to develop a cross-boundary regional vision for the Midlands, to ensure national and regional objectives can be achieved.**

23. Amend RPO 4.8 - Drogheda

Ibec response:

It is important to have consistency when referencing the Dublin-Belfast Corridor with the inclusion of “economic” each time in the specific sub-regional growth enablers for the Dublin City & Metropolitan Area, the Core Region and the Gateway Region.

Recommendation

Amend as follows:

A 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 and regeneration areas for the future physical, economic and social development of Drogheda to ensure it achieves targeted compact brownfield / infill growth of a minimum of 30% and ensure a coordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre on the Dublin – Belfast **Economic** Corridor. The Joint UAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development. Future development required to achieve the growth vision for Drogheda included in the Joint UAP shall:

- i. Provide for the sustainable, compact, sequential growth and urban regeneration in the town core by promoting the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.
- ii. Support the regeneration of the Westgate area of Drogheda’s historic town centre to address vacancy and dereliction in the town core and as an alternative to new development on green field sites.
- iii. Facilitate the regeneration of lands at McBride Station and environs as an employment hub to capitalise on existing and planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.
- iv. Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.

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- v. Support the sustainable development of existing zoned lands in the Southern Environs of the town with a particular emphasis on the promotion of the IDA Business Park as an employment hub and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs
- vi. Support the implementation of the Urban Design Framework Plan for the Heritage Quarter.

29. New RPO – Swords

Ibec response:

It is important that Dublin Airport's role in supporting local economic development is fully recognised. This is more than just aviation services. It is a key employment growth centre for aviation and non-aviation activities. Future enterprise growth and employment in non-aviation activities can be achieved sustainably on the Dublin Airport Campus on brownfield sites, and extends to wider non-aviation related economic development. The strategic employment sites are well connected to public transport and will also benefit from the delivery of Metrolink. Its location is well-placed in terms of the 'key town' of Swords and the wider Dublin Metropolitan Area. The proposed amendment does not reflect the potential growth in economic and employment across non-aviation activities at the airport.

Recommendation

Amend as follows:

Recognise and Support **the wider** Swords-Dublin Airport **area as a** key location for airport related economic development, employment provision and **opportunities, through** the protection and enhancement of access to Dublin Airport lands, including the delivery of MetroLink.

58. New RPO – Tullamore

Ibec response:

Development of higher and further education is an overarching objective for the region. It is important that the RSES supports access to a Technological University in the Midlands to meet enterprise needs and drive regional development.

Recommendation

Amend as follows:

~~To support the examination of a University in the Midlands and in particular Tullamore's and Co. Offaly's role in its provision.~~ **Support access to a Technological University in the Midlands, which will benefit Tullamore and Co. Offaly.**

63. Amend RPO 4.50 – Rural Areas

Ibec response:

Revitalising rural towns and villages will contribute to future growth across the region. Successful and sustainable town and village centre regeneration and revitalisation can only be achieved through the active involvement of the public and private sectors. This would allow projects and initiatives to be identified that would best support growth in a specific town or village. Regeneration strategies must reflect local requirements necessary such as housing, local enterprise and employment base, enterprise mix and other approaches to town centre renewal. This approach would lead to sustainable economic growth, renewal and revitalisation.

Recommendation*Amend as follows:*

In Development Plan policy Local Authorities shall prioritise the regeneration of rural towns and villages through identification of significant regeneration projects for rural villages and rural areas which could harness untapped assets with community and wider private and public sector support and investment including the Rural Regeneration and Development Fund. **Renewal strategies must address the full range of issues from housing and enterprise through to specific sectoral activities such as retail mix.**

66. New RPO – Rural Areas**Ibec response:**

The RSES must state how all smaller towns across the region will interact with, and benefit from, nearby large urban centres. To achieve effective regional development, we must place special focus on towns right across the region. Towns should be assessed and if necessary, strategically targeted for interventions. Over the lifetime of the plan, some will benefit greatly from improved connectivity and the effects of agglomeration.

Recommendation

Support but recommend the inclusion of a specific sub-section in the RSES stating the relationship, connectivity and inter-dependence between the focus urban centre (e.g. MASP, Regional Growth Centre, Key Town) and the smaller towns, villages and rural areas.

