



# 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 Framework for the Fingal Local Economic and Community Plan

The Eastern and Midland Regional Assembly notes the publication of the draft framework document for the Fingal Local Economic and Community Plan 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 12<sup>th</sup> January 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 Fingal Local Economic and Community Plan.

#### 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.

In relation to Fingal, the RSES identifies Swords as a Key Town. Swords is located in the Metropolitan Region and is a large economically active service town with high-quality transport links and a capacity for increased residential and employment densities.

One of the key focuses in the RSES for the settlement of Swords is to encourage compact growth, mainly through targeting infill development within the town, with residential development directed towards the western and southern areas of the town, and longer-term residential development at Lissenhall, on the northern side of Swords town. The regeneration of the town will rely on the proposals in the Sustainable Swords Project, which will consolidate and strengthen the historic town centre, and with a focus on the strengthening of the role of the Main Street. This regeneration will be further enhanced through the development of Swords Civic Centre and Cultural Centre; the delivery of the conservation plan for Swords Castle; and the delivery of an enhanced public realm in the town centre.

The RSES identifies that there are opportunities to create a strategic employment node in Swords, maximising the town's strategic location in proximity to Dublin airport, the proposed Metrolink and other public transport proposals, including the Bus Rapid Transport/BusConnects and Park and Ride programmes, and the national road network. Dublin Airport, in particular, has developed as a key location for industry and employment generating activities, and airport related activities including the provision of high skilled employment opportunities. In this respect, ensuring high skilled employment opportunities for the residents of Swords is a key objective of the RSES.

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 Fingal 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 Donabate and the Baldoyle-Stapolin areas (North Fringe lands) which are on the north-south DART transport corridor; Dunsink which is within the City Centre-M50 corridor and may be accessed by multi modal transport; the Dublin 15 lands at Hansfield linked to the future development of the Barnhill and Kellystown landbanks; Swords (sequential development and development of Oldtown-Mooretown lands), and; Swords – Lissenhall as a new mixed-use urban district on the northern side of Swords linked to delivery of Metrolink.

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 Dublin Enterprise Zone located in Blanchardstown and Dublin 15, which has the potential to provide large-scale office, research and development and high-tech manufacturing in proximity to Technological University Dublin's campus at Blanchardstown.

Section 3.1 of the RSES outlines the Growth Strategy for the overall Eastern and Midland Region which includes an objective to facilitate the collaboration and growth of the Dublin-Belfast Economic

Corridor. The Dublin-Belfast Economic Corridor is the largest economic agglomeration on the island of Ireland and plays a critical role in supporting economic growth and competitiveness. Fingal is located on the Dublin-Belfast Economic Corridor with strategic connections including high-capacity national road and rail links and Dublin Airport. The Growth Strategy also 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 Fingal 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.
- Facilitate collaboration to support the development of the Dublin-Belfast Economic Corridor.
- 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.
- Embed a network of Key Towns throughout the Region, which have the capacity to deliver sustainable compact growth and employment for their catchments in tandem with enabling public transport, infrastructure and services.
- Promote balanced growth in a limited number of economically active settlements which have the identified capacity and potential for self-sustaining growth.
- 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.

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 Swords and Blanchardstown as Level 2 [Major Town Centres and County (Principal) Town Centres], and Malahide,

Balbriggan, Skerries and Charlestown as Level 3 [Town and/or District Centres and Sub-County Town Centres (Key Service Centres)] within the retail hierarchy.

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 also highlights the importance of recreation and sporting facilities including blueways and greenways, including the promotion of the Ward River Valley Park, and the Town Park and Ward River Walk in Swords.

