

Recommendations and Submission by the
Joint County Development Boards

Mid-East Region



to the

Dublin & Mid-East Regional Authorities

regarding the

Draft Regional Planning Guidelines

for the Greater Dublin Area

4th March 2003

1 RESPONSE TO THE DRAFT REGIONAL PLANNING GUIDELINES FOR THE GREATER DUBLIN AREA

1.1 INTRODUCTION

The Kildare, Meath and Wicklow County Development Boards (the Boards) jointly submit this Review, and set of recommendations arising, of the *Regional Planning Guidelines for the Greater Dublin Area (Draft)* in accordance with the role of the Boards to make recommendations to the Mid East Regional Authority in regard to matters of policy applying to the implementation of the County Strategies in the Region. These recommendations are derived from a Consultation Workshop that included members from all three Boards and a separate commissioned independent review. Details of the output of the Workshop are included in *Annex A*.

The Boards will also be issuing separate reviews having regard for specific issues appropriate to each County.

1.2 BACKGROUND

1.2.1 *The relation with the National Spatial Strategy*

The *National Spatial Strategy* (NSS) provides a national level strategic planning framework for Ireland over the next 20-year period to 2020. Its implementation requires that regional planning guidelines be developed in all regions across the Country. The Draft Greater Dublin RPG's were released for comment in December 2003 and are the subject of this Review.

1.2.2 *Guidelines for the Preparing Regional Planning Guidelines*

The Department of Environment, Heritage and Local Government produced a reference document in February 2003 entitled *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*. This document outlines a framework for the overall development of the RPG's and provides a template for their structure, namely that each of the Regional Planning Guidelines should contain two distinct components:

- Part A- the Strategy Element, which should contain 'big picture' socio-economic development issues and the strategy for the future.
- Part B- the Regional Planning Guideline element, which should provide more detailed guidance for development plans at county and city levels.

A detailed review of each of the components of the Greater Dublin RPG is provided in *Section 3.1* and *4.1* of this report.

1.2.3

Role of County Development Board Strategies for Economic, Social and Cultural Development in the development of the RPG's.

City/ County Development Boards (CDB's) were established across Ireland in 2000. The Boards, which are led by local government, include in their membership a wide variety of national, regional and local agencies, social partners. In 2001, each CDB completed and published a *Strategy for Economic, Social and Cultural Development*, for which extensive and comprehensive community consultation took place.

These CDB Integrated Strategies (strategies) are key documents guiding the delivery of public and local development over the coming 6-8 year period, and as such were highly relevant to the development of the RPG's. Figure 1 below outlines the key documents that have to be considered in the preparation of the Greater Dublin RPGs.

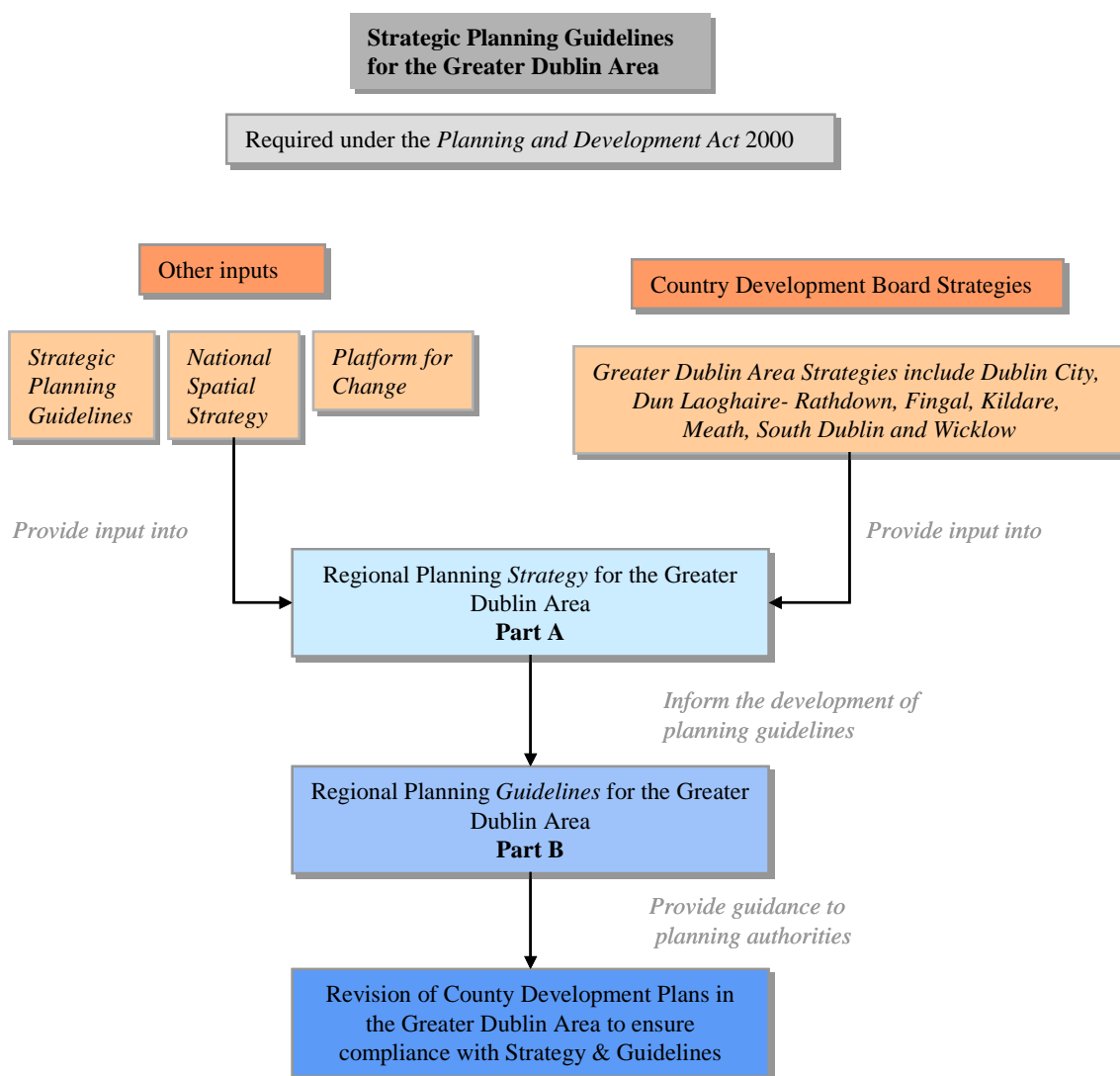


Figure 1. Key documents in the preparation of the RPGs.

1.3

STRUCTURE OF THIS REPORT

Section 1 Introduction and Background.

Section 2 provides a summary of key findings and makes recommendations on issues that need further discussion within both Part A and B

Section 3 provides an overview of the contents of Part A of the Greater Dublin RPGs, and a discussion on the issues that require further investigation.

Section 4 provides an overview of Part B of the Greater Dublin RPGs, providing a critical commentary on each of the sections within the draft guidelines.

Section 5 provides a summary of the Review and recommendations of the Boards.

The following provides a summary of the key issues that need to be addressed in the preparation of the RPG's. Comments are provided for both Part A and B. Further detail is provided in Section 3 and 4.

