



The Department welcomes that the Assembly has incorporated the suggestions made in the Department's submission on the Draft RSES (dated 23rd January 2019). These include the inclusion of reference to the infill/brownfield targets set out in the National Planning Framework, additional policies supporting the rural economy, and amendments to RPO 7.29 in relation to Climate Action to reflect the roles of key agencies.

The Department however, has some concerns relating to proposed material alterations, detailed below, under the relevant headings:-

Chapter 3 Growth Strategy

1. The objective of Amendment 7 (point 4) "*to increase employment in strategic locations, with a focus on re-intensification and regeneration of lands within the M50, and...*", may conflict with national objectives to secure increased mixed-use and residential development on some lands that are currently in industrial/employment use within the M50. This national objective will require land-use change and new forms of development, subject to planning strategies and investment.

The wording of the proposed amendment appears to assume that all current industrial/employment lands inside the M50 will be suitable for the continuation of such uses and should be intensified. It is suggested that "*with a focus on re-intensification and regeneration of lands within the M50, and*", should be deleted. This would serve to align the remainder of the objective towards the other suitable locations referred to, such as near public transport nodes and commercial/research synergies, which do include some lands within the M50.

2. Amendment 7 (point 5) expands to "*include district heating and water conservation.*" These measures, while important, may not be suitable in all circumstances and are also quite specific at the level of compact growth enablers. They should either be omitted at this point in the document, or, alternatively, changed from "*to include*", to "*which may include*".
3. Amendment 10 introduces a New Regional Policy Objective that requires a Quantitative Assessment of Proposals for Greenhouse Gas Emissions (GHGs). While



the purpose of this new text is understood, it is drafted in the form of primary legislation, which is not appropriate for inclusion in an RSES document, for a number of reasons. Both DHPLG and DCCAE are working on proposals to further develop capacity and requirements in this area.

This work includes objectives to develop a suitable methodology for measuring carbon emissions, appropriate to strategic land use designation and related transport infrastructure in the context of the preparation of City/County Development Plans.

DHPLG is currently developing updated Development Plan Guidance for local authorities that will be available for future development plan review processes further to publication of the RSES. Such guidance will address this issue.

It would be premature to address this matter as proposed in Amendment 10 and it would be beyond the remit of the RSES to render approval of land use designation or transport infrastructure, conditional on consistency with GHG emissions reductions targets.

It is suggested that the proposed amendment should be reworded as follows, which would be appropriate to the remit and scope of the RSES:-

“Support the development of a methodology to quantitatively assess the impact of city and county development plan strategies on carbon reductions targets and of measures to monitor and review progress towards implementation of those strategies.”

Chapter 3 Growth Strategy / Chapter 4 People and Place

4. Amendment 6 (point 8) and Amendment 11 refer to the classification of “i) Moderate Growth Towns” and “ii) Consolidation Towns”.

The intended objective of this further classification of medium-large towns that are not ‘Key Towns’ is understood, but it is of concern that the term “*moderate*” is poorly-defined and is likely to vary from settlement to settlement and from county to county.



It is also the case that it may be a desirable objective that there would be significant employment growth, but not necessarily significant population growth, in a consolidation town. In reality, the objective of consolidation will apply to all towns to some extent, especially given infill and brownfield objectives.

In addition, the RSES does not identify any specific towns for moderate growth or consolidation. Instead, this is to be addressed at local authority level, as part of future City/County Development Plan processes.

For these reasons, it is recommended that the wording set out in the draft RSES (dated January 2019) should not be amended as proposed.

Further to the above, DHPLG is currently developing updated Development Plan Guidance for local authorities that will be available for future development plan review processes further to publication of the RSES. It is intended that such guidance will address this issue.

However, it is suggested that if a change is required to further detail the text set out the draft RSES, the proposed “*moderate growth town*” may be replaced by “*self-sustaining growth town*”. It may also be appropriate replace “*consolidation town*” with “*self-sustaining town*”.

Chapter 4 People and Place

5. Amendment 13 proposes to revise Section 4.3 Taking Account of Existing Plans to include additional guidance that “*Core Strategies should apply prioritisation measures rather than de-zoning of land where a surplus of land is identified in existing plans...*”

It is a concern that this amendment, as worded, could be restrictive insofar as it could limit individual local authorities, the Office of the Planning Regulator (OPR), the DHPLG and ultimately the Minister, to one course of action, i.e. to only apply prioritisation measures in situations where de-zoning may be desirable and/or necessary. Alternatively a combination of such measures may be suitable.



Further to this, DHPLG is currently developing updated Development Plan Guidance for local authorities that will be available for future development plan review processes further to publication of the RSES and will address these options in more detail.

It is therefore suggested that the proposed text be amended to delete “*should*” and “*rather than*” and replace them with “*may*” and “*and/or*” as follows:-

“Core Strategies may apply prioritisation measures and/or de-zoning of land where a surplus of land is identified in existing plans...”.

