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Draft Westmeath County Development Plan 2021-2027

This submission on the Draft Westmeath County Development Plan 2021-2027 has been reviewed by the executive, discussed by the members of the Eastern and Midland Regional Assembly at the meeting of June 2020 and approved by the Cathaoirleach of the Assembly.

Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region, made on 28th June 2019, which consequently initiated the statutory time period within which the Council are required to prepare their Draft Development Plan, as stated at Section 11(1) (b) of the Planning and Development Act 2000, as amended (the Act). In this regard, The Assembly welcomes the publication of the Draft Westmeath County Development Plan which enables the coordinated and timely incorporation of Project Ireland 2040 - the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), thus ensuring full alignment between local, regional and national planning policy.

Legislative Context

As required by Section 27B of the Act, The Eastern and Midland Regional Assembly has prepared this submission, and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the aforementioned Act, a submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft development plan, and in particular its core strategy are consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the draft development plan, and its core strategy are not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27B of the Act.

The attention of the Council is also directed to the requirements of Section 12 (4) of the Act, whereby a Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly, and outline the

recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

Submission

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in order to prepare the Draft Plan and, in particular, that this work was completed during a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the RSES and the establishment of the Office of the Planning Regulator. In addition, The Assembly acknowledges that Westmeath County Council were required to suspend their Development Plan review process following a consultation period in 2018, in accordance with Section 11(1)(b) of the Act, and welcomes the overall approach and effort of Westmeath County Council to coordinate and incorporate policies and objectives, so that they are consistent with the NPF and RSES.

The Assembly considers that the overall draft development plan, including its Core Strategy, are generally consistent with the RSES subject to the contents of the remainder of this submission. The submission broadly follows the chapter headings of the Draft Development Plan, under the following headings:

1. Introduction
2. Core Strategy
3. Housing
4. Sustainable Communities
5. Economic Development and Employment
6. Tourism
7. Urban Centre and Placemaking
8. Settlement Plans
9. Rural Westmeath
10. Transport, Infrastructure and Energy
11. Climate Action
12. Natural Heritage and Green Infrastructure, Landscape and Lake Amenities, and Cultural Heritage
13. Landuse Zoning Objectives and Development Management Standards
14. SEA, AA and SFRA
15. Other

1. Introduction

The Assembly welcomes the preliminary 'Introduction' Chapter that provides a good overview of the basis of the Draft Plan including its strategic and legislative contexts, county profile, strategic vision and cross cutting themes. The inclusion of the county profile infographic is a welcome addition that clearly illustrates relevant indicators in a highly accessible way.

Whilst the NPF and RSES are mentioned at Section 1.5, and detailed further as part of the Core Strategy at Chapter 2, it is considered that this section would benefit from referencing National Strategic Outcomes (NSOs) of the NPF and Regional Strategic Outcomes (RSOs) of the RSES which set the

overarching national and regional policy framework for the County Development Plan. It should be noted that the ability to demonstrate delivery of these may potentially be linked to future funding sources.

2. Core Strategy

The Assembly acknowledge the clear and evident work that has gone into ensuring the thorough nature of the Core Strategy prepared. The clear reference to the legislative requirements of the Core Strategy, coupled with the detailed analysis of the relevant national (NPF) and regional (RSES) contexts, at sections 2.2 and 2.3 of the draft plan, clearly sets out the foundations of the Core Strategy presented. The stated utilisation of the 'Asset Based Approach' presented in the RSES, is welcome by the Assembly and is considered to ensure a consistency in approach. The Strategic Aims and population analysis presented, at Sections 2.5 and 2.6, provides understanding for the formulation of policy contained in the remainder of the Chapter. It is considered, subject the information below that the approach of Westmeath County Council is in accordance RPOs 4.1 and 4.2, which require that the hierarchy of settlements in development plans shall be determined in accordance with the hierarchy, guiding principles and typology of settlements as set out in the RSES.

Statutory Requirements

Westmeath County Council are reminded of their obligations to prepare a Core Strategy in accordance with the provisions of Section 10 of the Act. Relating specifically to the Core Strategy, the Assembly draws the attention of the Council to the contents of Section 10 (2A), (2B) and (2C) of the Act and asks Westmeath County Council to ensure consistency in this regard.

