



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

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Department of Housing, Local Government and Heritage (DHLGH) Statement of Strategy 2023 - 2025

The Assembly welcomes the publication of a new Statement of Strategy, which will serve as a framework for the work of the Department over the next three-year period across its main functions including housing, local government, heritage and planning. The actions of this strategy will also support the implementation of Project Ireland 2040, that includes the National Planning Framework (NPF), which is delivered in turn at a regional level by the Regional Spatial and Economic Strategies (RSES). The RSES supports the spatial, economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Eastern and Midland Region. The RSES also sets the context for local authorities within the Region to develop their city and county development plans in a manner that will ensure national, regional and local plans align.

Regional Spatial and Economic Strategy (RSES)

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on the formulation, adoption and implementation of the Regional Spatial and Economic Strategy (RSES), oversight and coordination of Local Economic and Community Plans, management of EU Operational Programs, EU project participation, implementation of national economic policy, and additional functions working with the National Oversight and Audit Commission.

The RSES for the Eastern and Midland Region was made in June 2019, and is a strategic plan and investment framework to shape future growth throughout the Region. The RSES supports the implementation of National Policy Objectives and targets contained in Project Ireland 2040. This includes the National Planning Framework (NPF) and alignment with the investment priorities of the National Development Plan 2018-27 (NDP), by coupling new development with the requisite investment in services and infrastructure. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision is supported by 16 Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

Observations

The current Statement of Strategy 2021-2025 is structured around 6 main strategic goals: supply of housing; management of water resources; effective local government; sustainable and balanced development; production and communication of reliable climate and weather information; and archaeological heritage and biodiversity. For ease of reference the observations below are structured under each of these headings in the current Statement of Strategy, insofar as they are relevant to the policies and objectives of the RSES and functions of the Regional Assembly. Accordingly, Strategic Goal E, which relates to further enhancing Met Éireann's role, is not dealt with as part of this submission.

Strategic Goal A: To provide a framework that ensures a sustainable housing system in Ireland with a supply of good quality housing to match needs.

The Eastern and Midland Region is a growing region, and while the analysis from the 2022 Census figures are due to be published over the coming months, the Census period 2006 – 2016 identified a population increase of 15%, which translated into an increase of 300,000 people, in the Region. As a result, the Region contains some of the fastest growing communities in the Country, with a significant demand for housing to meet the needs of the growing population.

At the core of the RSES is the consideration of a settlement hierarchy for the Region, which is informed by a number of key Regional Strategic Outcomes (RSOs) such as the provision of sustainable settlement patterns, compact growth, sustainable rural development, integrated transport and land use, sustainable management of environmental resources, enhanced regional connectivity and enhanced green infrastructure. In this respect, the Settlement Strategy is concerned with the delivery of sustainable compact growth within the Dublin Metropolitan Area Strategic Plan (MASP) region, targeting growth within Regional Growth Centres of Athlone, Drogheda and Dundalk, and developing a network of Key Towns throughout the Region.

Furthermore, the RSES sets out a number of Regional Policy Objectives (RPOs) which relate to housing and regeneration, which include;

- Support for local authorities, approved housing bodies, and other sectoral agencies in the provision of a greater diversity of housing type and tenure (RPO 9.3)
- Design standards for new apartments and developments that meet the needs of a wider demographic, including provision for an ageing population (RPO 9.4)
- Support for local authorities in the preparation evidence-based Housing Needs and Demand Assessments (HNDA) to inform housing policies that provides for diverse demand (RPO 9.5)
- Support local authorities and other relevant agencies such as the Dublin Region Homeless Executive in addressing homelessness (RPO 9.6)
- Support the Land Development Agency in coordinating and developing large strategic landbanks particularly on public lands in urban centres to enable regeneration (RPO 9.7)
- To work with local authorities, government departments and relevant agencies to promote compact growth, and where appropriate the use of Compulsory Purchase Orders, and other incentives to promote active land management and infrastructure delivery particularly on public lands (RPO 9.8)

- To support at a national level effective management of waste and contamination related to brownfield sites (RPO 9.9)

In monitoring the delivery of housing provision, one key area of focus is the delivery of housing as identified in the Dublin Metropolitan Strategic Plan (MASP), contained within the RSES, and in particular Table 5.1. Housing Delivery is a key component of MASP Implementation and as such, the Assembly has an established Governance structure that oversees this. This includes a MASP Strategic Policy Area Committee, made up of 30 elected members from the 7 MASP local authorities, and a MASP Implementation Group that includes key stakeholders from the infrastructure and enterprise agencies, local authorities (Directors and Senior Planners) and Department of Housing Local Government and Heritage (DHLGH). A Progress Report on MASP Implementation was delivered in 2021 and a further progress report is expected later this year. Progress on housing delivery will be a central component of this, and support for the MASP Implementation Group would only serve to further this.

