

21st April 2021

Senior Executive Officer,
Planning Department,
Kildare County Council,
Áras Chill Dara,
Devoy Park,
Naas,
Co. Kildare

Email: forwardplanning@kildarecoco.ie

Re: Draft Naas Local Area Plan 2021-2027

A chara,

Thank you for your authority's work on preparing the Draft Naas *Local Area Plan 2021-2027* (the draft LAP).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft LAP against the backdrop of an evolving national and regional planning policy and regulatory context and the need to balance competing pressures within an increasingly complex system.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft LAP under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the current county development Plan, the *Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region 2019-2031*, and relevant Section 28 guidelines. This submission makes two recommendations and six observations.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

The Office commends the planning authority on the quality of the draft LAP and for the comprehensive evidence base guiding the Vision. The comments and observations below are provided to enhance what is considered to be a robust and well thought out plan.

<u>OVERVIEW</u>

The challenge for Naas as clearly identified in Section 1 of the draft LAP is to control the pattern of development that has shifted towards the M7 Motorway, pulling the town in a northern direction and creating a peripheral arc which is detached from the established town centre and creates a disproportionate reliance on private transport modes. In

addressing these challenges, the draft LAP promotes many notable and positive approaches and proposals.

The Office commends the Regeneration Strategy in Chapter 10 of the draft LAP and in particular notes the urban development frameworks intended to stimulate development proposals. This approach in the draft LAP demonstrates a strong commitment to delivering the growth enablers for the core region as set out in the RSES¹, identifies regeneration areas in accordance with RPO3.3 and facilitates securing the brownfield development targets in the RSES. Supportive active land management measures such as site assembly and the use of Derelict Sites and Vacant Sites legislation to move on stalled sites are positively promoted in the draft LAP to give effect to delivery.

This Office also commends the Naas – Sallins Transport Strategy which presents a comprehensive analysis of the current transport situation in Naas/Sallins and presents potential solutions to improve conditions for all modes of transport. It seeks to address a number of challenges in Naas with the delivery of a connected and compact settlement at its core. The transport strategy provides the evidential basis for zonings in relation to their transport impact on the M7 Motorway and two key interchanges, including new zonings to the west and south of the M7 Newhall Interchange. The Office notes that these new zonings largely reflect existing development on the ground, with some infill, undeveloped sites benefitting from new zoning. Whilst such an approach is acceptable at this time, the Office is mindful of the Guiding Principles for Investment Prioritisation in Placemaking for Enterprise Development as set out in the RSES, where the focus is on densification of the existing built urban footprint around existing public transport corridors. The long-term plan for Naas, as detailed in the Transport Strategy, must continue to further consolidate urban zonings, to build a much stronger and vibrant town centre and to promote a pattern of development that is more conducive to public transport, walking and cycling modes.

Overall, the general approach as detailed in the draft LAP is supportive of and is consistent with the Regional Policy Objectives and Key Enablers as identified in the Regional Economic and Spatial Strategy for the Eastern & Midlands Region (RSES); and

¹ Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019 – 2031, pp.36

with the Core Strategy and provisions of the Kildare County Development Plan 2017 – 2023, in accordance with the provisions of. Sections 19(2) and 19(2B) of the Act.

The two recommendations and six observations listed below have been made under the following themes:

- 1. Population and Compact Growth
- 2. Transport and Accessibility
- 3. Climate Action
- 4. Economy and Employment
- 5. General and procedural matters

1. Population and Compact Growth

Compact growth as a cross cutting theme is evident throughout the draft LAP. The Office recognises the challenges of the planning authority in aligning the residential land supply with population growth, particularly given the high level of commencement and construction of planning permissions across the plan area and the fact that the town has performed significantly in meeting the County's housing targets.