Settlement Hierarchy

The application of an evidence based 'Asset Based Approach' (similar to that presented in the RSES) at Table 2.3 of the Draft Plan, which documents the criteria utilised to develop the draft settlement hierarchy for County Westmeath, is considered to be a positive addition to the Draft Plan.

The Settlement Hierarchy presented at Table 2.4 is in keeping with national and regional policy. The use of consistent terminology, reflective of that contained in the RSES, is appropriate and welcome. The Hierarchy is tiered as follows; Regional Growth Centre (Athlone), Key Town (Mullingar), Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns and Villages, Rural (serviced) and Rural Remainder. Sections 2.9- 2.14, which document each tier of the Settlement Hierarchy are considered to support the overall aims of same.

Section 2.9 documents the Regional Growth Centre of Athlone and clearly recognises its role within a national and regional planning context. Core Strategy Policy Objectives CPO 2.1-2.3 are in keeping with the RSES, including stated population growth to 30,000 up to 2031, the preparation of a Joint Urban Area Plan (UAP) with Roscommon County Council and provision of a coordinated transport plan for Athlone. The reference to the preparation of the Joint UAP in collaboration with EMRA is welcome.

It is considered that the policy framework contained at Section 2.9 could be strengthened through the inclusion of policies relating explicitly to; the coordinated economic development of Athlone to support its role as Regional Growth Centre, including reference to the Joint Economic Strategy

currently being prepared and its role in supporting the forthcoming UAP and; ensuring positive and coordinated placemaking for Athlone to realise its role as a Regional Growth Centre, any works/proposals that are underway, or are considered required to be initiated in order to deliver this and how this will support the forthcoming UAP and the role of Athlone as identified in national and regional policy.

Section 2.10 documents the Key Town of Mullingar. Core Strategy Policy Objectives CPO 2.4 and 2.5 are welcome, which include support for the role of the settlement as a Key Town and the intended preparation of a Local Area Plan aligned to the RSES and Core Strategy. The Council may wish to include additional policy that strengthens the role of Mullingar as a Key Town, which is reflective of the Mullingar specific policy contained within the RSES at RPOs 4.64-4.67.

The Assembly welcome the inclusion of Self-Sustaining Growth Towns at Section 2.11, which the RSES indicates should be defined by the County Development Plan. It is noted that Castlepollard, Moate, Kinnegad and Kilbeggan form this tier of the settlement hierarchy. The RSES defines Self-Sustaining Growth Towns as *'Towns with a moderate level of jobs and services- includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'*. In light of this, the Assembly consider that further clarity should be provided regarding the selection of four settlements at this tier of the settlement hierarchy and request that a clear rationale be provided outlining how each settlement is reflective of this tier.

Whilst it may be considered that the towns listed satisfy this criteria and it is recognised that the provision of services may be satisfactory, the development of employment opportunity is required. In this regard the Assembly acknowledges the inclusion of Settlement Plans at Chapter 8 of the Draft Plan, which include policy to address this issue. For instance, Policy CPO 8.120 which aims to *'Promote the development of Moate as a driver of economic growth in the area and fulfil its role as a designated Self-Sustaining Growth Town'*. It is considered that the policy framework contained at Section 2.11 of the Draft Plan could be strengthened through the inclusion of reference to these Settlement Plans.

The Assembly notes the selection of Self-Sustaining Towns- Rochfortbridge and Killucan/Rathwire. The RSES indicates that these are *'Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining.'* In light of the description of Self-Sustaining Towns as stated, the Assembly consider that greater clarification, and/or reclassification of necessary, should be provided with regard to the selection of Rochfortbridge, given that the Draft Plan has indicated a decline in population experienced between 2011-2016.

With respect to the tier dealing with Towns and Villages, policy CPO 2.8 is a welcome addition that seeks to promote consolidation coupled with targeted rural housing and investment policies to become more self-sustaining.