In addition to the above the Regional Assembly has reviewed (in accordance with the Planning and Development Act 2000 as amended) and made submissions to all City and County Development Plans within the Region to ensure consistency with the RSES, and by default the National Planning Framework. This includes ensuring that population targets and housing figures contained within each Development Plan are aligned to the RSES. The roll out of Local Area Plans across the Regions are the next step in achieving the objectives of the RSES and Project Ireland 2040.

Strategic Goal B: To provide a framework for the sustainable management of water resources from source to sea

The sustainable growth of the Region requires the provision of water services and water infrastructure in a plan-led manner to ensure that there is adequate capacity to support future development.

The vision of the RSES is supported by 16 Regional Strategic Outcomes (RSOs). RSO 7 is concerned with the ‘sustainable management of water, waste and other environmental resources’ and it seeks to conserve and enhance the water resources in the Eastern and Midland Region to ensure clean water supply, adequate waste water treatment and greater resource efficiency to realise the benefits of the circular economy. These are aligned with the National Strategic Outcomes 8 and 9 of the National Planning Framework. The overarching guiding principle for water in the Region is the protection, improvement and sustainable management of the water resource, as identified in the RSES Environmental Report.

The strategic environmental objectives which have informed the RSOs of the RSES and which remain priorities for the Region include:

- Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the Water Framework Directive and Marine Strategy Framework Directive.
- Ensure that economic growth of the marine resource and its ecosystems are managed sustainably.
- Ensure water resources are sustainably managed to deliver proposed regional growth targets in the context of existing and projected water supply and wastewater capacity constraints ensuring the protection of receiving environments.
- Avoid inappropriate development in areas at risk of flooding and areas that are vulnerable to current and future erosion, particularly coastal areas.

- Integrate sustainable water management solutions (such as SuDS, porous surfacing and green roofs) into development proposals.

As a result, the RSES has identified a number of key Regional Policy Objectives (RPOs) which include the sustainable management of water. These include:

- Local authorities shall include proposals in development plans to ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment. (RPO 10.1)
- The Regional Assembly and local authorities shall liaise and cooperate with Irish Water to ensure the delivery of Irish Water's Investments and other relevant investment works programme of Irish Water that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and local authority core strategies, and provide for long term solutions for waste water treatment for the Region. (RPO 10.3)
- Local authority core strategies shall demonstrate compliance with DHPLG Water Services Guidelines for local authorities and demonstrate phased infrastructure – led growth that is commensurate with the carrying capacity of water services and prevent adverse impacts on the integrity of water dependent habitats and species within the Natura 2000 network. (RPO 10.7)
- Support Irish Water and the relevant local authorities in the Region to eliminate untreated discharges from settlements in the short term, while planning strategically for long term growth in tandem with Project Ireland 2040 and in increasing compliance with the requirements of the Urban Wastewater Treatment Directive from 39% today to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040. (RPO 10.10)
- Support the relevant local authorities (and Irish Water where relevant) in the Region to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment and in the development and provision at a local level of Sustainable Urban Drainage solutions. (RPO 10.15)

Strategic Goal C: To support and enable democratic, responsive and effective local government, effective electoral management and high-quality fire services and emergency management

The Regional Assembly has a statutory role in promoting better effectiveness and coordination in local government. To this end, EMRA takes part in a number of forums including the Climate Change Adaption Steering Committee, Renewable Electricity Policy and Development Forum, Regional Enterprise Plan Steering Committees, Climate Action Regional Offices (CARO) steering groups, National SEA Forum, the National AA Forum, and National Sustainable Mobility Leadership and Delivery groups. This co-ordinating role enables a greater degree of coherence between all the initiatives and strategies developed at various levels, for the overall benefit of the Region.

Over the last number of years, the coordinating strengths of the Regional Assembly has been recognised and the inclusion of the Regional Assembly across numerous areas in this regard, speaks to this. This includes coordination of Government policy initiatives as outlined in the Climate Action Plan and Annex of Actions, the National Sustainable Mobility Policy and Implementation Plan, and the Electric Vehicle Charging Infrastructure Strategy and Implementation Plan.

The MASP Governance Structures outlined under ‘Strategic Goal A’ above, should also be considered as part of the forthcoming Statement of Strategy, having regard to the ongoing work of the EMRA in leading and supporting the MASP Committee and MASP Implementation group to provide effective local government that enables tangible coordinated results.