Chapter 5 Dublin MASP

Section 5.3 Guiding Principles for the growth of the Dublin Metropolitan Area**68. Amend Guiding Principles.****Ibec response:**

Metropolitan Dublin must become more competitive, resilient, and inclusive. Talent is mobile. It is not just businesses that invest in an area, people do too. Cities are also not just places where people work. We must recognise that urban planning necessitates building communities, not just housing. All of this impacts a city's ability to attract or retain people. However, this is an area of underperformance in recent years. In 2010, for example, Dublin was ranked as the 26th most liveable city in the world. Today, Dublin is 34th. This represents a failure of spatial planning and guidelines to connect the quality of life and place better. It is important that this changes.

Dublin must strive to be amongst the most liveable cities in the world. Essentially, the MASP is an overarching framework to manage the sustainable and compact growth of Dublin, urban regeneration and better use of under-used land, integrated transport and land use and the promotion of Dublin as a global city region. This includes identification of key growth enablers, strategic residential, employment and regeneration development opportunities and any infrastructure deficits or constraints that need to be addressed. It is important that the right infrastructure can be delivered on time and within budget. For example, delays to public transport infrastructural improvements in Dublin could undermine growth targets for the wider metropolitan area, the region and the country.

Our ports and airports are assets of strategic national infrastructure, underpinning regional development. We must also fully leverage these two infrastructure assets. International connectivity is recognised as a national strategic outcome in the National Planning Framework (NSO 6). For

example, any constraints on Ireland's airports have the potential to become constraints on economic growth. Ensuring *Dublin as a Global Gateway* requires securing the future growth and expansion of Dublin Airport and Dublin Port. This must be made more explicit in the MASP because of their critical role in supporting the metropolitan economy.

Recommendation

Amend as follows:

1. Dublin as a Global Gateway – In recognition of the international role of Dublin, to support and facilitate the continued growth of Dublin Airport, **in terms of passengers and air traffic movements**, and Dublin Port, to protect and improve existing access and support related access improvements **in line with industry requirements**.
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.

Section 5.6 Integrated Land use and Transportation

69. Amend Rail projects

Ibec response:

Enhanced rail connectivity should be part of the regional transport strategy. Expanding the region's rail infrastructure and upgrading it will underpin sustainable economic growth. The final RSES should incorporate the plans set out in the upcoming rail capacity review. Over the lifetime of the RSES, improved interurban and intraurban public transport, both bus and rail, must be advanced. Rail projects listed should be first contained in national, regional, metropolitan or other key transport strategies. These projects listed will contribute to medium-term growth. Yes, more investment and projects are needed. The NDP does not address all the key infrastructural deficits in transport and public infrastructure. However, if a clear business case can be made and cost-benefit analysis has been undertaken, more projects should be added to the public investment programme earlier than is currently envisaged. At this point the RSES could be amended to incorporate new projects.

Recommendation

Amend as follows:

- DART Expansion Programme - new infrastructure and electrification of existing lines, including provision of electrified services to Drogheda and further north on the Northern Line, Celbridge-Hazelhatch or further south on the Kildare Line, Maynooth and M3 Parkway on the Maynooth/Sligo Line, while continuing to provide DART services on the South-Eastern Line as far south as Greystones
- New stations to provide interchanges with bus, LUAS and Metro network including at Kishoge, Heuston West, Cabra, Glasnevin, Pelletstown and Woodbrook
- Implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy
- Complete construction of Metrolink from Swords to Sandyford, ~~including underground extensions to UCD and Knocklyon from Charlemont.~~
- LUAS Green Line Capacity Enhancement in advance of Metrolink; and Appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan, Poolbeg, ~~Hazelhatch, Booterstown and Blessington.~~
- In principle there is a need to carry out an evaluation of underground metro routes within the M50.

Section 5.7 Housing Delivery

74. Amend RPO 5.4 – Housing and Regeneration

Ibec response:

A sensible approach to urban building height limits will make a significant contribution to delivering the core objective of compact, urban growth. A focus on height will allow us to address the problems of urban sprawl, housing and commercial space shortages and improved densification. This amendment accounts for the new *Urban Development and Building Heights Guidelines for Planning Authorities* (December 2018), which were published after the consultation had commenced. More detail, however, is required on how planning authorities will integrate increased height into their forward planning process. This ranges from default minimum height standards such as six storeys within central urban areas.

Recommendation

Support amendment with the inclusion in the MASP of a clear statement on taller buildings in relation to sustainable development.

75. Amend RPO 5.5 – Housing and Regeneration

Ibec response:

The current housing market is undermining the Metropolitan Area's quality of life proposition. The RSES promotes compact, urban growth through urban infill and brownfield development. It identifies measures to unlock the barriers to supply in the Metropolitan Area, including its constituent 'key towns' and other urban areas. Future housing development is to be based on sustainable travel patterns, employment and educational locations.

