



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

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



Draft Dún Laoghaire-Rathdown Local Economic and Community Plan

The Eastern and Midland Regional Assembly notes the publication of the draft Dún Laoghaire-Rathdown Local Economic and Community Plan 2023-2028 and sets out hereunder observations on behalf of the Regional Assembly. The submission has been prepared by the executive of the Regional Assembly and approved by the elected members of the Eastern and Midland Regional Assembly at the meeting of 9th February 2024.

1.0 Overall Context

1.1 Role and Function of the Regional Assembly

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional Spatial and Economic Strategy (RSES), oversight and coordination of County Development Plans and Local Economic and Community Plans (LECPs), management of EU Programmes, EU project participation, implementation of national economic policy and additional functions working with the National Oversight and Audit Commission. As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

This submission relates to the statutory role of the Assembly regarding the Dún Laoghaire-Rathdown Local Economic and Community Plan 2023-2028.

1.2 Legislative Context

Section 44 of the Local Government Reform Act 2014 (amending Section 66C of the Local Government Act 2001), provides that every Local Economic and Community Plan (LECP) shall be consistent with any Regional Spatial and Economic Strategy as well as the City/County Development Plan that applies to the area of the LECP. It also states that the Local Authority shall submit a draft of the economic and community elements of the LECP to the Regional Assembly and it shall adopt a statement on the draft Plan for consideration by the Elected Members of that Local Authority.

The Act requires that the consideration of a draft plan by the Regional Assembly, shall relate to its consistency with—

- (i) the core strategy and the objectives of the development plan of the local authority concerned,
- (ii) any regional spatial and economic strategy that may apply, and
- (iii) the need to consider consistency between the economic and community elements of the draft plan.

The Local Economic and Community Plans (LECP) Guidelines 2021, published in November 2021, assist with the preparation of the draft LECPs, with a key focus on sustainability, consultation and engagement with local communities and businesses. The Guidelines also require local authorities to consider housing needs when formulating both the economic and community elements of their LECPs in accordance with the commitment in Housing for All, the Government’s national plan for housing to 2030.

The LECP process consists of two parts: the development of an overall LECP framework detailing the High-Level Goals and sustainable community and economic objectives, including outcomes for a six-year period; and the development of Implementation Plans of the objectives of the LECP.

1.3 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region

The RSES for the Eastern and Midland Region was made by the Members of the Assembly in June 2019 and is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision is supported by sixteen Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the Regional Spatial and Economic Strategy (RSES) is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES is of critical importance for the delivery of Project Ireland 2040, given that it is the succeeding tier of policy delivery in Ireland.

The RSES for the Eastern and Midland Region presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; identifying Regional Growth Centres which act as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places. The RSES identifies Regional Growth Centres and Key Towns within the Region, however Self-Sustaining Growth Towns, Self-Sustaining Towns and Rural areas are to be defined by Development Plans.

The majority of the built-up footprint of Dún Laoghaire-Rathdown is located within the area defined as Dublin City and suburbs which comprises the first tier in the regional settlement hierarchy set out in Table 4.2 of the RSES. The RSES identifies Dublin City and suburbs as an international business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. The RSES further states that Dublin City and suburbs acts as a national transport hub with strong inter and intra-regional connections and an extensive commuter catchment. The settlement strategy for Dublin City and suburbs, as set out in Figure 4.2 and Regional Policy Objective (RPO) 4.3 of the RSES, is to support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area and ensure that the development of future development areas is co-ordinated with the delivery of key water and public transport infrastructure.

The RSES identifies the potential for significant re-intensification of employment lands within the M50 ring, including at Sandyford Business District and Cherrywood in Dún Laoghaire-Rathdown, to complement the Docklands and city centre business district. Table 4.2 of the RSES further sets out the international significance of Dublin City and Suburbs, including its role as a self-sufficient (high internal trip rate) transport hub with high quality public transport and links to other centres. Table 4.3 of the RSES further specifies that the policy response required for Dublin City and suburbs is continued consolidated population and employment growth with a focus on improving housing supply and amenity provision to create sustainable communities and improve public transport and sustainable travel options.

The Dublin Metropolitan Area Strategic Plan (MASP) contained in Chapter 5 of the RSES provides a strategic planning and investment framework for the Dublin metropolitan area, and the administrative area of Dún Laoghaire-Rathdown County Council is located within the Dublin MASP boundary. The MASP is aligned with a number of Regional Strategic Outcomes in the RSES which include managing the sustainable and compact growth of Dublin; the regeneration of cities and better use of under-used land; integrated transport and land use; and the promotion of Dublin as a global city region. Of relevance to the MASP implementation strategy is Table 5.1 of the RSES, *Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing*, which identifies areas on high-quality public transport corridors that can accommodate population growth. This includes new and emerging mixed-use districts of Cherrywood and Sandyford, and new residential communities in Ballyogan and environs and Kiltiernan-Glenamuck on the Metrolink/LUAS Greenline Corridor, and development of new residential communities at Woodbrook-Shanganagh and the westward extension of Bray at Old-Connaught-Fassaroe on the North-South corridor (DART). In order for Bray, as a designated Key Town within the RSES, to fulfill its growth potential, lands at Fassaroe (Co. Wicklow) to the west of the N/M11 are targeted for new housing, employment and major community and sports facilities, along with development of lands at Old Connaught (Conna), which are within Dún Laoghaire-Rathdown. The westward expansion of the Key Town of Bray will require collaboration between Wicklow County Council, Dún Laoghaire-Rathdown County Council and the transport agencies to ensure the delivery of enabling transportation infrastructure and services.