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 Framework document for the Fingal LECP was received on 1<sup>st</sup> December 2023 and contains the following sections:

- Executive Summary
- Introduction
- Vision and High-Level Goals
- LECP Objectives, Outcomes and Impacts
- Appendix 1 – Socio-Economic Profile
- Appendix 2 – Policy Context

The draft Framework document sets out the following vision statement:

*“Fingal will be a vibrant, sustainable, progressive and climate resilient county, underpinned by inclusive, healthy, empowered communities and a dynamic economy.”*

The strategy of the draft Framework document is guided by fifteen High-Level Goals under six themes, which are supported by 31 objectives. The six ‘themes’ and their descriptions are as follows:

Theme	Theme Description
<b>Sustainability &amp; Climate Action</b>	Pursue climate resilience and embed sustainability in all we do.
<b>Prosperous Economy</b>	A dynamic, outward looking and innovative economy with sustainability at its core.
<b>Skills for Life &amp; Work</b>	A county that provides a supportive and diverse skills ecosystem, nurtures talent, and provides life-long learning opportunities for all.
<b>Healthy, Inclusive, Connected Communities</b>	A healthy, inclusive and connected county where communities are empowered and supported to thrive.
<b>Rich Arts, Culture &amp; Heritage</b>	Promote and protect our arts and heritage, and embrace cultural diversity in the county.
<b>Safe, Accessible, Vibrant Places</b>	A county of vibrant communities and places, accessible for all, where people want to live, work and socialise.

Source: Section 1.3 of the draft LECP Framework document

The draft Framework document indicates that the High-Level Goals, which set the direction of the LECP, were devised based on a review of the previous LECP, consideration of key supranational, national, regional and local policies and strategies, an assessment of the socio-economic analysis undertaken, and were refined through public as well as stakeholder consultation.

The content of the draft Framework document, 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 Framework document states that it has been prepared in accordance with the Local Government Reform Act 2014 and having regard to the recommendations set out in the LECP Guidelines 2021. In this regard, the following are noted from the draft Framework plan submitted to EMRA for consideration.

#### **3.1 Policy Context**

The draft Framework Plan states that both the economic and community dimensions were constructed having regard to a review of relevant policies and strategies from the local (Fingal) to the supranational levels (European Union and United Nations). These policies and strategies are outlined in Appendix 2 of the draft Framework document.

The 'Regional and Local Policies & Strategies' sub-section of Appendix 2 includes a dedicated section on the EMRA RSES. This includes a strategic overview of the RSES including an outline of the 16 Regional Strategic Outcomes (RSOs), the key elements of the RSES, and the three cross-cutting key principles. The Regional Assembly welcomes the inclusion of this strategic overview.

In addition to the strategic overview, the draft Framework document makes specific reference to RSES objectives relating to Swords as a Key Town in the settlement hierarchy; the retail hierarchy for the Region which is of relevance to Fingal; and the creation of new communities aligned with Strategic Development Areas as set out in Table 5.1 of the RSES.

#### **Swords Key Town**

The draft Framework document identifies Swords town as a Key Town within the Dublin Metropolitan Area Strategic Plan (MASP), acknowledging the town's strategic location proximate to Dublin City and Dublin Airport and the national road network, as well as its location on the Metrolink Corridor. The town's young and growing population and its strong economic and service function are similarly referenced. The draft Framework document notes that compact growth and enhanced public realm in the town centre along with the planned sequential development of Swords will be promoted, with reference to specific measures including the development of Swords Civic Centre and Cultural Centre and the delivery of an enhanced public realm in the town centre. The further rollout of greenways and cycle networks is also referenced. The draft Framework document notes the major importance of airport related activities in generating local employment, as well as supporting strategic employment development and creating future employment districts in Swords and Dublin Airport/South Fingal and the Dublin Enterprise Zone. These references and associated objectives demonstrate consistency with the Swords Key Town Regional Policy Objectives (RPOs) 4.28 – 4.32 of the RSES, which is welcomed by the Regional Assembly.

### Fingal Retail Hierarchy

The draft Framework document identifies Swords and Blanchardstown as Level 2 [Major Town Centres and County (Principal) Town Centres], and Malahide, Balbriggan, Skerries and Charlestown as Level 3 [Town and/or District Centres and Sub-County Town Centres (Key Service Centres)] within the retail hierarchy as outlined in the RSES under Chapter 6, Table 6.1, thereby demonstrating consistency with the RSES.