The Guidance Note on Core Strategies (2010) states that the population targets and housing requirements of lower-level plans must be consistent with the core strategy of the county development plan. Having regard to certain gaps in the information provided in the draft LAP, further information will be required to provide greater clarity and transparency regarding the potential quantity of New Residential and Residential Phase 2 zoned land required to meet the housing supply targets as detailed in Table 3.3 of the draft LAP, including:

The quantity of land zoned including the projected residential yield from land zoned for a mix of residential and other uses. It is noted that the population target of the draft LAP is based on projected population growth on lands zoned for new residential uses only² and does not account for potential housing yield from existing residential/infill lands, town centre or commercial / residential zoned lands.

- The basis upon which the land requirement is calculated using densities consistent with the Sustainable Residential Development in Urban Areas Guidelines and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines 2018³. The Office notes that the draft LAP promotes densities which are at variance with the aforementioned, including standards of between 35 40 and 35 50 units per hectare are promoted on parcels of land within walking distance of existing and proposed bus routes. Further, densities of 40 60 units per hectare have been used in estimating capacity for land at Finlay Park, zoned C(3), notwithstanding its location adjoining the defined town centre. Whilst it is reasonable for the draft LAP to provide a tailored approach to the consideration of residential densities on zoned land, dependent on the size and character/function of different plots, it is nonetheless important that the draft LAP provides for higher minimum residential densities within the ranges advised in the Guidelines to support national and regional policy objectives for compact growth.
- The allocation of land to New Residential and Residential Phase 2 zonings based on the findings of the Sustainable Planning & Infrastructure Assessment Report appended to the draft LAP and a sequential approach to development. There appears to be conflicts between the findings in the report and the zoning of lands, such that land zoned for Residential Phase 2 in the draft LAP (Sites C9 & C10) are defined as Tier 1 sites in the Sustainable Planning & Infrastructure Assessment Report, whilst lands zoned for new residential use (Site C8, C16, C12, C15, C10 & C7) in the draft LAP are categorised as Tier 2 sites in the report. Whilst the Office acknowledges that a sequential and balanced approach must be taken to the allocation of land, the approach must be rationalised and justified, particularly

² Table 3.5 of the draft LAP

³ The standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines 2018 recommend that densities in excess of 45 units per hectare should be promoted on sites within 800 – 1000m of principal towns or suburban centres and sites within proximity of existing or proposed public transport routes, dependent on the frequency of service. Minimum net densities of 50 units per hectare are promoted within 500m of a bus stop on a public transport corridor in the Sustainable Residential Development in Urban Areas Guidelines.

where a disconnect arises between the findings of the report and zonings in the Draft Plan.

Observation 1 – Population & Compact Growth

Having regard to Section 19(2) of the Planning and Development Act 2000 (as amended) and the clarity and transparency necessary to ensure the effective delivery of compact growth, in accordance with Regional Policy Objectives 3.1, 3.2 and 9.8, the planning authority is requested to further rationalise and substantiate the extent of New Residential and Residential Phase 2 zoned land to:

- a. Quantifying the provision of all zoned residential land, including land zoned for a mix of residential and other uses, to ensure that such provision aligns with the quantity of land necessary to accommodate housing supply targets in the draft LAP.
- b. Review density assumptions used to estimate the quantity of zoned land necessary to accommodate housing supply targets. These densities should be consistent with the recommended residential densities for large towns, in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines 2018.
- c. In consideration of the zoning of New Residential and Residential Phase 2 lands, the sequential approach to development must be applied in accordance with Regional Policy Objective 4.2 in the RSES. The findings of the Sustainable Planning & Infrastructure Assessment Report should inform this approach such that lands in proximity to the town core and categorised as Tier 1 lands are zoned for new residential use with residential phase 2 zoning afforded to Tier 2 sites where appropriate.

2. Transport and Accessibility

The draft LAP has demonstrated consistency with the guiding principles expressed in the transport strategy for the RSES (RPO 8.1), and the Transport Strategy for the Greater Dublin Area 2016 – 2035. The Naas / Sallins Transport Strategy, as already referenced,

is a significant study presenting potential solutions to improve conditions for active modes, public transport and private vehicles, whilst at the same time enhancing connectivity and sustainable compact growth.