Furthermore, Table 5.2 of the RSES and MASP, *Potential of Employment Development Areas in the Dublin Metropolitan Area*, identifies strategic employment locations with employment potential along strategic transport corridors. This includes the Metrolink/Luas Green line Corridor which can

accommodate mixed-use districts with significant retail and people intensive employment at Cherrywood, Ballyogan and Sandyford.

Section 3.1 of the RSES outlines the Growth Strategy for the overall Eastern and Midland Region which includes an objective to support the transition to a low carbon, climate resilient and environmentally sustainable Region. Section 3.2 of the RSES identifies the key Growth Enablers for the Region which include a number of measures relevant to Dún Laoghaire-Rathdown as follows;

- Promote global connectivity and regional accessibility as part of an integrated land use and transport strategy, with a focus on protecting national assets and enhanced inter-regional connectivity.
- Support the future success of Dublin as Ireland's leading global city of scale by better managing strategic assets to increase opportunity and sustain national economic growth and competitiveness.
- Deliver strategic development areas identified in the Dublin Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands to support Dublin's sustainable growth.
- Promote compact urban growth to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.
- Promote targeted 'catch up' investment to support self-sustaining local employment, and in services, sustainable transport and amenities in places that have experienced rapid commuter driven population growth.
- Promote regeneration and revitalisation of small towns and villages and support local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas.
- Support rural areas by harnessing natural resources to develop renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.

In addition to Growth Enablers for the overall Eastern and Midland Region, the RSES includes a series of Growth Enablers for Dublin City and Metropolitan Area relevant to Dún Laoghaire-Rathdown as follows;

- To sustainably manage Dublin's growth as critical to Ireland's competitiveness, achieving growth to 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031.
- To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life.

- To deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.
- To increase employment in strategic locations, providing for people intensive employment at other sustainable locations near high quality public transport nodes, building on commercial and research synergies in proximity to large employers, industry clusters and smart specialisation and activating strategic sites to strengthen the local employment base in commuter towns.
- Enhance co-ordination across local authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability.
- Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the Region and to serve the Nation, and safeguard and improve regional accessibility and service by rail, road and communication, with a key focus on the Dublin-Belfast Economic Corridor.

The Economic Strategy of the RSES has five key principles which include smart specialisation, clustering, placemaking, orderly growth and future proof. This Strategy includes a retail hierarchy for the Region, as outlined in the RSES under Chapter 6 Table 6.1, which identifies Dún Laoghaire and Dundrum as Level 2 [Major Town Centres and County (Principal) Town Centres], and Stillorgan, Blackrock, Cornelscourt, Nutgrove and Cherrywood as Level 3 [Town and/or District Centres and Sub-County Town Centres (Key Service Centres)] within the retail hierarchy.

The RSES notes that Dún Laoghaire-Rathdown is the most affluent local authority in the State and the Region. However, there are pockets of disadvantage across the Region, with 15% of the population living in disadvantaged areas, sometimes in close proximity to areas of relative affluence.

The RSES recognises the regional ports, including the port of Dún Laoghaire, as important centres of economic activity, and seeks to protect and support the role of regional ports as economic drivers for the Region. More specifically, RPO 8.22 outlines EMRA's support for ports of Regional Significance that serve an important regional purpose and/or specialised trades or maritime tourism and the need to address accessibility requirements from within their regional catchments through the provision of improved access routes, where necessary and improved access to the national and regional road networks. Opportunities for the use of rail, where such ports are connected to the rail network is also promoted. Furthermore, RPO 8.23 states that the EMRA supports the protection of the marine related functions of ports in the Region in order to ensure the future role of ports as strategic marine related assets is protected from inappropriate uses, whilst supporting complimentary economic uses including the potential for facilitating offshore renewable energy development at ports.

In relation to community development, the RSES outlines support for community and adult education providers who are already providing formal and non-formal education to targeted disadvantaged groups and who have already identified the barriers to participation in lifelong learning such as childcare, transport and rural isolation to increase participation rates and support progression into

further education and employment. The RSES notes that Dún Laoghaire-Rathdown, at an average age of 39 years (Census, 2016), is the oldest county in the Region and state. By 2031 there will be a significant increase in the regional population aged over 65 and the RSES identifies the need to plan for adequate healthcare, accommodation and services to enable independent living for as long as possible, encourage active lifestyles and address isolation for older residents. The RSES also highlights the importance of recreation and sporting facilities including blueways and greenways, including the promotion of the Wicklow Way hiking route from Dublin to the Blackstairs Mountains which begins at Marlay Park in Dún Laoghaire-Rathdown.

The draft LECP submitted makes reference to key spatial planning, economic, social and community elements of the policies and objectives of the RSES in order to demonstrate consistency with same, which is welcomed by the Regional Assembly. This is discussed further in Section 3.

