

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

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Draft Louth Local Economic and Community Plan

The Eastern and Midland Regional Assembly notes the publication of the draft document for the Louth Local Economic and Community Plan and sets out hereunder observations on behalf of the Regional Assembly. The submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 8th December 2023.

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 process of other relevant strategic plans and policies.

This submission relates to the statutory role of the Assembly regarding the Louth Local Economic and Community Plan (LECP).

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 Guidelines (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 County Louth, there are two Regional Growth Centres situated within the county, namely Drogheda (Core Region) and Dundalk (Gateway Region) as set out in the RSES settlement strategy.

The RSES states that the Census 2016 identifies Drogheda as the fastest growing town in the country. It also identifies that Drogheda's location on the Dublin-Belfast Economic Corridor, combined with its existing physical, economic and social asset base, provides significant sustainable growth potential. The Dublin – Belfast Economic Corridor is the largest economic agglomeration on the island of Ireland, with the cities and towns along the Corridor home to a population of around two million people. The Corridor links the two largest cities (Dublin and Belfast) and the large towns of Drogheda, Dundalk and Newry on the island by high-capacity road and national rail links and plays a critical role in supporting economic growth and competitiveness. If promoted, this latent potential of Drogheda can help to realise the growth potential of the broader Drogheda-Dundalk-Newry cross-border network as an engine for sustainable regional development.

The key priorities identified in the RSES for Drogheda are to promote the continued sustainable and compact growth of Drogheda as a regional driver of city scale with a target population of 50,000 by 2031. The objective is to provide for the regeneration of the town centre, the compact planned and co-ordinated growth of the town's hinterland along with enhancing Drogheda's role as a self-sustaining strategic employment centre on the Dublin-Belfast Economic Corridor. The dynamic of securing investment, while driving synergies between the Drogheda-Dundalk-Newry cross border network, and building on the existing education and skills base in the Region are promoted within the RSES Strategy period. In order to enhance co-ordination of development in Drogheda where the town and its environs lie within the combined functional area of two local authorities, the preparation and adoption of a statutory Joint Urban Area Plan (UAP), to be jointly prepared by Louth County Council and Meath County Council is a priority of the RSES. The UAP will provide for a coordinated planning framework to identify and deliver strategic sites and regeneration areas so that a minimum of 30% compact growth can be achieved.

The RSES also identifies that Dundalk, due to its proximity to Newry, provides for enhanced cross-border interactions which, if promoted, can help to realise the growth potential of Drogheda-Dundalk-Newry as an important cross-border network for regional development. Similar to Drogheda, the key priorities for Dundalk identified in the RSES are to promote its continued sustainable and compact growth as a regional driver of city scale with a target population of 50,000 by 2031. The objective is to provide for the regeneration of the town centre and the compact and planned co-ordinated development of the town's hinterland, along with enhancing Dundalk's role as a strategic employment centre on the Dublin-Belfast Economic Corridor. The dynamic to capitalise on its location, driving the linkage between Dundalk and Newry and strengthening cross border synergy in services and functions is promoted within the Strategy period. The preparation and adoption of a statutory Urban Area Plan (UAP) by Louth County Council is a priority for the RSES, to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas so that a minimum of 30% compact growth can be achieved.

Section 3.1 of the RSES outlines the Growth Strategy for the overall Eastern and Midland Region which includes an objective to target growth of the Regional Growth Centres of Athlone, Drogheda and

Dundalk as regional drivers. Section 3.2 of the RSES identifies the key Growth Enablers for the Region which include a number of measures relevant to County Louth 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.
- Facilitate collaboration to support the development of the Dublin-Belfast Economic Corridor, to drive synergy in the Drogheda-Dundalk-Newry cross border network and strengthen economic links with the south east extending to Rosslare Europort.
- Target significant growth in the Regional Growth Centres of Athlone, Drogheda and Dundalk to enable them to act as regional drivers, with a focus on improving local economies and quality of life to attract investment and the preparation of urban area plans (UAPs).
- 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 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.