The MASP will allow us to further streamline and harmonise spatial planning across the wider city region. It is envisaged that they will guide development plan formation at a local authority level once adopted. This includes the sequential delivery of strategic sites for housing and commercial use. The Metropolitan Area's overall Settlement Strategy should force local authorities to fully adopt the compact city policy aim, by requiring local authorities to align their height, density, indicative plot ratios and coverage policies with the emerging transport strategies.

A change in household mix and tenure within the Metropolitan Area will also be required. We need the right mix of housing in the right areas, in accordance with suitable and sustainable development practices. It is important that the Settlement Strategy adequately accounts for the expected demographic changes that will impact the housing stock and mix required over the coming years. A holistic view of housing is required, allowing for an appropriate mix of location, type, tenure and accommodation. Students, young professionals, families, and an older population all have different housing needs.

Recommendation

Amend as follows:

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

Section 5.8 Employment generation

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

Ibec response:

Metropolitan city areas concentrate productivity, innovation and creativity. Enhanced linkages between enterprise and higher education will contribute to attracting new investment and creating strategic employment opportunities. The Metropolitan Area is deepening its research and innovation capacity across a range of sectors, creating new products and services. Smart specialisation and cluster development are occurring. The development of specialist knowledge, expertise and research capacity by the higher education institutions across the Dublin Metropolitan Area have contributed greatly to this. This includes the provision of and access to dedicated research centres. On campus incubation centres supported by privately operated ones are key to growing high-growth innovative firms into the future who require access to specialist skills, technologies, advice and affordable commercial space. The MASP must reflect the role metropolitan R&D and incubators play in the location of strategic employment.

Recommendation*Amend as follows:*

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

- **suitable locations** (depending on the extent to which an enterprise is people or space intensive);
- **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 and airport/port);
- **skilled labour force** (proximity to third level education and lifelong learning) and
- **local strengths** (a diverse sectoral mix, **research centres and capacity, smart specialisation, start-up hubs and incubators**, emerging clusters or cross industry value chains),

See Section 6.3 for full list of Guiding Principles.”

77. Amend Table 5.2 Strategic employment development areas**Ibec response:**

References to strategic employment development areas reliant on public transport investment should be confined to projects already agreed in national and regional policy. For example, projects already being advanced and/or listed in the National Development Plan. Of course, further projects could be added in the future if a clear business case can be made and cost-benefit analysis has been undertaken. At this point the RSES could be amended to incorporate new projects.

Recommendation*Amend as follows:*

- Metrolink/LUAS Greenline; South County Dublin (Cherrywood, Ballyogan, Sandyford, ~~UCD & Knocklyon~~)

Chapter 6 Economy and Employment

Section 6.3 Economic Strategy**79. Amend RPO 6.1 – Competitive and Resilient Economic Base****Ibec response:**

Local business stakeholders are a key part of the national enterprise strategy and their voice should be heard. It is a positive development that not only the spatial but also the economic factors that set out the future of the region are brought together into one all-encompassing strategy.

Recommendation*Amend as follows:*

Support the national economic **and enterprise development** agencies, Local Enterprises Offices, Regional Enterprise Plan Steering Committees, Local Authorities and other relevant stakeholders, with their plans for job creation and enterprise development with an emphasis on:

- a) an enterprise base with increased productivity and more diversification – including diversification of their markets - with high levels of innovation, skills adaptability, **key**

enabling infrastructure, supportive regulatory environment and relatively low costs of doing businesses

- b) maintaining full-employment with unemployment rates of each Strategic Planning Area not exceeding the State average by more than one percentage point
- c) applying the Guiding Principles for strategic employment and investment prioritisation in placemaking for enterprise development presented in this draft RSES.

81. New RPO – Regional Enterprise Strategies

Ibec response:

The Eastern and Midlands region has proven that it can be an engine for growth for the whole country. With the right focus, investment and planning, the region can continue to grow and be successful, providing a vibrant and sustainable environment where future generations can live and work. ~~In particular, the Midlands requires a greater focus on clusters, smart specialisation, education and skills to realise its full potential.~~ The emergence of new opportunities should be facilitated through providing a favourable ecosystem for innovation and entrepreneurship. This includes a framework to stimulate the bottom up dynamics seen in clusters and cluster initiatives within the region.

