

Tionól Reigiúnach Oirthir agus Lár-Tíre

Eastern and Midland Regional Assembly

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Draft Framework for the Offaly Local Economic and Community Plan

The Eastern and Midland Regional Assembly notes the publication of the draft framework document for the Offaly Local Economic and Community Plan 2024-2029 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 members of the Eastern and Midland Regional Assembly at the meeting of 12th April 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 process of other relevant strategic plans and policies.

This submission relates to the statutory role of the Assembly regarding the Offaly Local Economic and Community Plan 2024-2029.

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, 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 the 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 Offaly, the RSES identifies Tullamore as a Key Town located in the Gateway Region as set out in the RSES settlement and growth strategies. Tullamore acts as a key population

and employment centre for the surrounding hinterland. It is located on the Dublin to Galway rail line, in close proximity to the M6 Dublin/Galway Motorway with the N80 and N52 providing important and essential intra-regional linkages to motorways, the Regional Growth Centre of Athlone and the Key Towns of Portlaoise, Mullingar and Longford.

The town is flanked by the Slieve Bloom Mountains to the south and Lough Boora Discovery Park to the west, and thus offers significant quality of life advantages. The town has a high ratio of jobs to resident workers, reflecting its role as an employment centre and the extent of its area of influence. As detailed in section 4.6 of the RSES, continued employment and population growth coupled with placemaking and regeneration are key priorities for the settlement.

Section 3.2 of the RSES identifies the key Growth Enablers for the Region which include a number of measures relevant to County Offaly 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.
- 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.

In addition to the above, Section 3.2 of the RSES specifies key Growth Enablers for the Gateway Region which include a number of measures relevant to County Offaly as follows;

- 'Catch up' investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.
- Regeneration of small towns and villages, with a focus on the identification of rural town,

village and rural regeneration priorities to bring vibrancy to these areas.

- Diversification and growth of smart specialisation of local economies with a strong focus on clustering including sustainable farming and food production, tourism, marine, energy and renewables, bioeconomy and circular economy, with a focus on publicly owned peatlands in the Midlands, to support a 'Just' transition and realise the benefits of green technologies.
- Promote the Region as a key destination for tourism, leisure and recreation activities and support the development of an integrated network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced.

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. This identifies Tullamore as Level 2 (Major Town Centres and County Town Centres), and Birr and Edenderry as a Level 3 (Town and/or District Centres and Sub-County Town 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 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, including the Grand Canal Greenways, Blueways and Lough Boora Discovery Park, Charleville Castle Demesne, Durrow High Cross, peatways, the planned Midlands Cycle Destination – Offaly and the Slieve Bloom Mountains, including the National Mountain Bike Trail (MTB) centre.

The draft LECP submitted states that consideration was given to a hierarchy of national, regional and local level plans and strategies during the preparation of the LECP. It further notes that the LECP must be consistent with the National Planning Framework – Project Ireland 2040; the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, and with the core strategy and objectives of the Offaly County Development Plan. This is discussed further in Section 3 of this submission.

2.0 Overview of the draft Framework LECP

The draft Framework document for the Offaly LECP was received on 2nd March 2024 and contains the following sections:

- Introduction
- Background and Context
- Socio-Economic Summary
- Consistency of LECP
- LECP Framework 2024-2029
- Implementation, Monitoring and Evaluation Process

Appendices

The draft LECP sets out the following Strategic Vision for the LECP:

"To create a sustainable and competitive county that supports the health and wellbeing of our people and places, from urban to rural, with access to employment opportunities supported by high quality accessible housing and physical, social and community infrastructure for all, in a climate resilient manner and with respect for our biodiversity"

The strategy of the draft LECP is guided by four High-Level Goals which are supported by eighteen objectives. The four High-Level Goals are as follows:

High-Level Goal 1	Sustainable Communities – Offaly will be a county which supports sustainable,
	inclusive, and empowered communities
High-Level Goal 2	Healthy Place Making – Offaly will improve the physical and social
	infrastructure to create places that are healthy and attractive to live, work and
	invest in
High-Level Goal 3	Economic Opportunity – Offaly will strive to spread economic opportunity and
	prosperity to all sections of society
High-Level Goal 4	Climate Action – Offaly will be proactive in addressing climate change and will
	work to reduce emissions by 40% by 2030 and support transition to a low
	carbon Region by 2050

The draft LECP indicates that the High-Level Goals were determined through analysis and consultation and are closely aligned with the Regional Spatial and Economic Strategy (RSES). 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

Section 2 of the draft LECP contains summary outlines of a range of policies, plans and strategies that it is noted were considered in the development of the draft LECP. Section 2.2 'Background and Context' includes an outline of key lessons from the review of the previous LECP 2016-2021, a high-level overview of the LECP Guidelines 2021, as well as a review of current challenges which were considered relevant to the development of the new LECP. The Regional Assembly welcomes this approach. Section 2.4 of the draft LECP provides a comprehensive overview of the Offaly Economic Development Strategy and Action Plan 2022-2027; the Midlands Regional Enterprise Plan to 2024; an overview of linkages with the Technological University of the Shannon: Midlands Mid-West (TUS); relevance of the Climate Action and Low Carbon Development (Amendment) Act 2021, the National Adaptation Framework (NAF) 2018 and the Climate Action Plan (CAP) 2021 and subsequent 2023 CAP.

Also included is an overview of Housing for All 2021, as it relates to the LECP. It is further noted that Section 2.5 of the draft LECP provides an overarching statement on the status of the LECP, including that it fully aligns with the provisions of the existing National Planning Framework, Ireland 2040, National Climate Action Plan 2023, Housing for All 2021, the Regional Spatial and Economic Strategy 2019-2031 and the current County Development Plan.

Section 4.1 of the draft LECP outlines consistency between the LECP and the UN Sustainable Development Goals. The Regional Assembly welcomes the inclusion of the Green Offaly schematic which reflects how the LECP goals, targets and indicators are interconnected via the SDGs, categorised across fours tiers, with Tiers 1-3 aligning directly with the three key principles of the RSES, Healthy Placemaking, Climate Action and Economic Opportunity. Section 4.1 further outlines sectoral emissions target reductions set out in CAP 21 in the context of the EMRA region, which 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. Section 4.1 also outlines the Local Authority's commitment to fully consider their responsibilities regarding Public Sector Duty and ensure that the objectives and actions detailed in the LECP are designed to support these responsibilities where appropriate.

Section 4.2 of the LECP proceeds to set out the strategic vision for the LECP, which it states is influenced by a hierarchy of national, regional and local level plans and strategies which were given consideration during the preparation of the Plan, as stated in Section 1.3 of this submission.

In relation to the RSES, the draft LECP states that Offaly County Council has ensured that the High-Level Goals and Objectives included in the LECP are closely aligned with the Regional Spatial and Economic Strategy (RSES). Further to this, Section 4.2 includes Figure 2.4 of the RSES which sets out the Regional Strategic Outcomes of the RSES categorised across the three key principles of Climate Action, Healthy Placemaking and Economic Opportunity, with a further description of how the four High-Level Goals under the LECP are mapped directly to these. The Regional Assembly welcomes this approach. Notwithstanding, the final LECP should reference the key priorities of the RSES in relation to County Offaly, with particular reference to the Key Town of Tullamore. The Regional Assembly considers that the draft LECP could be further enhanced by setting out the retail hierarchy for the Region, as outlined in the RSES under Chapter 6, Table 6.1 which identifies Tullamore as Level 2 (Major Town Centres and County Town Centres), and Birr and Edenderry as a Level 3 (Town and/or District Centres and Sub-County Town 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 Offaly County Council. Furthermore, the Regional Assembly welcomes the high-level commentary provided as to how the LECP is consistent with the core strategy of the Offaly County Development Plan 2021-2027.

