



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

3ú Urlár ó Thuaidh | Ionad Cathartha | An tSráid Mhór | Baile Munna | Baile Átha Cliath 9
3rd Floor North | Ballymun Civic Centre | Main Street | Ballymun | Dublin 9



Laois County Development Plan 2021-2027: Public Consultation Issues Paper

The Eastern and Midland Regional Assembly notes the publication of the 'Issues Paper' to inform the preparation of the Laois County Development Plan 2021-2027 and sets out hereunder observations on behalf of the Assembly. The submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 14th February 2020.

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 Laois 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 January 22nd 2020, 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 amended, the Eastern and Midland Regional Assembly, is obliged to prepare submissions / observations to be submitted to the relevant planning authority and copied to the Minister and 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; any policies or objectives for the time being of the Government or any Minister 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 (i) promoting consistency as far as possible, between housing, settlement and economic objectives in the draft development plan and core strategy and the regional spatial and economic strategy, and (ii) assisting in drafting the core strategy of the draft development plan; the objectives of providing physical, economic or social infrastructure in a manner that promotes regional

development through maximising the potential of the regions; 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, in particular in relation to large scale developments 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.

Under Section 11(4) of the Planning and Development Act 2000, as amended, A Chief Executive's Report prepared by the Planning Authority shall summarise the issues raised and recommendations made by the Eastern and Midland Regional Assembly in accordance with Section 27A of the Act, and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the draft development plan.

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 Laois 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 the Core and Gateway Regions, which are relevant to County Laois.

Compact Growth:

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. Relevant to County Laois, RPO 3.2 requires that local authorities set out measures to achieve compact development targets of at least 30% of new homes within the existing built up footprint of settlements. This is supported by a number of Guiding Principles contained at Chapter 3 of the RSES regarding the reuse of brownfield and infill sites to achieve compact development.

The RSES seeks that regeneration lands are identified in Core Strategies and that specific objectives are set out to develop the lands (RPO 3.3 refers), including measures to encourage urban regeneration of brownfield lands (RPO 9.8 refers). It is anticipated that further guidance on the delivery and monitoring of compact growth will be addressed in upcoming draft Departmental Guidelines for Development Plans.

Settlement Strategy including National and Regional Population Targets:

The RSES defines Portlaoise as a Key Town and the Settlement Hierarchy of the County Development Plan is required to reflect this. 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).

Population targets are to be applied in line with the requirements of the transitional population projections methodology in the Implementation Road Map for the NPF, issued under DHPLG Circular FPS04/2018. In addition, in order to ensure substantially better linkage between zoning of land and the availability of infrastructure, in accordance with National Policy Objective 72a and Appendix 3 of the NPF, the Local Authority are required to implement the new standardised methodology for core strategies that sets out a tiered approach to land use zoning. It is anticipated that the upcoming draft Departmental Guidelines for Development Plans, will further address the preparation of evidence-based core strategies that provide for an adequate supply of land and housing to meet projected population growth in the county.

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 Portlaoise, RPOs 4.26 and 4.27 address the role of Key Towns within Core Strategies and this is augmented by RPOs 4.71-4.74 which specifically relate to Portlaoise. 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 welcome the publication of the Issues Paper framed around a number of questions which the County Development Plan will address. In particular, the stated requirement to comply with national and regional planning policy and the policy hierarchy within which the County Development will sit, is a welcome inclusion.

The areas under which questions are framed within the Issues Paper include, Developing a Growth and Settlement Strategy, Developing an Economic Strategy, Infrastructure and Movement, Tackling Climate Change, Protecting Our Heritage, and Sustainable Communities. 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.

Developing a Growth and Settlement Strategy

Points outlined above, under the heading 'Ensuring Consistency with the RSES- Key Areas' should be considered when crafting the Settlement Strategy for the County. This section of the future Plan should emphasise the Core Strategy and the requirement to align with the national and regional strategies and policies of the National Planning Framework (NPF) and the RSES. In addition, 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 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 (NPF). It is also noted that draft Departmental Guidelines on HNDA are currently being prepared that will inform an approach to the preparation of HNDA.

Developing an Economic Strategy

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 Laois are; the relevant stated sectoral opportunities at Section 6.4 of the RSES, RPO 6.2 to anticipate unexpected opportunities that may provide for economic development, RPOs 6.4-6.8 and RPO 4.84 relating to the rural economy, RPO 6.9 which supports relevant actions within the Regional Enterprise Plan related to County Laois, RPO 6.19 that specifically relates to tourism in County Laois and, RPO 4.73 related to the J17 National Enterprise Park. Section 6.5 details specific economic sectors and Section 6.3 of the RSES contains Guiding Principles for situating Strategic Employment Development and should be consulted in developing related policy.

The future CDP should also draw on the relevant work of the Local Economic and Community Plan (LECP) and recognise the key role of the LECP in facilitating local economic development. The Assembly notes that the Laois LECP will also require review in light of the adoption of the RSES. The Council is directed to Sections 6.4 and 9.5 of the RSES which highlights the role of the LECP in enterprise development and in promoting social inclusion and economic opportunity for all.