In addition to the above, the RSES specifies the following key Growth Enablers for the Dublin – Belfast Economic Corridor;

- Compact and focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale.
- Drive in the linkage between Dundalk and Newry to strengthen a cross border synergy in services and functions.
- Improve accessibility and service by rail, road and communication between Dublin and Belfast.

In relation to the Economic Strategy of the RSES, it should be noted that this 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. This identifies Drogheda and Dundalk as Level 2 (Major Town Centres and County Town Centres), and Ardee, Drogheda District Centre (Matthews Lane) and Dundalk District Centres (Dublin Road and Ard

Easmuinn) as Level 3 (Town and/or District Centres and Sub-County Town Centres) of 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 disadvantage 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.

The draft LECP submitted makes reference to key spatial planning, economic, social and community elements of the policies and objectives of the RSES such as the status of Drogheda and Dundalk as Regional Growth Centres in the Region along with the county's location along the Dublin-Belfast Economic Corridor, in order to demonstrate consistency with same, which is welcomed by the Regional Assembly. This is discussed further in Section 3 of this submission.

2.0 Overview of the draft Framework LECP

The draft Framework document for the Louth LECP was received on 27th October 2023 and contains the following sections:

- Introduction
- Ambition for Louth
- Overview of Policy Framework
- Socio-Economic Profile
- SCOT
- Consultation Findings
- High-Level Goals, Objectives, Actions and Outcomes
- Implementation Plan
- Appendices

Section 2 of the draft document sets out the following ambition statement for the LECP;

“For Louth to continue to sustainably develop its advantages in location and infrastructure to create accessible economic opportunities which will allow all its inhabitants to thrive in vibrant, welcoming communities’.

The document highlights 5 no. High-Level Goals as follows;

Goal 1	Louth will work with all communities to help them reach their full economic, social and personal potential.
Goal 2	Louth will continue to develop entrepreneurship and the economic opportunities afforded by the county's strategic location.
Goal 3	Louth will foster healthy, inclusive, diverse, creative and resilient neighbourhoods.

Goal 4	Louth will actively lead on increasing the county’s climate resilience, sustainability and biodiversity.
Goal 5	Louth will have engaged empowered, dynamic, resourced and connected communities.

Each of the High-Level Goals above are supported by several listed objectives and actions along with key desired outcomes that are provided and explained in detail in Chapter 7 of the draft LECP.

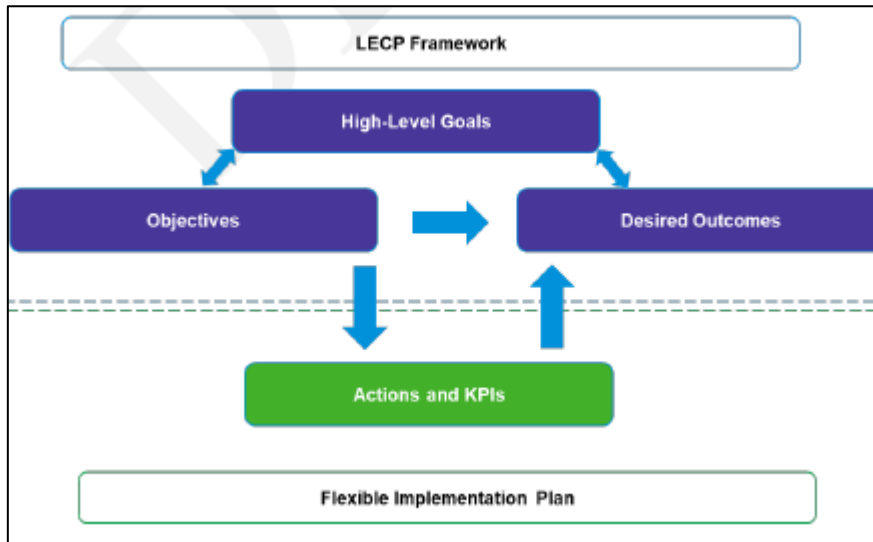


Figure 1.1 of the Draft Louth LECP

It is noted that Section 8 of the draft LECP will include the first 2-year Implementation Plan. However, this has not been completed to date and is not included in the draft document submitted to the Regional Assembly for review on 27th October 2023.