Recommendation

Amend as follows:

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.
- **Support the requirements of traditional and emerging business sectors across the region to boost local employment opportunities.**
- **Maximise opportunities to increase regional innovation capacity, smart specialisation and clustering.**
- **Deepen enterprise links to higher and further education to develop skills and increase innovation.**
- **Support access to a Technological University in the Midlands.**

Chapter 7 Environment and Climate

98. Amend Guiding Principles for Green Infrastructure

Ibec response:

There is significant potential in the region for additional carbon sequestration. Ireland's forests, bogs, shrublands, hedgerows and grasslands already play a valuable role in removing carbon from the atmosphere. However, only 11% of Ireland is under forest cover (2017 figures). This is well below the EU average of 40%. The State currently has a target to increase forest cover to 18% by 2050. This would not only create income opportunities for land owners – but also provide a steady supply of indigenous wood products and biomass which could help fuel the decarbonisation of industrial heat and drive employment and growth in a vibrant bio economy

Recommendation

Support amendment.

106 – Amend RPO 7.34 - Decarbonising Electricity Generation

Ibec response:

The draft RSES commitment to develop a Regional Landscape Character Assessment following the adoption of the National Landscape Character Assessment is a sensible approach (RPO 7.25). The development of a National Landscape Character Assessment will help ensure greater alignment and consistency in the development of regional and local landscape character assessments. However, there is no agreed timeline for the completion of this work. Therefore, it is vital that energy projects and the identification and creation of Strategic Renewable Energy Zones are not hindered or delayed by this process.

Recommendation

Amend as follows:

EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy **could** ~~should~~ be developed to support delivery of projects within the Strategic Energy Zones.

Chapter 8 Connectivity

113. Amend Table 8.2 Rail Projects for the Region.

Ibec response:

Enhanced rail connectivity should be part of the regional transport strategy. Expanding the region's rail infrastructure and upgrading it will underpin sustainable economic growth. The final RSES should incorporate the plans set out in the upcoming rail capacity review. Over the lifetime of the RSES, improved interurban and intraurban public transport, both bus and rail, must be advanced. Rail projects listed should be first contained in national, regional, metropolitan or other key transport strategies. These projects listed will contribute to medium-term growth. Yes, more investment and projects are needed. The NDP does not address all the key infrastructural deficits in transport and public infrastructure. However, if a clear business case can be made and cost-benefit analysis has

been undertaken, more projects should be added to the public investment programme earlier than is currently envisaged. At this point the RSES could be amended to incorporate new projects.

Recommendation

Amend as follows:

- DART Expansion Programme - new infrastructure and electrification of existing lines, including provision of electrified services to Drogheda and further north on the Northern Line, Celbridge-Hazelhatch or further south on the Kildare Line, Maynooth and M3 Parkway on the Maynooth/Sligo Line, while continuing to provide DART services on the South-Eastern Line as far south as Greystones
- Provide for an appropriate level of commuter rail service in the Midlands and South-East
- Complete the construction of the National Train Control Centre
- New stations to provide interchange with bus, LUAS and Metro network at including Kishoge, Heuston West, Cabra, Glasnevin, Pelletstown and Woodbrook
- A feasibility study of high-speed rail between Dublin Belfast, Dublin Limerick Junction/Cork will be carried out
- Implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy
- Complete construction of Metrolink from Swords to Sandyford, ~~including underground extensions to UCD and Knocklyon from Charlemont.~~
- LUAS Green Line Capacity Enhancement in advance of Metrolink
- Undertake appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan, Poolbeg, ~~Hazelhatch, Booterstown and Blessington.~~
- In principle there is a need to carry out an evaluation of underground metro routes within the M50.

114. Amend Table 8.4 Road Projects for the Region

Ibec response:

During the period up to 2008, there was considerable investment in road transport connections between the capital and most of the regions. However, the motorway network was never completed and the urban centres across the region remain poorly connected to each other. This makes it more difficult for them collectively to provide an effective counterweight to Dublin. Projects like N4 Dublin to Sligo and the N11 upgrade will significantly advance growth across the entire region.

The RSES is an opportunity to provide a regional vision for road network. It should contain a list of nationally significant road projects and significant regional road schemes. The connectivity chapter of the RSES must address inter-regional and intra-regional. Roads are part of the key enabling infrastructure for enhancing the interaction between 'key towns' and other urban centres with Dublin Metropolitan Area or the three Regional Growth Centres. For example, the N62 Birr-Athlone and N55 Longford-Athlone should be included in the RSES. Not all projects will be delivered nationally, with the local authorities have an important role in improving road connectivity and road quality locally.