The section on Rural Areas is a welcome inclusion as part of the Core Strategy. The reiteration of the NPF's National Policy Objective 19, which requires a distinction to be made between areas under urban influence and elsewhere in providing for the development of rural housing, coupled with the use of Figure 1.9 from the RSES 'EMRA Functional Urban Areas' are considered beneficial. The

approach undertaken to determine 'Rural Areas Under Strong Urban Influence' and 'Structurally Weak Rural Areas' is considered appropriate and robust in this regard.

Population

The Assembly welcome the reiteration of population targets for County Westmeath as a whole, and Athlone, as stated in the NPF and RSES. In determining future population levels within County Westmeath, it is noted that a number of scenarios (as listed in Table 2.6 and Table 2.7 of the Draft Plan) have been explored. The selected scenario is referred to as a proportional intervention (Pi) scenario because it assumes a particular level of policy based interaction, using an interpolated forecast of population. It is stated that the scenario envisages growth rates to 2031 which are proportional to each tier of the settlement hierarchy, aligned to settlement typologies detailed in the NPF.

The scenario, Proportional Intervention Scenario C, seeks to accord with the RSES by employing an approach that recognises the step change required to ensure that growth is sustainable in the long term, and to ensure that settlements identified for significant population and/or employment growth are supported by the requisite investment in infrastructure and provision of employment, amenities and services. It is noted that the scenario has utilised the additional 25% headroom, albeit at a rate of 5.8% as opposed to 25%, as indicated in the NPF Implementation Roadmap 2018 and therefore the NPF targets are exceeded. Whilst this is acceptable in principle, it is noted that the NPF Implementation Roadmap indicates that this headroom can be considered until 2026. In this regard, the Assembly request that further clarity should be provided with regard to the 2031 figure stated, prior to finalising the Core Strategy.

With respect to the Core Strategy Table, it is noted that the column 'Total Area Zoned 2021-2027' exceeds the figure listed in the column 'Quantity of Land Area Required'. It is unclear from the information presented the reasons for this and accordingly, Westmeath County Council are asked to clarify this and indicate the reasoning for same. A clear indication that the quantum of lands zoned as part of the Draft Plan, are in keeping with the figures presented as part of the Core Strategy Table, would enhance transparency.

Compact Growth

The Assembly welcomes the commitment to support the delivery of compact growth and the regeneration of underused town centre and brownfield/ infill lands in accordance with RSO 2 and RPOs 3.2 and 3.3. In this regard, Core Strategy Policy Objective CPO 2.15 which aims to deliver compact growth targets of 30% of all new housing to be built within the existing urban footprint, is welcome. The footnotes as part of the Core Strategy Table indicate that 68% lands are brownfield/infill with most potential existing in the upper tier settlements of Athlone and Mullingar.

The inclusion of the columns namely Brownfield, Infill and Consolidation Sites, detailed as part of the Core Strategy Table are welcome additions. It is recommended that an additional column detailing greenfield capacity (if any) should be added to provide clarity, as required by the NPF Implementation Roadmap (page six). The Council are also asked to provide clarification as to how mixed use sites, that may accommodate residential development, have been accounted for in accordance with the provisions of Section 10 (2A) (c) and (d) of the Act.

The inclusion of additional Core Strategy Policy Objectives including CPO 2.14, CPO 2.15, CPO 2.16 and CPO 2.17 (which aim to integrate land use and transport, support sustainable transport modes, reduce vacancy and underuse of existing building stock, and address the necessity of adaptation to climate change) are all considered to support compact growth.

Conclusion, Implementation and Monitoring

The Assembly welcome the inclusion of Core Strategy Policy Objective 2.18 that seeks to ensure effective alignment with national and regional policy and objectives over time. This is reflective of NPO 36 of the NPF which outlines that *'New statutory guidelines, supported by wider methodologies and data sources, will be put in place under Section 28 of the Planning and Development Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will be supported by the provision of standardised requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation.'*

The inclusion of information related to the 'Ecosystem Services Approach' used in the Draft Plan is welcome. Additional information detailing how it has been applied to the Core Strategy section of the Draft Plan would be beneficial in this instance.

3. Housing

The Assembly welcomes the stated evidence-based methodological approach that has been employed by Westmeath County Council to ensure that the housing needs of the County can be met whilst maintaining alignment with regional and national guidance.

