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South Dublin Local Economic and Community Plan 2024 - 2030

The Eastern and Midland Regional Assembly notes the publication of the draft South Dublin Local Economic and Community Plan 2024-2030 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 10th May 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 South Dublin Local Economic and Community Plan 2024-2030.

1.2 Legislative Context

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

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

- (i) the core strategy and the objectives of the development plan of the local authority concerned,
- (ii) any regional spatial and economic strategy that may apply, and

(iii) the need to consider consistency between the economic and community elements of the draft plan.

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

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

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

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

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

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

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

Regarding employment lands, the RSES identifies significant capacity for high-tech manufacturing, research and development in campus style settings outside the M50, including at Grange Castle in South Dublin. The Naas Road lands are also identified by the RSES as a significant landbank straddling the South Dublin County Council and Dublin City Council boundary, with long-term potential to become a major district centre, but which require significant investment and site assembly efforts to enable their activation. Table 4.2 of the RSES further sets out the international significance of Dublin City and suburbs, including its role as a self-sufficient (high internal trip rate) transport hub with high quality public transport and links to other centres. Table 4.3 of the RSES further specifies that the policy response required for Dublin City and suburbs is continued consolidated population and employment growth with a focus on improving housing supply and amenity provision to create sustainable communities and improve public transport and sustainable travel options.

The Dublin Metropolitan Area Strategic Plan (MASP) contained in Chapter 5 of the RSES provides a strategic planning and investment framework for the Dublin metropolitan area, and the administrative area of South Dublin County Council is located within the Dublin MASP boundary. The MASP is aligned with a number of Regional Strategic Outcomes (RSOs) 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 the regeneration of brownfield lands at Tallaght/Cookstown and a new district at Fortunestown near Saggart/Citywest along the Luas Redline Corridor and continued development of Adamstown SDZ, Clonburriss and Kilcarbery enabled by new roads, public transport infrastructure and DART/Kildare line expansion along the South-Western Corridor. Also included are significant brownfield lands at Naas Road/Ballymount to be enabled by multi-modal public transport and a new Luas stop in the medium to long term. This will require collaboration between South Dublin County Council, Dublin City Council and the transport agencies to ensure the delivery of enabling transportation infrastructure and services.

Furthermore, Table 5.2 of the RSES and MASP, *Potential of Employment Development Areas in the Dublin Metropolitan Area*, identifies strategic employment locations with employment potential along strategic transport corridors. This includes the Naas Road/Ballymount lands and Tallaght Town Centre /Cookstown on the DART /Luas Redline South West Corridor which can accommodate the intensification of industrial lands and new mixed-use districts. The RSES also identifies Grange Castle Business Park on the South West Corridor and its potential for space intensive uses such as IT, research

and pharmaceuticals in a campus style setting.

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

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

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

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

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

The Economic Strategy of the RSES has five key principles which include smart specialisation, clustering, placemaking, orderly growth and future proof. This Strategy includes a retail hierarchy for the Region, as outlined in the RSES under Chapter 6 Table 6.1, which identifies Tallaght and Liffey Valley as Level 2 [Major Town Centres and County (Principal) Town Centres], and Adamstown, Crumlin (Ashleaf), Clonburris, Clondalkin, Citywest, Kilnamanagh, Lucan and Rathfarnham 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. By 2031 there will be a significant increase in the regional population aged over 65 and the RSES identifies the need to plan for adequate healthcare, accommodation and services to enable independent living for as long as possible, encourage active lifestyles and address isolation for older residents. The RSES also highlights the importance of recreation and sporting facilities including blueways and greenways, including the promotion of the Grand Canal Greenway, the River Liffey Greenway and the Dodder Valley Greenway, all of which pass through South Dublin.

The draft LECP submitted makes reference to the overarching 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 South Dublin Local Economic and Community Plan (LECP) was received on the 28th of March 2024 and contains the following sections:

- Introduction
- Ambition for South Dublin
- Overview of Policy Framework
- Socio-Economic Profile
- SCOT
- Consultation Findings
- High-Level Goals, Objectives, Actions and Outcomes

The following sections are also listed in the table of contents of the draft South Dublin Local Economic and Community Plan (LECP), but were not submitted to the Regional Assembly for consideration:

- Implementation Plan
- Appendices

The draft LECP sets out the following statement of ambition for South Dublin:

“In order to improve the quality of life, economic prospects and environmental impact of its residents, South Dublin will become Ireland’s most innovative and agile Local Authority area.”