Infrastructure and Movement

The Assembly welcomes this section of the Issues Paper and in particular the need to coordinate land use and transport. Information contained at Chapter 8 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 Portlaoise is to be prepared. With respect to the provision of Infrastructure, information contained at Chapters 7, 8 and 10 will assist the Local Authority in developing related policy.

Tackling Climate Change

This section of the Issues Paper 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. It is noted that a number of the questions posed as part of the Issues Paper relate to environmental protection. The Council are asked to consider the role that renewable energy will play in future Climate Action and in this regard you are advised that draft Departmental Guidelines on Wind Energy Development are available which may assist the Council in formulating any future policy.

The attention of the Council is drawn to the requirements of RPO 3.6 and the preceding related paragraphs of the RSES. To this end, it should be noted that EMRA is leading an ESPON EU research programme (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which are anticipated in 2020, and may inform the upcoming review of the development plan.

In addition, the Assembly also recommends engagement with the Climate Action Regional Office who may also be able to provide guidance as part of this theme.

Protecting Our Heritage:

The recognition and promotion of the Natural, Built and Archaeological Heritage of County Laois is a welcome inclusion within the Issues Paper. Sections 7.5 and 9.7 will assist the Local Authority in formulating future County Development Plan policy around cultural, architectural and archaeological heritage, heritage led regeneration, biodiversity and natural heritage. Section 7.7 of the RSES provides information regarding Green Infrastructure and Section 7.8 provides detail on the topic of Landscape which will also be of assistance in formulating future County Development Plan policy.

Sustainable Communities:

This Assembly welcome this section of the issues paper focused on measures aimed at creating sustainable communities in County Laois. 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.

Other Topics for Inclusion

Whilst the aforementioned themes of the Issues Paper are considered a good starting point for scoping out and developing the overall County Development Plan, the Assembly recommends that the Council also give consideration to the following topics;

Regeneration:

Regeneration is a recurrent theme of the RSES and the Assembly therefore promote the concept of regeneration and renewal for inclusion as part of the future County Development Plan.

The reference to Portlaoise as a Key Town within RSES policy and in particular that contained at Chapter 4 of the RSES 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'. Specifically, the RSES recognises that Portlaoise has a number of strategic areas that can act as regenerative catalysts increasing the residential, economic and leisure potential of the town centre, whilst also addressing vacancy, derelict buildings and enhancing the vibrancy of the town. Key areas identified include the opportunity sites of James Fintan Lalor Avenue, Lyster Square and laneways connection with the Main Street, Fort Protector and Fitzmaurice Place, Schools site and the former Bank of Ireland Branch/Prison Officer's Club. The RSES also provides support for the document "2040 and Beyond – A Vision for Portlaoise, A strategy for a Better Town

Centre” completed in 2017 which sets out principles and a programme of regeneration of the town. This is in keeping with RSES and NPF policy that supports the delivery of the Portlaoise Regeneration and Development Demonstration Project. In addition, support is also provided within the RSES for the transition of Portlaoise to a low carbon town centre by reducing car use and promoting walking and cycling and improving the mix of uses within the town centre.

Sections 9.3 and 4.8 of the RSES deal explicitly with Regeneration in urban and rural contexts. In addition, Regional Strategic Outcome 2 specifically emphasises the importance of Compact Growth and Urban Regeneration, whilst one of the key enablers for growth across the Region (Section 3.2) promotes regeneration and revitalisation of small towns and villages and supports local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas. The RSES outlines that Local authorities, in developing their core strategies and settlement hierarchies will consider a number of growth enablers to meet the potential of places within the County including Regeneration and Development, through the identification of significant ready-to-go regeneration projects in the existing built areas of our cities, towns, villages as well as rural regeneration opportunities, which could leverage private and public-sector support and investment, including NPF and European funding with a focus on social as well as physical regeneration.

Rural Development:

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 People and Place chapter and Sections 6.4, 6.5, 6.6 and 6.7 of the Economy and Employment chapter, and it is considered that these elements of the RSES will assist in formulating future County Development Plan policy. It should be noted that RPOs 4.80 and 4.81 specifically relate to rural housing provision whilst RPOs 4.84, 6.6, 6.7 and 6.8 relate to diversification within the rural economy including through enhancing sectors such as agriculture and food, forestry and aquaculture, energy and extractive industries, the bioeconomy, tourism and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.

Tourism:

The attention of the Council is drawn to the potential that County Laois has to gain from tourism, building on its wealth of heritage, natural assets and recreational infrastructure. Information contained as part of Chapter 6 of the RSES, which specifically relates to Tourism, Natural and Cultural Tourism Assets and Investing in the Tourism Product will assist the Local Authority in developing related policy.

Environment (SEA, AA and SFRA)

The assembly acknowledge and welcome the statement as part of the Issues Paper that the County Development Plan will be carried out alongside 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.

In determining the overall vision of the Laois 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.

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

25th February 2020