

Dear Sir/ Madam, Please find attached a copy of the observations of the Eastern and Midland Regional Assembly on the Draft Offaly County Development Plan 2021-2027, issued in accordance with the provisions of Section 27B of the Planning and Development Act 2000, as amended. This submission has been reviewed by the executive and approved by the Cathaoirleach of the Assembly. I would be grateful if a receipt of this submission can be issued for our records. If you have any queries please feel free to contact me using the details supplied. Kind Regards, Clare Bannon







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

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### **Draft Offaly County Development Plan 2021-2027**

The Eastern and Midland Regional Assembly notes the publication of the Draft Offaly County Development Plan 2021-2027 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been reviewed by the executive, and approved by the Cathaoirleach of the Assembly.

#### **Regional Spatial and Economic Strategy (RSES)**

As indicated in the Assembly's previous submission to the County Development Plan review process made under Section 27A of the Planning and Development Act 2000, as amended, The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region, made on 28<sup>th</sup> 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 Offaly 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 follows 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. Accordingly, the Assembly welcomes the overall approach and effort of Offaly 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, Settlement Strategy, Housing Strategy
3. Climate Action & Energy
4. Biodiversity and Landscape
5. Economic Development
6. Tourism and Recreational Development
7. Retail & Town Centre Strategy and Regeneration
8. Sustainable Mobility & Accessibility
9. Social Inclusion, Community and Cultural Development
10. Built Heritage
11. Water Services and Environment
12. Land Use Zoning Objectives and Development Management Standards
13. Settlement Plans
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 a county profile, details on accompanying strategies, strategic vision and objectives, demonstration of compliance with Section 28 Guidelines, and implementation and monitoring. In particular, the Assembly welcome Table 1.3 which outlines the main County Strategic Outcomes, which have been crafted in line with the three Key Principles of the RSES, namely Healthy Placemaking, Climate Action and Economic Opportunity.

Whilst Section 1.4 mentions the NPF and RSES, it is considered that this section could be strengthened by referencing these documents in terms of the legislative context and planning policy hierarchy with



which the County Development Plan is required to be consistent with. The inclusion of figures 1.4 and 1.5 of the Draft Plan are welcome, however figure 1.4 is of the Regional Strategic Outcomes (RSOs) and not Regional Policy Objectives (RPOs) as stated. In addition, there is a more up to date version of figure 1.5, presented as Figure 4.2 of the RSES, which can be made available to the Council.

## **2. Core Strategy, Settlement Strategy and Housing Strategy**

The Assembly acknowledge the clear and evident work that has gone into the preparation of Chapter 2 which details the Core Strategy, Settlement Strategy and Housing Strategy.

### Statutory Requirements

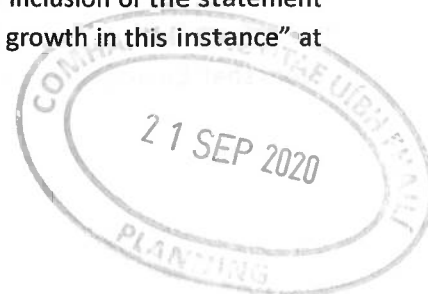
Offaly County Council are reminded of their obligations to prepare a Core Strategy in accordance with the provisions of Section 10 of the Act. Relating specifically to this chapter of the Draft Plan, the Assembly draws the attention of the Council to the contents of Section 10 (2A), (2B) and (2C) of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

### Topic 1- Core Strategy:

The stated principles of growth at Section 2.1.4 of the Draft Plan are considered to provide a robust foundation for the Chapter. This includes key principles such as compact growth, focus on infill/brownfield lands, transition to a low carbon society, and developing the Key Town of Tullamore amongst others. The Assembly welcome the statement that these principles stem from the NPF and RSES and have been crucial in the formation of the Core Strategy Table and Core Strategy Map, and indeed the remainder of the County Development Plan.

The Core Strategy Table indicates a population increase for County Offaly of 9239 people until 2027. This level of overall population growth is considered to be in keeping with the population prescribed for the County at Appendix 2 of the the NPF Implementation Roadmap, which details a high-level population projection of 86,500 (high) to 2026 and 90,000 (high) to 2031.