2.1**PART A**

- It would be appropriate to include an outline early in Part A of the approach taken in developing the Greater Dublin RPGs, and to provide a summary of what the document aims to achieve.
- Strong strategic direction for the Area is missing from the document. It does not contain adequate guidance for the development of the guidelines in Part B, and does not provide a strategic framework for the development of the region into the future.
- Part A completely fails to adequately address many of the issues contained within the CDB Strategies for the region, and in particular, does not take into account the vision statements contained within them. Greater emphasis needs to be placed on the issues identified in the strategies.
- There are no clear linkages between the policy review and the identification of key issues to be addressed within the guidelines. The 'key issues' section is very brief, and simply highlights the issues facing the GDA today, failing to address many of the issues that are likely to impact on the development of the region into the future. This is considered to be a significant concern that could undermine the Guidelines.
- It is recommended that the goals presented in Part A be revisited in order to ensure that all the key issues identified in section 2 are covered. Furthermore, the goals as they currently stand provide little strategic direction for the region as a whole.
- The relationship between current government policy and the strategic direction of the region is not clearly identified and developed. This is particularly the case in regard to national policy on transport, education, housing, social inclusion, health, policing, decentralisation and community development.
- Little or no consideration of the changing international environment, the Dublin area's competitiveness in this environment and the impact of increased competition from other City Regions within the EU and elsewhere, has been given in Part A.
- No clear perspective is offered in regard to the co-ordination of public service delivery in the Area notwithstanding the clear requirement to do so in the National Guidelines issued by the Department of the Environment, Heritage and Local Government.

- It is considered that the key issues and development principles identified in Part B could be more clearly articulated, and that the role and scope of the guidelines needs more careful explanation. It is acknowledged that the failure to adequately address within this Part the future of the region is a result of the lack of strategic direction provided in Part A.
- The development of objectives within the document is weak, though it is acknowledged that this is a direct result of the limited goals as developed in Part A. The objectives will need to be reassessed once a review of the goals in Part A has been undertaken.
- While the Guidelines do attempt to provide strategic development options and scenarios, these have not been adequately explained. The 'do nothing' scenario and the 'sustainable development' scenario (full implementation of the NSS) need to be further explained to highlight the reasons for assessing these two scenarios, and the evaluation and justification for the use of the 'sustainable development' needs to be further explained.
- The actual guidelines contained within Part B are in the format of 'Planning Authorities should...'. While the guidance to planning authorities is generally adequate, the format of the report is such that this information is difficult to easily access.
- The sustainable development scenario outlined in Section 5 concentrates predominately on transportation. Sustainability is a cross cutting issue however, and has further reaching implications than transport. As such, a number of additional issues need to be addressed within this section including (but not limited to) social inclusion, economic and environmental sustainability.
- Section 6 *Economic Development Strategy and Employment Trends* is somewhat Dublin city focused, and does not address the specific economic or employment issues being faced in rural areas. In addition, there is no discussion of tourism within the guidelines, despite this being a key sector within the region for employment and economic development. Tourism also plays an important role in the economic sustainability of many rural areas.
- A strategic vision statement for the development of the region is provided in Section 7. This should be provided much earlier within the RPG and be used to guide the development of the guidelines as a whole. The vision statement does not build on any of the vision statements outlined within the CDB Strategies, and does not include any reference to issues associated with quality of life, a key issue within the strategies. It is recommended that the GDA vision statement be reviewed within the context of the CDB Strategies.
- Transportation between rural areas need to be addressed, not just transportation between rural hinterland areas and Dublin. A continuing

focus on radial routes fails to adequately address the current, let alone future, development patterns in the Greater Dublin Area, and impacts negatively on accessibility to key public services in health education/training and employment.

- The guidelines should acknowledge the implications of the lack of broadband communication facilities within rural areas in terms of potential employment opportunities and economic development and should more fundamentally address the implications of communications needs for the region.
- Issues relating to social inclusion are included within Section 9 of the guidelines. Social inclusion, like sustainability, is a cross cutting issue should be given greater prominence within the guidelines. In addition, reference should be made to the CDB strategies, with the Board's having undertaken considerable work in this area.
- In relation to Rural Development as outlined in Section 10, the RPG's should ensure the protection of rural areas from urbanisation and residential development, and ensure that policies are in place to enable appropriate development while at the same time facilitating sustainable farming and agriculture practices.
- Inter-regional concerns are poorly developed in Part B reflecting the lack of direction in Part A. Peripheral areas require attention in the context of their having an interface with other regions (which in some cases are equally peripheral) as the gaps in public service delivery are often most acute in these areas.

3.1 INTRODUCTION

As outlined within *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*, the Greater Dublin RPG contains two distinct components, Part A and B.

Part A- the Strategy Element, is required to include:

A synthesis of the 'big picture' socio-economic development issues and opportunities in the region, and how these are to be addressed, building on previous exercises, such as the city and county development board strategies in the region, existing development plans, and preparatory work for the National Development Plan 2000-2006 mid term review and the NSS.

Its purpose is to:

- Contribute to the two Regional Authority's general function of promoting co-ordination of public services in the region;
- Monitor the delivery of EU Structural Funds; and
- Make proposals to the national and NUTS II authorities.

Inherent to Part A are the answers to three of the four basic questions as outlined within *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*, namely:

- *What are the 'big picture' development issues and opportunities in the region today?*
- *What is a realistic and robust vision of the region in the future?*
- *What is the preferred strategy to realise this vision? (in conjunction with Part B).*

3.1.1 Structure of Part A

The structure of Part A of the RPG is required to include three sections:

Section 1: Context and Aims

- Link to NSS
- Outline of Approach Taken
- Summary of what the RPG aims to achieve

Section 2: The Region Today- Main Development Issues

The key issues relevant to strategic planning and socio-economic and physical planning in terms of broad trends, housing, employment, provision of services, accessibility, environmental issues, social and cultural development.

Section 3: The Development Strategy- Goals and Objectives

- Overall goals for the region including detailed objectives in terms of the following:
 - How to develop the strengths of the region;
 - How to implement the NSS; and
 - How other towns and villages and rural areas will fit with the NSS.

3.2 OVERVIEW OF PART A OF THE DRAFT RPG'S FOR THE GREATER DUBLIN AREA

Part A of the Greater Dublin RPG was prepared by the Dublin and Mid East Regional Authorities, in conjunction with the 7 relevant local authorities, and was published in December 2003. The Report is in three parts, termed:

- Section 1: Context, including a description of the international, regional and local policy context.
- Section 2: Outline of the state of the region today.
- Section 3: Key issues and Goals for the Region.

Each of the sections is briefly discussed below, and considered in light of the requirements of the reference document *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*, as discussed above. Reference is made to the role of each of the County Development Boards, and any key issues that need to be further addressed will also be identified.

3.2.1 General Comments on Part A

The following provides a general overview analysis on the content of Part A. A more detailed discussion of each of the sections within Part A is provided in *Sections 3.3.2 to 3.3.4* below.

In general, it is considered that Part A, as it is currently presented, is not a strategy document and does not contain an adequately developed strategic vision for the Region.

