



11th October 2019

Mr David Kelly
Director
Southern Regional Assembly
Assembly House
O'Connell Street
Co. Waterford

**RE: Proposed Material Amendments to the Draft Regional Spatial and Economic
Strategy for the
Southern Regional Assembly 2019 - 2031**

A Chara

I am directed by the Minister for Housing, Planning & Local Government to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department acknowledges the significant work that the Assembly is continuing to undertake in the preparation of the Regional Spatial and Economic Strategy (RSES).

There were over 200 submissions made to the Assembly during the consultation period of the Draft RSES, and further to this 145 material amendments are proposed, ranging from amendments to the growth strategy, economy, environment and climate, connectivity, infrastructure and place making.

The Department welcomes that the Assembly has incorporated a number of the suggestions made in the Department's submission on the Draft RSES (dated 8th March 2019). These include addressing potential ambiguity within rural areas and amending the SDZ objective.



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

Section 3.4 Cities – Metropolitan Areas

1. Material Amendment 4: New RPO B: Collaboration between Metropolitan Areas

The Department commends and is supportive of the ethos of MA4, a new objective, which focusses on collaboration between Metropolitan Areas. However, there are concerns regarding the last sentence of this paragraph, which states “*Central to the success of this collaborative approach is the early delivery of the M24*”. A collaborative approach can take many forms, the success of which may not necessarily be measured through the implementation of an infrastructural project. Accordingly, it would be inappropriate to include this sentence as the Department is of the opinion that the reference to this specific project within this objective is unnecessary.

Therefore, the Department respectfully requests the deletion of the text “*Central to the success of this collaborative approach is the early delivery of the M24*” in material amendment 4.

Section 3.5 Key Towns

2. Material Amendments 6 – 8: Key Towns

The Department in its submission to the Draft RSES, dated 8th March 2019, considered that it would be more appropriate for the strategy to identify no more than eight to ten Key Towns as opposed to the fourteen identified within the Draft.

The Director’s Report sought to make a distinction between the Key Towns, recognising the Key Towns with large populations – Kilkenny, Ennis, Carlow, Tralee, Wexford and Clonmel and Key Towns that generally have a smaller population but are strategically located urban centres (Killarney, Mallow, Nenagh, Thurles, Newcastle West, Clonakilty, Dungarvan and Gorey).



This is a consistent and reasonable approach given the hierarchy of the Southern Regional settlement pattern, which includes three cities (Cork, Limerick, Waterford). However, further reflection on the distinction between the 6 large scale Key Towns and the 8 network of Key Towns is considered necessary.

In particular, the Department suggests that the 30% population growth target attributed to all Key Towns should be revised to allow for a population growth target distinction between the 6 large scale Key Towns (Kilkenny, Ennis, Carlow, Tralee, Wexford and Clonmel) and the 8 network of Key Towns (Killarney, Mallow, Nenagh, Thurles, Newcastle West, Clonakilty, Dungarvan and Gorey). While recognising the important role of the 8 network of Key Towns, a standardised growth target of 30% in the wider context of forthcoming Development plans would be inappropriate.

In this regard, the Department suggests a clear population growth target distinction be made between the 6 large scale Key Towns (Kilkenny, Ennis, Carlow, Tralee, Wexford and Clonmel) and the 8 network of Key Towns (Killarney, Mallow, Nenagh, Thurles, Newcastle West, Clonakilty, Dungarvan and Gorey), which would be better addressed in the context of Development Plans.

Section 3.8 Networks

3. Material Amendment 24 (MA 73, 106): Limerick-Waterford Economic and Transport Corridor

In relation to Networks and Transport Investment Priorities, parts of Amendments 24, 73 and 106 require adjustment in order to reflect more accurately national transport policy. These amendments contain an additional project, which goes beyond the scope of the National Development Plan 2018 – 2027 Government of Ireland, and projects set out as priority by Transport Infrastructure Ireland.