EMRA also provides research and analysis to support evidence-based policy-making and inform our implementation and monitoring function. This has been illustrated by the development of the Regional Development Monitor (RDM- <https://rdm.geohive.ie/>), which involves extensive baseline data gathering and regional profiling to inform the development and monitoring of the RSES, in collaboration with the All-Island Research Observatory (AIRO), based at Maynooth University. The RDM also provides a valuable resource to local authorities, elected members, government officials, researchers and the general public. The RDM is currently the largest open-source data hub in the state and presents complex data to users in a highly accessible way. The RDM provides real time data and is revised as data updates become available. Phase one was launched in November 2022 by Minister Peter Burke, and additional phases are expected to be launched over the coming months and years.

EMRA can also rely on a range of skills and expertise in the field of research policy, environment and climate action and the economy through our participation in EU projects, for example the PROGRESS project of which the purpose is to promote improved governance for ecosystem services across our Region.

EMRA has also produced a number of reports related to key activities including recent economic analysis in response to the impact of COVID-19, which have been undertaken in collaboration with the two other Regional Assemblies. The Regional Assemblies will continue to support effectiveness in local government through the provision of shared services and specialist expertise to provide decision-makers with evidence to help them adopt the necessary policy responses in our Region.

There is potential for a future enhanced role for the Regional Assemblies in promoting evidence-based policy-making and monitoring, now moving into implementation and evaluation. To that end, the Assembly would welcome further engagement with the Department and to explore further opportunities on shared specialist services at a regional level, including to support NPF and RSES implementation and the development of any revised or new NPF or RSES.

EMRA plays a key role in promoting multi-level governance and acting as a bridge between local and European levels. EMRA manages the Irish Regions European Office (IREO) which represents the interests of Irish local and regional government in Brussels and supports the Irish delegation to the Committee of the Regions (CoR) as directed by the Department, providing direct access to the EU and ensuring European dimension is incorporated into regional and local decisions. EMRA also provides ongoing advice and guidance to local authorities in the region on EU funding, with the support and expertise of the IREO.

There is an opportunity for an enhanced future role for the Regional Assemblies as a regional resource hub on funding and project opportunities to increase the participation of LAs and regional stakeholders in European projects and networks by providing information and support. EMRA and the IREO aim to ensure ongoing representation of Irish local and regional government at events such as the European Week of Regions and Cities and actively participate in networks, in order to advance and promote the regional agenda, and raise the profile of the region.

Strategic Goal D: To ensure that planning and building in our regions, communities and maritime area contributes to deliver sustainable and balanced development

The RSES presents a spatial strategy, devised and informed by a complementary economic strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. One of the key drivers of the strategy is to deliver sustainable and balanced growth across the Region.

The key policy parameters for the RSES strategy are set by, and closely align with national policy documents such as the National Planning Framework, and the National Enterprise Policy 2015-2025. Furthermore, the policies and objectives of the RSES aim to fulfil the priorities in the Programme for Government, including on housing, health, climate action and transport. This can be seen in the 16 Regional Strategic Outcomes (RSOs), which are: sustainable settlement patterns; compact growth and urban regeneration; rural communities; healthy communities; creative places; integrated transport and land use; sustainable management of water, waste and other environmental resources; build climate resilience; support the transition to low carbon and clean energy; enhanced green infrastructure; biodiversity and natural heritage; a strong economy supported by enterprise and innovation; improve education skills and social inclusion; global city region; enhanced strategic connectivity and collaboration platform.

In order to secure the delivery of Strategic Goal D, or any similar update in the revised Statement of Strategy, the Regional Assembly advocates for the Dublin MASP Implementation Structures, as outlined in this submission under Goal A and Goal C, and is happy to engage further with the Department if required. In addition, the Regional Assembly also considers that the implementation of the recommendations in the Submission of the Regional Assemblies to the Joint Oireachtas Committee on Housing, Local Government and Heritage on the Draft Planning and Development Bill 2022, are also required to ensure that planning and building in our regions, communities and maritime area contributes to deliver sustainable and balanced development. The aforementioned submission was also forwarded to Department of Housing, Local Government and Heritage. Key areas of concern for the Regional Assemblies include the removal of the Assemblies' statutory oversight role regarding County Development Plans as outlined at section 27 of the current Planning and Development Act, the change to the Monitoring Report of the RSES that no longer requires input from prescribed bodies, the removal of the provisions of Section 22A. of the current Planning and Development Act, the need to maintain focus on the economic components of the RSES, and the need for statutory implementation powers to support RSES and MASP implementation.