In particular, the Assembly consider the inclusion of a Housing Need Demand Assessment (HNDA) as extremely positive. The HNDA ensures that the draft plan is supported by a robust methodology to inform policies and funding initiatives around housing and land requirements, whilst supporting the preparation of the housing strategy and other related housing policy outputs. It is acknowledged that Westmeath County Council have undertaken a HNDA, as part of the Housing Strategy, in accordance with National Policy Objective (NPO) 37 and Regional Policy Objective (RPO) 9.5, during a time when the finalised HNDA guidance at national level is yet to be confirmed. The methodology employed is in keeping with page 96 of the NPF. The initiative of the Council in this regard is extremely welcome.

Future Housing Requirements

Chapter 3 of the Draft Plan and the associated Housing Strategy at Appendix One, project a need for 4,983 additional residential units during the plan period 2021-2027. It is stated that consolidation and sustainable intensification in established urban areas and existing towns, through infill development and brownfield redevelopment, is a priority. This is in keeping with the Core Strategy presented in the Draft Plan and aligns with regional and national policy.

Detail provided on average household size, household size cohort and tenure, provides a clear methodology for the distribution of the quantum of housing required and the demand for different tenure types, across the County. The transparency of the Housing Section of the Draft Plan, and indeed

the preceding Core Strategy chapter, could be enhanced through the inclusion of housing allocation figures displayed across the various tiers of the Settlement Hierarchy, and in this regard the Council should give consideration to this in addition to the requirements of Section 10 (2A) (2B) and (2C) of the Act. Likewise, Table 9 contained as part of the Housing Strategy, could be enhanced through the inclusion of columns to reflect the proportion of social and affordable housing required.

Having regard to the above points, it is considered that the Draft Plan should include a clearly presented summary of the entire housing need in County Westmeath, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes. This will present a clear and concise guide as to what is required to successfully deliver the housing requirement for the County over the plan period.

Rural Single Housing

The NPF requires that development plans quantify the demand for single housing in the countryside with National Policy Objective 20 outlining the requirement to *'Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes'*. In this regard, the Assembly welcome the inclusion of Section 3.5.2 as part of the Draft Plan which details Rural Single Housing requirement.

The Housing Strategy which incorporates the HNDA, indicates an indicative number of potential applications for single rural dwellings using an evidence based methodology that combines an analysis of previous trends (demand driver), construction costs and affordability thresholds. In order to ensure compliance with the stated quantum of rural single housing, the Assembly consider that the Housing Strategy Policy Objective CPO 3.12 should be amended to include the monitoring of residential development permitted as single rural houses.

Apartment Development, Residential Densities and Layout and Design

The sections contained as part of Chapter 3 relating to apartment development, residential densities and layout and design are considered to be positive additions to the Draft Plan coupled with the inclusion of complementary Housing Strategy Policy Objectives including CPOs 3.5, 3.6, 3.7 and 3.8. In particular the emphasis on higher densities within the higher order settlements of Athlone and Mullingar, and the application of graded densities in towns and villages having regard to their role in the settlement hierarchy and that are commensurate to the existing built environment, are welcome. This is in keeping with the RSES and NPF, including for instance page 73 of the NPF which states *'Rural town living requires a proportionate and tailored approach to residential development. This means that it is necessary to tailor the scale, design and layout of housing in rural towns to ensure that a suburban or high density urban approach is not applied to a rural setting and that development responds to the character, scale and density of the town'*.

4. Sustainable Communities

This Chapter is extremely welcome as part of the Draft Plan. It is considered that the inclusion of the national and regional planning context, which reiterates RPOs 9.14 to 9.20 of the RSES, provides a clear foundation for the formulation of the remaining policy within the chapter. The focus on quality

of life coupled with the development of the three pillars of a sustainable economy, sustainable housing and social infrastructure, whilst referencing related Guidelines enhances the robustness of the Chapter.

5. Economic Development and Employment

The Economic Development and Employment Chapter presented as part of the Draft Plan is welcomed by the Assembly. The economic context and profile of the County, presented at Figures 5.1 and 5.2 respectively, provide an excellent overview of the economic scenario in County Westmeath in a highly accessible way.