Recommendation

Partially reject the amendment. Reinstate and update the list of significant regional road schemes.

118. Amend RPO 8.17 – Dublin Airport

Ibec response:

Ireland's competitiveness is underpinned by the international connectivity that our aviation infrastructure provides. It plays an essential role in our economic prosperity, especially trade and tourism. National policies such as the National Planning Framework and the National Aviation Policy duly acknowledge the vital role of our airports for high quality international connectivity. This must be reflected in the RSES. Our airports must be appropriately recognised in the RSES as assets of strategic national importance. This must be duly recognised in all applicable metropolitan and local plans.

It is vital that development is preserved for the primary purpose of facilitating Ireland's international connectivity. Proper spatial planning must facilitate, not restrict, the future development of our ports and airports. The RSES should specify that operators of these strategic infrastructure assets should maintain full autonomy over asset management decisions.

Recommendation

Amend and expand as follows:

Spatial planning policies in the vicinity of the airport shall recognise **the protection of national airport infrastructure** and reflect the airport noise zones associated with Dublin Airport:-

- a. **Spatial planning policies in areas surrounding Dublin Airport must actively resist when non-compatible land uses are proposed and pose threats to aviation safety.**
- b. ~~In particular w~~ Within the Inner Airport Noise Zone provision of new residential and/or other noise sensitive development shall be actively resisted. Within the outer noise zone provision of new residential and/or other noise sensitive development shall be strictly controlled and require appropriate levels of noise insulation in all cases.

Chapter 9 Quality of Life

119. New Guiding principles for Healthy Placemaking

Ibec response:

The proposed guiding principal regarding the location of fast food outlets is highly discriminatory in nature. It is not well defined. Whilst it allows for the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools or parks, it must not result in a blanket ban on such establishments. There is an absence of evidence that supports proposal as an effective measure to safeguard the health of children.

This is simply a tool to place unfair and unsubstantiated restrictions on trade by certain types of food businesses, regardless of the range or quality of products for sale by specifically singling out fast food outlets. It ignores the fact that fast food outlets are regulated food business operators who must comply with food safety regulations and associated high hygiene standards. As with the wider food industry, many fast food operators have undertaken positive health and nutrition initiatives. Many of these health and nutrition initiatives are undertaken on a voluntary basis by companies in the sector but are aligned with wider sector initiatives undertaken in consultation with national public health authorities.

It is questionable whether the proposal will be consistent with the overall theme of town centre renewal and the retail strategies and retail planning guidelines. Achieving a greater mix in uses within urban areas will lead to sustainable rejuvenation occurring. It requires achieving a better and more appropriate balance between residential, retail and other commercial or business activity.

Increased availability of cafés, bars and different categories restaurants will not only relieve the pressure on the retail sector but support it also.

Over the years, peoples' shopping habits have changed. Retailers across the city are facing challenges of online shopping, new shopping destinations in neighbouring local authority areas and people who want to shop later in the day and after work. Fast food outlets also have a significant economic and social benefit providing employment, paying commercial rates, supporting local causes and charities.

Recommendation

Amend as follows:

Guiding Principles to read as follows;

- Future development prioritises the need for people to be physically active in their daily lives and promote walking and cycling in the design of streets and public spaces
- New schools and workplaces are linked to walking and cycling networks
- ~~Exposure of children to the promotion of unhealthy foods is reduced such as the careful consideration of the location of fast food outlets in the vicinity of schools and parks~~
- Provision of open space should consider types of recreation and amenity uses required
- Public open spaces to have good connectivity and be accessible by safe, secure walking cycling routes
- Open space to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, green infrastructure and key landscape features in their design.

120. Amend Guiding Principles for Urban Infill and Brownfield Regeneration

Ibec response:

Due to increased construction, soil waste management must be adequately addressed. The RSES, through the Regional Waste Management Office, and local authorities should take into account the expected increase in demand for management of soil removed from sites. Much of this soil may require extensive treatment before being classified as 'no longer waste' and appropriate facilities should be provided to address this along with easing the current administrative burden.