Furthermore, the valuable contribution that sustainable utilisation of marine resources for balanced regional development and quality of life is closely associated with effective engagement and the protection of the marine environment. Of particular relevance to sustainable and balanced

development in our maritime areas are the RSOs that support a strengthening blue-green economy, that build climate resilience, that protect and enhance international connectivity and regional accessibility and support strengthened urban and rural communities and economies along with the sustainable management of water and other environmental resources.

In this regard, the Assembly notes and supports the indicated “significant potential for collaboration between coastal planning authorities and regional assemblies to deliver Joint DMAPs” as outlined in the Department update on Marine Spatial Planning and the Maritime Area Planning Act 2021, circulated in June 2022 to the Regional Assembly.

Strategic Goal F: To conserve, protect, manage and present our built, natural, archaeological heritage, and our biodiversity, for its intrinsic value, including to the environment as well as a support to local communities, regional economic development and sustainable employment

The Region’s historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the Region’s economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of local, national and international value.

In this respect, the Region’s heritage assets include World Heritage Sites, built and natural conservation areas, protected structures, parks and gardens, monuments, archaeological remains, canals and waterways, peatlands, hedgerows and ancient woodlands. The Region is home to the world-renowned UNESCO World Heritage Site at Brú na Bóinne. In addition, the Region is home to a number of UNESCO candidate sites including the historic city of Dublin and medieval monastic sites at Clonmacnoise, Durrow, Glendalough, Kells and Monasterboice and representatives of the Royal Sites of Ireland at Dún Áilinne, Hill of Uisneach, and Tara Complex.

The RSES has identified a number of key Regional Policy Objectives (RPOs) in relation to the built and archaeological heritage. These include:

- Seek to work with all relevant stakeholders to promote equality of access to and engagement with arts and cultural services and in the promotion of culture and heritage led urban and rural regeneration. (RPO 9.25)
- EMRA will support local authorities to work with local communities to promote historic towns in the Region in the practice of heritage led regeneration, to promote the sensitive and adaptive reuse of historic building stock and industrial structures where appropriate, and to strengthen their capability to draw down European and national funding. (RPO 9.27)
- Support the designation of the UNESCO candidate sites in the Region. (RPO 9.29)
- Support the sensitive reuse of protected structures. (RPO 9.30)

Furthermore, in relation to biodiversity and the environment, Chapter 7 of the RSES, Environment and Climate, recognises that a clean, well-protected environment supports human health and wellbeing and provides a natural resource for our agriculture and tourism industries. It also recognises that challenges remain in relation to biodiversity protection and climate resilience.

The RSES has identified a number of key Regional Policy Objectives (RPOs) in relation to biodiversity and the importance of green infrastructure. These include:

- Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and local authority development plans. (RPO 7.16)
- Facilitate cross boundary co-ordination between local authorities and the relevant agencies in the Region to provide clear governance arrangements and coordination mechanisms to support the development of ecological networks and enhanced connectivity between protected sites whilst also addressing the need for management of alien invasive species and the conservation of native species. (RPO 7.17)
- Work with local authorities and state agencies to promote the development of all aspects of park management in the Wicklow National Park and the Slieve Bloom Mountains. (RPO 7.18)
- Support the consideration of designating a National Park for the peatlands area in the Midlands. (RPO 7.19)
- Promote the development of improved visitor experiences, nature conservation and sustainable development activities within the Dublin Bay Biosphere in cooperation with the Dublin Bay UNESCO Biosphere Partnership. (RPO 7.20)
- Local authorities shall promote an Ecosystem Services Approach in the preparation of statutory land use plans. (RPO 7.21)
- Local authority development plan and local area plans, shall identify, protect, enhance, provide and manage Green Infrastructure in an integrated and coherent manner and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species. (RPO 7.22)
- Support the further development of Green Infrastructure policies and coordinate the mapping of strategic Green Infrastructure in the Region. (RPO 7.23)

In addition to these RPOs, EMRA is involved in PROGRESS (Promoting the Governance of Regional Ecosystem Services). This project aims to initiate a process of policy change for maintaining nature's biodiversity, and maintaining nature's capacity to deliver wide-ranging goods and services, by establishing a more central role for ecosystem services in providing solutions for regional development. The project involves collaboration with regional partner organisations in the EU and exchanging experience in order to improve the implementation of regional policy protecting and valuing biodiversity and ecosystem services.

Conclusion

The Regional Assembly welcomes the opportunity to engage in the process of preparing the new Statement of Strategy 2023 – 2025 and looks forward to continuing engagement with the Department of Housing, Local Government and Heritage.

Regards,

A handwritten signature in black ink, appearing to be 'Jim Conway', written over a horizontal line.

Jim Conway
Director, Eastern and Midland Regional Assembly
30th March 2023