3.2 Socio-Economic Profile, Consultation Process and SCOT Analysis

Socio-Economic Profile

Section 3 of the draft LECP contains the socio-economic profile of County Offaly with up-to-date information on population, health and wellbeing, economy, enterprise, labour force, housing, built environment, transport, deprivation, poverty, social exclusion, education, training, ethnicity, the traveller community, climate change and digital connectivity. This information is drawn from a number of authoritative public data sources including CSO Census 2022; POBAL datasets; the Labour Force Survey; Live Register; the quarterly national household survey, and; additional up-to-date statistics from local government and state agencies including the EMR Reports, HSE, IDA and Enterprise Ireland.

This Section identifies that Census 2022 recorded a population for Offaly of 83,150, representing an increase of 4,707 (+6%) since 2016. This was made up of a natural increase of 2,704 and an estimated net inward migration of 2,003. This was a lower rate of growth than the EMR (8.6%), and the State as a whole (7.6%).

According to 2022 Census results, the Tullamore MD recorded a population of 30,958. The draft LECP notes that Tullamore is the largest settlement in County Offaly, serving as the main source of employment and sustaining the largest population and is designated as a Key Town under the RSES and plays a strategic role in the regional context as part of the 'Linked Gateway' with Athlone and Mullingar. It further notes that the town of Clara fulfils a supportive economic function to Tullamore, benefitting from its advantageous proximity to the M6 (Dublin-Galway) route.

The draft LECP notes that population growth has been most prevalent in the centre of the county – in Tullamore and its environs and in communities to the east of the town. Population growth is also evident in Edenderry and around Portarlington. Lower levels of growth have occurred in and around Birr, and, to a lesser extent, in and around Clara and Banagher. Levels of growth have been much lower in rural communities, and several rural EDs in west and south Offaly have experienced population decline over the past 40 years.

Regarding employment, the draft LECP states that according to Census 2022, there were 35,248 people (aged 15 and over) at work in Offaly, an increase of 4,961 people (+16%) between 2016 and 2022, thereby matching the growth rate for the State (+16%). However, it is noted in the draft LECP that there this growth has not been evenly reflected across the county. Furthermore, comparison of the types of jobs carried out by the population of the catchments revealed Offaly County has high proportions of people working in manual and agricultural employment and low proportions of employers, managers, and professional workers. The draft LECP notes that the rate of employment in the farming sector is significantly higher in County Offaly (8.9%), compared to the EMR (2.3%) and the State as a whole (5.8%). According to the 2022 Census, the unemployment rate in County Offaly was 9.4%, this was higher than the State (8.3%). The unemployment rate was higher in Birr (9.5%), Edenderry (9.1%), and Tullamore (9.5%), than the State (8.3%). Between 2016 and 2022, however, the county experienced a significant decline in unemployment of 6.5%.

In relation to foreign direct investment (FDI), Offaly has seen investment and support from both local and foreign direct investors. The draft LECP notes that a total of 5,358 jobs were supported by IDA

Ireland in 2021. While there was a slight decline of these jobs between 2018 and 2020, there was an increase in both 2020 and 2022.

Regarding enterprise, the draft LECP states that 63% of the enterprises in County Offaly had fewer than 50 employees. 21% of the businesses were medium sized (50 to 249 employees) and 16% were large (250+ employees). In terms of traditional sectors, the draft LECP notes the significant transformation in the energy sector with cessation of peat extraction and developments in relation to alternative green energy production including wind and solar energy development, as well as the importance of the forestry sector and potential for growth in the tourism sector.