The content of the draft LECP will be discussed in the following sections of this report.

3.0 Evaluation of Consistency with the RSES

The draft LECP has been prepared having regard to the recommendations set out in the LECP Guidelines 2021. In this regard, the following are noted from the draft document submitted to EMRA for consideration.

3.1 Policy Context

Section 3 of the draft LECP details the preparation structure of the LECP which includes a list of international, national, regional and local plans and strategies that were considered to inform the overall plan. These plans include the 2030 Agenda UN 17 Sustainable Development Goals (SDGs), the National Planning Framework and the National Development Plan under Project Ireland 2040, the Regional Spatial and Economic Strategy for the Eastern and Midland Region, the North-East Regional Enterprise Plan to 2024, the Louth County Development Plan 2021-2027, the Louth LECP 2016-2022 and the Louth Social Enterprise Strategy 2019-2022.

Overall, the policy considerations are in line with the LECP ministerial guidelines. It is, however, noted that in relation to Section 3.4 (Regional Policy) an incorrect reference is made to nine local authorities in the EMRA region, whereas there are twelve local authorities under the jurisdiction of EMRA. It is

also considered that more in-depth commentary could be provided in Section 3.5 (Local Policy) on the consistency of the final LECP with the Louth County Development Plan 2021-2027.

3.2 Socio-Economic Profile, Consultation Process and SCOT Analysis

Section 4 of the draft LECP provides information regarding the socio-economic profile of County Louth. It is noted that the information and figures provided arise from information gathered from the most recent CSO Census 2022. This is welcomed by the Regional Assembly and provides a strong evidence base for the socio-economic profile of the county. Some of the key points noted from this section of the report are outlined below;

- The population of the county is steadily increasing, with a growth of 8.4% (10,819 persons) between the census period 2016-2022. Louth has a younger population than the State average. In 2022, over half the county's population (52.3%) was under 40 years old.
- The average household size in 2022 was 2.80 persons which is slightly higher than the State average of 2.74 persons.
- In 2022, Louth had a housing stock vacancy rate of 6.8% which is the sixth lowest in Ireland.
- Louth's economic opportunities are largely focused on the urban employment centres of Drogheda and Dundalk. The key industry sectors in the county were Commerce and Trade (25.8%), Professional Services (23.9%) and Manufacturing Industries (11.8%).
- Foreign Direct Investment (FDI) and large firms play a crucial role in the county's economic prosperity with the IDA client companies providing employment to over 4,500 people in 2022.
- Commuting for employment and education is a feature of the county with POWSCAR data from 2016 indicating that approximately 5,700 people commute from Louth to Dublin and Northern Ireland (4,800 to Dublin, and 900 persons to Northern Ireland).
- Louth has higher unemployment rates when compared to the national average, but progress is being made particularly in reducing the gender disparity. Between 2016 and 2022 rates decreased from 16.7% to 10.9%.
- Transportation patterns in County Louth are heavily reliant on private vehicle usage, with 2016 census data indicating that over 70% of commuters use car, van or are passengers in cars. Only a small percentage commute by bicycle (2%), on foot (10%) or by public transport (6%).

A detailed list of Strengths, Challenges, Opportunities and Threats (SCOT) Analysis for County Louth has also been outlined within Section 5 of the draft LECP, which is welcomed by the Regional Assembly.

The appendix (Section 9) of the draft LECP outlines the community participation and stakeholder engagement process that was carried out during the preparation of the draft LECP.

The community and public engagements were carried out in March and April 2023 and included the following;

- Public Webinar (March 2023) where five individuals attended an online webinar on the project

and the initial draft High-Level Goals.