Congestion on the strategic national road network is acknowledged in the Naas/Sallins Transport Strategy. The M7 Naas to Newbridge Upgrade Scheme was recently completed and it is important that the N/M7 and its associated Junctions (9, 9a & 10) which adjoin the LAP boundary, are managed in view of Government investment. The Spatial Planning and National Roads Guidelines for Planning Authorities (2012) require that the strategic function of national roads is maintained. Whilst Objective MTO 3.1(b) seeks to safeguard the national road infrastructure along the existing M7, the Office considers it necessary, having regard to the pattern and form of development in Naas, that junctions are also specified and included in Objective MTO 3.1(b).

Objective MTO4.1 seeks to implement the parking standards in the Kildare County Development Plan (CDP), and relevant Section 28 Guidelines, to all applications for planning permission in Naas. However, Table 17.9 Car Parking Standards, set out in the CDP clarifies that other than residential all car parking standards are maximum. It will thus be necessary to clarify the residential car parking standards promoted in the draft LAP to ensure that maximum limits apply in accordance with RPO8.1.

Observation 2 – Transport & Accessibility

In accordance with the requirements of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and Regional Policy Objective 8.1, which requires consistency with the guiding principles expressed in the transport strategy for the RSES, the planning authority is requested to:

a. Amend Objective MTO 3.1(b) to ensure that the development and carrying capacity of not only the M7 but also its junctions (9, 9a & 10) are safeguarded. b. Amend Objective MTO4.1 in the draft LAP to clarify that the residential car parking standards promoted are maximum limits for the purpose of consideration of residential applications in Naas.

3. Climate Action

3.1 Modal Share

Considerations regarding climate mitigation and adaptation are well integrated throughout the various chapters of the draft LAP and that the Office acknowledges that it has been informed by County Kildare's Climate Adaptation Strategy 2019-2024.

Policy objectives within the draft LAP should be climate proofed and contribute to the wider county objectives and further contribute to the national long-term goals of achieving net zero emissions by 2050 as set out in the government's Climate Action Plan 2019. On completion of the review of the current Kildare County Development Plan, additional targets and specific measures may need to be included in the LAP. In particular, the Office would welcome the incorporation of modal share targets based on the implementation of the road and street network objectives in Chapter 5 of the draft LAP. This would provide a means of monitoring the progress of actions and connectivity measures as set out in the LAP, and assist in meeting the town's land use, regeneration, and related sustainability objectives.

Recommendation 1 – Climate Action & Modal Share Targets

In accordance with the requirements of Regional Policy Objective 8.1 and the obligation to demonstrate consistency with the guiding principles expressed in the transport strategy for the RSES, and in particular the behavioural change interventions promoted to encourage and support a shift to sustainable modes of transport, the planning authority is required to include modal shift targets which will assist in measuring the outcomes of infrastructure measures promoting sustainable transport in the town.

3.2 Data Centre Development

The draft LAP notes that the development of the Northwest Quadrant, in conjunction with the two sites identified for Data Centre developments, could benefit from the roll out of a heating network, with Objective WH1.2 seeking to ensure that all significant development proposals on the sites, designated for Data Centres carry out an Energy Analysis and explore the potential for the development of low carbon district heating networks. This objective is supported by RPO7.40 which promotes high levels of energy conservation, energy efficiency and the use of renewable energy sources in buildings.

The Office has concerns that the location of the two zoned data centre sites which are spatially removed from new and developing areas of Naas may not have been fully considered in the context of developing a viable heating network, particularly having regard to Site P1 and the barrier created by the heavily trafficked M7. In conjunction with the identification of sites for the provision of such high energy demand uses, consideration should be given to the use of heat mapping or other appropriate analysis, as supported in RPO7.38, thereby better connecting the need and the sources in order to reduce the cost of heat and greenhouse gases emissions.