Regarding digital connectivity, the draft LECP notes that in 2019, 80.9% of households had internet access. However, 35.51% of households reported not having a PC. The draft LECP notes that this indicates that access to digital hubs or other locations with PCs will be important for some cohorts to avail of remote working opportunities. It notes that County Offaly has remote working, co-working and business workspaces in Tullamore, Birr and Edenderry which provide digital learning services and training opportunities to the local community and are designed to suit residents, entrepreneurs and visitors alike. It also outlines the role of public libraries which offer resources, study space, ICT and professional and knowledgeable staff.

Regarding education and training, the draft LECP set out figures from Census 2022 which reveal comparatively early cessation of education, with a higher proportion of people ceasing education at under 15 years old compared to the EMR and the State. County Offaly had the second highest proportion of people whose education ceased at under 15 years (9.5%) in the EMR. Education ceased comparatively early in Offaly at 19 years old and positions the county in the bottom five counties in terms of average age of those who ceased education.

In terms of housing, the draft LECP states that the total housing stock in County Offaly in April 2022 was 32,151, of which 34.3% were in Birr, 28.7% were in Edenderry, and 37.0% were in Tullamore. This represents an increase of 1,411 (+4.6%) since 2016. There were 2,663 vacant dwellings, 23 more than in 2016 (+0.87%). This does not include holiday homes, of which there were 211. Compared to the State in 2022 (87.4%), the proportion of occupied dwellings was higher in Birr (88.5%), Edenderry (91.6%) and Tullamore (91.0%). The LECP further notes that the average household size was slightly larger in County Offaly (2.86 people) compared to the EMR (2.85 people), and the State as a whole (2.79 people).

Regarding transport, the draft LECP notes that the most common mode of travel to work in County Offaly was by personal vehicle (motorcycle or scooter, car driver, car passenger, van) at 81.8%. This was much greater than the equivalent proportions in the EMR (65.3%) and the State (73.1%). This suggests a high reliance on personal vehicles and a lack of public and active transport in the county. The draft LECP also provides information on commuting times and EV ownership in the county, as well as challenges in relation to public transport and associated challenges in accessing key services.

In relation to deprivation, poverty and social exclusion, the draft LECP notes that in 2016, the median household income of County Offaly (€41,271) was in 8.8%, lower than the State median (€45,256). Disposable household income was also lower in Offaly (€16,908) in 2019, compared to the State

(€22,032), with substantial disparities noted across the county. County Offaly scored marginally below average according to the HP Pobal Deprivation Index, indicating the county has marginally more deprivation relative to other counties.

Regarding ethnicity and the Traveller Community, the draft LECP provides detailed figures in relation to nationality and ethnicity across the county. The demographic analysis highlighted the growth of new communities in County Offaly, with in-migration accounting for approximately three quarters of the population growth between 2016 and 2022. Since the beginning of the war in Ukraine, there has also been a growing population of Ukrainian refugees in the county, with the majority located in Tullamore. The LECP further notes that County Offaly has the second highest number of Travellers per 1,000 of total population in the State, and growing ethnic diversity across the county overall.

In terms of climate change, the draft LECP includes information on the quality of river, lake and groundwater bodies, renewable energy projects and peatland restoration. The draft LECP also includes a section on the EU Just Transition Fund, outlining opportunities for funding in County Offaly.

The highlights of the socio-economic analysis are useful and the figures compared against national averages and the EMR are particularly informative. The up-to-date authoritative information included in the socio-economic analysis is welcomed by the Regional Assembly and provides a robust evidence base for the socio-economic profile of the county.

Consultation Process

Section 2.3 of the draft LECP contains a concise consultation process report. The report states that the initial round of public consultation was undertaken in parallel with the process for the Local Development Strategy (LEADER Programme). From this consultation process, an original set of High-Level Goals was developed. They were informed by the outcome of the socio-economic profile, the review of the policy environment, and the experience of the LCDC regarding the delivery of the previous LECP. It is noted that the original set of High-Level Goals was subsequently amended and improved through an open process inviting the public, business sector, agencies, and organisations to offer further input. It is further noted that a mix of online surveys, individual meetings and written submissions were used to encourage further elaboration on the economic and community elements of the LECP.