### Strategic Development Areas

In addition to the sequential development of Swords, the draft Framework document recognises the potential to create new communities at Baldoyle-Stapolin, Donabate, and Dunsink and this demonstrates consistency with Table 5.1 of the RSES which is welcomed by the Regional Assembly. The Regional Assembly considers that this could be further strengthened by recognising the potential of developing the areas of Swords–Lissenhall, Oldtown-Mooretown and continued development of Hansfield linked to the future development of Barnhill and Kellystown landbanks in line with Table 5.1 of the RSES.

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 Fingal County Council. Furthermore, the Regional Assembly welcomes the commentary provided in Appendix 2 which demonstrates consistency of the LECP with the Fingal County Development Plan 2023 – 2029.

## **3.2 Socio-Economic Profile and Consultation Process**

Appendix 1 of the draft Framework document contains the socio-economic profile of Fingal County with up-to-date Census information on housing, demographics, social indicators, educational attainment, economy and employment statistics and environmental figures. This identifies that Census 2022 recorded a population for Fingal of 330,506, which was 11.6% higher than the previous census, and resulted in Fingal being the third fastest growing county in Ireland. As a result, the County accounts for 6.4% of Ireland's population. In relation to demographics, Fingal had the youngest average age of any county in 2022 at 36.2 years, with some 63% of its population below the age of 44, compared to 58.3% nationally. Census 2022 also outlined that the housing stock in Fingal was 116,135 residential units and represented 5.5% of the total Irish housing stock. Of the housing stock, only 4.3% were vacant which is considerably lower than the national average (7.7%). Of the residential units, 67% of households lived in owner-occupied accommodation, which broadly matches the national rate of 65.9%.

With regard to employment levels, Appendix 1 of the draft Framework document states that 27% of the population in Fingal were within the socio-economic group of 'professional workers' in 2022 (employers, higher professional and lower professional). This was amongst the highest in the country. Non-manual workers made up 40% of the workforce, compared to 36.6% nationally. This is the largest proportion of non-manual workers in Ireland. Fingal also had the highest proportion of residents in employment (60.5%) in Ireland.

With regard to industry, Appendix 1 of the draft Framework document states that clustering has been a key concept in Fingal with many successful informal clusters already in place including the ICT sector in Blanchardstown, the Pharmaceutical sector in both the Swords area and in Blanchardstown/

Mulhuddart, the Aviation sector in proximity to Dublin Airport, and the Agri-Food sector in rural locations principally in the north of the County. Further clustering is also evident in the Dublin Enterprise Zone.

Appendix 1 of the draft Framework document acknowledges the infrastructure network that serves Fingal, including Dublin Airport, and harbours, rail and road linkages with both Dublin Port and Dublin City. The County also sits along the Dublin-Belfast Economic Corridor which, alongside Dublin Airport, represents a significant economic asset and opportunity for the County.

The draft Framework document states that public consultation was invited during June and July 2023, and that a variety of engagement methods were provided to ensure access to the public consultation process was inclusive. In this respect, both in-person and online consultation methods were used. Stakeholder engagements were also held with Fingal County Council sub-committees, local stakeholder groups, and elected representatives on Local Area Committees. The feedback from the consultation process informed the final draft socio-economic statement (vision) and draft High-Level Goals.

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 Assembly note 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**

The Regional Assembly notes that the review of the LECP 2016-2021, the analysis of the socio-economic profile of the County, the consideration of key European, national, regional and local policies and strategies, and the feedback from the consultation process informed the draft High-Level Goals and accompanying objectives and outputs. The draft Framework document states that the draft High-Level Goals are ambitious, achievable and realistic.

Each draft High-Level Goal has related Sustainable Community Objectives (SCOs) and/or Sustainable Economic Development Objectives (SEDOs). There are thirty-one supporting objectives in total. These SCOs and SEDOs are key priority areas within each draft High-Level Goal. Like the draft High-Level Goals, the development of the objectives was informed by consultation with the community and stakeholders, as well as by the socio-economic analysis.