2.0 Overview of the draft Framework LECP

The draft Dún Laoghaire-Rathdown Local Economic and Community Plan (LECP) was received on 22nd December 2023 and contains the following sections:

- Executive Summary
- Introduction
- Policy Context
- Overview of the County
- Consultation
- SWOT Analysis
- High-Level Goals, Objectives and Outcomes
- Implementation Plan
- Monitoring and Evaluation
- Appendices

The draft LECP sets out the following vision statement for Dún Laoghaire-Rathdown:

“A progressive climate resilient County that is inclusive, promotes quality of life, health and wellbeing, economic activity and employment and builds a better future for all.”

The strategy of the draft LECP is guided by six High-Level Goals which are supported by 19 objectives. The six High-Level Goals and their descriptions are as follows:

Goal	Goal Description
Goal 1	Create a climate-resilient County by promoting and delivering best practice in climate action, biodiversity, and the circular economy.
Goal 2	Pursue balanced development of the local economy and enhance the business environment to build a creative, inclusive and robust economy.
Goal 3	Develop pathways to employment through enhancing education and training opportunities for all.
Goal 4	Realise the County's potential as a sustainable tourism destination and protect and support the County's heritage and creative sector.
Goal 5	Promote a healthy, inclusive and diverse County that supports good physical health and mental wellbeing across all our communities.
Goal 6	Continue to develop connected, vibrant and sustainable towns and villages and promote active participation and civic engagement within the County.

Source: Section 6.1 of the draft LECP

The draft LECP indicates that the High-Level Goals, which set the direction of the LECP, were devised based on the findings from the socio-economic analysis, consultation, and review of existing policies. It is further stated that these high-level goals and their associated objectives, actions and outcomes, have been jointly developed by Dún Laoghaire-Rathdown County Council, the Local Community Development Committee (LCDC), and the Special Planning Committee (SPC) for Economic Development and Enterprise in consultation with key stakeholders.

The content of the draft LECP, including the High-Level Goals, will be discussed in the following sections of this report.

3.0 Evaluation of Consistency with the RSES

The draft LECP states that it has been developed in line with the requirements of the Local Government Reform Act 2014 and the revised Local Economic and Community Plans Guidelines 2021. In this regard, the following are noted from the draft LECP submitted to EMRA for consideration.

3.1 Policy Context

The draft LECP states that it has been informed by and is consistent with the aims and objectives of key policies and strategies at the national, regional and local level. It notes the need to address the climate crisis and has also been developed in the context of the principles of the United Nation's Sustainable Development Goals (SDGs). A summary list of relevant policy documents to which the LECP has aligned is included in Section 2 of the draft LECP. The draft LECP further identifies a number

of recurring and common priorities relating to the objectives and aims of existing policy. The draft LECP states that these ‘community’ and ‘economic’ priorities have been taken into account during the development of the LECP to ensure that the plan aligns, complements and supports local, regional and national objectives and aims.

Section 2.1.3 of the draft LECP provides a summary of the EMRA RSES as it relates to the LECP. This includes a high-level summary of the strategic purpose of the RSES; specific reference to the strategic position of Dún Laoghaire-Rathdown within the Dublin Metropolitan Area, and; reference to Dún Laoghaire, Dundrum and Cherrywood as designated hubs for enterprise development and innovation in the Region. The Regional Assembly welcomes the inclusion of this strategic overview. Notwithstanding, this section should be expanded upon to comprehensively reference named Strategic Development Areas and Corridors, and Strategic Employment Development Areas, in the administrative area of Dún Laoghaire-Rathdown as set out in Tables 5.1 and 5.2 of the RSES.

Section 2.1.4 of the draft LECP provides an overview of the Dún Laoghaire-Rathdown County Development Plan (CDP) 2022–2028. This includes a high-level summary of the strategic purpose of the County Development Plan, stating that it is in full alignment with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES). The overview notes the emphasis of the County Development Plan on sustainability as its central tenet, with a specific focus on fostering dynamic, liveable, and climate-resilient communities. The overview then proceeds to outline the shift from enterprise and employment to climate action as the priority focus of the County Development Plan.

The Regional Assembly considers that the draft LECP could be enhanced further by setting out the retail hierarchy for the Region, as outlined in the RSES under Chapter 6, Table 6.1 which identifies Dún Laoghaire and Dundrum as Level 2 [Major Town Centres and County (Principal) Town Centres], and Stillorgan, Blackrock, Cornelscourt, Nutgrove and Cherrywood as Level 3 [Town and/or District Centres and Sub-County Town Centres (Key Service Centres)] within the retail hierarchy.

Overall, however, the Regional Assembly considers that the policy considerations are in line with the LECP ministerial guidelines and are consistent with the policies and objectives of the RSES in so far as it relates to the administrative area of Dún Laoghaire-Rathdown County Council. Furthermore, the Regional Assembly welcomes the commentary provided in relation to each High-Level Goal which demonstrates consistency of the LECP with the Dún Laoghaire-Rathdown County Development Plan 2022-2028, the RSES, the NPF and the UN SDGs.

3.2 Socio-Economic Profile and Consultation Process

Socio-Economic Profile

Section 3 of the draft LECP contains the socio-economic profile of Dún Laoghaire-Rathdown with up-to-date authoritative information on population, climate change, energy, households, families, housing, employment, economy, enterprise, community wellbeing, deprivation, poverty, social exclusion, transport and infrastructure.