This report notes the following:

- Consultation was held with members of the LCDC, the Municipal Districts, the Community, Culture and Emergency Services SPC, and the Community Response Forum members.
- Individual meetings and discussions were held with representatives of key stakeholder groups.
- Consultation documents were circulated to agencies and community groups seeking feedback.
- Online submissions were received via Submit.com from May until August 2023.
- Public consultation was advertised via public notices in local newspapers.

- Targeted emails were sent to PPN community groups, elected members, Community Forum, Age Friendly Alliance, Council staff, key NGOs and social enterprises.
- Regular Facebook/Instagram notices were posted.
- County Councillors were updated regularly.
- Emails inviting submissions were sent to LCDC, SPCs and Community Response Forum members.
- The draft Socio-Economic Statement and draft High-Level Goals were made available for public viewing at each of the eight public Libraries.

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 (including information on the number of participants and responses/online submissions at each stage), and a list of written submissions as detailed in Appendix 2 of the LECP Guidelines 2021. The Regional Assembly welcomes the inclusion of the membership of relevant structures (LCDC, SPC) in Appendix C of the draft LECP as required by Section 66C (2)(a)(i)(I) and Section 66C (3)(a)(i)(I) of the Local Government Reform Act 2014.

SCOT Analysis

Further to the socio-economic analysis and the consultation process, a detailed SCOT analysis which identifies the economic and community Strengths, Challenges, Opportunities and Threats (SCOT) for County Offaly is included at Section 3.2 of the draft LECP, which is welcomed by the Regional Assembly. It is stated that this analysis was derived following consideration of the policy context and an analysis of the Socio-Economic profile for the county together with the stakeholder submissions and views received as part of the public consultation process.

3.3 High-Level Goals, Objectives and Outcomes

Section 5 of the draft LECP lists the four High-Level Goals which, it is stated, have been identified and divided across the economic and community streams of the Plan. It includes an LECP framework table which details the High-Level Goals, Objectives and Outcomes of the draft LECP. It is noted in the draft LECP that this framework was determined through analysis and consultation and that actions and outputs will be outlined in the subsequent Implementation Plan.

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 four High-Level Goals and the stated objectives and outcomes. The Regional Assembly is satisfied that the chosen goals align with

the three Key Principles of the RSES (Healthy Placemaking, Climate Action and Economic Opportunity), the sixteen 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. While it is noted that "Sustainable Economic Development Objectives (SEDOs)" is included as a title in the framework table for High-Level Goal 3, the draft LECP should be reviewed to ensure that the objectives are suitably categorised in the final LECP, in accordance with the recommendations of the LECP Guidelines 2021.

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

<u>High-Level Goal 1: Sustainable Communities – Offaly will be a county which supports sustainable, inclusive, and empowered communities.</u>

This goal contains four priority objectives that aim to support vibrant and inclusive communities and enhance quality of life, health and wellbeing.

Objective 1.1	Support vibrant, sustainable, inclusive, empowered and self-determining
	communities
Objective 1.2	Transform the quality of life and opportunity for people living in rural areas
Objective 1.3	Make Offaly a great county where everyone can enjoy physical and mental health
	and wellbeing to their full potential
Objective 1.4	Reduce poverty and promote social inclusion and equality

The draft High-Level Goal and objectives outlined above support the Key Principles of Healthy Placemaking and Economic Opportunity as outlined in the RSES, including RSO 3 relating to rural communities; RSO 4 in relation to healthy communities, and; RSO 13 relating to improved education, skills and social inclusion. They also demonstrate consistency with RPOs such as 9.1 and 9.2 in relation to diverse and inclusive region; RPO 9.16 which supports the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, and; RPOs 9.18 and 9.19 relating to social and economic opportunity.