- Written Submissions (March and April 2023) where seven submissions were received from the public, community representative groups and other stakeholders.
- Community Survey (March and April 2023) where 421 responses were received. The survey sought community views in relation to areas such as Louth's greatest assets, barriers to living and working in County Louth, service provision, remote working, climate change and the use of smart technology.
- Business Survey (March and April 2023) where 66 responses were received in relation to the survey which targeted the private sector in County Louth. The survey sought views in relation to County Louth's main strengths and barriers as a place to do business, solutions to the county's main urban centres, climate action, Brexit and Covid-19.

The Regional Assembly considers that the public consultation stage 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. However, the draft LECP does not include a report on this stage, as required by Section 66C (2)(a) (i) (I) and Section 66C (3)(a) (i) (I) of the Local Government Act 2014. 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 Outcomes

Section 7 of the draft LECP sets out the details of the High-Level Goals, objectives, actions and outcomes contained in the plan. It is stated that Louth County Council together with their LCDC, SPC for Planning, Economic Development and Infrastructure and other key stakeholders have developed five High-Level Goals with associated objectives, actions and desired outcomes to assist in guiding the direction of the county over the 2023-2029 period. It is further stated that their development has been informed from the findings of the socio-economic analysis, stakeholder and public consultation and the review of existing policies at local, regional and national levels.

The draft LECP indicates that the five High-Level Goals align with the suggested themes in the LECP guidelines relating to;

- Health and Well Being (High-Level Goal 3)
- Economic Development (High-Level Goals 1, 2 and 4)
- Community and Local Development (High-Level Goal 1 and 5)
- Climate Action (High-Level Goal 4)

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).

Overall, the Regional Assembly is satisfied with the selection of the five High-Level Goals and the stated objectives and outcomes, based on the evidence-based approach used and the socio-economic profile which was analysed to develop the goals. The Regional Assembly is satisfied that the chosen goals align with the 3 Key Principles of the RSES (Healthy Placemaking, Economic Opportunity and Climate Action), the 16 Regional Strategic Outcomes (RSOs) of the RSES and with a number of relevant Regional Policy Objectives (RPOs) of the RSES as highlighted in this section of the report. It is however noted that 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 this part of the document to ensure the objectives are suitably categorised in accordance with the recommendations of the LECP Guidelines 2021.

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

Goal 1: Louth will work with all communities to help them reach their full economic and social potential.

This goal contains five objectives that relate to additional housing, addressing and providing supports for disadvantaged groups in society, supporting increased levels of educational achievement in the county, promotion of arts, culture, sporting life and nightlife and promotion of the tourism industry locally including guest accommodation capacity.

Objective 1.1	Support the provision of housing where appropriate across the county
Objective 1.2	Address concentrations of disadvantage where they exist
Objective 1.3	Expand the capacity of education providers to meet the education needs of communities
Objective 1.4	Facilitate the provision of a vibrant social life
Objective 1.5	Develop a strong tourism sector

These objectives support the Key Principle of Healthy Placemaking outlined in the RSES, including RSOs in relation to Compact Growth and Urban Regeneration (RSO 2) and to Improve Education Skills and Social Inclusion (RSO 13). In addition, the goal and objectives support a number of RPOs including RPO 9.3 in relation to the provision of a greater diversity of housing types and tenures, RPO 6.27 relating to supports for community and adult education providers to targeted disadvantaged groups and RPO 9.24 relating to the promotion of arts and culture as a unique economic development/tourism offering throughout the Region.

Goal 2: Louth will continue to develop entrepreneurship and economic opportunities afforded by the county's strategic location.

This goal contains three objectives that relate to economic development, the green economy and supporting small and medium enterprises and businesses.

Objective 2.1	Help improve the 'carrying capacity' of the economy and develop an ecosystem that is highly attractive and supportive of indigenous businesses and FDI
Objective 2.2	Develop a strong green economy
Objective 2.3	Find opportunities to improve entrepreneurship and business conditions in the county for SMEs and retail businesses.