The strategy of the draft LECP is guided by six High-Level Goals which are supported by 24 objectives and 111 actions. The six High-Level Goals are as follows:

High Level Goal 1	For the County of South Dublin to become a better place in which to live and work.
High Level Goal 2	To improve the physical and mental health of those living and working in South Dublin.
High Level Goal 3	Increase access to education, upskilling and lifelong learning to further meet the social and economic needs of residents and employers now, and into the future.
High Level Goal 4	Fairness, collaboration and innovation to be at the core of South Dublin’s transition to becoming a low carbon County.
High Level Goal 5	Empower communities through SMART initiatives and skills development to help make their areas better places in which to live, work and visit.
High Level Goal 6	For society within South Dublin County to be more inclusive, equitable and welcoming of diversity.

The draft LECP indicates that the development of the High-Level Goals, associated objectives, actions and desired outcomes was informed by the findings of the socio-economic analysis, stakeholder and public consultation, and the review of existing policies at local, regional and national level. It is further stated that these High-Level Goals and their associated objectives, actions and desired outcomes, have been developed by South Dublin County Council, together with the Local Community Development

Committee (LCDC), the Special Planning Committee (SPC) for Economic Development, Enterprise and Tourism and other key stakeholders. The content of the draft LECP, including the High-Level Goals, will be discussed in the following sections of this report.

3.0 Evaluation of Consistency with the RSES

The draft LECP states that it fulfils the requirements as set-out in the Local Government Reform Act 2014 and has been developed in accordance with the guidance set out in the Local Economic and Community Plan Guidelines (2021). In this regard, the following are noted from the draft LECP submitted to EMRA for consideration.

3.1 Policy Context

The draft LECP states that it fully aligns with and supports existing strategies at the local, regional and national level. At a local level this includes the South Dublin County Development Plan 2022-2028, South Dublin County Council Housing Delivery Action Plan 2022 –2026, South Dublin’s Local Enterprise Office (LEO) Development Plan (2021-2024), South Dublin Age-Friendly Strategy 2020–2024 and South Dublin County Council Draft Climate Action Plan (2024–2029). At the regional level, this includes the Eastern and Midland Regional Assembly’s Regional Spatial and Economic Strategy 2019-2031 and the Dublin Regional Enterprise Plan to 2024. At the national level, this includes the National Planning Framework 2018 (NPF), the National Development Plan 2021-2030 and the National Climate Action Plan 2023. At the international level, the LECP identifies UN Sustainable Development Goals (SDGs) which share a strong alignment with the purpose and objectives of the South Dublin Local Economic and Community Plan (SDGs 8, 10, 11 and 13) and identifies the SDGs which are most relevant for each action of the Plan with the aim of ensuring that sustainability and climate considerations underpin the development of South Dublin. Based on the review of policies and strategies, the LECP identifies a number of key ‘community’ and ‘economic’ priorities that South Dublin can draw upon relating to the objectives and aims of existing policy and which informed the development of the High-Level Goals.

Section 3.4 of the draft LECP provides a high-level summary of the strategic purpose of the RSES. Notwithstanding, this section should be expanded upon to include an outline of the 16 Regional Strategic Outcomes (RSOs) and the three cross-cutting Key Principles of the RSES. Furthermore, the final LECP should make reference to Strategic Development Areas and Corridors, and Strategic Employment Development Areas, in the administrative area of South Dublin as set out in Tables 5.1 and 5.2 of the RSES relating to the MASP. 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 Tallaght and Liffey Valley as Level 2 [Major Town Centres and County (Principal) Town Centres], and Adamstown, Crumlin (Ashleaf), Clonburris, Clondalkin, Citywest, Kilnamanagh, Lucan and Rathfarnham as Level 3 [Town and/or District Centres and Sub- County Town Centres (Key Service Centres)] within the retail hierarchy.

Overall, however, the Regional Assembly considers that the policy considerations are in line with the LECP ministerial guidelines and are consistent with the policies and objectives of the RSES in so far as it relates to the administrative area of South Dublin County Council.

3.2 Socio-Economic Profile and Consultation Process

Socio-Economic Profile

Section 4 of the draft LECP contains the socio-economic profile of South Dublin with up-to-date authoritative information on demographics, housing, economy, employment, social and community and the environment. The analysis primarily used 2022 and 2016 Census data with additional data from the SEAI, Pobal and GeoDirectory where relevant.

This identifies that Census 2022 recorded a population for South Dublin of 301,075, up 22,308 (8%) from Census 2016. Of the county's total population growth, 66% (14,714 individuals) can be attributed to natural increase. The remaining 34% (7,591 individuals) is the result of positive net migration. The Electoral Divisions that experienced population growth of over 15% included Lucan-St.Helens, Newcastle, Rathcoole, Saggart, Tallaght-Fettercairn, Bohernabreena, and Firhouse-Ballycullen.