The Department has concerns in relation to the reference to the potential upgrade of the N24 to M24. While this project may be of future merit, it is somewhat premature within the period of this RSES at this point.



It is recommended that Amendments 24, 73 and 106 are revised and any reference to the “potential upgrade of the N24 to M24” is removed in order to accurately reflect and be in line with national transport, spatial development, and public investment policy.

Section 7.1 Regional Quality of Life

4. Material Amendment 85: Amended wording to RPO 176

Objective 176 supports the further enhancement of higher education provision in the region through the establishment of high quality universities. The amended objective now also states that the “...*Multi-Campus Technology University of the South East including development of the Wexford campus and the Munster Technological University and the development of associated land and buildings for associated enterprise and industry*”.

While the Department is fully supportive of the enhancement of higher education there are concerns about the inclusion of text purporting to the use of land for particular zoning objectives such as the following text “*and the development of associated land and buildings for associated enterprise and industry*”

The wording of the proposed amendment appears to assume that lands and buildings associated with the universities would be suitable for enterprise and industry. This may or may not be the case and therefore would be more suited to assessment at a local level through the appropriate development plan process. It is beyond the remit of the RSES to render approval of land use designations particularly as the RSES is not a mechanism for zoning land.

The Department recommends removal of “*and the development of associated land and buildings for associated enterprise and industry*” from Material Amendment 85.



Section 1.2 Spatial Definition Limerick Shannon Metropolitan Area Strategic Plan (MASP)

5. Material Amendment 120 (MA 121, 126): Extension to the Limerick Shannon MASP boundary

This amendment proposes an extension to the Limerick Shannon MASP boundary to include the settlements of Ballina and Newport in Co. Tipperary (this will include the associated Electoral Divisions of Ballina, Birdhill, Kilcomenty and Newport).

The Metropolitan area boundaries were subject to Government consideration in May 2018 and are defined within Appendix 4 of the *Implementation Roadmap for the National Planning Framework, July 2018*. The boundaries of the MASPs were defined using a developed methodology based on a set of principles, which the Minister agreed and approved.

The proposed extension to the Limerick Shannon MASP boundary results in the inclusion of further rural areas, associated with the addition of the four Tipperary DEDs, and would significantly dilute the delivery of compact growth for the Limerick Shannon area. This is contrary to the requirements of the National Strategic Outcomes of the National Planning Framework. Moreover, from a local perspective, it is noted within the environmental assessment that the Waste Water Treatment Plants at Ballina/Killaloe and Newport are both operating over capacity and operations have resulted in licence non-compliances. No evidence basis has been provided for the justification of this proposed boundary extension.

The MASP boundary designation is a national designation and as such, it is beyond the remit of this RSES to amend the agreed and approved boundary of the Limerick Shannon MASP.

It is an objective of the RSESs to support the implementation of the National Planning Framework and the economic policies and objectives of the Government, in accordance with the principles of proper planning and sustainable development and ensure that the strategy is consistent with national planning policy, any relevant directives, policies or



guidelines under Section 23(1), (2) and (3) of the Planning and Development Act 2000 (as amended).

The Regional Assembly is therefore respectfully requested to reconsider material amendment 120 and uphold the alignment of the RSES with national policy as outlined in the National Planning Framework and the Implementation Roadmap for the National Planning Framework, July 2018.

Accordingly, the Department recommends that Material Amendment 120 is not adopted and that the Limerick Shannon MASP boundary reverts to the MASP boundary as per the Draft RSES as published in December 2018. Further to this, all references and text associated with the inclusion of the additional lands in Tipperary within the MASP boundary are to be omitted from material amendments 121 and 126.

The steps above are critical in ensuring that the decision of the Regional Assembly in relation to the adoption of the Regional Spatial & Economic Strategy is in accordance with statutory requirements of the Planning & Development Act 2000 (as amended), which must be upheld, including if necessary through the use of Ministerial powers under Section 31A of the Planning Act.

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

Maria Graham
Assistant Secretary
Planning Division