Observation 3 – Climate Action & Data Centre Sites

The Planning Authority is requested to further rationalise and substantiate the spatial location of the two identified data centre sites (P1 & P2) in the Draft Plan relative to future development and growth locations in Naas and with particular regard to the barrier created by the heavily trafficked M7 which is likely to complicate any District Heating implementation in the future. The use of heat mapping should be considered to inform the identification of sites for the provision of such high energy demand uses, in accordance with the provisions of Regional Policy Objective 7.38.

3.3 Flood Risk Management

Presently, there is high uncertainty regarding flood risk in Naas due to poor availability of model calibration events and possible interconnection between fluvial and surface water drainage and canal systems. Appropriately, Objective IO 3.5 in the Draft Plan states that

the planning authority will carry out an update to the SFRA to address these uncertainties and dependent on the findings, may necessitate an amendment to the Plan. Whilst there is no existing flood scheme in place for Naas, the Office notes that the Flood Risk Management Plan (FRMP) for the River Liffey and Dublin Bay identified a flood relief scheme for the town. It is noted that Kildare County Council has committed to implementing any recommendations from the FRMP.

Pending an update of the SFRA and a possible flood scheme for the town, as detailed in the FRMP, the Office considers that a precautionary approach to flooding should be adopted and that the zoning of undeveloped land that is subject to flooding, particularly on land removed from the town centre, is premature.

In accordance with Box 4.1 of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), Development Plan Justification Tests were carried out on a number of sites, subject to flooding, in the town. Land identified for Industry & Warehousing purposes (H4) to the north of Monread Road (Site 12 in the SFRA), and for residential at Blessington Road (C(8) and Phase 2) and at Finlay Park

(C(3)), and certain parts of the land identified for new enterprise and employment purposes (Q2, Q3 & Q5) in the Northwest Quadrant (site 20 in the SFRA), fall within Flood Zone A & B. These sites do not comply with all of the criteria set out in Box 4.1 Justification Test of the Guidelines having regard to their position removed from the town centre, the non-essential nature of the sites for regeneration purposes, and the availability of alternative lands. The zoning of these lands is considered to be premature pending completion of the updated SFRA and, in the case of land in the Northwest Quadrant, pending the preparation of a masterplan for the area and is inconsistent with the Guidelines.

Concerns also arise regarding the zoning of attenuation / floodplain areas associated with within the permitted residential lands at Tipper Road and new Residential lands at Kilcullen Road which would be more appropriately zoned for floodplain/compensatory storage, as a water compatible type, to reflect this use and prevent encroachment and/or loss of floodplain.

In addition, it is unclear whether the SFRA has considered the implications for flood risk off site from flood mitigation measures forming part of permitted development / development under construction.

Recommendation 2 - Flood Risk

Having regard to the criteria set out in Box 4.1 Justification Test of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) the planning authority is required, in consultation with the OPW, to:

- a. Re-evaluate the findings of the Justification Test detailed in the Strategic Flood Risk Assessment and ensure that sites subject to flooding and identified for development purposes satisfy all of the criteria set out in Box 4.1 Justification Test.
- b. Remove enterprise and employment zoning from land identified as Q2, Q3 and Q5 which is subject to flooding and reconsider identifying such land for water compatible uses, or as a Strategic Reserve for inclusion and consideration in the masterplan that is to be prepared following further flood analysis in the area.
- c. Remove industry and warehousing zoning from land identified as H4 and residential land (including phase 2) identified as C(3) and C(8) which is subject to flooding and reconsider identifying such land for water compatible uses.
- d. Zone attenuation / floodplain areas associated with within the permitted residential lands at Tipper Road and new Residential lands at Kilcullen Road for floodplain/compensatory storage, as a water compatible type.
- e. Consider in the SFRA the potential for flood risk mitigation measures (as identified in SSFRAs carried out for developments currently under construction/granted planning permission), to increase flooding to other areas.