Rather than being a strategic document, Part A provides a comprehensive review of current policy in relation to land use planning and transport. Of particular relevance, it provides an overview of the NSS and the Regional Planning Guidelines for the Greater Dublin Region produced in 1999. This review does provide some discussion of the issues that will affect the Dublin region in the future, but falls short of providing adequate guidance to local authorities within the region as to how these issues are to be addressed.

While the document does outline some issues that need careful consideration for future development, it does not provide an adequate base for the development of the Guidelines in Part B.

The development of the Goals within the final section of Part A (further discussed in *Section 3.2.4* below) is somewhat weak, with few linkages between the issues outlined in the review section.

Of the six goals identified, three relate to developing the role of the GDA in an international or national context. It is considered that greater weighting needs to be given to local and regional issues. The remaining three goals are worthwhile but, provide little guidance on important issues such as rural/urban

interface, the impact of dormitory towns and villages, improving transport for local communities, or considering the physical implications of social exclusion. It is recommended therefore that the goals of the RPG be re-examined to ensure that they best meet the strategic vision for the region.

Part A contains some reference to the County Development Board strategies. In general, the discussion of the Strategies is somewhat brief. This is to be considered as regrettable given the extent to which public funds were used in setting a strategic direction for each of the constituent parts of the Region concerned and in light of the extensive public consultation associated with the Strategies. It is furthermore considered a concern that despite the wealth of information contained within the Strategies and the key role they should play in the development of the RPG's, as envisaged by the Department, that no attempt has been made to in the first instance apply the Strategies in forming the Regional Strategy and in the second to provide a regional direction to the Boards and the constituent members in regard to regional applications to both the Board Strategies and the operational plans of the Agencies represented on the Boards.

It is recommended therefore that the CDB Strategies should be considered in greater depth in order to underpin the development of the Region's vision and goals for the future and that the Regional Strategy inform both the County Boards and through them the constituent members.

3.2.2 Section 1: Policy Context

This section provides an overview of the policy context for the RPGs. It provides background information on a large number of policy documents including:

National Policy

- *National Development Plan*;
- *National Spatial Strategy*;

Regional Policy

- *Strategic Planning Guidelines for the GDA (1999)*;
- *Regional Analysis of the City/County Development Board Strategies*;
- *A Platform for Change* (Dublin Transportation Office);

Local Policy

- *Development Plans* (for both metropolitan and hinterland areas);
- *City/County Development Board Strategies*.

The purpose of this section is generally unclear. Description is provided of the content of each of the policies outlined above, but there is little or nothing to indicate the strategic relevance of these to the development of the new strategy for the GDA.

Furthermore, this section should contain an outline of the approach taken in developing the strategy, and a summary of what the document aims to achieve. Both of these are clearly missing.

Whilst Part A briefly describes the content of the 7 city/county development board strategies, both from a regional and local perspective, it does not highlight the importance of these documents in driving the development of the

overall vision for the Region. While the 'Regional Analysis' section briefly outlines issues of joint concern in the region, the 'Local' section only provides a background to the CDB process. Of particular concern is the lack of acknowledgement within the RPG of the vision statements developed by each of the Boards. Greater consideration of the CDB Strategies for Economic, Social and Cultural Development is warranted, particularly given the requirement of *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines* to consider the information contained within them.

3.2.3 Section 2: The Region Today

Section 2 provides significant detail of the state of the region, and is divided into six sub sections, namely:

- Socio-economic trends, including demographics, settlement trends, and employment;
- Transportation, including private and public transport, and road infrastructure;
- Waste, wastewater and water infrastructure;
- Electricity and communications;
- Health, education, retail and community facilities; and
- Environmental protection, including archaeological, architectural, and natural heritage.

A number of additional relevant issues that would benefit from being considered in section 2 include:

- The Strategic Rail Review;
- The implications of a lack of broadband technology in rural areas, particularly in terms of economic development and employment opportunities;
- Retail provision is discussed for the Dublin city region, but not in terms of the Mid East region;
- Issues associated with local access and opportunities that may arise for local bus routes that do not necessarily provide access to Dublin.

Unfortunately, the format of this section is relatively unclear and there is no clear link between the policy review undertaken in section 2, and development of a strategy for the future in section 3. While section 2 generally complies with *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines* in terms of content, it would be useful if the implications of the current state of the region were discussed, and guidance provided on how these issues can be addressed in the future.

3.2.4 Section 3: Key Issues and Goals for the Region

Within section 3 of Part A, a summary is provided of the key issues for the region. They are:

- Provision of accommodation, particularly affordable accommodation, in appropriate locations in the metropolitan and hinterland areas;
- Transportation, in particular public transport;

- Community support, enlivenment and quality of life in both urban and rural communities;
- Provision of civil infrastructure prior to building houses including community and arts centres, public swimming pool complexes, and playgrounds; and
- Protection of the environment and eco-systems.

This section also identifies six Strategic Planning Goals, as follows:

1. *A robust strategic framework that clearly articulates the objectives of the NSS;*
2. *A strategy that creates a sustainable, attractive, high quality, accessible, cost effective, properly functioning region in its physical, economic, and cultural dimensions;*
3. *Policies that strengthen the international economic competitiveness of the GDA;*
4. *The Strategy will promote sustainable policies that meet the requirements of the European Directives;*
5. *Plan and provide for sustainable infrastructure corridors; and*
6. *Strengthen and enhance global linkages.*

As discussed in *Section 3.3.1*, the development of the regional goals is poor, in that they do not provide adequate guidance for the future, nor aid the development of the guidelines. In general, the Goals as developed in Part A do not consider many of the key issues also identified within this section (though these key issues also need some further consideration). From the key issues identified for example, there is no reference to the provision or location of housing or residential development; there is no mention of adequate public and private transport services or infrastructure. Furthermore, none of the goals relate specifically to the provision of adequate community infrastructure or the enhancement of the communities quality of life, and none relate to the protection of the natural environment.

It is considered that this section of Part A requires some considerable revision but that this can be done by referencing into Part A the current Government policy agenda as set out in Sustaining Progress (particularly in regard to social inclusion) and including recent policy decisions, the distillation of the CDB Strategies into a succinct regional document, the incorporation of EU policy changes and more direct input from the Agencies responsible for transport, energy and communications, rural and agricultural development and industrial development.

3.3 INTER-REGIONAL CO-OPERATION

A clear challenge in the preparation of the Regional Strategy is the relationship between the regions. The Strategy as currently developed does not seek to address inter-regional perspectives. Given the publication of the Strategies of the Midlands, Border and South East Regions the opportunity should now be taken to apply inter regional perspectives into the final strategy document.

In addition, the lack of a clear spatial perspective that seeks to integrate the peripheral areas of the region with the more developed core metropolitan

areas could underpin a long-standing two speed economic environment in the region. It would therefore be useful to establish, in parallel to the proposed settlement hierarchy, a sphere of influence framework to could address internal and external developmental influences in the region.

4.1 INTRODUCTION

As outlined within *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*, the final RPG's will contain two distinct components, one of which will be the Part B- Regional Planning Guidelines.