It is noted that the Core Strategy Table outlines that the population for the Key Town of Tullamore is set to increase by 4853 people to 2027 from its recorded 2016 population of 14,607. This marks a growth rate of 33%, which is beyond the percentage growth rate projected for the Regional Growth Centres of Athlone, Drogheda and Dundalk. The National Planning Framework indicates that in each Regional Assembly area, where it is proposed to target significant growth, i.e. at a rate of 30% or more above 2016 population levels to 2040, in any settlement not identified in Policy 2a or Policy 2b of the NPF, for example where there will be major employment or infrastructure investment, this will be on an agreed basis, aligned with investment in infrastructure and/or the provision of employment, together with supporting amenities and services. This is further detailed by National Policy Objective (NPO) 9 of the NPF. In order to ensure compliance with the requirements of the NPF and RSES, the Council are therefore asked to provide a robust and clear rationale, in accordance with NPO 9, that outlines the suitability, or otherwise, of this growth level for Tullamore, prior to finalisation of the Draft Plan. It is noted that currently this issue is only addressed by way of inclusion of the statement "The Key Town of Tullamore lends itself to significant rates of population growth in this instance" at Section 2.1.5 of the Draft Plan.



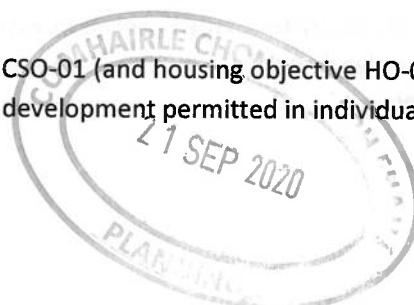
Whilst the Core Strategy table provides a synopsis of how the population projections across the County translate into the required quantum of residential zoned land, the Assembly consider that further clarification is required to ensure consistency and transparency. Whilst the final column outlines 'Ha. of land required for new residential units to 2027', there is no indication as to the quantum of residential land that is zoned as part of the Draft Plan and Local Area Plans. It is therefore recommended that the Core Strategy Table is amended to clearly demonstrate the quantum of land that is zoned for residential purposes in each of the respective settlement categories, including all zoning categories that provide for residential development in accordance with the provisions of Section 10 (2A) (c) and (d) of the Act. Furthermore, whilst the column 'At least 30% of residential units into built-up footprint' outlines the quantum of residential units required to achieve same, it is not clear as part of the Draft Plan as to whether the lands zoned achieve this or otherwise. Accordingly, it is recommended that the Core Strategy Table be updated to indicate the quantum of new homes that will be delivered within the existing built up footprints of each of the respective settlement categories, where appropriate, based on the location and yield of lands zoned. The Assembly also bring your attention to the requirements of page six of the NPF Roadmap, whereby the Council are asked to include details of the infill/brownfield and greenfield capacity of the lands zoned as part of the Draft Plan.

The Assembly welcomes the inclusion of the paragraph on density and the indication that higher densities are applied to higher order settlements i.e. the Key Town of Tullamore, with a graded reduction in residential densities for Self-Sustaining Growth Towns and Self-Sustaining Towns, and other towns and villages that is commensurate to the existing built environment. 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*'.

It is noted that in determining the number of households required for each respective settlement level, and based on calculations using the stated density applied, that varying household size figures have been used across different settlement tiers. It is recommended that a clear rationale should be provided for this as part of the finalised County Development Plan, in order to ensure transparency and that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the development plan.

The Assembly welcomes the inclusion of the Core Strategy Policies and Objectives contained at Sections 2.2 and 2.3 of the Draft Plan, including the commitment to support the delivery of compact growth in accordance with RPO 3.2 of the RSES. The Assembly consider that a policy promoting the regeneration of underused town centre and brownfield/ infill lands in accordance with RPO 3.3 would be a positive addition to the Plan.