The Assembly welcome the evidence based approach that the Local Authority have adopted in formulating this Chapter. This includes an overview of the economic profile of County Westmeath, presenting data from a number of key indicators that help to paint a picture, whilst using this data to inform economic policy making as part of the Draft Plan. The economic profile also provides an overview of the higher order settlements of Athlone and Mullingar, which is most welcome and in keeping with the RSES.

The Economic Development Strategy (EDS) of the Draft Plan contained at Section 5.13 is structured in broad terms around six guiding principles. These include Location of Employment, Availability of Land and Infrastructure, Skills and Innovation (Smart Economy), Promoting Economic Development and Local Enterprise, Transition to a Low Carbon Economy (the Green Economy), and Quality of Life.

The Assembly welcome that the location of development in County Westmeath will be guided by the County's Settlement Hierarchy and is aligned to the NPF and RSES. Policies of the Draft County Development Plan, such as CPO 5.3 which aims to facilitate and support the continuation of balanced population and employment growth, with a focus on strengthening the County's urban structure in line with the Settlement Hierarchy are considered to echo regional policy, including Chapter 3- Growth Strategy and Chapter 4- Settlement Strategy of the RSES.

The individual policy sections relating to the various tiers of the Settlement Hierarchy is a positive addition. It is considered that these sections align with the suite of related policies of the RSES regarding Athlone at Section 4.5 and Mullingar at Section 4.6. It is unclear however, why Athlone and Mullingar are both classified as Tier 1. Further clarification should be provided in this regard and reclassification, to reinforce the roles of Athlone and Mullingar as outlined in the NPF and RSES, where necessary.

Policy supports for the rural economy are welcome, including those at Section 5.13.9 and Section 5.13.12.1 in terms of diversification of the rural economy. In this regard, the Local Authority are directed to related RSES policies for 'Rural Areas' contained at Chapter Four of the RSES and also those contained at Chapter 6 that relate to the 'Rural Economy'.

In terms of the availability of Land and Supporting Infrastructure, an Economic Briefing Paper currently being prepared by the Eastern and Midland Regional Assembly, has found a shortage of appropriately sized land banks and FDI/IDA appropriate business premises throughout the Region, including in

Athlone and Westmeath as a whole. In this regard, the Assembly ask that the Local Authority consider the inclusion of a complimentary CPO, as part of 5.13.10, to enable the delivery of same.

The Section on The Smart Economy is welcome and in keeping with Section 6.6 of the RSES 'Smart Cities, Towns and Villages'. The inclusion of CPO 5.41 is welcome and reflective of RPO 6.30. It is recommended however that the wording be revised to reflect the settlement hierarchy with respect to Athlone and Mullingar.

The sections of the Economic Development Strategy relating to the remaining guiding principles are also extremely welcome. This includes policies relating to quality of life, tourism, promotion of the local enterprise base to create resilience, and transition to a low carbon/ green economy- all of which are supportive of the RSES Key Principles of Healthy Placemaking, Climate Action and economic Development.

The dedicated section for retail development is a positive addition to the County Development Plan and the related County Policy Objectives and sections focused on town centre renewal are welcome. It is noted that the retail hierarchy is determined by the Westmeath Retail Strategy, included at Appendix 4 of the Draft CDP. The Assembly are concerned that the Retail Strategy is now out of date, particularly with regard to the County Retail Hierarchy presented. It references 'linked gateway towns' for example, which is at odds with NPF and RSES policy and the Settlement Hierarchy proposed as part of the Draft CDP. In this regard, Westmeath County Council are asked to update the Retail Strategy accordingly and to amend CPO 5.65 to ensure that retail development is reflective of the revised and updated Settlement Hierarchy of the CDP.

6. Tourism

The inclusion of a stand-alone Tourism Chapter is a welcome addition to the Draft Plan. The RSES recognises the important role that tourism plays in County Westmeath, including as a Growth Enabler for the Gateway Region as identified at Section 3.2 of the RSES, as a means to enable and sustain the rural economy as per Section 4.8 of the RSES, and as a sectoral opportunity for the Midlands as per Section 6.4 of the RSES.