The Guidelines, should aim to:

'..provide more detailed guidance for development plans at county and city level as well as land use and transportation strategies. This guidance will involve setting out broad physical planning frameworks in areas such as settlement and transportation to addressing the 'big picture' development issues in the region'.

The purpose of the RPG's is to:

- Provide a long term strategic planning framework for the development of the region;
- Translate national planning policies- particularly the NSS- at regional level; and
- Focus on the proper planning and sustainable development of the region.

Inherent to this section are the answers to two of the four basic questions as outlined within *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*, namely:

- *What is the preferred strategy to realise this vision?* (in conjunction of Part A); and
- *What are the implementation mechanisms?*

4.1.1 Structure of Part B

In accordance with *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*, Part B, the Strategic Planning Guidelines for the Region, should include:

- Section 4: The role and scope of the Planning Guidelines
The development plan as a catalyst for sustainable development
Issues to be addressed
Development Principles
- Section 5: Strategic Development Options and Scenarios
- Section 6: Assessment of Options (including Environmental Assessment)
- Section 7: Recommended Option
Outline of implications for county/city development plans
- Section 8: Next Steps

4.2

OVERVIEW OF PART B OF THE RPG'S FOR THE GREATER DUBLIN AREA

Part B, prepared by the Atkins, in association with Urban Institute Ireland, Tom Phillips and Associates and Goodbody Economic Consultants, was published in December 2003. The Report divided into 11 sections, including:

1. Introduction;
2. Review of Strategic Planning Guidelines;
3. Strategic Goals and Objectives;
4. Current Trends and their Impacts;
5. Towards a Sustainable Development Strategy;
6. Economic Development Strategy and Employment Trends;
7. Settlement and Housing Strategy and Planning Policy Zones;
8. Transportation and Infrastructure;
9. Preservation and Protection of the Environment and its Amenities, including the Archaeological, Architectural and Natural Heritage;
10. Strategy for Rural Development in the Metropolitan and Hinterland Areas; and
11. Next Steps.

Section 4-11 will be discussed below, and will be considered in light of the instructions in *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*, as discussed above. In addition, specific reference will be made to the role of each of the County Development Boards, and any key issues that need to be further addressed will also be identified.

4.2.1

General Comments

The following provides a general analysis on the content of Part B. A more detailed discussion of each of the sections within Part B is provided in *Sections 4.2.2 to 4.2.9* below.

In general, Part B is not strictly in keeping with *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*. The issues to be addressed and their associated development principles are inherent within the guidelines, but are not clearly articulated or explained. Role and scope of the guidelines needs more careful discussion, and not just in legislative terms. In part, this is a reflection of the lack of a strategic framework provided in Part A.

The *Indicative Settlement Strategy* (Table 7.5, page 64) is excellent and provides a definition of each of the settlement types and guidance as to what should be included in each area. This however needs to have greater prominence, for as the guidelines currently are written it is lost in the text. The hierarchy would benefit from greater detail in regard to levels of public service and other industry/service sector levels appropriate to each level of town on the hierarchy along the lines of those suggested in the national policy in applying retail hierarchies. Nonetheless it will be a useful guide to the Planning Authorities.

Strategic development options and scenarios have not been adequately addressed. While two development scenarios have been discussed, this is

not clear from the text. In addition, while an evaluation of the scenarios is also included, this is not immediately accessible given it is within Annex A.

While there is some attempt to undertake an evaluation of parts of the guidelines (evaluation of current settlement trends against the identified goals), there is little to link the impacts of this to the guidelines. Environmental assessment has been carried out on the guidelines, though not in the assessment of options (see above). The results of the environmental assessment are found in Appendix A, and cover a wide range of issues.

The actual guidelines for planning authorities are provided in the format of 'Planning Authorities should...' and highlight issues that should be considered as part of a review of local development plans. The format of guidelines is somewhat unclear the key messages are often hidden in the text. The guidelines would benefit from a more consistent format in this regard, ensuring that the key messages are easily accessible from the document. This is particularly important for those charged with planning policy application in the Local Authorities. Inaccessible guidance will be ignored in reality and the many benefits from having the guidance as envisaged in the Departments own Guidelines could be lost.

It is recommended that the format of the guidelines be reviewed and presented more clearly with particular reference to the needs of the local authority planning personnel, local elected members and the County/ City Managers.

4.2.2 Section 3: Goals and Objectives

This section begins with a discussion of the 'conceptual terminology' used in the guidelines. This is somewhat confusing and is in any event more appropriate to Part A.

Initially, a definition is provided for the 'city region', though no definition of the hinterland or area outside the 'city region' is provided within the section. In addition, there is some discussion of the theoretical models such as the 'Compact-Dispersed model', 'Economic Clustering', and 'Multi-modal transport corridors and interchanges'. The relevance of these is unclear. Is this initial section simply providing definitions, or are these models and principles to be applied in the GDA? If they are to be applied, there needs to be some discussion of this within Part A, and clear linkages should be evident between these models and principles, and the goals and objectives set out within both Part A and B.

There is a clear link needed between the goals identified in Part A and B. As discussed above, the nature of the Goals needs some rethinking. To reiterate, the Goals identified provide no reference to a number of key issues such as the provision or location of housing or residential development and there is no mention of adequate public and private transport services or infrastructure. Furthermore, none of the goals relate specifically to the provision of adequate community infrastructure or the enhancement of a communities quality of life, and none relate to the protection of the natural environment. It is considered that this section within Part B needs some considerable revision, though it is recognised that this is dependant on a review of Part A.

Part B expands on the Goals and provides more specific objectives. As the Goals are currently outlined in Part A there is some difficulty in providing greater relevant analysis of the objectives that have been identified in Part B to underpin them. As such, consideration of the objectives will not be included in this review as it is considered that the current goals in Part A require considerable re-thinking, and thus the objectives identified in Part B will also need to be reconsidered as a consequence.

4.2.3 Section 4: Current trends

This section includes detail on the current and future population trends. Some analysis is also provided on the impact of these trends on settlement patterns and the implications of this for land use characteristics.

The 'current trends' section appears to be one of the development scenarios (the 'do nothing' scenario) as required by the *Implementing the National Spatial Strategy: Preparing Regional Planning Guidelines*, though this is not made clear within the text.

It is clear that current trends are not consistent with the approach adopted within the NSS. Further development of the goals within the RPG will enable a more thorough analysis, and provide more guidance on the implications for the RPGs. Furthermore, recent Government policy must be reflected into the trends as key drivers. eg Government policy on the provision of affordable housing will impact on population movement and trends in the Mid East but this does not seem to have been taken into account.

4.2.4 Section 5: Towards a Sustainable Development Strategy

Linking from the discussion in *Section 4.2.3* above, this section of the Guidelines is essentially a second development scenario, though this is again highly unclear from the text. This section is essentially based on the full implementation of the NSS, as distinct from the 'do nothing' approach. The 'sustainable development option' is evaluated against the goals and objectives of the Guidelines as outlined in *Section 3.3.4*. Again however, the reason for this evaluation is not clear, as this section is not identified as a discussion of development scenarios.