This identifies that Census 2022 recorded a population for Dún Laoghaire-Rathdown of 233,860, up 15,842 (7.3%) from Census 2016, however population growth was not spatially even across the County. The Electoral Divisions that experienced population growth included both new residential growth areas such as Ballyogan and Environs and existing built-up areas such as Dundrum and Dún

Laoghaire. This growth was supported by high levels of inward migration and the number of families increasing by 6% to 59,431. At 17%, Dún Laoghaire-Rathdown has a higher proportion of population aged 65 years and over when compared to the State (15%). The rate of growth in population aged 65 and over in Dún Laoghaire-Rathdown through the period 2016-2022 was, however, at 15%, lower than the 22% growth experienced at the national level.

As set out in the socio-economic profile, Census 2022 identified that the housing stock in Dún Laoghaire-Rathdown was 93,257 residential units, representing an 8.4% increase since Census 2016, which is higher than the comparative figure of 6% for the State. In 2022, 68% of households in Dún Laoghaire-Rathdown were owner occupied compared to 66% nationally.

The draft LECP states that Dún Laoghaire-Rathdown has a labour force of 106,548 people, representing an increase of 11% from 95,925 in 2016. The County had the joint lowest unemployment rate nationally at 6%, and the joint lowest long-term unemployment rate at 3%. This continues a trend evident since the 2011 Census of falling unemployment rates in Dún Laoghaire-Rathdown. Census 2016 confirmed the continuing trend in the County towards a high proportion of residents employed as managers/professionals. In 2016, DLR had the highest proportion (26%) of persons classified as Employers and Managers (Socio-Economic Group A) in the State. As stated in the draft LECP, the occupational composition of the County is characterised by a significant number of residents employed in the knowledge economy and high-value growth sectors.

With regard to educational attainment, the Census 2022 figures indicate that 65% of the population of Dún Laoghaire-Rathdown aged 15 years and over have completed some third level education with 91.6% of leaving cert students progressed to third level studies according to the 2016 census. This is significantly higher than the other Dublin local authorities. As stated in the draft LECP, Dún Laoghaire-Rathdown contains several third level and further education institutions including UCD, with c. 30,000 students, IADT with c. 2,500 students, Smurfit Business School, the Dún Laoghaire Further Education Institute, and the Irish Management Institute.

The draft LECP states that at the end of 2022, Dún Laoghaire-Rathdown had 333 Enterprise Ireland-supported companies. The majority of these companies (accounting for 70% of the employee numbers) operate in the Digital Technologies, Fintech/Financial & Business Services and Hi-Tech Construction and Housing sectors, supporting 15,501 jobs. With regard to industry, there are 63 IDA client companies located in the County, operating primarily in the financial services, software, ICT, and medical devices sectors.

With regard to deprivation, poverty and social exclusion, the draft LECP states that Dún Laoghaire-Rathdown is a county of contrasts with areas of both affluence and disadvantage. In 2019, Dún Laoghaire-Rathdown recorded the highest median household income in the State at €71,206 (12.5% higher than Fingal which had the second highest level in the State). It is noted in the draft LECP, however, that household income in Dún Laoghaire-Rathdown is not distributed evenly across the County. In 2016, 11 Electoral Divisions recorded a gross median household income less than €50,000, while 7 Electoral Divisions recorded a gross median household income greater than €85,000. Furthermore, thirty-three of the 760 Small Areas in Dún Laoghaire-Rathdown are classified as disadvantaged or very disadvantaged. This accounts for a population of 10,289 or 4.7% of the total population. Since 2015, the social inclusion programme, SICAP, has delivered support to build stronger communities in disadvantaged communities and to provide support for disadvantaged individuals.

Section 3.7 of the draft LECP acknowledges that Dún Laoghaire-Rathdown is a well-connected County, with an extensive network of active travel and public transport routes, representing significant economic assets and opportunity for the County.

The highlights of the socio-economic analysis are informative, recent and establish the context of Dún Laoghaire-Rathdown for the Local Economic and Community Plan process. Furthermore, the SWOT analysis at Section 5 and the highlights provided demonstrate considerable preparation and evidence-based thought feeding into the selection of the High-Level Goals. The socio-economic highlights compared against national averages and the other Dublin local authorities are particularly informative. Notwithstanding, additional information should be included on vacancy rates within the County to provide a more complete socio-economic profile in relation to housing and dereliction. As noted in Section 8.4 of the draft LECP, the GeoDirectory provides information on a quarterly basis for commercial and residential vacancy at county and selected town level and can be used to monitor the commercial and residential vacancy rates.

Consultation Process

The draft LECP states that its preparation has involved extensive consultation with a range of stakeholders from across the County. It has included engagement with community and voluntary groups, the PPN, local business representatives, elected officials, education and training providers and the public. The draft LECP states that the consultation sought to encourage inclusive participation in the development of the County and provide an opportunity for all interested parties to voice their views. In doing so, the consultation process had a stated aim to identify needs and gaps to be addressed as well as specific ideas and actions for potential inclusion in the LECP. The draft LECP states that findings from the consultation process were used to revise the draft High-Level Goals and also contributed to the development of the objectives, outcomes and actions outlined in Sections 6 and 7 of the draft LECP.