The inclusion of Core Strategy Objective CSO-01 (and housing objective HO-03) which outlines that a record shall be maintained of residential development permitted in individual settlements in order to



ensure compliance with the population allocations defined by the Core Strategy Table, is welcomed. It is recommended that this should be amended to include the monitoring of residential development permitted as single rural houses. 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.'*

## Topic 2: Settlement Strategy

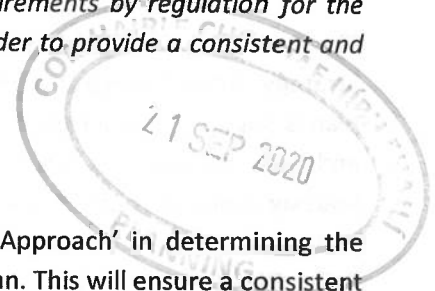
The Assembly welcome the utilisation of the RSES's 'Asset Based Approach' in determining the Settlement Strategy for County Offaly, as per Table 2.3 of the Draft Plan. This will ensure a consistent approach. In addition, the Regional Context for the Settlement Strategy, presented at Section 2.4.3, benefits the Chapter, including detail on the functional areas relevant to County Offaly which includes the Core and Gateway Regions. It is noted that the aforementioned table 2.3 states that Tullamore was designated a Key Town as part of the NPF, however, it should be noted that Tullamore was designated a Key Town through the RSES. It is considered, subject to the information below that the approach of Offaly 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.

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; Key Town (Tullamore), Self-Sustaining Growth Town (Birr), Self-Sustaining Towns (Portarlinton and Edenderry), Towns, Rural Villages and Sráids, and the open countryside. The information contained in Table 2.4, which documents each tier of the Settlement Hierarchy, is considered to support the overall aims of same.

The Settlement Strategy policies contained at Section 2.5 are welcome, including policies SSP 1-5 which support strategic issues such as compact growth and arresting decline and stagnation. Policies relating to the Key Town of Tullamore are provided at SSP 06-07 of the Draft Plan. It is considered that this policy framework could be strengthened to reflect RPOs 4.68- 4.70 of the RSES that are specific to Tullamore.

The Assembly welcomes the inclusion of the Self-Sustaining Growth Town and Self-Sustaining Towns Tiers, whereby Birr, Edenderry and Portarlinton have been selected. Whilst a brief statement, reflective of the wording of the RSES has been included as reason for selection of these settlements, it is recommended that the Draft Plan be strengthened through the provision of a more robust and justified reasoning for the designation of the aforementioned settlements.

It is noted that included as part of this section of the Chapter, is criteria detailing the requirement for housing in the open countryside. The intention of the Council to ensure the protection of the open countryside through the avoidance of urban generated housing is noted and welcomed by the



Assembly. Notwithstanding this, it is recommended that prior to the finalisation of the Draft Plan, the Council ensure that related policy in this regard is consistent with RPOs 4.80 and 4.81, NPO 19 of the NPF and the content of Circular Letter PL 2/2017 “Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans.”

### Topic 3: Housing Strategy

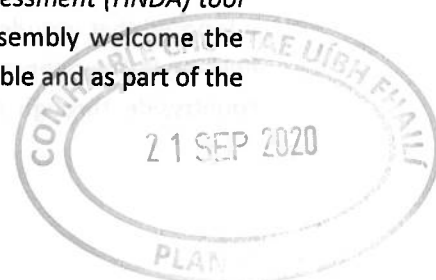
The Assembly welcomes the inclusion of housing policy that has been informed by the Housing Strategy that includes a Housing Need Demand Assessment (HNDA). The HNDA ensures that the draft plan is supported by a robust methodology to inform policies and funding initiatives around housing and land requirements, whilst supporting the preparation of the housing strategy and other related housing policy outputs. It is acknowledged that Offaly 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 initiative of the Council in this regard is extremely welcome.

The inclusion of a number of strategic policies and objectives to ensure the provision of housing needs within County Offaly is welcome. This includes, for example, policy and objectives related to ensuring the provision of specific housing needs for the likes of the elderly, disabled, homeless, travellers etc, encouraging the reuse of upper floors of commercial premises, promoting social integration within residential developments, and the provision of quality social and affordable housing to name a few.