Sustainable development is not well defined within this section. While the principles discussed are generally adequate, transport and accessibility are the only sectors considered. Sustainability has far wider reaching implications than transport. This section should include a discussion of a number of additional issues including (but not limited to) social, economic and environmental sustainability. This is of key importance given that the Local Authorities are required to implement proper planning and sustainable development through their development plans.

This section contains considerable detail on orbital/radial routes within the Region. While this is a relevant discussion in terms of the region as a whole, it is more relevant to a discussion of transport options rather than sustainability.

Section 6: Economic Development Strategy and Employment Trends

This section contains an economic overview of the Region, including a discussion of sectoral structure and regional economic growth, current labour patterns and growth the jobs market. This review provides a basis for the development of economic policy priorities.

The policy principles, as outlined within *Section 6.5*, do not have a spatial focus, but rather highlight the need to attract high tech manufacturing and internationally traded businesses to the region, enhance the competitiveness of indigenous firms and expand research and technological development. While important, these principles do not recognise the role of agriculture generally, and the impact of the decline in this sector within rural areas. A priority in relation to protecting the hinterland from economic decline or encouraging more balanced economic growth/development also would be appropriate.

In addition the focus on the job ratio as a means of appraisal is questionable. It is suggested that an additional consideration is the level on an employment hierarchy may be worth considering in light of the on-going effects of international competition on the Region's environment.

High quality economic infrastructure should include a discussion of the importance of broadband and other communications etc to both urban and rural areas. The lack of telecommunications infrastructure in the hinterland is likely to have considerable impact on the attraction of high quality enterprise and therefore employment opportunities.

Availability of appropriate education infrastructure should include a comment on creating links between third level education facilities and enterprise in order to facilitate growth. This is particularly important in rural areas and peri urban areas where employment opportunities need to be maximised.

In discussing *General Policies for the Promotion of Economic Development (Section 6.6)*, a number of planning policies are suggested. In addition to the policies identified, it may also be appropriate for planning authorities to be encouraged to ensure an appropriate mix of housing types in order to accommodate changing household structures (eg increase in single occupant housing).

In general the *General Policies for the Promotion of Economic Development* are somewhat Dublin city focused. The instructions to the Planning Authorities, in the form of 'planning authorities should...', do provide some guidance though all issues are not necessarily applicable to all areas. Issues having considerable and specific impact on the hinterland are not adequately dealt with.

In terms of commercial and retail policies, some discussion is required in relation to 'out of town centre' retail developments and the potential for such developments to cause negative social and economic impacts. While this issue can impact both rural and urban environments, the impacts are likely to be more pronounced in rural areas and have a greater impact on the local

community. A discussion of this issue at a regional level is likely to strengthen local retail policies.

As discussed within the CDB strategies for the region, tourism plays an important role for the area having as it does internationally recognised unique selling points in Glendalough, Bru na Boinne and the National Stud, and some discussion of the economic impacts of tourism would be welcomed within this section. For example, the natural environment (particularly in regard to the Dublin and Wicklow Mountains) and outdoor pursuits are a key attraction to the region and should be protected from inappropriate development.

4.2.6 Section 7: Settlement and Housing Strategy and Planning Policy Zones

This section contains a strategic vision statement for the GDA. While this is broadly appropriate, this vision should be discussed in the beginning of the report, and be used to guide the development of the guidelines. The impact of the vision is lost this far into the report.

The vision identified within this section generally incorporates the vision statements of the CDB Strategies, though fails to incorporate issues associated with quality of life, a key message from the Strategies.

Related to this, this section needs to include discussion of the importance of community facilities, particularly in relation to fast growing areas, and also the timing of the provision of these facilities. A key issue emerging from the CDB strategies is the need for community facilities to be developed at the same time as housing, and ensuring that a wide range of age groups and activities are catered for. Strategies for Sport, Recreation and Leisure, and for Art and Culture, should be incorporated within the RPG's to ensure sustainable and healthy communities.

As discussed in *Section 4.2.1* above, the Indicative Settlement Hierarchy is a highly useful tool for planning authorities in determining appropriate levels of infrastructure for each of the settlement types. Table 7.5 however, is hidden within the text. The format of this section, and the report more generally, could be improved to ensure that key message are more easily identified.

4.2.7 Section 8: Transportation and Infrastructure

In relation to transport, this section provides an overview of *Platform for Change*, and a discussion of the public transport infrastructure improvements it contains. In addition, the section outlines the various road improvement schemes currently proposed.

In relation to other infrastructure, this section contains a discussion of water supply, wastewater treatment and collection, waste disposal, energy and communications infrastructure.

Transportation

Discussion is provided on the need to improve bus services in the hinterland, but *Table 8.1* is still somewhat Dublin focused. Some discussion of the areas within the hinterland that need to be prioritised for transportation

improvements, or any specific transport projects in the hinterland, would be welcomed. In addition, it must be recognised that transport services (predominately bus services) are not only required for travel into Dublin, but also within towns and villages within the hinterland. Transportation should be linked to the town/village hierarchy, with services from the smaller to the larger centres. Of concern is the complete absence of any reference to the implementation of the rural transportation initiative though the all Counties in the Greater Dublin Area.

Other Infrastructure

In relation to communications, some discussion needs to be included to highlight the lack of broadband facilities in the hinterland, and the potential impact this has in terms of economic development. Broadband infrastructure roll out should be encouraged to minimise the potential for disadvantage in rural areas.

In regard to waste management it is recognised in the guidelines that separate institutional arrangements are in place in Meath, Kildare and Wicklow and the Dublin Authorities. No recommendations are set out in regard to addressing this potential barrier to integrated waste management in the GDA, of particular importance in regard to the movement of waste in the region.

4.2.8 *Section 9: Preservation and protection of the Environment and its amenities, including the archaeological, architectural and natural heritage*

This section generally aims to preserve and protect both the natural environment and cultural heritage within the Region. The guidelines to planning authorities are generally in keeping with existing legislation and the issues raised within the CDB strategies. A small number of issues require some further consideration, including:

- *Open space and recreation* should include a discussion on the importance of open space in both urban and rural communities. The format of the guidelines for planning authorities should more clearly reflect the difference in approach for rural and urban areas; and
- Issues of rural isolation, including reduced access to services and facilities, and the impact of reduced education and employment opportunities, need to be more carefully addressed;

Social inclusion is briefly discussed towards the end of this section. This is a key issue identified within the CDB strategies, and its inclusion within the RPG's is welcomed. This section however, should include greater detail and some discussion is required on the different issues that affect rural and urban communities. In addition, this section is somewhat hidden within the text. Social inclusion is a cross cutting issue, applicable to all sectors, and perhaps deserves greater prominence within the RPG's. In particular reference to current government priorities including integrated service delivery in RAPID areas must be considered.

The impact of the guidelines on the Gaeltacht areas in County Meath has not been addressed. The impact of urbanisation of this area needs careful

guidance including application of linguistic impact assessment to development in the Gaeltacht.

4.2.9 Section 10: Strategy for Rural Development in the Metropolitan and Hinterland areas

Rural Development is briefly discussed within the penultimate section of the RPG's. This section provides a discussion on local need, and the demands for housing in rural areas to address local need.