Overall, the Regional Assembly is satisfied with the selection of the fifteen draft High-Level Goals under the six overarching themes, and the stated objectives, based on the evidence-based approach used and the socio-economic profile which was used to develop the goals. The Regional Assembly is satisfied that the chosen goals align with the 3 Key Principles of the RSES, the 16 Regional Strategic Outcomes (RSOs) of the RSES and with a number of relevant RPOs of the RSES. The draft Framework document states that the Implementation Plan is nearing completion and will form part of Fingal County Council's LECP Framework document. It is stated that the Implementation Plan will examine



the High-Level Goals/Sustainable Objectives and Outcomes as set out in the Framework LECP and determine the actions to be pursued to contribute to the achievement of the Goals and Objectives. Notwithstanding, the Regional Assembly considers it appropriate that an Implementation Plan, detailing how the proposed objectives and outcomes of the draft High-Level Goals are to be achieved, measured, and monitored, as required by the LECP Guidelines 2021, is prepared and forms part of the final LECP document. The LECP Guidelines offer suggestions for relevant datasets that should provide the foundation for the Framework LECP and the initial Implementation Plan.

Each draft High-Level Goal is discussed in detail below under the six overarching themes, with each Sustainable Community Objective (SCO) and Sustainable Economic Development Objective (SEDO) stated:

#### Theme 1: Sustainability and Climate Action

- Goal 1.1: To support communities and the economy in the transition to Net Zero and climate resilience.

SCO 1: To develop and broaden the scope of the Sustainable Fingal initiative.

The draft High-Level Goal outlined above supports the Key Principles of Climate Action, Healthy Placemaking and Economic Opportunity as outlined in the RSES, including Regional Strategic Outcomes (RSOs) of the RSES in relation to healthy communities (RSO 4), building climate resilience (RSO 8), and supporting the transition to low carbon and clean energy (RSO 9). It also demonstrates consistency with RPO 7.42 in relation to decarbonising transport, RPOs 7.35–7.38 in relation to decarbonising the energy sector, RPOs 7.39 - 7.41 in relation to low energy buildings, RPOs 7.24–7.25 relating to greenways, blueways and peatways, RPOs 5.2-5.3 relating to MASP Sustainable Transport, and RPO 6.23 relating to low carbon and circular economy.

SCO 1 is to develop and broaden the scope of the Sustainable Fingal initiative, however, no description or outline of the Sustainable Fingal initiative is provided in the draft Framework document. Given the centrality of this initiative to the achievement of this sole objective under Theme 1, a description or outline as it relates to the Fingal LECP should be provided. Furthermore, while it is noted that no SEDOs are included for Theme 1, point 6 under ‘Sustainability & Climate Action: Priority Areas’ at Section 4.1 refers to ‘business supports’ and thereby appears to be aligned with Economic Action Area 3 of the LECP Guidelines 2021. Additionally, point 7 under ‘Sustainability & Climate Action: Priority Areas’ at Section 4.1 refers to ‘support trials of new energy concepts’ and ‘further adoption of renewable energy production’ which would appear to involve economic action ‘to support a shift towards low-carbon and climate resilient economic activity’ as referred to under Economic Actions in the LECP Guidelines 2021. The final LECP should review section 4.1 of the Framework document to ensure that objectives included for Theme 1 are suitably selected to support High-Level Goals and categorised as SCOs or SEDOs in accordance with the recommendations of the LECP Guidelines 2021.

## Theme 2: Prosperous Economy

- Goal 2.1: Support the development of sustainable and strategic infrastructure.
- Goal 2.2: Provide a supportive business environment that encourages innovation and attracts, retains and grows.
- Goal 2.3: Remove barriers to labour market participation.

SEDO 1: To promote, support and input into the development of strategic infrastructure.

SEDO 2: To facilitate incubation and business growth.

SEDO 3: To develop clusters and strategies to leverage sectoral growth opportunities.

SEDO 4: To enhance strategic engagement across the business ecosystem.

SEDO 5: To provide greater clarity on and access to business supports.

SEDO 6: To develop Fingal's brand as a business location.

SCO 2: To understand and address key barriers to work and identify and support affected population cohorts.

SCO 3: To provide supports to enable under-represented groups to (re-) enter the workforce.

These draft High-Level Goals 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), strong economy supported by enterprise and innovation (RSO 12), and enhanced strategic connectivity (RSO 15). 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, and RPOs 6.4-6.8 in relation to the rural economy.