<u>High-Level Goal 2: Healthy Place Making – Offaly will improve the physical and social infrastructure to create places that are healthy and attractive to live, work and invest in.</u>

This goal contains five priority objectives that support access to services and housing; promotion of the arts and culture and heritage-led regeneration, good urban design and improved connectivity.

Objective 2.1	Ensure good access to health, education and services for all ages, abilities and
	backgrounds
Objective 2.2	Support the provision of adequate housing and shelter
Objective 2.3	Promote arts, culture and heritage-led regeneration as key to our identity and the
	character of places
Objective 2.4	Promote good urban design to create vibrant urban centres and attractive safe and
	accessible public spaces

Objective 2.5	Provide good connectivity and infrastructure to attract investment and diversify
	local economies

The draft High-Level Goal and objectives outlined above support the Key Principles of Healthy Placemaking, Economic Opportunity and Climate Action outlined in the RSES, including the RSOs in relation to sustainable settlement patterns (RSO 1); compact growth and urban regeneration (RSO 2); healthy communities (RSO 4); creative places (which includes enhancing, integrating and protecting culture and heritage assets to promote creative places and heritage led regeneration) (RSO 5); integrated transport and land use (RSO 6); a strong economy supported by enterprise and innovation (RSO 12); improved education, skills and social inclusion (RSO 13) and; enhanced strategic connectivity (RSO 15). They also demonstrate consistency with 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; RPOs 9.20 - 9.22 in relation to childcare, education and lifelong learning; RPOs 9.24 -9.27 in relation to arts, culture and heritage; and; RPOs 8.25 and 8.26 in relation to communications networks and digital infrastructure. 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.

<u>High-Level Goal 3: Economic Opportunity – Offaly will strive to spread economic opportunity and prosperity to all sections of society.</u>

This goal contains four priority objectives that aim to diversify the economy of County Offaly, support small enterprise, develop the tourism sector and progress transformative projects that align with strategic aims and sustainability goals.

Objective 3.1	Re-evaluate and build resilience for a more diversified, vibrant and sustainable
	economy in Co. Offaly with a connected and engaged local business base and
	focused regional leadership
Objective 3.2	To develop and sustain a positive enterprise ecosystem at local level throughout
	the country that will in particular drive new added-value start-ups, the further
	growth of small and micro enterprises and enhance local economies.
Objective 3.3	Develop Tourism as a tool of social and economic regeneration to provide for a
	more balanced transition to sustainable living for communities and businesses.
Objective 3.4	Explore and progress transformative projects that align with strategic aims and
	sustainability goals

The draft High-Level Goal and objectives outlined above support the Key Principle of Economic Opportunity, including RSO 12 in relation to a strong economy supported by enterprise and innovation; RSO 13 in relation to improving education skills and social inclusion; and; RSO 15 in relation to enhanced strategic connectivity (which includes building economic resilience and supporting strengthened rural communities and economies including the blue-green economy and tourism). In addition, they support RPOs of the RSES including RPOs 6.4 – 6.6 relating to the rural economy; RPO 6.9 in relation to Regional Enterprise Plans; RPO 6.23 relating to support for agencies that promote growth in green technologies; RPOs 6.25-6.27 in relation to skills and innovation; RPO 6.31 relating to supporting enterprise development agencies and local enterprise offices; and; RPO 6.38 in relation to anticipating economic structural changes. Furthermore, these objectives support specific objectives

of the RSES in relation to Tullamore Key Town including RPO 4.68 in relation to Tullamore's role as a tourism hub and development as a destination town; and; RPO 4.69 to support the role of Tullamore as a major employment centre. In addition, they support the RSES growth enabler to promote the Gateway Region as a key destination for tourism, leisure and recreation activities.

<u>High-Level Goal 4: Climate Action – Offaly will be proactive in addressing Climate Change and will work</u> to reduce emissions by 40% by 2030 and support transition to a low carbon Region by 2050.