It is also noted that considerable information that informs this chapter is contained as part of the Draft Offaly Housing Strategy. It is considered that some of the material presented as part of the housing strategy, should be provided here as part of the Draft Plan written statement in order to enhance the robustness of the Chapter as a whole. This includes for instance (and as previously requested in the preceding paragraphs relating to the Core Strategy), providing clear information on the housing requirement for County Offaly for the plan period and the housing yield provided by the quantum of lands zoned that enable residential development. In addition, the Assembly request that clarity is provided between the Core Strategy table and the Housing Strategy document with respect to the number of residential units required and the period to which this applies.

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 Offaly, 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.

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 the Rural Single Housing requirement as part of the Core Strategy Table and as part of the





Housing Strategy. It is recommended that this chapter of the Draft Plan be strengthened through the inclusion of the rationale outlining how this figure was arrived at.

### 3. Climate Action and Energy

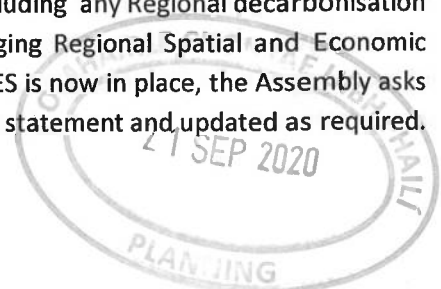
The Assembly welcomes the Climate Action and Energy Chapter that deals with an array of topics such as, renewable energy, circular and bioeconomy, wind energy, electricity transmission and distribution, energy storage, peatlands, agriculture, forestry and flooding. It is considered that the chapter could benefit from a chapter aim that relates to the overall Strategic Vision and Objectives of the Draft County Development Plan contained at Section 1.5 of the Draft Plan. The Chapter begins with an in-depth presentation of policy related to the contents of this chapter. Whilst this information is useful the Council are asked to reconsider the inclusion of all of this content which runs at 17 pages of the 29 page chapter. Notwithstanding this, it is considered that the role of the appropriate Climate Action Regional Office, currently not detailed, should be included as part of this contextual overview.

The inclusion of Section 3.1.4 of the Draft Plan which details some of the related Climate Action RSOs is a welcome addition. Climate Action is a Key Principle of the RSES and underpins the RSES in its entirety. Climate Action RSOs are numbered 6-11. In addition to the RSOs there are also a number of relevant RPOs relevant to this Chapter including RPOs 3.6, 3.7 and those contained at Chapter 7 of the RSES, which may assist the Council. 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. Notwithstanding this, the Council are reminded of their obligations to comply with Ministerial Guidelines including the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change published in 2017.

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.

#### Climate Change Adaptation and Mitigation

It is noted that Objective CAEP-04 identifies that it is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation including 'any Regional decarbonisation Plan prepared on foot of commitments included in the emerging Regional Spatial and Economic Strategy for the Eastern and Midland Region'. Given that the RSES is now in place, the Assembly asks that greater clarity is provided with regard to the meaning of this statement and updated as required.



## Peatlands

The Assembly welcomes the inclusion of Objective of CAEP-13 that supports the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands and adjacent parts of the north west and southern regions, which meets the environmental, economic and social needs of communities in these areas, whilst also demonstrating leadership in climate change mitigation and land stewardship. This is in keeping with the guiding principles for the development of peatlands contained at Section 7.8 of the RSES and also numerous RPOs, such as RPO 4.84, 6.38 and 7.29. The Draft Plan is further strengthened by the inclusion of Objective CAEP-21 which outlines that it is Council policy to actively promote and support the 'Just Transition' and the EU Programme for Coal Regions in Transition, in particular to support communities which have been dependent on the peat industry for decades.

## Wind Energy

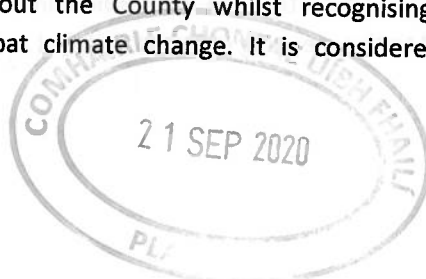
With reference to Wind Energy, the Assembly welcome that it is Council policy to recognise the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions. Prior to the finalisation of the Draft Plan including all related policy and objectives, such as objective CAEP-35 and Development Management Standard 109, it is recommended that the Council have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in December 2019, which are expected to be finalised in the near future.