The draft LECP states that the formal consultation process took place between April and July 2023 and included online surveys, stakeholder interviews, workshops and written submissions. The consultation was promoted through the Council's website and social media channels and circulated to relevant stakeholder networks to generate interest, engagement, and attendance. The draft LECP notes that further supplementary consultation also took place during the development of the objectives, outcomes, and actions to ensure alignment and buy-in from stakeholders who would be responsible for the delivery of specific actions.

Sections 4.1 summarises the consultation approach and Section 4.2 outlines the key themes which emerged from the consultation which fed into the selection of High-Level Goals. The eight overarching themes which emerged from the consultation were:

- Climate Action
- Transport and Accessibility
- Community Development and Wellbeing
- Town Centres
- Housing

- Economic Development
- Education and Training
- Culture and Heritage

The Regional Assembly considers that the public consultation stage as set out was satisfactorily carried out and in accordance with the LECP Guidelines 2021 which require the public consultation phase to take into account different stakeholder needs across both the economic and community sectors. The Regional Assembly notes that as required by Section 66C (2)(a)(i)(I) and Section 66C (3)(a)(i)(I) of the Local Government Reform Act 2014, a report should be included in the LECP on this stage. In this respect, the appendices of the final LECP should be amended to include full details of the public consultation information, a list of written submissions and the membership of relevant structures (LCDC, SPC) as detailed in Appendix 2 of the LECP Guidelines 2021.

3.3 High-Level Goals, Objectives and Outputs

It is noted in Section 6 of the draft LECP that a set of six high-level goals have been created based on the findings from the socio-economic analysis, consultation, and review of existing policies. It is further indicated that these high-level goals and their associated objectives, actions and outcomes, have been jointly developed by Dún Laoghaire-Rathdown County Council, the LCDC, and the SPC for Economic Development and Enterprise in consultation with key stakeholders. The specific actions for each goal are included in the initial two-year implementation plan outlined in Section 7, the inclusion of which as a core element of the draft LECP is welcomed by the Regional Assembly.

Each draft High-Level Goal has related ‘Objectives’ and ‘Key Desired Outcomes’ which the draft LECP notes cover both economic and community development. There are nineteen supporting objectives in total. These objectives are key priority areas within each draft High-Level Goal. Like the draft High-Level Goals, it is indicated in the draft LECP that the development of the objectives was informed by consultation with the community and stakeholders, as well as by the socio-economic analysis.

The LECP Guidelines 2021 recommend that High-Level Goals should be achievable and realistic. These are discussed in detail below, including an evaluation of consistency with the Regional Spatial and Economic Strategy (RSES).

It is noted that for High-Level Goals, alignment with the strategic objectives of DLR’s County Development Plan; named chapters of the EMRA RSES; relevant National Strategic Outcomes (NSOs) of the National Planning Framework; the National Climate Action Plan 2023, and the United Nations Sustainable Development Goals (SDGs) is outlined and this approach is welcomed by the Regional Assembly. Notwithstanding, the final LECP should ensure alignment of High-Level Goals and objectives with the National Climate Action Plan 2024 as approved by Government on 20th December 2023, in accordance with the LECP Guidelines 2021

Overall, the Regional Assembly is satisfied with the selection of the six draft High-Level Goals and the stated objectives, based on the evidence-based approach used and the socio-economic profile and SWOT analysis which were used to develop the goals. The Regional Assembly is satisfied that the chosen goals align with the three Key Principles of the RSES, the sixteen Regional Strategic Outcomes (RSOs) of the RSES and with a number of relevant Regional Policy Objectives (RPOs) of the RSES.

Notwithstanding, the draft LECP refers to objectives under the High-Level Goals rather than being categorised as Sustainable Economic Development Objectives (SEDOs) and Sustainable Community Objectives (SCOs) as per the recommendations of the LECP Guidelines 2021. The final LECP should review the LECP framework document to ensure the objectives are suitably categorised in accordance with the recommendations of the LECP Guidelines 2021.

Each draft High-Level Goal is discussed in detail below:

Goal 1: Create a climate-resilient County by promoting and delivering best practice in climate action, biodiversity, and the circular economy.

This goal contains four objectives that relate to supporting a shift away from a carbon-based economy; ensuring a just transition to a more sustainable society; safeguarding the County’s natural assets and environment, and; maintaining the County’s appeal as a desirable place to live, visit, and work.

Objective 1.1	Implement climate action and biodiversity initiatives to support DLR's transition to a more sustainable County and protect the environment
Objective 1.2	Raise awareness and encourage participation in sustainability initiatives across communities and businesses
Objective 1.3	Encourage the use of more sustainable modes of transport and travel
Objective 1.4	Encourage and promote the Circular Economy in the County

The draft High-Level Goal and objectives outlined above supports the Key Principles of Climate Action, Economic Opportunity and Healthy Placemaking as outlined in the RSES, including Regional Strategic Outcomes (RSOs) of the RSES in relation building climate resilience (RSO 8); biodiversity and natural heritage (RSO 11); supporting the transition to low carbon and clean energy (RSO 9); integrated transport and land use (RSO 6), and; healthy communities (RSO 4). It also demonstrates consistency with RPOs 5.2-5.3 relating to MASP Sustainable Transport, and RPO 6.23 relating to low carbon and circular economy.