## Theme 3: Skills for Life and Work

- Goal 3.1: Stimulate a culture of life-long learning.
- Goal 3.2: Support skills development to meet the diverse needs of communities and businesses.

SCO 4: To update the *Fingal Skills Strategy* and support implementation of its recommendations.

SCO 5: To provide all Fingal residents with basic English language, literacy and numeracy skills.

SCO 6: To develop greater opportunities for up- and re-skilling.

SEDO 7: To equip Fingal's labour force with the skills to meet businesses' current and future needs.

SCO 7: To broaden pathways to education.

SCO 8: To ensure communities have the skills to take effective voluntary and participative action.

The draft High-Level Goals and objectives outlined above support the Key Principle of Economic Opportunity as outlined in the RSES, including RSO 13 of the RSES 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 lifelong learning programmes, business supports and upskilling, 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.

#### Theme 4: Healthy, Inclusive, Connected Communities

- Goal 4.1: Increase participation in initiatives that promote active living, positive mental wellbeing, and physical activity to achieve improved health and wellbeing for all.
- Goal 4.2: Promote citizen participation.
- Goal 4.3: Encourage inclusion and connection within and between communities.
- Goal 4.4: Target improvements in areas of disadvantage.

SCO 9: To provide facilities and support services which enable a healthier lifestyle.

SCO 10: To increase participation in health-related activities, particularly amongst young people and senior citizens.

SCO 11: To support community based initiatives to address mental health issues.

SCO 12: To provide more opportunities and access points for citizens to participate in local decision making.

SCO 13: To support implementation of the *Fingal Migrant Integration and Social Cohesion Strategy*.

SCO 14: To encourage inclusion and integration through support for services, outreach and events.

SCO 15: To reduce absolute and relative disadvantage in specific areas of Fingal.

Healthy Placemaking is one of the Key Principles of the RSES and the RSES highlights that the availability of, and access to, services is key to healthier places. These draft High-Level Goals and objectives support both Key Principles of Healthy Placemaking and Economic Opportunity, including RSO 4 of the RSES in relation to healthy communities and RSO 13 of the RSES in relation to improving education skills and social inclusion. They also demonstrate consistency with 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.

#### Theme 5: Rich Arts, Culture and Heritage

- Goal 5.1: Promote, protect, and grow the heritage of Fingal and ensure quality amenities for all.
- Goal 5.2: Support new and existing cultures to thrive.
- Goal 5.3: Champion the arts and cultural life of the county.

SCO 16: To enhance the promotion and brand of Fingal's heritage.

SCO 17: To improve access to key heritage assets.

SCO 18: To preserve and protect Fingal's heritage assets.

SCO 19: To promote inclusivity by providing supports for new and existing cultures.

SCO 20: To enhance the promotion and brand of Fingal's arts and cultural life.

The draft High-Level Goals and objectives outlined above support the Key Principle of Healthy Placemaking as outlined in the RSES, and align with RSO 5, Creative Places, and several RPOs including RPOs 9.24-9.27 and 9.30 in relation to arts, culture, language and heritage.

#### Theme 6: Safe, Accessible, Vibrant Places

- Goal 6.1: Support the development of areas for a high quality of life.
- Goal 6.2: Promote safety in the community through collaboration and inclusivity.

SEDO 8: To revitalise the centres of key towns and villages.

SEDO 9: To support enhancements to transport and infrastructure.

SCO 21: To develop rural and urban areas which are safe for all.

SCO 22: To develop and implement measures to reduce anti-social behaviour.

These draft High-Level Goals and objectives support the Key Principles of Healthy Placemaking 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), enhanced strategic connectivity (RSO 15), and demonstrate consistency with RPOs 4.28-4.32 in relation to the Key Town of Swords, RPOs 4.77-4.84 in relation to the development, protection and regeneration of rural areas, RPOs 6.4-6.7 in relation to the rural economy, and RPO 9.19 in relation to social infrastructure needs. This theme also acknowledges the location of Fingal along the Dublin-Belfast Economic Corridor.