## **4. Biodiversity and Landscape**

The Assembly welcome the inclusion of Chapter 4 regarding the biodiversity and landscape of County Offaly. As indicated previously, it is considered that an overall chapter aim in line with the Strategic Vision and Objectives of the Draft County Development Plan, would be beneficial. It is considered that the array of topics is reflective and supportive of the content of the RSES and in particular Chapter 7. Specifically, this includes section 7.5 of the RSES which deals with biodiversity and natural heritage including designated sites, section 7.6 which details ecosystem services, section 7.7 with regard to Green Infrastructure including Greenways, Blueways and Peatways, and Landscape at section 7.8.

The Assembly welcome the reference to the County's Peatlands within this context. This includes the numerous policies that are focused on the future sustainable use of the peatlands and their links within a wider regional network, including policies BLP 14-18. This is reflective of policy contained as part of the RSES including RPOs 4.84, 6.38, 7.19 and 7.29.

The inclusion of policies and objectives to support the Council's Green Infrastructure Strategy are positive additions to the Draft Plan. This includes objectives BLP 25-29 aimed at enhancing green infrastructure throughout the County whilst recognising how this can be used for carbon sequestration to combat climate change. It is considered that additional green infrastructure



objectives could be included that provide for the development and/or enhancement of specific green infrastructure routes throughout the County, having regard to the numerous, existing and potential, greenways, blueways and peatways that exist. This is also considered important so that any future funding applications, for the development or enhancement of same, can demonstrate policy compliance and that the proposal is plan led. In finalising this section of the Draft Plan, the Council 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.

## **5. Economic Development**

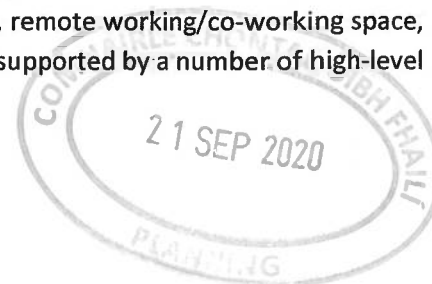
The Economic Development and Employment Chapter presented as part of the Draft Plan is welcomed by the Assembly. The Chapter's stated overall aim is to contribute towards the promotion of the maintenance and growth of employment across every sector in County Offaly that is sustainable, competitive, inclusive and resilient, so that the people of Offaly will have access to a range of quality employment opportunities enabling them to live and work in the county. The Economic Chapter of the Draft Plan contains four main themes. These are Strategic Policy, a Sector Focused Approach, the Rural Economic Strategy, and Information and Communication Technologies.

It is considered that the Chapter could be strengthened through the inclusion of an economic profile of County Offaly, that provides an overview of the economic environment of the County at present and therefore creates a strong evidence base for the formulation of related economic policy.

The Assembly welcome that the location of economic development in County Offaly will ensure that future development must have regard to an individual settlement's location within the overall settlement hierarchy and its capacity to facilitate the scale of such development proposed, as per Section 5.4.1, 5.4.2 and 5.4.3 of the Draft Plan and reinforced by policies ENTP- 05-10, and objectives ENTO-03-06. It is considered that the inclusion of additional policies and objectives tailored for each tier of the settlement hierarchy would reinforce the commensurate economic development of each settlement tier in a focused manner and therefore inclusion of same would be a positive addition to the plan.

The Assembly welcomes the inclusion of policy ENTP-02 that seeks to facilitate and work pro-actively with interest groups (both public and private sector) in the location of industry, business and enterprise in particular by zoning of lands for enterprise development and activity which can facilitate the provision of large-scale and small-scale development, as appropriate. Notwithstanding this policy inclusion, 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 Tullamore. In this regard, the Assembly ask that the Local Authority consider the inclusion of a complimentary policy and/or objective, to enable the delivery of same. Indeed, this economic briefing paper is forthcoming and may assist the council in the finalisation of the content of this Chapter.