It is considered that the content of the Tourism Chapter is reflective of the RSES, including the suite of related policies, namely RPOs 6.8, 6.15-6.19 and 6.21, that seek to enhance the Tourism Sector. The inclusion of policies as part of the Draft Plan that supports the tourism sector within Athlone and Mullingar, including through their promotion as destination towns, are positive additions. The Assembly consider that the structure of this chapter provides a robust basis to facilitate tourism development, through recognition of need to ensure adequate tourism infrastructure and visitor services, coupled with the promotion of the County's history and heritage, lakes and waterways, greenways, cycling and walking, and arts, culture and festivals.

7. Urban Centres and Placemaking

Healthy Placemaking is a Key Principle of the RSES (Section 2.3) and underpins many of the Regional Strategic Outcomes and Regional Policy Objectives of the RSES. Accordingly, the Assembly welcome

the inclusion of Chapter 7 Urban Centres and Placemaking and refer the Council to Section 9.4 of the RSES. The inclusion of 'The Place Diagram' as Figure 7.2 of the Draft Plan is an excellent addition and helps to convey the many components required to enable positive placemaking.

In line with NSO 1 of the NPF and RSOs 1 and 2 of the RSES, Section 7.6 of the Draft Plan is a proactive and constructive addition to this Chapter. The reference to achieving compact urban growth through the development and regeneration of key brownfield, infill and backland development sites, using measures such as the Vacant Site Levy and the Urban Regeneration and Development Fund (URDF), is essential to realising the sustainable growth and consolidation of the County's settlements, creating more attractive places for people to live and work. Likewise, the addition of Section 7.7 focusing on Rural Regeneration in order to strengthen rural economies and communities, creates a consolidated and needed county wide approach, towards improving the quality of Westmeath's urban and rural environments.

8. Settlement Plans

The Assembly welcome the inclusion of the numerous plans for the various settlements throughout County Westmeath. It is considered that the stated aim of the Chapter at Section 8.1 is positive, however, it is recommended that the term 'increased levels of population' be amended to state 'appropriate levels of population' or similar. This ensures that development in the towns and villages is commensurate with the existing character of the settlement and aligns with the Settlement Hierarchy.

The reiteration of the Settlement Hierarchy and presentation of plans in accordance with same is welcome. The Assembly recognises the clear and evident detailed work that has gone into preparing the numerous plans. This comprises a suite of policies applicable to each settlement, the identification of regeneration/ opportunity sites for the self-sustaining growth towns, down to public realm, development and design and community/social policies for rural villages.

9. Rural Westmeath

The inclusion of Chapter 9 Rural Westmeath is considered a welcome and needed component of the Draft Plan. Section 4.8 of the RSES specifically recognises the major contribution that the multitude of rural places make towards regional and national development in economic, social and environmental terms and the inclusion of the related policy context of the RSES at Section 9.3 of the Draft Plan is welcome. In addition, Chapter 6 of the RSES, and particularly Sections 6.4 and 6.5, provide related content that may assist the Local Authority with regard to Sections 9.10-9.15 of the Draft Plan relating to the rural economy and specific sectors of agriculture, horticulture, equine industry, forestry and the extractive industry.

The Assembly note the inclusion of Section 9.4 Rural Settlement Strategy and acknowledge the reiteration of RPO 4.80 within the text, which states that *"Local authorities shall manage urban generated growth in Rural Areas under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable*

economic or social need to live in a rural area, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.” In order to ensure consistency within the Chapter, it is recommended that the related rural housing need policy is aligned with RPOs 4.80 and 4.81, and NPO 19 of the NPF.

10. Transport, Infrastructure and Energy

The Assembly welcome the inclusion of this Chapter which coincides with Chapters 8 Connectivity and 10 Infrastructure of the RSES. In this regard the Council is directed to RPOs 4.2 requiring Infrastructure investment and priority alignment with the spatial planning strategy of the RSES whereby all residential and employment developments shall be planned on a phased basis in collaboration with infrastructure providers so as to ensure availability of adequate capacity for services (e.g. water supply, wastewater, transport, broadband) to match projected demand and so that the assimilative capacity of the receiving environment is not exceeded.