As set out in the socio-economic profile, Census 2022 identified that the housing stock in South Dublin was 106,074 residential units, representing an increase of 7,687 since Census 2016. In 2022, 71.5% of households in South Dublin were owner occupied (with or without a mortgage) compared to 66% nationally. Per the preliminary results of the 2022 Census, the draft LECP notes that South Dublin County has a housing stock vacancy rate of 3.7%, which is the lowest in Ireland. There were 3,899 vacant units in South Dublin, accounting for 2.4% of national vacancies.

As stated in the draft LECP, the occupational composition of South Dublin is characterised by a significant number of residents employed in professional occupations (20%). The draft LECP disaggregates the labour force by occupation and gender while unemployment rates are presented by age and gender. Similarly, principal economic status and key industries are presented in relation to gender. While these disaggregated figures are insightful, it would be beneficial if the final LECP includes overall gross figures and percentage change since Census 2016 for these metrics. It would also be useful if these figures were compared to national rates, or those recorded in other counties. Furthermore, no information is provided in the socio-economic profile in relation to enterprise, research activities or Foreign Direct Investment (FDI) in the county. In this respect the Regional Assembly suggests that up-to-date authoritative public information should be included, where available.

Under 'social and community', metrics for crime rate, education levels, household composition, community health, deprivation, social class and volunteering are included. According to Census 2022, 33.18% of the population in South Dublin aged 15+ have third level education, which is slightly below the state average of 33.7%. The average household size in 2022 was 2.97 persons, slightly above the national average of 2.74 persons. The LECP notes that the Pobal HP Deprivation Index for 2022 reveals that South Dublin is a county of contrasts with areas of both affluence and disadvantage. The County has some pockets of extremely disadvantaged areas including Tallaght-Jobstown (-37.25) and Clondalkin-Moorfield (-37.50). South Dublin also has areas like Tallaght-Fettercairn, where neighbourhoods that are very affluent and disadvantaged are side-by-side. Overall, the Index reveals that 7.3% of the population in South Dublin live in Affluent areas, compared to 76.8% living in Marginally Below Average areas, 13.1% in Disadvantaged areas, and 2.74% in Very Disadvantaged areas. According to Census 2022, 31% of the population in South Dublin were categorised as belonging to the managerial and technical social class, while 8.6% of the population were categorised as professional workers.

Under environment, metrics for private transportation reliance, electric vehicle infrastructure, renewable energy generation, district heating, sustainable energy communities, environmental conservation areas, greenway infrastructure, water quality and flood risk are included.

The snapshot Socio-Economic Analysis is informative and helps to establish the context of South Dublin for the Local Economic and Community Plan process. Furthermore, the SCOT analysis at section 5.1 demonstrates considerable preparation and evidence-based thought feeding into the selection of the High-Level Goals.

Consultation Process

The draft LECP provides a summary of the various consultations which were undertaken as part of the analysis to inform the South Dublin LECP 2024-2030. The draft LECP notes that it has been developed in a collaborative and cooperative manner through engagement with a wide range of key stakeholders including the general public, community representative groups, state agencies, education providers and the private sector. The draft LECP states that the aim of these engagements, in conjunction with the socio-economic analysis, was to identify key priorities and needs that could be addressed through the High-Level Goals, objectives and actions of the plan and reflected in the desired outcomes. This includes community elements related to areas such as service provision and social inclusion and economic elements related to areas such as developing the green economy and attracting new investment.

As set out in the draft LECP, consultation for the South Dublin LECP included two face-to-face public consultation sessions; an online business survey; an online community survey; individual meetings with key stakeholders from the public, private and community sectors; visits to two DEIS primary schools, and; written submissions. Two online group workshops with key stakeholders to aid the prioritisation process for the implementation plan were also scheduled to be completed in April 2024, and were not therefore reflected in the draft LECP document submitted to EMRA for consideration on March 28th 2024. The draft LECP does not set out the dates or timeframe across which the consultation took place, nor does it provide details in relation to the number of participants at each consultation event, or survey response numbers or response rates.

Section 6.2 of the draft LECP outlines the key themes which emerged from the consultation which fed into the selection of High-Level Goals. Four overarching themes which emerged from the consultation were:

- Social issues, Vulnerability and Community Engagement
- Employment, Housing, and Transportation
- Education, Innovation and Business Supports
- Community and Quality of Life

The summary of findings from the public consultation is informative and helps to establish the context of South Dublin for the Local Economic and Community Plan process.

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 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 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).