In general, this section is rather brief and a number of key issues are not adequately addressed, including:

- A key issue for rural development is the need to protect rural areas from pressures from urbanisation and residential development. Policies should enable appropriate development while at the same time ensuring that land use planning facilitates sustainable farming and agricultural practices;
- Training and diversification opportunities for farmers need to be maximised in order to ensure that rural communities are not disadvantaged; and
- Significant pressures are currently being placed on some rural areas, particularly those located close to Dublin. The impact of the dormitory town or village on the hinterland needs to be comprehensively understood and policy should aim to reduce the impacts of the commuter lifestyle.

In terms of *Policy Guidelines*, a clear presumption against urban generated one off housing may cause some conflict with local development plans. In addition, it may be useful for the guidelines to include a statement on the reuse of rural farm buildings for small-scale enterprise operations.

In relation to the provision of adequate infrastructure in towns and villages, this should include a clear reference to community services and facilities, not only fixed infrastructure such as water and wastewater.

5.1 PART A

The preparation of regional guidelines provides a considerable challenge to both Regional Authorities, particularly in light of the often, inherent conflicts associated with large city-hinterland planning. Critical to a successful adoption of such guidelines is the preparation of a clear strategic focus on which planning can be considered. In that regard the Greater Dublin Area and other regions in Ireland have been well positioned given the output of Government Departments, State Agencies and local agencies including the County/City Development Boards and the Local Authorities. It is recommended therefore that Part A be reconsidered to more fully reflect the work of both national and local authorities and agencies and that clearer direction in goals and objectives be set out for the Local Planning Authorities through Part A.

In addition Part A should be reconsidered in light of the publication of the Draft Guidelines and Strategies for the South East, Midlands and Border Regions to ensure greater recognition of cross boundary issues including where appropriate consideration for cluster development across such boundaries eg. Athy, Carlow and Portlaoise as recently referenced by the Minister for Finance.

Part A should also address internal boundary conflicts in particular the relationship between the hinterland and the expanded metropolitan area.

The impact of the wider socio-economic environment also needs to be reflected in Part A given the openness of the GDA economy, the advent of greater competition for foreign direct investment and reforms to both regional and agricultural policy in the European Union.

The relatively restricted approach to interpreting national policy also needs consideration. The national policy arena is now well established through the National Spatial Strategy in the first instance but other policy areas need to be reflected in to the Strategy. In particular application of social inclusion policy including health, education, housing and in particular the Anti Poverty Strategy needs to be embedded more directly into Part A.

In regard to transport the implications of the development of both the M3 and M9 requires strategic consideration given the impact on current and future transport movements along with impact on areas currently peripheral in the Region relative to more developed areas in the Midlands, Border and South East Regions. A failure to reflect on the strategic impact of such corridors will result in such areas becoming even more peripheral and could undermine current Local Authority efforts to sustain population levels, and the associated public services such as education and healthcare.

Part A also needs to more clearly reflect the level of strategic thinking that has occurred at the local level and indeed regional level over the recent past. In particular a stronger interface with the strategies of the constituent development boards is critical. Under Section 135 of the Local Government

Act 2001 there is provision which requires Local Authorities to comply with the County Development Board Strategies in the adoption of their Corporate Plans.

The Corporate Plans will underpin local authority service provision including planning over the life of the next elected body in each Authority. Any conflict between the Strategies, the Corporate Plans and the Guidelines therefore will create an environment of uncertainty in local government in the Region that can be easily avoided through proofing Parts A and B against the CDB Strategies. Completing this exercise would also go some way to completing an overall proofing of the two Parts in the context of rural, poverty and gender proofing requirements that we now associate with all policy making in Government.

In regard to ensuring that infrastructure provision is in line with population growth it is recommended that Part A also clearly sets out a policy perspective in this regard. Currently the Region is challenged to ensure that a large infrastructure deficit is met. It would be critical that the lessons associated with meeting this gap are reflected into the Strategy otherwise it could be argued that the current draft might reinforce disadvantage arising from delays in infrastructure provision.

The Guidelines through Part A would be expected to give greater direction to Part B in regard to the development of a settlement hierarchy though establishing standards in service provision that could be applied to such settlements that will be covered in the hierarchy. No such direction is given.

Part A also needs to provide greater direction in regard to industrial development in the Region in light of ongoing competitiveness pressures. It is difficult, as Part A is currently written, to decipher any sense of direction for the State Agencies that are mandated to deliver economic development through out the Region. This is of importance, as such agencies constantly have to address the often competing demands of the City and Counties.

Associated with the issue of economic investment is that of Sustainable Development. In fairness to the preparation of Part B which attempts to consider the application of sustainable development to the actual planning guidelines little or no direction is given in Part A. This is a serious gap that must be corrected given that the Planning Authorities are to apply proper planning and sustainable development principles through the Development Plans. This could be addressed relatively simply through reflecting the sustainable development approaches of the Development Boards into Part A and thereafter into Part B.

Associated with the issue of sustainability is that of Quality of Life. Greater clarity is called for in setting out a regional perspective in regard to quality of life in both urban and rural areas. This is absent from the current Part A despite clear policy from both Government and CDB's.

The lack of direction in regard to transportation outside of the metropolitan area is also of concern with the need to more fundamentally address the orbital routes in addition to radial movement. Again no clear direction is given

in Part A notwithstanding the recognition of this in the National Spatial Strategy.

5.2

PART B

In regard to Part B a number of dilemma's are created which if not addressed will cause confusion in the Planning Authorities and will undermine the impact of the guidelines. There is also likely to be significant political concern with the guidelines.

There is in Part B a real risk as referenced earlier of institutional conflict given that the Planning Authority also operates under a mandate set out in the Local Government Act 2001. A failure to appreciate this and the need to ensure that the recommendations of Part B clearly underpin the output of the CDB strategies will possibly result in delays in the planning process in the future.

In addition there is concern that, with Government policy in regard to affordable housing in the Mid East, there must be a more clear delineation of this policy in the Guidelines. Its absence could result in the non-implementation of policy due to the perceived cap the guidelines are suggesting to population growth in the region.

The impact of Government policy in regard to decentralisation now also needs to be factored into the Guidelines.

Integration of public service delivery remains a key challenge and in light of the missing direction of Part A it is not surprising that there is relatively little reference in the Planning Guidelines as set out in Part B. This requires both an address of the institutional setting of policy but also of the actual planning of waste and water services, transport provision, levels of education facility provision and retail provision, all of which require greater detailed perspective in Part B. Broad statements do not give any sense of direction to the Planning Authorities particularly given the challenges they currently are having to face.

Adherence to the NSS in Part B could also be given more consideration particularly in regard to the interface of peripheral areas in the Region with those of other regions. No apparent guidance is applied in this instance, or indeed to areas such as the Meath Gaeltacht and rural communities.

In regard to the question of consolidation of such communities, a clear strategic direction that is given in the NSS is missing from the guidelines, as is a definition of local need and its application to the actual guidelines.

Clear concerns have been expressed in regard to population growth, the current level of residential zoning and the trends set out in the Guidelines. While population movement can be difficult to apply in what is in effect a competitive environment between Planning Authorities, current interpretation of population growth as set out in Part B does not adequately factor in known influences arising from industrial policy, agricultural reform and the already referenced affordable housing policy of the State. Such reconsideration may result in a review of the extent to which towns are placed in the settlement hierarchy (which is a welcome guideline).