6. Amendment 33 includes a new RPO for Maynooth allowing for the preparation of a cross-boundary Joint Local Area Plan by Kildare and Meath County Councils to provide a co-ordinated planning framework for the Maynooth area. While the Department notes the consideration of a cross-boundary plan for this area, there shouldn't be any presumption of development zoning across the boundary further to the RSES, in advance of both local authorities concluding and agreeing a joint local area planning process, particularly as the RSES is not a mechanism for zoning land. Therefore, in order to ensure transparency, clarification should be added to this amendment.
7. Amendment 58 supports the examination of a University for the Midlands and in particular Tullamore's role in its provision. There is an existing Institute of Technology in Athlone and while the Department would be supportive of any proposal for third level outreach facilities in Tullamore to complement the provision of services in Athlone, there are no proposals for an additional separate University for this region. Therefore, it is suggested to amend this text to read as follows; “*To support Athlone Institute of Technology and examine the need for complementary third level outreach educational facilities to be provided in Tullamore*”.
8. The Department is broadly supportive of Amendment 60, introducing a new RPO to support any future development and expansion of the Midlands Regional Hospital. However, it is the Department's opinion that the inclusion of the text “*centre of excellence*” is beyond the remit of the RSES and is a matter of health policy and would



not be appropriate. Therefore, the Department respectfully requests the deletion of the text “*centre of excellence*” in amendment 60.

Chapter 5 Dublin MASP

9. Amendment 73 is proposing to amend the core strategy section to include additional guidance that the determination of population targets within the Dublin MASP is a matter for the local authorities within the MASP area and the MASP Implementation Group.

It is reasonable that this would be agreed as suggested, provided agreement can be reached within six months of publication of the approved RSES in order to provide an appropriate level of information necessary for effective review of the relevant City/County Development Plans.

The Regional Assembly should ensure that the RSES is fully in accordance to the NPF particularly National Planning Objective 68.

Should it not be possible to reach agreement within the above timeframe, it is recommended that the Assembly refer the matter to the Minister for further determination. Having regard to above it may be beneficial for the Assembly to include additional clarification text as outlined above as follows:-

“The determination of population targets for local authorities within the MASP in accordance with the NPF and this strategy, including the population targets for the city and the metropolitan key towns, should be agreed in consultation with the MASP Implementation Group, within six months of publication of the RSES to inform the preparation of the core strategies of the relevant city and county development plans. Should it not be possible to reach agreement within the above timeframe, the Assembly will refer the matter to the Minister for further determination.”

Chapter 5 Dublin MASP / Chapter 8 Connectivity

10. The coordination of a planned strategic connectivity network facilitating development is a key tenet of national planning policy and is essential in the pursuit of NPF objectives relating to compact growth, brownfield development and reducing carbon emissions.



In relation to Connectivity and Integrated Land use and Transportation, parts of Amendments 69, 70, 77, 113 and 114 require adjustment in order to reflect more accurately national transport policy. These amendments contain additional projects, which go beyond the scope of the *Transport Strategy for the Greater Dublin Region 2016-2035*, National Transport Authority, the *National Planning Framework* and, the *National Development Plan 2018 – 2027*, Government of Ireland.

The Department has concerns in relation to some of the amendments to the rail and road projects including:

- The construction of Metrolink to include underground extensions to UCD and Knocklyon,
- The LUAS network expansion to include Hazelhatch, Booterstown and Blessington, and
- The inclusion of the N81 Tallaght to Hollywood road scheme including linkage roads from Baltinglass and Dunlavin to N9 from N81.

While these additional projects may be of future merit, they are somewhat premature within the period of this RSES at this point.

The proposed material amendments also seek to omit reference to the Dublin Port Southern Access Route project, which entails a road link connecting the southern end of the Dublin Port Tunnel to the South port area. The Department notes that the NTA clarified within their strategy that while the section of the route from the Dublin Port Tunnel to the South Port area is included for delivery in their Strategy, the remainder of the route was not proposed for development during the Strategy period. Therefore, reference to this portion of the Southern Access Route project should be included within the RSES.

It is recommended that Amendments 69, 70, 77, 113 and 114 are revised in order to accurately reflect and be in line with national transport, spatial development, and public investment policy.



Chapter 7 Environment and Climate

11. Amendment 99 relates to a new RPO to develop guidance for riparian setbacks. Given that any such guidance would be prepared by the relevant national agencies and Departments with input from appropriate stakeholders, it is suggested that this RPO would be re-worded to read as follows; “*Support the development of guidance for assessment of proposed.*”.

12. Amendment 103 amends RPO 7.30 relating to climate change stating that ‘*EMRA in conjunction with appropriate stakeholders shall identify the sectoral emissions and assign a series of sectoral emissions reduction targets...*’

This is currently a matter that is being addressed by DCCAE and as such, is beyond the remit of the RSES to assign sectoral emissions reductions targets. Moreover, there are no regional decarbonisation plans that would support this amendment. It is suggested that the proposed amendment be deleted.

The officials of the Department are available to discuss the matters raised above in further detail as necessary to assist the Assembly in the statutory RSES process.

Yours sincerely,

A handwritten signature in black ink that reads "Maria Graham".

Maria Graham,
Assistant Secretary
Planning Division