### **3.4 Implementation**

The draft Framework document states that a set of underlying actions, inputs and outputs for each SEDO and SCO have been devised, covering the first two operational years of this LECP (2024 and 2025), and section 1.3 states that these are incorporated into the Implementation Plan which accompanies the draft Framework. However, sections 1.1 and 2.1 of the draft Framework document note that the Implementation Plan is nearing completion and will form part of Fingal County Council's LECP Framework document. It is stated that the Implementation Plan will examine the High-Level Goals/Sustainable Objectives and Outcomes as set out in the Framework LECP, and determine the actions to be pursued to contribute to the achievement of the Goals and Objectives. Notwithstanding, a specific Implementation Plan is required in line with the LECP Guidelines 2021. The finalised LECP should include an Implementation Plan that is prepared and presented in accordance with the requirements of same.

## **4.0 Evaluation of Consistency with the Fingal County Development Plan 2023-2029**

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 Fingal County Development Plan 2023-2029. Given that the Fingal County Development Plan 2023-2029 was deemed to be consistent with the RSES by way of the submission approved by the members of the Eastern and Midland Regional Assembly at the meeting of 8th April 2022, 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 4. of the LECP that the 2023-2028 Fingal LECP Framework has been designed to be consistent with a broad range of policies, including the Fingal Development Plan 2023-2029, to ensure consistency with the statutory planning framework of the Council. Furthermore, the Regional Assembly welcomes the commentary provided in Appendix 2 which demonstrates alignment and complementarity between the LECP and the policies, objectives and identified priorities contained in the Fingal County Development Plan 2023 – 2029.

## **5.0 Other Considerations**

A number of clerical errors and anomalies are evident in the draft LECP document. In this respect, the draft LECP (at section 1.2) lists a series of ‘Principles’ which underpin the LECP Guidelines 2021 and were deemed central to the LECP development process. It is noted that the principle of ‘Harmonisation’ is included twice in the table, while the principle of ‘Collaboration,’ as set out in the LECP Guidelines 2021, is omitted from the table. At section 3.3, the word ‘Draft’ is used in the header of the first table which sets out the broad ‘themes’ of the LECP. It is noted that the word ‘Draft’ is not used in the equivalent table at section 1.3. The term ‘Doughnut Economics’ is used in relation to point 6 under ‘Sustainability & Climate Action: Priority Areas’ at section 4.1. This concept is not defined or outlined within the draft Framework document or its Appendices, nor is it defined in the Glossary of Terms contained in the LECP Guidelines 2021. Such an explanation or definition should be provided for reasons of clarity.

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 Fingal County Council to date in the preparation of the draft Framework document of the LECP and issues a Statement of Consistency for the Fingal LECP as required under Section 44 of the Local Government Reform Act (as amended) subject to the following recommendations:

- The final LECP should include an outline of the Sustainable Fingal initiative (the focus of SCO 1) as it relates to the Fingal LECP. Related to this, the final LECP should review section 4.1 of the Framework document to ensure that objectives included for Theme 1 are suitably selected to support High-Level Goals and categorised as SCOs or SEDOs in accordance with the recommendations of the LECP Guidelines 2021.
- The final LECP should include an outline or definition of the concept of ‘Doughnut Economics’ as referred to under section 4.1 of the draft Framework document.
- Appendix 2 in the Framework document should be expanded upon to comprehensively reference named Strategic Development Areas and Strategic Employment Development Areas in the administrative area of Fingal County Council as set out in Tables 5.1 and 5.2 of the RSES.
- The final LECP should include a specific Implementation Plan that is prepared and presented in accordance with the requirements of Section B of the LECP Guidelines 2021. This may be included as an appendix of the LECP.
- 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.

## **7.0 Conclusion**

The Eastern and Midland Regional Assembly (EMRA) welcomes the progression of the Local Economic and Community Plan to a draft Framework document and considers the economic and community objectives to be consistent with the RSES and the Fingal CDP 2023-2029. 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 Fingal County Development Plan 2023-2029.

Regards,



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Clare Bannon  
A/Director  
Eastern and Midland Regional Assembly  
12<sup>th</sup> January 2024