The Assembly welcomes the inclusion of the 'Sector Focused Approach' within this Chapter, which covers topics such as Start-Ups, home based employment, SMEs, remote working/co-working space, FDI, Rhode Green Energy Park and Ferbane Food Campus. This is supported by a number of high-level



policies. It is considered that this section of the economic chapter would benefit from more detail on the sectors that are relevant to County Offaly at the moment and the potential sectors that are most relevant for the future. Some of these sectoral opportunities are identified at Section 6.4 of the RSES. It is considered that this will create a more robust and evidence-based framework for policy formulation within the finalised plan.

The inclusion of a Rural Economic Strategy is welcome, particularly with regard to the diversification of the rural economy and the support for the longer-term strategic planning of industrial peatlands. 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 line with the economic strategy of the RSES, it is recommended that the Draft Plan include additional policies and objectives relating to Smart Specialistaion, clustering, placemaking, skills and innovation, future proofing and anticipating economic structural change. The Council are directed to Chapter 6 of the RSES in this regard.

## **6. Tourism and Recreational Development**

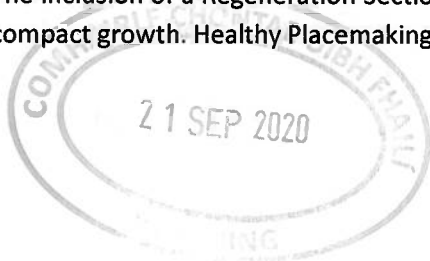
The inclusion of a stand-alone Tourism Chapter is a welcome addition to the Draft Plan. The RSES recognises the important role that tourism plays in County Offaly, including as a Growth Enabler for the Core and Gateway Regions as identified at Section 3.2 of the RSES, as a means to enable and sustain 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, 6.15-6.18 and 6.21, that seek to enhance the Tourism Sector; and RPOs 6.19 and 6.20 that specially deal with tourism development in County Offaly, including supporting linkages between the River Shannon Blueway, Grand Canal Greenway and Tullamore, and supporting the development of 'Midlands Cycling Destination- Offaly'. RPO 4.68 also identifies support for Tullamore as a tourism hub and tourism destination town with links to the Grand Canal Greenways, Lough Boora Discovery Park, Slieve Bloom Mountains and peatlands. It is considered that the overall Draft Plan could be strengthened through cross-referencing the information contained in this chapter to the Green Infrastructure Section contained at Chapter 4.

## **7. Retail, Town Centre Strategy and Regeneration**

The Assembly welcome the inclusion of this Chapter detailing Retail, Town Centre Strategy and Regeneration. It is noted that the Retail Hierarchy presented reinforces the settlement hierarchy and it is stated that the Chapter has been prepared in accordance with the provisions of the RSES and the Retail Planning Guidelines 2012. The Assembly recommend that a policy demonstrating a clear commitment to prepare a Retail Strategy for the County, should be included as part of the finalised Plan.

The inclusion of a Regeneration Section is beneficial, including the focus on healthy placemaking and compact growth. 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. The reference to achieving compact urban growth is a positive addition and is in keeping with NSO 1 of the NPF and RSOs 1 and 2 of the RSES. This is complemented through the Draft Plan's inclusion of sections detailing opportunity sites, taller buildings, derelict sites, vacant sites, vacant homes, and funding opportunities through mechanisms such as The Urban and Rural Regeneration and Development Funds.

With regard to information contained in the Draft Plan detailing 'Taller Buildings', the local authority is requested to ensure that this complies with the Specific Planning Policy Requirements of the Urban Development and Building Height Guidelines for Planning Authorities.

#### **8. Sustainable Mobility and Accessibility**

The Assembly welcome the inclusion of this Chapter which coincides with Chapter 8 Connectivity of the RSES. The Council is also directed to RPO 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.

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 settlement of Tullamore and in this regard objective SMAO-02 which reflects this policy is welcome. In addition, objective SMAO-09 of the Draft Plan is a positive addition and in keeping with RPO 8.10 and Table 8.4 of the RSES which supports the appraisal and delivery of the N52 Tullamore to Kilbeggan road project.

#### **9. Social Inclusion, Community and Cultural Development**

The inclusion of this chapter as part of the Draft Plan is an extremely welcome addition. It is reflective of, and reinforces, the content and policy of Chapter 9 of the RSES. This includes topics such as social inclusion, education, childcare, and arts, culture and language. The additional inclusion and reference to co-working hubs within this context is also considered to enhance the robustness of the plan and provide links to the economic chapter contained at Chapter 5.

