



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

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Offaly County Development Plan 2021-2027: Public Consultation, Issues Paper

The Eastern and Midland Regional Assembly notes the publication of the 'Public Consultation Issues Paper' to inform the preparation of the Offaly County Development Plan 2021-2027 and sets out hereunder observations on behalf of the Assembly. The submission has been reviewed by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 13th September 2019.

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 which was made on 28th June 2019. In line with the provisions of the Planning and Development Act 2000, as amended, the Planning Authority shall ensure, when making the County Development Plan, that it is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy. In this regard, The Assembly welcomes the publication of the Issues Paper in preparation of the new Offaly County Development Plan.

Legislative Context

As required by Section 11(2) of the Planning and Development Act 2000, as amended, the Regional Assembly received notice from the Council on July 30th 2019, of its intention to review its existing County Development Plan and to prepare a new County Development Plan for its area.

Under Section 27A of the Planning & Development Act, 2000 (as inserted by Section 17 of the Planning and Development Act, 2010) the Eastern and Midland Regional Assembly, is obliged to prepare submissions / observations to be submitted to the relevant planning authority and copied to the Office of the Planning Regulator.

The submission of the Regional Assembly shall include, but shall not be limited to, recommendations regarding a number of matters including, policies or objectives of the Government in relation to national and regional population targets and the best distribution of residential development and related employment development with a view to promoting consistency with the RSES and assisting in drafting the Core Strategy; promoting regional development through maximising the potential of the region; planning for the best use of land having regard to location, scale and density of new

development to benefit from investment of public funds in transport infrastructure and public transport services; and collaboration between the planning authority and the regional assembly in respect of integrated planning for transport and land use, and the promotion of sustainable transportation strategies in urban and rural areas, including the promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change.

Accordingly, 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 27A of the Planning and Development Act 2000 as amended.

Ensuring Consistency with the RSES- Key Areas

Notwithstanding the requirement of the Planning Authority to ensure, when making the County Development Plan, that the Plan in its entirety is consistent with the Regional Spatial and Economic Strategy, the following are key areas that the Assembly would like to bring attention to in order to inform the future Offaly County Development Plan 2021-2027.

Growth Strategy of the RSES:

In preparing the forthcoming County Development Plan, it should be noted that Growth Enablers have been specified (Section 3.2) as part of the RSES to facilitate growth across the Region. Growth Enablers are underpinned by the spatial mapping of Functional Urban Areas (FUAs) within the Region. The FUAs for the Eastern and Midland Region are The Dublin Metropolitan Area, The Core Region and The Gateway Region. In this regard, the attention of the Council is brought to the appropriate general Growth Enablers and the Growth Enablers of both the Core Region and Gateway Regions, which are relevant to County Offaly.

In addition, when formulating the above, the future County Development Plan shall ensure consistency with RPOs 3.2 and 3.3, aimed at securing compact growth in line with the NPF.

Settlement Strategy:

The RSES defines Tullamore as a Key Town and the Settlement Hierarchy of the County Development Plan is required to reflect this. Acknowledgement of this as part of the Issues Paper is welcomed by the Assembly. In formulating the Core Strategy, the attention of the Council is brought to Chapter 4 of the RSES, including Settlement Strategy RPOs 4.1 and 4.2, and Appendix B of the RSES (SPA and County Population Tables).

Table 4.2 of the RSES outlines the Settlement Typologies to be included as part of the Settlement Hierarchy, which are to be defined by the County Development Plan. This includes Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns, Villages and Rural areas. Regarding the Key Town of Tullamore, RPO 4.26 addresses the role of Key Towns within Core Strategies and this is augmented by RPOs 4.68-4.70 which specifically relate to Tullamore. Table 4.3 of the RSES provides further guidance and details policy responses for the different settlement typologies. Future County Development Plan policy should ensure consistency in this regard.

Section 3.1 and Appendix A of the RSES provide detail on the Asset-Based Approach to spatial development and it is considered that the Local Authority will find this useful in formulating a Settlement Strategy for the County Development Plan that secures the proper planning and sustainable development of the area.

Issues Paper

The Regional Assembly welcomes the explicit recognition, contained as part of the Issues Paper, of the policy hierarchy with which the Offaly County Development Plan is required to be consistent with, including reference to the RSES and National Planning Framework. In addition, the broad areas outlined including the Overall Vision, Towns, Villages and Regeneration, Housing, Climate Action and Energy, Economic Development, Natural Assets, Key Resources, Sustainable Communities and Rural Areas, are considered to provide a robust basis for scoping out and developing the overall strategy. This submission has detailed each of these sections below and consideration should be given to the following in order to ensure consistency with the RSES when formulating the County Development Plan.

Overall Vision:

In determining the overall vision of the Offaly County Development Plan 2021-2027, it is recommended that the Council consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES (Chapter 2) in crafting this. The RSOs are aligned to the National Strategic Outcomes (NSOs) of the NPF and it should be noted that the ability to demonstrate delivery of these may potentially be linked to future funding sources.