This goal contains five priority objectives that support climate change mitigation and adaptation measures focusing on implementation of the Offaly Climate Action Plan 2024-2029, sustainable settlement patterns and low energy buildings, integrating green infrastructure and ecosystem services into development and land-use plans, addressing flood risk and addressing modal shift to more sustainable transport modes.

Objective 4.1	Implement the goals of the Offaly Climate Action Plan 2024-2029
Objective 4.2	Promote sustainable settlement patterns to achieve compact urban development
	and low energy buildings.
Objective 4.3	Integrate green infrastructure and ecosystem services into development and land-
	use plans
Objective 4.4	Address flood risk to ensure resilience of critical infrastructure and water
	resources
Objective 4.5	Achieve modal shift towards public transport, walking and cycling and roll out EV
	charging infrastructure

The draft High-Level Goal and objectives outlined above support the Key Principles of Healthy Placemaking and Climate Action as outlined in the RSES, including RSOs in relation to sustainable settlement patterns (RSO 1); compact growth and urban regeneration (RSO 2); healthy communities (RSO 4); integrated transport and land use (RSO 6); sustainable management of water, waste and other environmental resources (RSO 7); building climate resilience (RSO 8); supporting the transition to low carbon and clean energy (RSO 9); enhanced green infrastructure (RSO 10), and; biodiversity and natural heritage (RSO 11). They also demonstrate consistency with a range of RPOs including RPO 6.30 in relation to smart cities, towns and villages; RPOs 7.32 and 7.33 relating to climate mitigation and adaptation measures; RPO 7.40 relating to energy efficiency and the use of renewable energy sources in existing buildings, and RPO 7.42 in relation to decarbonising transport.

3.4 Implementation

Section 6 of the draft LECP, in relation to the initial Implementation Plan, states that the Implementation Plan sets out a series of actions against each objective that the Local Authority believes will make an individual and collective impact in delivering the outcomes associated with each objective. It notes that actions have been prioritised, so that the goals of the LECP will be addressed by a wide number of programmes, strategies, organisations and groups in County Offaly, regionally and nationally. It further notes that actions have been prioritised through a process of engagement with those agencies who have been and will continue to be responsible, alongside the County Council, for supporting change and growth in County Offaly and that the list of actions will be reviewed and amended where necessary on a regular basis.

From a review of the submitted draft LECP, a specific Implementation Plan has not been provided for assessment. An initial 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. Notwithstanding, the Regional Assembly welcomes the detail provided in relation to the implementation, monitoring, evaluation and review arrangements relating to LECP implementation.

4.0 Evaluation of Consistency with the Offaly 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 Offaly County Development Plan 2021-2027. Given that the Offaly County Development Plan 2021-2027 was deemed to be consistent with the RSES, as acknowledged by the submission made by EMRA dated the 21st September 2020, the Regional Assembly therefore considers that an analysis of the RSES is deemed sufficient in order to demonstrate consistency. The Regional Assembly welcomes the statements at Sections 2.2, 2.5 and 4.2 of the draft LECP which note that the LECP 2024-2029 fully aligns with the provisions of the Offaly County Development Plan 2021-2027 and incorporates goals and objectives that are consistent with and complementary to the Offaly County Development Plan 2021-2027, including its SEA and AA reports. Furthermore, the Regional Assembly welcomes the cross-referencing of relevant LECP outcomes with relevant sections of the County Development Plan within the LECP Framework table at Section 5 of the draft LECP.