Finally planners and elected members are under constant pressure to manage both the development control and development aspects of the planning framework in their respective functional areas. This is a huge challenge by international standards given the nature and extent of development in the State. Clearer interpretation of the recommendations set out in the guidelines will be necessary if the general nature of these are to be applied in a coherent manner in each of the Planning Authority Development Plans and it is recommended that all planners and Councillors and other relevant personnel be afforded the opportunity through training to be made aware of the application of the Guidelines and the range of interpretation that can be given to the Guidelines otherwise given much of their generality they might have little or no impact.

5.3 RECOMMENDATIONS OF THE BOARDS

The Boards recommend that the following amendments be applied to the Draft Regional Planning Guidelines for the Greater Dublin Area.

Recommendation 1;

Part A should be restructured and drafted to reflect more accurately the guidelines of the Department of the Environment, Heritage and Local Government as follows;

- *Part A- the Strategy Element, which should contain ‘big picture’ socio-economic development issues and the strategy for the future.*
- *Part B- the Regional Planning Guideline element, which should provide more detailed guidance for development plans at county and city levels.*

Recommendation 2;

It would be appropriate to include an outline early in Part A of the approach taken in developing the Greater Dublin RPGs, and to provide a summary of what the document aims to achieve.

Recommendation 3;

A strategic framework for the development of the region into the future in light of competitive trends and other external factors should be more clearly stated and integrated into a series of development scenarios that are translated into Strategic Development Options in Part A.

Recommendation 4;

The vision statements in the CDB Strategies for the region must be more clearly taken into account in setting a Regional vision under Part A and this must be clearly translated into Part B.

Recommendation 5;

The linkages between the policy review and the identification of key issues to be addressed within the guidelines in Part A must more clearly be established and incorporate the strategic perspectives of the Boards as set out in their Strategies.

Recommendation 6;

The goals presented in Part A must be revisited in order to ensure that all the key issues identified in section 2 of Part A are covered.

Recommendation 7;

The relationship between current government policy and the strategic direction of the region must be more clearly identified and developed.

Recommendation 8;

The changing international environment, the Dublin's area's competitiveness in this environment and the impact of increased competition from other City Regions must be more directly addressed in Part A.

Recommendation 9;

Co-ordination of public service delivery in the Area must be more clearly addressed in Part A.

Recommendation 10;

The key issues and development principles identified in Part B should be more clearly articulated, and the role and scope of the guidelines needs more careful explanation.

Recommendation 11;

The objectives in Part B need to be reassessed once a review of the goals in Part A has been undertaken.

Recommendation 12;

While the Guidelines do attempt to provide strategic development options and scenarios, these have not been adequately explained. The 'do nothing' scenario and the 'sustainable development' scenario (full implementation of the NSS) need to be further explained to highlight the reasons for assessing these two scenarios, and the evaluation and justification for the use of the 'sustainable development' needs to be further explained.

Recommendation 13;

While the guidance to planning authorities is generally adequate, the format of the report is such that this information is difficult to easily access.

Recommendation 14;

Sustainability is a cross cutting issue however, and has further reaching implications than transport. As such, a number of additional issues need to be addressed within this section including (but not limited to) social inclusion, economic and environmental sustainability.

Recommendation 15;

The specific economic or employment issues being faced in rural areas need to be more clearly addresses in Part B.

Recommendation 16;

Tourism plays an important role in the economic sustainability of many rural areas and must be more fully addressed in Part B.

Recommendation 17;

A strategic vision statement for the development of the region is provided in Section 7 of Part B. This should be provided much earlier within the RPG and be used to guide the development of the guidelines as a whole.

Recommendation 18;

Transportation between rural areas in the region needs to be addressed, not just transportation between rural areas and Dublin.

Recommendation 19;

The implications of communications needs for the region must be more fully addressed.

Recommendation 20;

Social inclusion, like sustainability, is a cross cutting issue and should be given greater prominence within the guidelines. Proofing of both Part A and B is required. In addition, reference should be made to the CDB strategies, with the Boards having undertaken considerable work in this area.

Recommendation 21;

Part B should more clearly provide policies to enable appropriate rural development including residential development while at the same time facilitating sustainable farming and agriculture practices.

Recommendation 22;

Peripheral areas require attention in the context of their having an interface with other regions (which in some cases are equally peripheral) as the gaps in public service delivery are often most acute in these areas.

Recommendation 23;

It is recommended therefore that the goals of the RPG's be re-examined to ensure that they best meet the strategic vision for the region.

Recommendation 24;

It is recommended that the CDB Strategies should be considered in greater depth in order to underpin the development of the Region's vision and goals for the future and that the Regional Strategy inform both the County Boards and through them the constituent members.

Recommendation 25;

Section of Part A requires some considerable revision but that this can be done by referencing into Part A the current Government policy agenda as set out in Sustaining Progress and including recent policy decisions, the distillation of the CDB Strategies into a succinct regional document, the incorporation of EU policy changes and more direct input from the Agencies responsible for transport, energy and communications, rural and agricultural development and industrial development.

Recommendation 26;

A clear challenge in the preparation of the Regional Strategy is the relationship between the regions. The Strategy as currently developed does not seek to address inter-regional perspectives. Given the publication of the Strategies of the Midlands, Border and South East Regions the opportunity

should now be taken to apply inter regional perspectives into the final strategy document.

Recommendation 27;

The Indicative Settlement Strategy needs to have greater prominence, provide more detail in regard to levels of public service deliverability, and more appropriate reflection of local authority determined population trends.

Recommendation 28;

The guidelines would benefit from a more consistent format ensuring that the key messages are easily accessible from the document. This is particularly important for those charged with planning policy application in the Local Authorities.

Recommendation 29;

It is recommended that the format of the guidelines be reviewed and presented more clearly with particular reference to the needs of the local authority planning personnel, local elected members and the County/ City Managers.

Recommendation 30;

The Goals as set out in Part A and developed in Part B should relate specifically to the provision of adequate community infrastructure and the enhancement of the communities quality of life, and the protection of the natural environment.

Recommendation 31;

A priority in relation to protecting the hinterland from economic decline or encouraging more balanced economic growth/development also would be appropriate.

Recommendation 32;

Availability of appropriate education infrastructure should include a comment on creating links between third level education facilities and enterprise in order to facilitate growth.

Recommendation 33;

It would also be appropriate for planning authorities to be encouraged to ensure an appropriate mix of housing types in order to accommodate changing household structures.

Recommendation 34;

The instructions to the Planning Authorities, in the form of 'planning authorities should...' do provide some guidance though all issues are not necessarily applicable to all areas. This needs to be made clear in the Guidelines.

Recommendation 35;

In terms of commercial and retail policies, some discussion is required in relation to 'out of town centre' retail developments and the potential for such developments to cause negative social and economic impacts.

Recommendation 36;
Strategies for Sport, Recreation and Leisure, and for Art and Culture, should be incorporated within the RPG's to ensure sustainable and healthy communities.