Relating to transport, the inclusion of a summary policy context of the RSES at Section 10.3.2 is welcome. CPO 10.3 which supports the implementation of national and regional transport policies that includes the RSES, as they apply to Westmeath, reinforces the realisation of Project Ireland 2040 and is a positive inclusion. RPO 8.6 identifies that in order to give local expression to the regional level Transport Strategy within the Region, in conjunction with the NTA, Local Transport Plans (LTP) will be prepared for selected settlements in the Region. This includes the settlements of Athlone and Mullingar and in this regard CPO 10.8 and 10.9, aimed at preparing transport plans for Athlone and Mullingar, are welcome.

Relating to water supply and wastewater infrastructure, the Assembly acknowledge the inclusion of County Policy Objectives that support alignment with Irish Water’s Capital Investment Programme. In addition the alignment of such infrastructure with the Settlement Strategy and Core Strategy, as per CPOs 10.66 and 10.87, is acknowledged.

The attention of the Council is brought to RPO 7.43 advising local authorities to consider the identification of Critical Infrastructure (CI) within their functional areas, and particularly of the interdependencies between different types of sectoral infrastructure, as a first step in ‘future-proofing’ services and to help to inform longer term adaptation planning and investment priorities.

With reference to Wind Energy detailed at Section 10.23 of the Draft Plan, it is noted that the policy provided is not reflective of the Wind Energy Development Guidelines 2006, or of the Draft Revised Wind Energy Guidelines published in December 2019. In order to ensure consistency with the RSES, it is recommended that CDP policy relating to wind energy is revised to reflect the contents of the aforementioned draft guidelines, which are expected to be finalised in the near future.

11. Climate Action

The Assembly welcomes the Climate Action Chapter and its stated aim to transition to a low carbon and climate resilient County, with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change.

The recognition that the response to climate change requires an interdisciplinary approach that cross references the various sections of the Draft Plan is welcome. This is in keeping with the RSES Key Principle of Climate Action that seeks to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this.

The reiteration and acknowledgement of the Regional Policy Context regarding Climate Action, including reference to RPOs 3.7, 7.7, 7.28, 7.29, 7.32, 7.35, 7.37, 7.39 and 7.40 are positive additions to the Chapter. The Council's attention is also drawn to RPO 3.6 and the preceding paragraphs of the RSES which outline the requirement of Development Plans to assess their impact on carbon reduction targets. To this end, it should be noted that EMRA is leading an ESPON EU research project (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which are anticipated in 2021, and should inform the Draft Plan as it progresses. The Eastern and Midlands Climate Action Regional Office (CARO) also play a key role in assisting and supporting the respective local authorities in the region in implementing their climate action strategies and have organised training workshops to help inform potential measures, policies and regulatory tools for the preparation of the Draft Development Plans. It is understood that the forthcoming Development Plan Guidelines will provide similar guidance in this area.

Having regard to the above, the Assembly acknowledge the beneficial inclusion of Table 11.1 which details Land Effects on Direct Emissions. The inclusion of a policy objective relating to the quantification of the baseline emissions would enhance the robustness of this approach.

The attention of the Council is also brought to the Climate Action Fund made available under the Department of Communications, Climate Action and Environment, and, in order to be availed of, requires policy support. In this regard, the Council may wish to identify potential projects as part of the finalised Plan.

12. Natural Heritage and Green Infrastructure, Landscape and Lake Amenities, and Cultural Heritage

The Assembly welcome Chapters 12, 13 and 14 which are aimed at protecting and enhancing the natural and cultural heritage of County Westmeath. As part of Chapter 12, the Assembly welcome the reference to the County's Peatlands. This includes the numerous County Policy Objectives (CPOs) that are focused on the future sustainable use of the peatlands and associated infrastructure, including CPOs 12.59- 12.65. This is reflective of policy contained as part of the RSES including RPOs 4.84, 6.38, 7.19 and 7.29 that includes working with the Just Transition Team and support for a comprehensive afteruse plan.

The Assembly welcome the recognition within the Draft Plan identifying green infrastructure as a key strategic asset for the County. This includes the preparation of a Green Infrastructure Strategy aimed at providing improved access across Westmeath through enhanced walking and cycling routes, whilst ensuring adequate protection to the existing environment and ecology of the landscape. The Council, in formulating the finalised Green Infrastructure and Blueways section, should consult with Section 7.7 of the RSES which details policy for green infrastructure and guiding principles for the preparation of Green Infrastructure Strategies.