Towns, Villages and Regeneration:

The reference to Tullamore as a Key Town within the Issues Paper is welcomed. RSES policy for Tullamore is contained at Chapter 4 of the RSES and is relevant for the Planning Authority in formulating the County Development Plan. This should be considered in tandem with the points outlined above under the heading 'Ensuring Consistency with the RSES- Key Areas'.

Housing:

The Assembly welcomes the stated alignment that is required between policies of the NPF and RSES with the Core Strategy, Settlement Strategy and Housing Strategy of the County Development Plan. Points outlined above, under the heading 'Ensuring Consistency with the RSES- Key Areas' should be considered in this regard. Section 9.3 of the RSES deals specifically with 'Housing and Regeneration', whereas Section 4.8 of the RSES deals with housing in rural places. These sections will provide further direction to assist in formulating related policy for the County Development Plan.

The Council are reminded of the obligation to also prepare a Housing Need Demand Assessment (HNDA). RPO 9.5 outlines the commitment of the Regional Assembly to support local authorities in the provision of a Housing Need Demand Assessment. This is in keeping with National Policy Objective (NPO) 37 of the National Planning Framework.

Climate Action and Energy:

The Climate Action and Energy Section of the Issues Paper is a welcome addition. This is in keeping with the RSES Key Principle on Climate Action, which is supported by RSOs 6-11. Information contained at Chapters 7, 8 and 10 of the RSES will assist the Local Authority in developing related policy. Included as part of this is specific reference to the challenge of climate change and of particular relevance to County Offaly attention is drawn to the Guiding Principles for peatland areas and RPO 7.29 which refers to the role of the Peatlands.

Economic Development:

The Assembly welcomes the inclusion of a section on Economic Development as part of the Issues Paper. Economic Opportunity is one of the three Key Principles of the RSES and is supported by RSOs 12-16. Chapter 6 of the RSES deals specifically with Economy and Employment and information contained as part of this chapter will assist the Local Authority in developing related policy. Of particular note for County Offaly are; the relevant stated sectoral opportunities at Section 6.4 of the RSES, RPOs 6.4-6.8 and RPO 4.84 relating to the rural economy (including the Peatlands), RPO 6.9 which supports relevant actions within the Regional Enterprise Plan related to County Offaly and RPOs 6.19 and 6.20 that specifically relate to tourism in Offaly. Section 6.5 also details specific sectors, including retail which is specifically mentioned as part of the Issues Paper, and should be consulted in developing related policy.

Natural Assets and Key Resources:

The recognition and promotion of 'Natural Assets' and 'Key Resources' of County Offaly is a welcome inclusion within the Issues Paper. As part of the Issues Paper, it is noted that the two topics of 'Natural Assets' and 'Key Resources' cover a breadth of subjects including biodiversity, landscape, natural heritage, green infrastructure, protected structures and infrastructure related to transport, water and waste. Elements of Chapters 7, 8, 9 and 10 of the RSES will provide assistance to the Local Authority in developing related policy in this area, including RPO 8.6 which outlines that a Local Transport Plan (LTP) for the settlement of Tullamore is to be prepared.

Sustainable Communities:

The section 'Sustainable Communities' contained as part of the Issues Paper, is a welcomed inclusion by the Assembly. This is in keeping with the RSES Key Principle of Healthy Placemaking aimed at promoting people's quality of life through the creation of healthy and attractive places in which to live, work and visit. The information contained as part of Chapter 9 of the RSES, which details subjects including diversity, inclusivity, housing, regeneration, healthy placemaking, social opportunity, economic opportunity, access to childcare, education, health services and access to arts, culture, language and heritage, will support the Local Authority in developing relevant policy for the future County Development Plan.

Rural Areas:

The RSES recognises the contribution that rural places make towards regional and national development in economic, social and environmental terms. This is specifically reflected in Section 4.8 of the chapter People and Place and Section 6.4 of the chapter Economy and Employment, and it is considered that these elements of the RSES will assist in formulating future County Development Plan policy. Given the particular reference as part of the Issues Paper, it should be noted that RPO 4.84 specifically relates to the after use of Bord na Móna peatlands and supporting the longer term strategic planning for these areas.

Environmental Protection

The assembly acknowledge and welcome the statement as part of the Issues Paper that the County Development Plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment.

The Assembly recommend early engagement with the relevant bodies in this regard, including the Office of Public Works, Department of Culture, Heritage and the Gaeltacht, the National Parks and Wildlife Service, the Environmental Protection Agency and Irish Water.

General

In formulating the County Development Plan, the Council are advised to give consideration to the style and legibility of the future County Development Plan, in order to ensure that the information contained as part of the County Development Plan is as clear and accessible as possible for future users.

Conclusion

The Regional Assembly welcome the publication of the Issues Paper which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. The Assembly look forward to corresponding with the Council on the forthcoming stages of the County Development Plan process.

It should also be noted that the officials of the Regional Assembly are available to discuss the matters raised above and will be available throughout the County Development Plan process.

Regards,



Jim Conway

Director

Eastern and Midland Regional Assembly

16th September 2019