Recommendation 37;
The Indicative Settlement Hierarchy is a highly useful tool for planning authorities in determining appropriate levels of infrastructure for each of the settlement types. Table 7.5 however, is hidden within the text.

Recommendation 38;
The hinterland areas that need to be prioritised for transportation improvements, or any specific transport projects in the hinterland, would be welcomed. In particular clear reference to the role out of the pilot rural transport initiatives is necessary.

Recommendation 39;
Transportation should be linked to the town/village hierarchy, with services from the smaller to the larger centres clearly defined with minimum standards.

Recommendation 40;
In relation to communications, some discussion needs to be included to highlight the lack of broadband facilities in the hinterland, and the potential impact this has in terms of economic development.

Recommendation 41;
There is a need to address the institutional arrangements for integrated waste management in the GDA in light of the expected review of the regional waste Strategies.

Recommendation 42;
Open space and recreation should include a discussion on the importance for open space in both urban and rural communities.

Recommendation 43;
Issues of rural isolation, including reduced access to services and facilities, and the impact of reduced education and employment opportunities, need to be more carefully addressed;

Recommendation 44;
Social inclusion is a cross cutting issues, impacted by all sectors, and deserves greater prominence within the RPG's. In particular reference to current government priorities including integrated service delivery in RAPID areas must be considered.

Recommendation 45;
The impact of the guidelines on the Gaeltacht area in County Meath has not been addressed.

Recommendation 46;
The impact of the dormitory town or village on the hinterland needs to be comprehensively understood and policy should aim to reduce the impacts of the commuter lifestyle.

Recommendation 47;

It is recommended that a more detailed outline of the approach to monitoring evaluation and review be set out. This monitoring should parallel monitoring and evaluation that will be undertaken by CDBs at county level. In addition, the structures to undertake the monitoring and evaluation should be set out.

Recommendation 48;

It is recommended that a Guideline manual/explanatory handbook be produced for elected members and personnel of planning authorities.

Annex A - Workshop Output

from the

Joint Meeting of CDBs

26th February 2004

WORKSHOP No.1 ECONOMY

- Need to understand the impact of changing the scale of the Metropolitan Area.
- Ratio of Population to employment is considered too blunt as it fails to account for employment overspill.
- Nature of the employment (level) is of equal significance.
- Quality of Employment paramount in the increasingly competitive environment the Region now faces.
- Interface issues within the Region requires consistency i.e. Planning policy in Meath viz. Fingal in regard to development role out.
- Consistency of application of RPG's outside of the Metropolitan Area.
- Interface between infrastructure provision and housing and industrial delivery is critical and underdeveloped in the Guidelines.
- FDI is not seeking to go into smaller towns and there is the need to appreciate the need for a changed investment pattern for such towns.
- Region's telecoms exposure completely missed.
- General infrastructure exposure also missed.
- Recognition of some Mid East upgrade but not in tandem with development pressures.
- Population trends are dealt with inadequately with a clear bias towards Dublin.
- Housing/Quality of Life critical for investors but not sufficiently considered in the Guidelines.
- No attempt to address the costs of development lands for housing/industrial use.
- Two-speed economy requires variations in response rather than generic guidelines.
- Plan centred on peripheral areas being a playground.
- Lack of integration between urban/rural areas.
- No addressing of high wage effects of population overspill on Housing costs.
- Job creation system supports under considered i.e. education, health leisure.
- Impact of BMW regions not considered.
- Impact of Agriculture policy change not considered.
- Integration of RPG's with County Development Plans and CDB strategies not developed.
- Impact of the enlargement of the EU not considered.

SOCIAL INCLUDING SOCIAL INCLUSION

- Concern regarding the lack of reference to Social Inclusion issues in the region
- Lack of any meaningful analysis of what the key Social Inclusion issues for the region are currently and over time.
- Group found it very difficult to find enough references to Social Inclusion issues in the Guidelines to actually react to.

- Most references were direct quotes lifted from Government policy documents with no specific connection made to the needs of communities in Meath, Kildare and Wicklow.

Particular areas that the group felt should have been picked up upon include:

- Drawing attention to the short term nature of many of the funding programmes / schemes for Social Inclusion measure within the region and the negative impact this is having on the target groups in Meath, Kildare and Wicklow.
- Specific problems / issues not highlighted including for example Drugs.
- Growing ethnic diversity of population in region.
- Youth needs.
- Education - existing provision unable to cope in many areas in Kildare, Meath and Wicklow - needs to be flagged up.
- Childcare - no analysis of future trends / implications for planning for future need.
- Rural Social Exclusion.
- Health Care.
- Employment Opportunities for more marginalised / disadvantaged groups.
- No attempt made to link Planning Guidelines with the many existing regional structures tackling Social Inclusion issues e.g. Regional Drugs Taskforce, forthcoming establishment of Regional Education Board etc
- More attention should be focused on the role of SIM groups in Meath, Kildare and Wicklow who have a key role in tackling Social Inclusion issues in an integrated way. A significant amount of the work of the SIM groups has a regional focus and as such should be referred to in the Planning Guidelines.
- In an overall sense, comments were made about the implications for Meath, Wicklow and Kildare having absorbed huge population increases in recent years. As a result, these counties are now playing catch up in terms of service delivery and a real fear exists that the region could have missed out in terms of increased resources for public service delivery.
- Sense of resignation within our group that once again the Social Inclusion agenda has been virtually left out of this strategy with the emphasis almost exclusively on physical planning issues. Suggestions made around the need for some way of assessing the social impact of these types of plans on communities. Comments also made regarding

yet again having to fight a rearguard action from a Social Inclusion perspective and that the overall thrust of the Planning Guidelines had completely bypassed the social needs of the wider community.

QUALITY OF LIFE

- Consolidation as a concept needs to be expanded to include provision of and catch up of social, community infrastructure etc. to reach an acceptable and defined level of service.
- Inter-regional clusters need to be expanded to address cross regional boundaries.
- Population scenarios need to factor in known influences and reflect reality.
- Re-inforcing disadvantage by concentrating resources into growth areas may simply perpetuate disadvantage of rural areas.
- Location of the outer orbital route may be key to providing opportunity for such areas.
- Dynamic clusters with improved infrastructure and social and community facilities essential if the Region is to retain its quality of life.
- Job creation needs mechanisms to encourage employers to move or relocate in to the Region.
- An attractive environment remains one of the cornerstones for the development of industry and services in the Region. This needs considerable expansion in the Guidelines.
- Settlement Hierarchy needs further consideration and expansion to include the range of services that would be available to the appropriate levels of settlement in the hierarchy.
- Balance between retail and leisure facilities requires more consideration.
- Rail development proposals not tying in with the planning criteria set out in the Strategic Rail Review.
- Provision of Communications and broadband specifically not set out in the Guidelines.

***Signed on behalf of the Joint County Development Boards
of the Mid-East Region***

Kildare County Development Board

**Cllr. Catherine Murphy,
Chairperson,**

**Mr. Desmond Page
Director of Service,**

Meath County Development Board

**Cllr. Gabriel Cribben
Chairperson**

**Mr. Brendan McGrath
Director of Service**

Wicklow County Development Board

**Cllr. Michael Lawlor
Chairperson**

**Mr. Seamus Walker
Director of Service**