These objectives support the Key Principle of Economic Opportunity outlined in the RSES, including the RSOs relating to A Strong Economy Supported by Enterprise and Innovation (RSO 12) and Enhanced Strategic Connectivity (RSO 15). In addition, the goals support RPOs including RPO 6.23 relating to support for agencies that promote growth in green technologies, RPO 6.26 supporting research, development and innovation for local industries and RPO 6.31 relating to supporting enterprise development agencies and local enterprise offices to increase business innovation capacity in the Region.

Goal 3: Louth will foster healthy, inclusive, diverse, creative and resilient neighbourhoods.

This goal contains six objectives that relate to community development and connectivity, improvements to health and lifestyle, participation in physical activity, increased usage of heritage assets and social inclusion.

Objective 3.1	Support the development of attractive communities within the county
Objective 3.2	Increase physical accessibility to all within Louth’s towns and villages and rural communities
Objective 3.3	Work with national and local health agencies to support our people in improving their health and lifestyle
Objective 3.4	Increase the rate of participation in physical activity
Objective 3.5	Increase and enhance the usage of existing heritage assets (built and natural) and community infrastructure in order to improve community mental and physical health
Objective 3.6	Support and promote social inclusion within the county with a particular focus on including the marginalized within the community

These objectives support the Key Principle of Healthy Placemaking outlined in the RSES, including the RSO in relation to Healthy Communities (RSO 4) and Creative Places (RSO 5). They also demonstrate consistency with RPOs such as RPO 9.10 relating to the creation of healthy and attractive places, RPO 9.13 in relation to new social infrastructure developments being accessible and inclusive for a range of users, RPO 9.14 supporting the provision of easily accessible social, community, cultural and recreational facilities and RPO 9.16 in relation to public health policy supports. The objectives listed above also support the Guiding Principles for the creation of healthy and attractive spaces detailed in Section 9.4 of the RSES.

Goal 4: Louth will actively lead on increasing the county’s climate resilience, sustainability and biodiversity.

This goal contains three objectives that support climate mitigation and adaptation measures in the county, promotion of renewable energy developments and protection of the environment.

Objective 4.1	Facilitate proactive climate mitigation and adaptation actions within the county
Objective 4.2	Significantly increase the level of renewable energy generated
Objective 4.3	Protect and renew the environment of Co. Louth

These objectives support the Key Principles of Climate Action outlined in the RSES, including the RSO seeking to Build Climate Resilience (RSO 8), Support the Transition to a Low Carbon and Clean Energy (RSO 9) and Biodiversity and Natural Heritage (RSO 11). They also demonstrate consistency with a range of RPOs including RPOs 7.32 and 7.33 relating to climate mitigation and adaptation measures, and RPO 4.84 in relation to renewable energy diversification.

Goal 5: Louth will have engaged, empowered, dynamic, resourced and connected communities.

This goal contains four objectives that relate to community connectivity, capacity building in the community and voluntary sectors and supporting age friendly initiatives.

Objective 5.1	Continue to develop safe and connected communities (social, business, digital and physical)
Objective 5.2	Strengthen the capacity of communities to lead
Objective 5.3	Support the community and voluntary sector and build their capacity to deliver support to the people of County Louth
Objective 5.4	Continue to support the Age Friendly society that embraces all ages

These objectives support the Key Principle of Healthy Placemaking outlined in the RSES, including the RSO in relation to Rural Communities (RSO 3) and Healthy Communities (RSO 4). They also demonstrate consistency with RPOs such as RPO 9.14 in relation to accessible social, community, cultural and recreational facilities and supporting sport and physical activity locally. In addition, the objectives support RPO 9.1 of the RSES in relation to the integration of age friendly strategies at a local policy level.