5.0 Other Considerations

A number of clerical errors and anomalies are evident in the draft LECP Framework document. On page 32 in Section 3, the draft LECP states that "In 2026 the proportion of Irish Travellers was higher in Birr...". This statistic should be checked and the correct year stated. On page 33, a graph is included for central heating for which the data source for the information presented should be stated. In Section 4.1, some of the text in the SDGs schematic is illegible and should be readable in the final LECP. In Section 4.2 and in the list of regional policies and strategies contained in Appendix A of the draft LECP, the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region is referenced as covering the period 2020-2032. This is incorrectly referenced as the adopted RSES covers the period 2019-2031. In Section 5 under 'LECP Framework', it is stated that five High-Level Goals are included in the LECP for Offaly. This statement is incorrect since four High-Level Goals are included in the draft LECP. In the list of acronyms included in Appendix B of the draft LECP, a number of acronyms are included multiple times including EMRA, RSES and MREP and formatting is not consistent across the two columns in the table. Furthermore, the EMRA acronym is referenced as meaning 'East & Midlands Regional Assembly'. This is incorrect as the name of the organisation is Eastern & Midland Regional Assembly. In the draft LECP Framework document, some section headings included in the main document do not match the section headings included in the table of contents. For example, Section 4.2 in the table of contents is listed as "Alignment with RSES and County Development Plan" whereas Section 4.2 in the main body of the text is "Strategic Vision for the LECP", which is also the heading for Section 5.1. Similarly, while Sections 5.1, 5.2 and 5.3 are listed in the

table of contents, the section headings in the main document do not correspond with these. In the LECP Framework table at Section 5 of the draft LECP, the stated outcome for Objective 2.5 is "Increase provision and use of digital infrastructure and services throughout Offaly and in all parts of society through the delivery of the National Digital Strategy". The text of the objective should be reviewed to ensure that the type of connectivity and infrastructure being referred to is clear (e.g. digital, transport, etc.) and this should be reflected in any corresponding action/s included in the Implementation Plan. Furthermore, in the text of Objective 3.2 under High Level Goal 3, the phrase "throughout the country" is used, rather than "throughout the county". Finally, the wording of Objective 4.3 should be reviewed in relation to the corresponding outcomes as set out in the LECP Framework table. The integration of green infrastructure and ecosystem services into development and land-use plans is not within the scope of the LECP itself, but rather the integration of such concepts can support the achievement of the objectives as set out. The wording of the objective should reflect this, in addition to any corresponding action/s included in the Implementation Plan.

These matters should be adequately addressed in the final LECP document.

6.0 Recommendations and Statement of Consistency

The Regional Assembly commends the work of Offaly County Council to date in the preparation of the draft LECP document and issues a Statement of Consistency for the Offaly LECP as required under Section 44 of the Local Government Reform Act (as amended) <u>subject to</u> the following recommendations:

- 1. The final LECP should reference the key priorities of the RSES in relation to County Offaly, with particular reference to the Key Town of Tullamore.
 - Reason: To ensure consistency between the LECP and the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031 as required under Section 44 of the Local Government Reform Act 2014.
- 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 Tullamore as Level 2 (Major Town Centres and County Town Centres), and Birr and Edenderry as Level 3 (Town and/or District Centres and Sub-County Town Centres) within the retail hierarchy.
 - Reason: To ensure consistency between the Offaly LECP and the retail hierarchy for the Region as set out in the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031.

The following are <u>observations</u> by the Regional Assembly that should be incorporated into the final LECP in the interest of best practice:

 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 final implementation plan should also 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 require an implementation plan to be prepared and form part of the overall LECP process and also 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.

2. 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.

3. 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 categorise objectives as SCOs or SEDOs in accordance with the recommendations of the LECP Guidelines 2021.

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

4. The appendices of the final LECP should be amended to include full details of the public consultation information (including information on the number of participants and responses/online submissions at each stage), and a list of written submissions as detailed in Appendix 2 of the LECP Guidelines 2021.

Reason: To ensure that the final LECP for Offaly 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 framework document and considers the economic and community objectives to be consistent with the RSES and the Offaly County Development Plan 2021-2027. Subject to the recommendations 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 Offaly County Development Plan 2021-2027.

Regards,

Clare Bannon

A/Director

Eastern and Midland Regional Assembly

12th April 2024