Goal 2: Pursue balanced development of the local economy and enhance the business environment to build a creative, inclusive and robust economy.

This goal contains three objectives that aim to enhance the County’s business environment, ensure a thriving economy and increase economic prosperity.

Objective 2.1	Increase collaboration and promote the County as a world class location to do business
Objective 2.2	Attract new investment, support existing businesses and drive sustainable employment throughout the County
Objective 2.3	Improve the business environment, encourage entrepreneurship and develop innovative clusters

The draft High-Level Goal and objectives support the Key Principles of Healthy Placemaking and Economic Opportunity and also the five principles of the Economic Strategy of the RSES which are

listed as smart specialisation, clustering, placemaking, orderly growth and future proof, including RSOs of the RSES in relation to healthy communities (RSO 4); creative places (RSO 5); strong economy supported by enterprise and innovation (RSO 12); enhanced strategic connectivity (RSO 15), and; global city region (RSO 14). They also demonstrate consistency with RPO 6.1 in relation to competitive and economic resilient base; RPO 6.2 in relation to unexpected opportunities for enterprise development; RPOs 8.22 and 8.23 in relation to ports of Regional Significance and marine related functions; RPO 6.28 in relation to social enterprise; RPO 6.31 in relation to innovation capacity, and; RPO 6.38 in relation to anticipating economic structural changes.

Goal 3: Develop pathways to employment through enhancing education and training opportunities for all.

This goal contains three objectives that aim to increase participation in lifelong learning; increase availability and participation in traineeships and apprenticeships, and; assist disadvantaged and vulnerable groups in accessing training and education.

Objective 3.1	Encourage lifelong learning and increase the employability of the County's people
Objective 3.2	Support disadvantaged and vulnerable groups to access education and training
Objective 3.3	Increase awareness, uptake and provision of apprenticeships and traineeships in the County

The draft High-Level Goal and objectives outlined above support the Key Principles of Economic Opportunity and Placemaking as outlined in the RSES, including RSO 13 in relation to improving education skills and social inclusion. In addition, they support RPOs of the RSES including RPOs 6.25-6.27 in relation to skills and innovation; RPO 6.38 in relation to anticipating economic structural changes, particularly in relation to lifelong learning programmes, business supports and upskilling; RPO 9.2 which supports investment in youth services that support and target disadvantaged young people and improve their employability, and; RPO 9.22 in relation to supporting the role of Higher Education Institutions and Educational Training Boards in addressing skills shortages and life-long learning needs in the Region.

Goal 4: Realise the County's potential as a sustainable tourism destination and protect and support the County's heritage and creative sector.

This goal contains three objectives that aim to build the potential of the County as a sustainable tourism destination and foster growth and accessibility of the arts, culture, and creative sector.

Objective 4.1	Increase awareness of the County as a sustainable tourism destination
Objective 4.2	Continue to develop and enhance the County's tourism offering
Objective 4.3	Support and celebrate the County's rich heritage and creative sector

The draft High-Level Goal and objectives support the Key Principles of Healthy Placemaking, Climate Action and Economic Opportunity, including RSO 4 of the RSES in relation to healthy communities, RSO 5 in relation to creative places, RSO 11 in relation to biodiversity and natural heritage, RSO 12 in relation to enterprise and innovation, and RSO 15 in relation to strategic connectivity. They also

demonstrate consistency with RPO 3.7 in relation to sustainable growth, RPOs 4.77-4.84 which address the development, protection and regeneration of rural areas; RPOs 6.4 and 6.5 in relation to the rural economy; RPOs 6.7 and 6.8 in relation to rural tourism; RPOs 6.15-6.18 in relation to natural and cultural tourism assets; RPOs 9.24-9.30 in relation to arts, culture, language and heritage; RPO 9.1 in relation to age and family friendly strategies, RPO 9.2 in relation to active participation and social integration of minority groups, RPOs 9.12- 9.14 in relation to the accessibility and availability of new social infrastructure, RPO 9.18 in relation to the reduction of social exclusion, and; RPO 9.19 regarding social infrastructure needs.

Goal 5: Promote a healthy, inclusive and diverse County that supports good physical health and mental wellbeing across all our communities.

This goal contains three objectives that aim to enhance equality and social inclusion; address poverty and deprivation, and; improve the health and wellbeing of all groups across the County.

Objective 5.1	Enhance equality and social inclusion across all communities
Objective 5.2	Address poverty and deprivation where it exists
Objective 5.3	Improve health and wellbeing across the County

The draft High-Level Goal and objectives outlined above support the Key Principle of Healthy Placemaking as outlined in the RSES, and align, in particular, with RSO 4 in relation to healthy communities. They also demonstrate consistency with RPOs 9.1 and 9.2 in relation to a diverse and inclusive region; RPOs 9.18 and 9.19 in relation to social and economic opportunity; RPO 9.23 in relation to the provision of health services; RPOs 9.14-9.17 in relation to recreation and open space, and; RPO 9.25 which seeks to promote equality of access to and engagement with arts and cultural services.