#### **10. Built Heritage**

The inclusion of this chapter with regard to the Built Heritage of County Offaly is welcome. In finalising this Chapter, the Council should consult with Section 9.7 of the Draft Plan. It is considered that the policies and objectives of the Draft Plan are in keeping with same, including for instance, dealing with UNESCO World Heritage Sites as outlined at objective BHO-06 of the Draft Plan and RPO 9.29 of the RSES.

#### **11. Water Services and Environment**



The inclusion of this chapter is in keeping with Chapter 10 Infrastructure of the RSES. As indicated at point 8 above, RPO 4.2 is relevant in this regard, 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.

Having regard to the aforementioned RPO, the inclusion of policies such as WSP-02, which promote co-operation with Irish Water in the implementation and delivery of their relevant investment works programmes in order to provide infrastructure to service settlements in accordance with the Council's Core Strategy and Settlement Strategy, are welcome inclusions within the Draft Plan.

The inclusion of policy WSP-13 and objective WSO-03 with regard to the Irish Water Eastern and Midlands Water Supply Project pipeline is welcome and reflective of Table 10.1 and RPO 10.2 of the Draft Plan. Likewise the inclusion of WSO-07 is a positive addition, in keeping with RPO 10.4, that supports the servicing of small towns and villages through the serviced sites initiative to provide an alternative to one-off housing in the countryside, in accordance with National Policy Outcome 18b of the National Planning Framework and Regional Policy Objective 4.78 of the Eastern and Midland Regional Spatial and Economic Strategy.

## **12. Land Use Zoning Objectives and Development Management Standards**

This section of the Draft Plan provides comprehensive land use zoning objectives and a set of development standards 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.

It is noted that Section 12.2 'Zoning Principles' of Chapter 12 states that land is only zoned if it is serviced and/or serviceable within the life of this Plan based on Appendix 3 of the National Planning Framework. NPO 72a of the NPF states 'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.' In accordance with the aforementioned national policy objective, it is recommended that the Draft Plan be updated in order to fully comply with the provisions and requirements of NPO 72a and Appendix 3 of the NPF.

## **13. Settlement Plans**

The inclusion of the numerous plans for the various settlements throughout the County is a welcome addition to the Draft Plan. 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 strategic aims, a development strategy and opportunity sites, together with village plans and a general guide for Sráids.

## **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. The SEA indicates that there are no 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. The emerging conclusion of the AA is that the Plan will not affect the integrity of the European Sites, alone or in combination with other plans or projects.

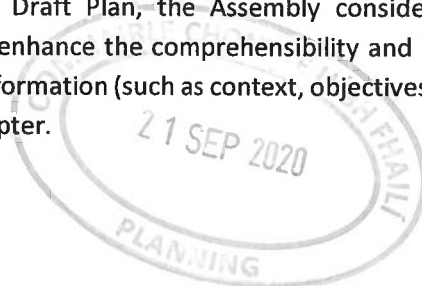
A Strategic Flood Risk Assessment (SFRA) was undertaken of the Draft Plan area having regard to the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities and associated circular. It is noted that all SFRA recommendations, including those related to land use zoning and flood risk management provisions, have been integrated into the Draft Plan.

## 15. Other

In order to ensure the success of the County Development Plan and notwithstanding Section 1.7 of the Draft 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.

With regard to the general provision of infrastructure, and notwithstanding the inclusion of CAEP-53 of Chapter 3, 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.

In terms of the structure of the chapters of the Draft Plan, the Assembly consider that the consolidation of themes within each chapter would enhance the comprehensibility and legibility of the plan. In this way the reader can access all of the information (such as context, objectives and policy provision) related to a topic at one point within a chapter.

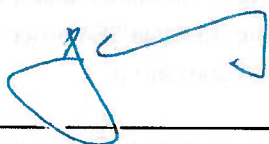


**Conclusion**

It is considered that the Draft Offaly 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 Offaly 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 Offaly County Development Plan.

Regards,



Jim Conway  
Director  
Eastern and Midland Regional Assembly  
21<sup>st</sup> September 2020