3.4 Implementation

Section 8 of the draft LECP is titled 'Implementation Plan', however the draft version submitted to the Regional Assembly for consideration does not include any content in this section. Section 1.1 of the draft LECP refers to a detailed two-year Implementation Plan that identifies action owners and Key Performance Indicators (KPIs) to assist with monitoring and evaluation. The draft LECP states that a revised and updated Implementation Plan will be developed for each subsequent two-year period up to 2029, to reflect progress made and take account of newly emerging policies and programmes.

From a review of the submitted draft LECP, a specific Implementation Plan has not been provided for assessment. As 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 Louth County Development Plan 2021-2027

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 Louth County Development Plan 2021-2027 (as varied). Given that the Louth County Development Plan 2021-2027 was deemed to be consistent with the RSES, as acknowledged by the submission made by EMRA on 11th December 2020, the Regional Assembly

therefore considers that an analysis of the RSES is deemed sufficient in order to demonstrate consistency. Notwithstanding this, it is considered beneficial if the LECP Framework document could address the Louth County Development Plan 2021-2027 in more detail to demonstrate that it aligns with and complements the policies and objectives and identified priorities in the County Development Plan.

5.0 Other Considerations

A number of clerical errors and anomalies are evident in the draft LECP document. In this respect, the draft LECP in Section 1.1 refers 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. A similar incorrect reference to the RSES is also noted in Section 1.7 of the draft LECP. In Section 3.3 of the draft LECP document, it is noted that the section highlighting the Regional Spatial and Economic Strategy incorrectly references nine local authorities contained in the EMRA region, which should be amended to being comprised of twelve local authorities. Section 4.3 of the draft LECP (Economy and Employment) also makes reference to the county's designation as a Regional Growth Centre. This should be amended to clarify it refers to the status of both Drogheda and Dundalk as Regional Growth Centres in the RSES settlement strategy.

In relation to national policy background, the draft LECP should where relevant refer to the National Planning Framework and the National Development Plan as joint documents that together form Project Ireland 2040.

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

- The LECP is required to be consistent with the core strategy and objectives of the Louth County Development Plan 2021-2027. It is recommended that additional commentary be provided in Section 3.5 (Local Policy) clearly setting out the provisions of same as it relates to the LECP.
- The final LECP should provide greater emphasis on the location of County Louth along the Dublin-Belfast Economic Corridor which is highlighted of significant importance in the overall Growth Strategy contained in the RSES and making reference to the growth enablers for the Region in Section 3.2 of the RSES would be encouraged with regards to same.
- The importance of Drogheda and Dundalk identified as Regional Growth Centres in the Region as set out in the RSES settlement strategy should be afforded greater emphasis in the final LECP which are both targeted for significant growth up to a population base of 50,000 people by 2031.
- The final LECP should also highlight the importance of Dundalk IT as the only third level institution in the county and its importance to the overall economic development of County Louth.

- The LECP should make reference to the retail hierarchy for the Region, as outlined in the RSES Chapter 6 Table 6.1 which identifies Drogheda and Dundalk as Level 2 (Major Town Centres and County Town Centres), and Ardee, Drogheda District Centre (Matthews Lane) and Dundalk District Centres (Dublin Road and Ard Easmuinn) as Level 3 (Town and/or District Centres and Sub-County Town Centres) of the retail hierarchy.
- 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 this part of the document to ensure the objectives are suitably categorised in accordance with the recommendations of the LECP Guidelines 2021.
- The LECP should include an Implementation Plan that is prepared and presented in accordance with the requirements of Section B of the LECP Guidelines 2021. This should be included in Section 8 of the LECP which was not completed in the version submitted to the Regional Assembly for review.
- The appendices of the LECP should include the full details of all 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 document and considers the economic and community objectives to be consistent with the RSES and the Louth CDP 2021 - 2027. However, as outlined above, it is considered that the draft LECP document could demonstrate better integration of key references to, and stronger links, with policies and objectives of the RSES and the Louth CDP 2021 - 2027. 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 Louth County Development Plan 2021-2027.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
11th December 2023