Goal 6: Continue to develop connected, vibrant and sustainable towns and villages and promote active participation and civic engagement within the County.

This goal contains three objectives that aim to ensure that adequate levels of accommodation are available, reducing vacancy and dereliction and seeking to enhance public transport while increasing community involvement in the development of the County.

Objective 6.1	Continue to develop a collaborative environment to deliver accommodation in the County
Objective 6.2	Regenerate the County's towns and villages and increase connectivity and accessibility
Objective 6.3	Support voluntary and community groups and increase community participation in the development of the County

The draft High-Level Goal and objectives support the Key Principles of Healthy Placemaking, Climate Action and Economic Opportunity, including RSOs in relation to sustainable settlement patterns (RSO 1), compact growth and urban regeneration (RSO 2), rural communities (RSO 3), healthy communities

(RSO 4), integrated transport and land use (RSO 6), and enhanced strategic connectivity (RSO 15). They also demonstrate consistency with RPOs 6.12-6.14 in relation to town centre renewal; RPOs 5.4 and 5.5 in relation to MASP Housing and Regeneration; RPOs 4.37 and 4.40 in relation to the delivery of public transport links and enabling infrastructure for the westward expansion of Bray Key Town; RPOs 4.77-4.84 which address the development, protection and regeneration of rural areas; RPOs 9.1 and 9.2 in relation to diverse and inclusive region, and; RPOs 6.4 and 6.5 in relation to the rural economy.

3.4 Implementation

The draft LECP includes an initial 2-year Implementation Plan containing 67 actions for achieving the 6 high-level goals, 19 objectives and associated outcomes set out in the framework document. For each action, lead and partner agencies responsible for the delivery of the actions have been identified along with outputs/Key Performance Indicators (KPIs) and delivery timeframes. It is further noted in the draft LECP that the actions have been designed within the context of existing policies and strategies, including the County Development Plan, the EMRA RSES, and the NPF to which the LECP is aligned, and the United Nations' Sustainable Development Goals (SDGs). Notwithstanding, the final Implementation Plan should indicate, for each action, the potential funding sources (programmes and funding streams) available, as well as the availability of other relevant resources in line with the LECP Guidelines 2021. Furthermore, the Implementation Plan should be reviewed to ensure that the objectives are suitably categorised as SCOs or SEDOs and clearly relate to identified actions in accordance with the recommendations of the LECP Guidelines 2021.

The draft LECP outlines that in line with the LECP Guidelines 2021, the Implementation Plan will be revised every two years and will remain responsive to the County's changing needs over the course of the six-year period, underscoring its significance in relation to both economic and community development. Furthermore, the draft LECP notes the importance of accurate monitoring and evaluation of progress both in terms of the initial implementation plan and the overall LECP. The LECP Guidelines 2021 requires that each local authority should draw up implementation arrangements to suit the content of its Plan and local circumstances. Section 8, Monitoring and Evaluation, of the draft LECP indicates that Dún Laoghaire-Rathdown County Council holds the responsibility for overseeing the comprehensive implementation of the LECP and will ensure the regular and consistent monitoring of its progress. It further notes that the monitoring of progress will require a collaborative effort between the Council and agencies responsible for the implementation of specific actions. It further notes that accurate monitoring and evaluation of progress can be used by the Council and its partners to effectively allocate resources to address economic and community needs. To assist with this process, the draft LECP indicates that designated points of contact in each lead agency/group will be established to report on progress at agreed intervals and recommends that lead agencies provide updates to the Council on the progress of actions every quarter. Furthermore, it is stated that Dún Laoghaire-Rathdown County Council will annually circulate an overall progress report on the Plan, reflecting information gathered throughout the year.

The Regional Assembly welcomes the inclusion in the draft LECP of the Implementation Plan and Monitoring and Evaluation chapter in line with the LECP Guidelines 2021. Overall, the Regional Assembly is satisfied with the selection of the 67 actions and the stated objectives, based on the evidence-based approach used and the socio-economic profile and SWOT analysis which were used to develop the High-Level Goals. The Regional Assembly is satisfied that the chosen actions align with

the three Key Principles of the RSES, the sixteen Regional Strategic Outcomes (RSOs) of the RSES and with a number of relevant RPOs of the RSES.

4.0 Evaluation of Consistency with the Dún Laoghaire-Rathdown County Development Plan 2022–2028

Section 44 of the Local Government Reform Act 2014 (amending Section 66C of the Local Government Act 2001) states that LECPs should be consistent with the core strategy and objectives of the Development Plan, in this respect the Dún Laoghaire-Rathdown County Development Plan 2022–2028. Given that the Dún Laoghaire-Rathdown County Development Plan 2022–2028 was deemed to be consistent with the RSES by way of the submission made by EMRA on 16th March 2021, the Regional Assembly therefore considers that an analysis of the RSES is deemed sufficient in order to demonstrate consistency. The Regional Assembly welcomes the statement at Section 2 of the draft LECP that the draft LECP has been informed by and is consistent with the aims and objectives of key policies and strategies at the national, regional and local level including the current County Development Plan 2022-2028. Furthermore, the Regional Assembly welcomes the overview of the Dún Laoghaire-Rathdown County Development Plan 2022–2028 at Section 2.1.4 of the draft LECP and the statement of alignment with the County Development Plan - including reference to relevant chapters therein - contained in the description of each of the six High-Level Goals.

