

Eastern and Midlands Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Ballymun,
Dublin 9,
D09 C8P5.

11/04/2019

Re: Response to the Eastern and Midlands Regional Assembly regarding the Proposed Material Amendments to their Draft Regional Spatial and Economic Strategy

Dear Sirs,

With regard to the proposed material amendments to the Draft RSES, we would like to make the following observations:

CHAPTER 5 – DUBLIN MASP

With reference to Amendment 72 – amendments to **Table 5.1 Strategic Development Corridors, Capacity Infrastructure and Phasing:-**

We note that only some of the areas within the Strategic Corridors reference water and waste water infrastructural upgrades. However, significant water services infrastructure is not mentioned in some areas where it is required e.g. Woodbrook-Shanganagh and Fassaroe. We also note the reference to LIHAF roads and other infrastructure. In a number of cases water services infrastructure is to be delivered in conjunction with these roads. We suggest the amendments listed in Appendix 1 (attached), or a footnote be added to the Table to the effect that *“new/upgrades to existing water and waste water services are required in the short to medium term, to service these strategic corridors, in addition to the strategic water services projects identified in Section 5.5 (Enabling Infrastructure)”*.

CHAPTER 7 – ENVIRONMENT AND CLIMATE

Reference is made to the Vartry Reservoir under the heading of Amendment No. 9.7 – **Table 7.a Strategic Natural, Cultural and Heritage Assets:-**

We note that the reservoir is a man made structure and not a *Natural* facility as such. We would have concerns regarding any unintentional implications this may have on the management of the reservoir. The EMRA might expand the description or, for example, to say the walks around the reservoir.

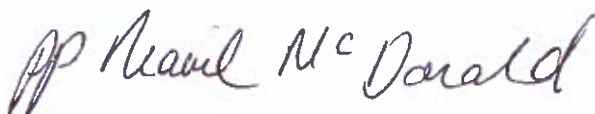
CHAPTER 10 – INFRASTRUCTURE

We respectfully submit that the material amendment to the wording in Table 10.1 does not address our concern that no particular beneficiary be singled out. Further, our proposed wording explicitly links the WSP to Strategic Outcome 9 of the NPF, which follows logically from the narrative that precedes Table 10.1 in the Draft RSES.

Arising from the above, we would request that the wording of Table 10.1 be amended in line with our original submission, noted in Appendix 2 attached.

We acknowledge that the Material Amendments include some five new water supply policies. Of these we request that changes are made to New RPO 131 and New RPO 133 as set out in Appendix 2.

Yours faithfully,



Sean Laffey
Head of Asset Management.

APPENDIX 1

Proposed edits to Table 5.1 – Strategic Development Corridors - with regard to *Enabling Infrastructure*

Corridor	Residential	Phasing / Enabling Infrastructure (edits to this column only)
Docklands and City Centre	Docklands	LIHAF Dodder bridge, LUAS extension to Poolbeg, local and wider area Water upgrades, Waste Water upgrades and district heating.
	City Centre	LUAS cross city and extension to Finglas, Metrolink, roads and social infrastructure. DART underground for long term capacity, and Waste Water upgrades.
	Naas Road	Multi-modal public transport, site assembly, waste water upgrades and local area water network upgrades.
North-South Corridor	North Fringe	Access to rail station, bus upgrades LIHAF road connections, water and drainage upgrades, parks and social infrastructure.
	Donabate	DART expansion, LIHAF Distributor Road and railway bridge, social infrastructure, local Water network upgrades and Wastewater upgrades.
	South County Dublin	LIHAF access road and new station at Woodbrook-Shanganagh. Access to Bray station and PT bridge. Waste Water upgrades. Local and wider area Water Network and storage upgrades.
	Bray Fassaroe	Bus Links, Distributor Road, N/M11 Upgrades, new bridge to Old Conna. Waste Water upgrades. Local and wider area Water Network and storage upgrades.
North-West Corridor	Dublin 15	Public transport, Clonsilla Station, Water Network and Waste Water upgrades.
	Leixlip	LUAS Extension to Maynooth, Roads upgrade, community and social infrastructure, Waste Water and local Water Network upgrades.
	Maynooth	LIHAF Relief Road and bridge, Road upgrades, Waste Water and local Water Network upgrades, LUAS extension to Maynooth.
	Dunboyne	Outer Orbital Road, Distributor Road, additional Watermains and Waste Water upgrades.
South Western Corridor	Western Suburbs	Add to end - New water network infrastructure to supply Clonburriss SDZ and Local network upgrades.
	LUAS red line	Brownfield conditions and site assembly. Waste Water upgrades and Citywest junction link at Tallaght/Fortunestown.
Metrolink Corridor	Dun Laoghaire	Metrolink, LUAS green line upgrades. Public transport and roads upgrades. LIHAF road and bridge, N11 Junction Cherrywood and Water upgrades.
	Swords	Public realm, pedestrian and cyclist provision. LIHAF road improvements, Bus Connects. Additional runway and improved access to Airport. Waste water upgrades. Local and wider area Water Network upgrades.
	Lissenhall	Metrolink, Roads improvements and Expanded internal road network and Waste Water Network Upgrades.

Table 10.1: Strategic Water Services Projects

<p>FROM THIS</p> <p><i>“The Water Supply project for the Eastern and Midlands Region to supply water to the Greater Dublin Area (GDA) and other communities including Athlone”</i></p>	<p>TO THIS</p> <p><i>“The Water Supply Project for the Eastern and Midlands Region to supply water to the Greater Dublin Area and other communities in the Eastern & Midlands Region in accordance with the sustainable approach set out by National Strategic Outcome 9 of the National Planning Framework”</i></p>
<p>Amendment 131 - New RPO - Comment - Policy would benefit from simplification</p>	
<p>FROM THIS</p> <p><i>“Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Planning Authorities and demonstrate phased infrastructure led growth to meet demands on the water supply, suitability of new and/or existing drinking water sources (for example hydromorphological pressures) and prevent adverse impacts on the integrity of water dependent habitats and species within the Natura 2000 network.”</i></p>	<p>TO THIS</p> <p><i>“Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Planning Authorities and provide for phased infrastructure-led growth that is commensurate with the carrying capacity of water services in order to protect the environment and designated European networks.”</i></p>
<p>Amendment 133 - New RPO – Comment - There may be very few water resources made redundant by the WSP as part of Phase 1 of the project.</p>	
<p>FROM THIS</p> <p><i>“Local Authorities and Irish Water should work together to examine significant raw water sources which may be made redundant by the Water Supply Project for the Eastern and Midlands Region with a view to reserving and protecting them for future back up or ‘windfall’ type economic development opportunities where high water use is required.”</i></p>	<p>TO THIS</p> <p><i>“Local Authorities and Irish Water should work together to ensure that future development and required water infrastructure are aligned, with Irish Water’s National Water Resources Plan, a critical component in this.” The NWRP is Irish Waters 25 year strategy to ensure we have sustainable, secure and reliable drinking water supplies for everyone.</i></p>