Addendum to Director’s Report
On
Draft Regional & Spatial Economic Strategy
for the Northern & Western Regional Assembly
### Proposed Material Alterations

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Addendum to Directors Report

The following is an addendum to the Director’s Report, April 2019 that issued on 18th April and should be read in conjunction with it.

1. Section 2.4. (Environmental Assessment):
   Submission
   DAFM has made a detailed submission that highlights that the Strategy should be developed to integrate biodiversity considerations in a positive, proactive and precautionary way, and that this should be reflected in the text and content of the Strategy, including its aims, objectives and policies, as well as in any associated maps. It provides suggestions throughout the document as to how it believes this can be achieved. It is also suggested that the strategy should identify potential constraints to development that arise from their unique position relative to sites of international conservation interest and the need to ensure the integrity of European sites is maintained thus ensuring that sites maintain favourable conservation status and that habitats and species outside the Natura 2000 network are given adequate protection.

   Directors response:
   The issues raised by DAFM are understood and I agree with the ultimate aim that the integrity of European sites is central to this strategy. This is a high level strategy and the issues raised are best addressed by incorporation of Overarching Environmental Regional Policy Objectives (OERPO). This shall obviate the need to be incorporating references to the need to ensure that the integrity of European sites are maintained throughout all the RPO’s. It is accepted that the OERPOs would benefit from incorporating additional wording that reflects the need to integrate biodiversity considerations.

   Director’s recommendation:
   i. To make a Material alteration by including an additional OERPO worded as follows:
      The Assembly supports the integration of biodiversity considerations in a positive, proactive and precautionary way and promotes the protection of the environment and biodiversity conservation as key principles of this strategy.

2. Section 3.5 Smaller Towns, Villages and Rural Areas

   Director’s Response – additional text:
   It has been noted that the wording of RPO 13 is unclear. RPO’s 11, 12 and 13 relate to the provision of a targeted proportion of new housing within the existing built-up footprint of settlements, 50% for Galway MASP, 40% for Regional Centres and 30% for other settlements with a population of over 1,500. These RPOs eminate from the NPF, where the existing built-up footprint is said to be as defined by the CSO.
Directors Recommendation

i. Make non-material change to wording of RPO’s 11, 12 and 13 by inserting a footnote that confirms that the existing built-up footprint of a settlement is that defined by the CSO and to amend wording as follows:

From:
RPO11: Deliver at least 50% of new city housing within the existing built-up footprint of Galway City and suburbs;
RPO12: Deliver at least 30% of all new housing within the existing built-up footprint of settlements with a population of over 1,500 (excluding Galway Metropolitan Area);
RPO13: Deliver at least 40% of all new housing, to be delivered within the existing built-up areas of cities, towns and villages, on infill and/or brownfield sites;

To:
RPO11: Deliver at least 50% of all new city homes targeted in the Galway MASP, within the existing built-up footprint of Galway City and suburbs;
RPO12: Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint.
RPO13: Deliver at least 30% of all new homes that are targeted in settlements with a population of 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints;

3. Section 3.6(A) Galway MASP
S 3.6A 2 (Collaborative approach between all MASPs (Pg 14))

Change recommended wording under No2
From:
Make material amendment by inserting a New Objective as follows:
It is an objective to establish a collaborative approach to enable the Galway Metropolitan Area and those Metropolitan Areas of Cork, Limerick/Shannon, and Waterford to lead in partnership with each other to harness their combined potential as viable alternatives to Dublin.

To:
Make material amendment by inserting a New Objective as follows:
It is an objective to establish a collaborative approach between the Regional Assemblies (NWRA, SRA), the Local Authorities and other stakeholders to enable all their metropolitan areas to collaborate with each other to harness their combined development potential as an alternative to development of Dublin.

4. Section 3.6(B) Letterkenny RGCP:

Director’s recommendation

i. Insert additional narrative at the bottom of P.115 to say that the Social Enterprise Centre, (on the Neil T Blaney Road, and linking onto the proposed Joe Bonar Link
Road) will not only provide a landmark building on a key site, but will serve to improve access to and open up lands in this area for regeneration, and potential large scale, mixed use projects in this edge of Town Centre location.

ii. Add Objective for Critical infrastructure (p.122) as follows:
RGCO 10: To deliver the Letterkenny Social Enterprise Centre, and associated improved access to lands to the West of Neil T Blaney Road, as part of a wider Urban Regeneration project.

5. **Section 3.6 (B) (C) and (D)**  
**Make material alteration with inclusion of additional RPO to read:**  
The Assembly supports the retention of existing agricultural land within the RCSP boundary and only in exceptional circumstances would it support the development of new residential or commercial uses on un-serviced green field sites.

**Make non-material amendment with inclusion of RPO to read:**  
The Assembly supports the preparation of a Building Heights Study, a strategy to guide future sustainable development which takes into account the historic culture and infrastructure features of the city. In developing this strategy, areas of high density will target minimum rates for residential of 50 units/ha. The default rate for other areas will generally be 35 units/ha.