4. Economy and Employment

The key principle underpinning the draft LAP is to maintain the current high job ratio⁴ to 2027, which results in the need for a further 3,329 jobs⁵. The draft LAP confirms that the economic lands zoned under the Plan can accommodate a variety of floorspace scenarios, ensuring Naas has the ability to increase its employment base given its status as a 'Key Town' and County Town.

The Office notes that the town awaits the preparation of a new regional retail strategy to replace the outdated Greater Dublin Area Retail Strategy 2008 – 2016, as per RPO6.10 of the RSES. Whilst the Draft Plan does provide for a number of retail policies, pending the preparation of a new Regional Retail Strategy, the Office considers that these policies could be strengthened.

The draft LAP does not address the provision of retail warehousing and specifically it is noted that retail warehousing is not listed as a landuse within Table 11.3 Landuse Zoning Matrix. The Retail Planning Guidelines 2012⁶ recommends that careful consideration is given to the zoning of land for any additional retail warehousing development, given the level of provision of this category of development in recent years.

The Landuse Zoning Matrix provides limitations and restrictions in the size and quantum of retail floorspace to be accommodated on certain zoned lands. In the interest of transparency and clarity and to ensure the strengthening of such provisions, the Office considers that all retail floorspace restrictions should be incorporated as objectives into the draft LAP.

Observation 4 – Retail

⁴ Census 2016 confirmed a jobs ratio of 1.01 which exceeds the 0.7 ratio target set out in the Kildare County Development Plan 2017 - 2023

⁵ Table 6.2 Job Profile of Naas, draft LAP pp.72

⁶ Section 3.8 Development Plans and Retail Warehousing

Pending the preparation of a new Regional Retail Strategy and a new Development Plan for the County, the planning authority is requested to:

- a. Make a distinction in retail policy terms between comparison shopping and retail warehousing and having regard to the provisions of the Retail Planning Guidelines 2012 carefully consider the provision of or need for any additional retail warehousing in locations outside of the defined town centre.
- b. Translate the retail floorspace restrictions indicated in the Landuse Zoning Matrix into clear objectives in the Plan, thereby strengthening such provisions and ensuring their effective implementation.

5. General and procedural matters

It is not the role the Office to assess the Environment Report under article 6(4) of the SEA Directive or the Screening Report for Appropriate Assessment under Article 6 of the Habitats Directive and Part XAB of the Planning & Development Act 2000 as amended. However, within the context of the Section 28 Guidelines it is appropriate and relevant for this Office to comment upon the environmental reporting.

To ensure a robust environmental report, it is considered that there are areas of the report which require further consideration.

As detailed in the Planning System and Flood Risk Management Guidelines for Planning Authorities, flood risk assessments undertaken for plans should be integrated with the SEA process. Whilst the issue of flooding is recognised as a threat in the SEA, Section 8.4.4, Summary of Potential Effects, does not comprehensively address proposed zoning in the context of the SFRA and the Justification Test undertaken. Further, there are no strategic environmental objectives or monitoring measures proposed for flooding notwithstanding the ongoing studies in the town.

- There is scope to enhance the integration between environmental reporting and the Draft Plan preparation process. For instance, the environmental report does not include any analysis or discussion of the council's deliberations of the Draft Plan prepared by the Executive or any analysis of the directions or motions of the Elected Members in the process of the Draft Plan for public display.
- As detailed in the 'Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Regional Authorities and Planning Authorities', a Non-Technical Summary of the Environmental Report is required.

Observation 5 – Strategic Environmental Assessment

In order to give full meaning to the Strategic Environmental Assessment process as set out in the Directive, the planning authority is requested to:

- a. Better integrate the findings of the SFRA into the SEA and detail the potential effects arising from the zoning of lands based on the findings of the Justification Test. Strategic environmental objectives and monitoring measures should also be considered in the SEA for flooding.
- b. Ensure that as/when material amendments arise in respect of the Plan that the environmental reporting is iterative and transparent with the decision-making process at that stage.
- c. Prepare a Non-Technical Summary of the Environmental Report.