5.0 Other Considerations

A number of clerical errors and anomalies are evident in the draft LECP document. In this respect, the introduction to the Executive Summary of the draft LECP, and the opening paragraph and summary list of relevant policy documents in Section 2, refer to the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region covering the period 2020-2032. This is incorrectly referenced as the adopted RSES covers the period 2019-2031. Similar incorrect references to the RSES are also noted in Sections 1.2 and 2.1.3 of the draft LECP which refer to the RSES covering the period 2019-2032. In Section 2.1.3, Dún Laoghaire, Dundrum and Cherrywood are referred to as ‘key towns’. These settlements are not designated as ‘Key Towns’ in the RSES settlement hierarchy and should not therefore be referred to as key towns in the final LECP. Under Objective 2.2, the word ‘with’ should be inserted before the word ‘disabilities’ in reference to those with disabilities.

The above matters should be adequately addressed in the final LECP document.

6.0 Recommendation and Statement of Consistency

The Regional Assembly commends the work of Dún Laoghaire-Rathdown County Council to date in the preparation of the draft LECP and issues a Statement of Consistency for the Dún Laoghaire-Rathdown LECP as required under Section 44 of the Local Government Reform Act (as amended) subject to the following recommendations:

1. Section 2.1.3 of the draft LECP should be expanded upon to comprehensively reference named Strategic Development Areas and Corridors, and Strategic Employment Development Areas, in the administrative area of Dún Laoghaire-Rathdown as set out in Tables 5.1 and 5.2 of the RSES. This should include reference to the Old Connaught lands located in the

administrative area of Dún Laoghaire-Rathdown which comprise a component part of the Key Town of Bray.

Reason: To ensure consistency between the Dún Laoghaire-Rathdown LECP and the Dublin Metropolitan Area Strategic Plan (MASP) in relation to strategic residential and employment development corridors and strategic employment and mixed-use development areas.

2. The final LECP should make reference to the retail hierarchy for the Region, as outlined in the Regional Spatial and Economic Strategy which identifies Dún Laoghaire and Dundrum as Level 2 [Major Town Centres and County (Principal) Town Centres], and Stillorgan, Blackrock, Cornelscourt, Nutgrove and Cherrywood as Level 3 [Town and/or District Centres and Sub-County Town Centres (Key Service Centres)] within the retail hierarchy.

Reason: To ensure consistency between the Dún Laoghaire-Rathdown LECP and the retail hierarchy for the Region as set out in the Regional Spatial and Economic Strategy.

3. The socio-economic profile should include information on commercial and residential vacancy at county and selected town level.

Reason: To provide a more complete socio-economic profile in relation to housing and dereliction to support actions under Goal 6 of the draft LECP in line with RSES RPOs relating to town centre renewal, and the guiding principles of the RSES to deal with the complexities of brownfield and infill sites.

4. The final LECP should ensure alignment of High-Level Goals and objectives with the National Climate Action Plan 2024 .

Reason: The LECP Guidelines 2021 state that consideration of the role of the LECP in supporting the delivery of actions in Local and National Climate Action Plans should form part of the LECP with specific actions included in LECP Implementation Plans as appropriate.

5. The draft LECP refers to objectives under the High-Level Goals rather than being categorised as Sustainable Economic Development Objectives (SEDOs) and Sustainable Community Objectives (SCOs) as per the recommendations of the LECP Guidelines 2021. The final LECP should review the draft LECP framework document and Implementation Plan and categorise objectives as SCOs or SEDOs in accordance with the recommendations of the LECP Guidelines 2021.

Reason: To ensure that the objectives of the Dún Laoghaire-Rathdown LECP are suitably categorised as SCOs or SEDOs in accordance with the recommendations of the LECP Guidelines 2021.

6. The final Implementation Plan should indicate, for each action, the potential funding sources (programmes and funding streams) available, as well as the availability of other relevant resources.

Reason: The LECP Guidelines 2021 recommend that the Implementation Plan should include suggestions on what funding streams may be available to support the implementation of the relevant identified prioritised actions.

7. The appendices of the final LECP should be amended to include full details of the public consultation information, a list of written submissions and the membership of relevant structures (LCDC, SPC) as detailed in Appendix 2 of the LECP Guidelines 2021.

Reason: To ensure that the final LECP for Dún Laoghaire-Rathdown is consistent with Section 66C (2)(a)(i)(I) and Section 66C (3)(a)(i)(I) of the Local Government Reform Act 2014, which,

as detailed in the LECP Guidelines 2021, requires that a report should be included in the LECP on this stage.

7.0 Conclusion

The Eastern and Midland Regional Assembly (EMRA) welcomes the progression of the Local Economic and Community Plan to a draft document and considers the objectives to be consistent with the RSES and the Dún Laoghaire-Rathdown County Development Plan 2022–2028. Subject to the amendments listed in Section 6.0 of this report being incorporated into the finalised LECP, the Regional Assembly considers that the document would be consistent with the policies and objectives of the Regional Spatial and Economic Strategy 2019-2031 and the Dún Laoghaire-Rathdown County Development Plan 2022–2028.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
9th February 2024