Recommendation

Amend as follows:

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

1. The establishment of a database of strategic brownfield and infill sites as part of the active land management process, that identifies the development capacity and any constraints on sites that are zoned for development including potential contamination and incorporating other relevant databases such as the Derelict Sites Register and the Vacant Sites Register. The database should be spatially referenced and searchable to allow for regular updating and monitoring and so that brownfield re-use can be managed and co-ordinated across multiple stakeholders.
2. Proposals for strategic brownfield and infill sites should be accompanied by a site brief and/or masterplan that sets out a phased programme for the regeneration of the site and demonstrates how the proposal will comply with National Guidelines that seek to achieve sustainable compact development and to integrate principles of good urban design and placemaking.
3. Local authorities should liaise with the Regional Waste Management Office when considering proposals for the development of brownfield sites that require the offsite

disposal of contaminated waste, so that a programme for site remediation can be identified early and considered by all stakeholders. Proposals for brownfield regeneration in strategic locations should be accompanied by a site risk statement and waste plan and for the disposal of any wastes arising including any hazardous or contaminated material. **The Regional Waste Management Office to undertake a demand review of the available capacity for soil waste treatment to meet RSES commitments.**

4. Encourage pilot projects for the re-use of brownfield sites and encourage active temporary uses where feasible and as far as practicable to encourage activation of vacant sites that require longer lead in time regeneration processes.
5. Set out measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres.

121. Amend RPO 9.12 – Regeneration

Ibec response:

It is important that the active land management strategy of each local authority fully supports the objectives of compact, smart growth through urban infill. Clear direction must be given to planning authorities to ensure Core Strategies are consistent. To date, the approach taken by local authorities has been inconsistent and incoherent. Height and density need to be planned to improve quality of life within the Region's urban centres.

Core Strategies must now take a pragmatic approach to ensure well-designed higher density development can be delivered in specific locations and make a considerable contribution to urban regeneration. Higher density development can encourage more affordable housing by spreading construction costs across more housing units within a development, also increasing the viability of site development and works. Getting the overall approach to urban regeneration right will allow us to address the problems of urban sprawl, housing and commercial space shortages and improved densification.

Recommendation

Support amendment.

124. New RPO- Childcare, Education and life long learning

Ibec response:

It is right that the RSES must recognise the importance of education and lifelong learning to sustaining economic success and building strong communities. It must improve education and develop the right skills to attract employers and retain talent and promote social inclusion to ensure opportunities for quality jobs across the region. Education and lifelong learning are essential national policy objectives.

This is not just a quality of life issue. The creation of high skilled jobs can have a strong 'local multiplier' effect on job creation while the 'drag' on regional economic growth of large numbers of low skilled workers can be significant. The Eastern and Midland Region is currently home to four universities (DCU, NUIM, TCD and UCD), one technological university (TU Dublin), three institutes of technology (IADT, AIT and DKIT), six Education and Training Boards. The RSES correctly supports access to a Technological University in the Midlands.

Recommendation

Support amendment.

Section 9.8 Healthy Communities (Combine with Section 9.4 Placemaking)

125. New RPO – Healthy Placemaking

Ibec response:

More sustainable modes of transport such as walking, cycling, and public transport must be prioritised as an alternative to commuting by car. As the number of pedestrian and cyclists in the city continues to rise, so should investment in footpaths and dedicated cycling infrastructure that will facilitate the move towards more sustainable modes. Over time, there should be a conscious effort by authorities to continue reallocation of road space from private car to more sustainable transport modes. Climate smart place-making initiatives such as this will also help drive emissions reduction across the region while reducing congestion and improving air quality.

Recommendation

Support amendment.

Chapter 10 Infrastructure

136 Amend Guiding Principles relating to the provision of energy network

Ibec response:

The draft RSES commitment to develop a Regional Landscape Character Assessment following the adoption of the National Landscape Character Assessment is a sensible approach (RPO 7.25). The development of a National Landscape Character Assessment will help ensure greater alignment and consistency in the development of regional and local landscape character assessments. However, there is no agreed timeline for the completion of this work. Therefore, it is vital that energy projects are not delayed due to the absence of a national or regional assessment.

Recommendation

Support amendment with clarification that proposed or planned energy projects are not delayed due to the absence of a national or regional assessment.

Chapter 11 All Island Cohesion

139. Amend RPO 11.1 – All Ireland Approach- extend RPO to include ‘economic growth’.

Ibec response:

Local and regional economies function across both jurisdictions, creating an all island market across many sectors. Our ambition is for a fully connected all-island market that supports greater prosperity and employment through increased flows of people, goods, services, energy and investment. Cross border economic activity plays a significant role in driving growth in both Ireland and Northern Ireland. Cities and local economies in Northern Ireland have a strong influence on the economies on this side of the border. Towns within the region derive economic benefits by their proximity to urban centres in Northern Ireland. It is crucial to recognise the importance of economic growth as a Regional Policy Objective (RPO 11.1) for the all-island economy.

Recommendation

Support amendment.



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