The Office considers that the Screening Report for Appropriate Assessment would benefit from further detail and analysis. The methodology defining the Zone of Influence (ZoI) is the 15km limit concept and not the recommended Source-Pathway-Receptor link approach. There is no opinion presented in Section 4 which would confirm/satisfy that

the (European) sites selected (within the 15km radius of the settlement) are relevant for the purpose of the assessment, and why sites in excess of 15km have been ruled out.

The Office also advises that the planning authority should consider providing further detail in respect of the assessment of likely significant effects on relevant European sites, particularly relating to a description of individual elements of the plan (alone or in combination) including development objectives, zoning, and designations.

The Office notes that the terminology used in the Screening Determination is incorrect and references the legal test associated with conclusions arising from a Natura Impact Report (Stage 2) and not an AA Screening Report (Stage 1). The terminology used should be amended to ensure that the correct legal test is being applied.

Finally, the Office is concerned with the proposal to zone the former Cemex/Donnelly Mirrors sites, adjacent J9, objective K(3) Commercial / Residential 'To provide for commercial and appropriate residential mixed-use developments'. The said objective is subject to a caveat at footnote 65 to table 11.3 that 'No residential development will be permitted within the Commercial/Residential lands at the Maudlins Interchange', which is further confirmed by section 6.4.3 of the draft plan and in table 11.1. The zoning of the subject site as 'residential', when residential use is not permitted thereon, is misleading and contradictory and is therefore inconsistent with the requirement under the Local Area Plans Guidelines for Planning Authorities (DECLG, 2013) that LAPs are clear and concise.

Observation 6 - Land use zoning

The planning authority is requested to reconsider the zoning objective K(3) for lands at Maudlins to exclude reference to 'residential' in the title to and within the wording for the objective.

In summary

Arising from the foregoing evaluation and assessment of the Draft Naas Local Area Plan

2021-2027, the Office concludes that two recommendations are necessary to ensure that

the Draft LAP is consistent with the RSES and the Planning System and Flood Risk

Management Guidelines for Planning Authorities (2009).

The Office requests that your authority addresses the six observations outlined above,

which are made in the context of the provisions of section 31AO(3)(a) of the Act, and to

enhance the LAP's consistency with relevant national and regional policy obligations,

guidelines and legislative requirements.

At the end of the process, your authority is required to notify this Office within five working

days of the decision of the planning authority in relation to the proposed Variation. Where

your authority decides not to comply with the recommendations of the Office, or

otherwise makes the plan in such a manner as to be inconsistent with the

recommendations made by this Office, then the chief executive shall inform the Office

and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's

responses to the above, which we would be happy to facilitate. Contact can be initiated

through plans@opr.ie.

Is mise le meas,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations



21 May 2021

Senior Executive Officer Planning Department Kildare County Council Áras Chill Dara, Devoy Park, Naas, Co. Kildare

Email: forwardplanning@kildarecoco.ie,

Re: Minor correction regarding OPR submission letter to Draft Naas Local Area Plan 2021-2027

A chara.

The Office of the Planning Regulator (the Office) would like to make a minor correction to its submission letter of 21 April 2021 regarding the Draft Naas Local Area Plan 2021-2027. The correction relates the OPR's Observation 1.

The Office respectfully requests the planning authority make the following minor correction:

Reference in the preamble to Observation 1 (page 5) refers to sites C9 and C10 as residential phase 2 tier 1 sites, this is incorrect and should have referred to sites C5 Kilcullen Road and C11 North of Edmondale, respectively.

The Office advises that the above minor correction does not alter the substance of the issues raised regarding the OPR's Observation.

Please feel free to contact the staff of the Office in the context of your authority's responses to its submission and the above minor correction, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Yours sincerely,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations

CC: eryan@kildarecoco.ie; agranville@kildarecoco.ie