6. **Section 3.7.9 ) Other Areas**

Director’s Recommendation (P33)  
No1. states that text be amended on SDZ and that it include Objectives in respect of Ireland West Airport Knock.  
Text to read:  
The presence of an airport in the region acts as a magnet to draw people and investment to the region, driving economic activity in the form of business and investment as well as tourism and travel. The Airport acts as an international gateway to the West of Ireland as well as the North, North West and Midlands areas. The Northern and Western Region is home to many world leading multi-nationals, local companies with global success as well as yet untapped economic sectors. Together with the high quality of life offered in the West and North West, the region has much to offer with the ability to expand and grow based on its resources. In this regard the concept of the place-based approach which requires tapping into the inherent potential of the area is central to the future growth of the region. In terms of business and enterprise, investment in the creation of ‘place’ is important to realising regional potential and to position itself so as to attract skills/talent, to grow businesses and to embrace creative and innovative economic activity. The National Planning Framework includes High-Quality International Connectivity as a National Strategic Outcome and recognises the crucial role that the provision of high-quality international connectivity has for overall international competitiveness and addressing opportunities and challenges from Brexit through investment in our ports & airports, in line with sectoral priorities already defined through National Ports Policy and National Aviation
Policy. The development of the EU Ten-T designation is desirable for international connectivity and integrated performance of road, rail and air.

The regional and international connectivity provided by an airport significantly broadens the transport network capacity of a region, providing catalytic as well as direct, in-direct and induced economic and social benefits. In this regard, Ireland West Airport Knock plays a significant role as an economic driver for the region and has a major impact on the social and economic infrastructure of the surrounding area.

It is considered that the best route to harness the potential of Ireland West Airport as an economic driver for the region is through the fast-track planning framework of a Strategic Development Zone (SDZ). The SDZ offers a spatial planning approach to the future development and expansion of the airport and surrounding lands. The Strategic Development Zone at Ireland West Airport represents a shared outlook for the future economic development of the West/North West region and represents a significant gamechanger for the region and the Atlantic Economic Corridor. As we are currently entering a period of renewed growth in Ireland, Ireland West Airport is well placed to expand its share of economic development.

The Planning Scheme and implementation framework of the SDZ will provide a clear blueprint for development offering certainty to potential applicants, developers or investors which is time-saving and in turn beneficial to economic development. The SDZ will also play an important role in the delivery and implementation of higher level infrastructure for the area.

Insert RPO as follows:

i. To promote and support the strategic role of IWA Knock SDZ as a significant regional economic driver and to promote the SDZ location as regional economic business and enterprise hub.

ii. To support and promote the implementation of the approved Planning Scheme for the designated SDZ at IWA Knock which provides the framework for the expansion of the Airport in terms of its transport and business operations; and as a new business & enterprise destination.

iii. To support the development of the SDZ in tandem with required infrastructure for both the expansion of the Airport and in the delivery of the regional business and enterprise hub.

7. Section 5.2 Environment and Heritage (P53 of Director’s Report)

Change recommended wording of New RPO as Material Alteration

From:
With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate strategies, which shall address issues
including local vulnerability to climate risks and identify and prioritise actions in accordance with the guiding principles of the National Adaptation framework, National Mitigation Plan.

To:
The Assembly will support the preparation of local climate strategies by CAROs and Local Authorities to address vulnerability to climate risks and prioritise actions in accordance with the principles within the National Adaptation Framework and the National Mitigation Plan.

8. Section 5.8

Submission
Reference is made by DCH&G to sensitivity of peatlands and their supporting wetland environs to hydrological change as well as water and airborne pollutants (nutrients) that are associated with settlement growth and agricultural intensification. They recommend that there is specific reference to ammonia deposition as a potential pathway for impact to peatland habitats in the Assembly area as adverse impacts to peatlands can be driven by changes resulting from activities undertaken at a considerable distance from a site. It is asked that the RSES should incorporate a clear commitment to peatland conservation with reference to the aims and objectives of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022 and the National Peatlands Strategy.

Director’s Response
It is agreed that there is merit in including reference to sensitivities in the narrative. RPO101 provides appropriate commitment to peatland conservation.

Directors recommendation:

i. Make non-material amendment by incorporating a narrative that confirms that peatlands and their supporting wetland environs are particularly sensitive to hydrological change as well as water and airborne pollutants (nutrients) that are associated with settlement growth and agricultural intensification. Ammonia deposition is a potential pathway for impact to peatland habitats, as adverse impacts to peatlands can be driven by changes resulting from activities undertaken at a considerable distance from a site.

9. Section 5.9. Forestry & Woodland: p.63 / 64

Submission:
The Dept. of Agriculture, Fisheries, and the Marine highlight a number of environmental controls which are now in place in relation to licencing afforestation, in addition to felling, and management of forestry near rivers, and water catchments. In summary the Department do not accept any inference which could be drawn from the Draft RSES which suggests that forestry is having an impact upon the viability of farming across rural areas
and would contend it (forestry) is rather a tool for farm diversification. The DAFM commit to working with the suggested forum.

**Director’s Response**

No further comments

**Director’s recommendation:**

No further amendments arise.