The Chapter on Landscape and Lake Amenities is a positive addition to the Plan and the attention of the Council is directed to Section 7.8 of the RSES in this regard. The Assembly welcome the approach taken to the designated views and prospects, outlined at Section 13.26 and listed as part of Appendix 5. It is noted that a number of amendments have been made to the Areas of High Amenity, outlined at Section 13.18 and presented at Map 42. Given the sensitivity of these lakes as high amenity areas, and the noted inclusion of a number of these lakes as part of Table 7.1 of the RSES, a clear rationale should be provided as part of the plan outlining the reasoning behind such amendments prior to the finalisation of the Plan.

Chapter 14, detailing cultural heritage, is in keeping with the provisions of Section 9.7 of the RSES. In particular, the Assembly welcome the specific policies related to Fore and the Hill of Uisneach, including CPO 14.20 which reflects RPO 9.29 in supporting the designation of UNESCO candidate sites in the Region.

13. Landuse Zoning Objectives and Development Management Standards

This section of the Draft Plan provides a comprehensive set of development standards and land use zoning objectives to be applied in the assessment of planning applications. It is considered that the inclusion of these sections as part of the Draft Plan will enable a robust application of preceding policy chapters. The reference to compliance with Section 28 Ministerial Guidelines is a positive addition and is considered will enhance the sustainability of the development proposals.

14. SEA, AA and SFRA

The Draft Plan is subject to Strategic Environmental Assessment (SEA) and an environmental report has recorded the process to date. It is the finding of the environmental assessment that the full implementation of the Plan, based on the iterative process to date, is likely to improve the status of a number of Strategic Environmental Objectives (SEOs) with no indicated probable conflicts with the status of SEOs that are unlikely to be mitigated. The Assembly welcome the indication as part of the environmental report that, where appropriate, the measures identified in the RSES SEA have been used, as they are or having been slightly modified, in most instances in order to ensure consistency.

The Assembly note the inclusion of Table 8.3 as part of the Environmental Report, which details motions that were advised against. The Assembly request that a clear rationale be provided for the inclusion of same as part of the finalised Plan, and omitted where there is potential for significant negative environmental effects.

The attention of the Council is drawn to new EPA Guidance on SEA Statements and Monitoring (Second Review of Strategic Environmental Assessment Effectiveness in Ireland), published January 2020, which provides best practice on devising meaningful monitoring measures, suitably detailed indicators and the frequency of monitoring and reporting. This guidance shall inform the iterative SEA process and preparation of the monitoring programme as part of the County Plan's SEA statement.

The Draft Plan is subject to Appropriate Assessment and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. It is concluded that the Draft Westmeath Plan is

not foreseen to give rise to any significant adverse effects on designated European sites, alone or in combination with other plans or projects.

A Strategic Flood Risk Assessment (SFRA) was undertaken of the Plan area having regard to the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities. It is noted that the SFRA identifies that the risk posed by flooding on zoned lands throughout the County is generally not significant or low. It is indicated that flood risk and development can be managed in line with CDP policy. Whilst the policies contained as part of the Draft Plan (CPOs 10.96-10.113) are considered to be robust, the Assembly consider that the flood risk policy context can be strengthened through the inclusion of generic flood risk policy for impacted settlements as part of the Settlement Plans included at Chapter 8 of the Draft Plan.

15. Other


In order to ensure the success of the County Development Plan, the Assembly recommend that a Chapter detailing the strategic implementation and monitoring of the CDP over its lifespan, be provided. Chapter 12 of the RSES and Chapter 10 of the NPF, which detail implementation and monitoring measures, may provide assistance in this regard.

Conclusion

It is considered that the Draft Westmeath County Development Plan, and in particular the Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the Draft Westmeath County Development Plan 2021-2027, which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and The Assembly welcome further opportunities to engage in the statutory process of the making of the Westmeath County Development Plan.

Regards,



Jim Conway
Director
Eastern and Midland Regional Assembly
25th June 2020