Section 7 of the draft LECP notes that the development of the six High-Level Goals and associated objectives, actions and desired outcomes by South Dublin County Council together with the LCDC, SPC for Economic Development, Enterprise and Tourism and other key stakeholders has been informed by the findings of the socio-economic analysis, stakeholder and public consultation, and the review of existing policies at local, regional and national level. It is further noted in the draft LECP that the six High-Level Goals cover both economic and community elements as required by the LECP Guidelines and also align with the suggested themes in the Guidelines as follows:

- Health and Wellbeing (High-Level Goals 2, 5 and 6)
- Economic Development (High-Level Goals 1, 3, 4 and 5)
- Community and Local Development (High-Level Goals 1, 2, 3, 4, 5 and 6)
- Climate Action (High-Level Goal 4)

It is stated in the draft LECP that the six High-Level Goals and associated objectives, actions and desired outcomes have been designed to positively contribute to the economic and community development of South Dublin and are aligned with the overall ambition for an innovative, agile, inclusive, prosperous and sustainable county. It is also noted in the draft LECP that they support the public sector duty to promote equality, prevent discrimination and protect human rights. The draft LECP states that it addresses crosscutting priorities including: sustainability, equality, poverty, rurality, age and disability.

In section 7 of the draft LECP, each draft High-Level Goal, along with the associated objectives, actions and desired outcomes has been linked with their corresponding Sustainable Development Goals (SDGs), which is welcomed by the Regional Assembly. Notwithstanding, the final LECP should ensure alignment of High-Level Goals, objectives, actions and desired outcomes with the National Climate Action Plan 2024 as approved by Government on the 20th of December 2023; South Dublin County Council's Climate Action Plan (CAP) 2024-2029 approved by Elected Members at the County Council meeting, held on the 12th of February 2024; the South Dublin County Development Plan, and; the EMRA RSES in accordance with the LECP Guidelines 2021.

The draft LECP states that the initial prioritised actions related to the goals are included in the 2-year Implementation Plan in Chapter 8. It is noted however that no Implementation Plan was included in the draft LECP submitted to EMRA for consideration on March 28th 2024. As noted in the draft LECP, the prioritisation process for the Implementation Plan was also scheduled to be completed in April 2024.

Overall, the Regional Assembly is satisfied with the selection of the six draft High-Level Goals and the stated objectives, based on the evidence-based approach used and the socio-economic profile and SCOT

analysis and consultation processes which were used to develop the goals. The Regional Assembly is satisfied that the chosen goals align with the three Key Principles of the RSES, the sixteen Regional Strategic Outcomes (RSOs) of the RSES and with a number of relevant Regional Policy Objectives (RPOs) of the RSES. Furthermore, it is noted in section 1.6 of the draft LECP that the community and economic elements are not separated into different sections of the draft LECP and that the goals, objectives and actions have been developed using an integrated approach reflecting the cross-cutting and interlinked nature of economic development. Notwithstanding, the draft LECP refers to objectives under the High-Level Goals rather than being categorised as Sustainable Economic Development Objectives (SEDOs) and Sustainable Community Objectives (SCOs) as per the recommendations of the LECP Guidelines 2021. The final LECP should review the LECP framework document to ensure the objectives are suitably categorised in accordance with the recommendations of the LECP Guidelines 2021. Each draft High-Level Goal is discussed in detail below.

Goal 1: For the County of South Dublin to become a better place in which to live and work.

This goal contains five objectives, each with supporting objectives and key desired outcomes. These objectives relate to improved housing provision, increased employment, enhancement of the County’s business environment, and ensuring a thriving economy and increased economic prosperity while making the County a safer, aesthetically pleasing and enjoyable place to live and visit.

Objective 1.1	Support the provision of housing that meets the requirements of an expanding population with varying needs.
Objective 1.2	South Dublin is to be a safer place for all.
Objective 1.3	Improve the aesthetic appearance of our County in the interest of its Economic and Social Development.
Objective 1.4	Enhance the citizen and visitor cultural experience of South Dublin through arts, culture, heritage and tourism.
Objective 1.5	Increase Employment across the County and support both existing and new businesses.

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 Regional Strategic Outcomes (RSOs) relating to healthy communities (RSO 4); creative places (RSO 5), and strong economy supported by enterprise and innovation (RSO 12). They also demonstrate consistency with RPOs 9.1-9.2 in relation to diverse and inclusive region; RPOs 9.10-9.13 in relation to healthy and attractive places, disability, universal design and providing for an age friendly society; RPOs 6.15-6.18 in relation to natural and cultural tourism assets; RPOs 9.24-9.30 in relation to arts, culture, language and heritage; RPO 6.1 in relation to competitive and economic resilient base; RPO 6.2 in relation to unexpected opportunities for enterprise development; RPOs 6.25-6.27 in relation to skills and innovation, and; RPO 6.38 in relation to anticipating economic structural changes. Furthermore, Objective 1.5 of the draft LECP includes a specific action to expand on the success of Grange Castle Business Park which is consistent with Table 5.2 of the MASP which identifies the potential for space intensive uses at Grange Castle Business Park on the South West Corridor.

Goal 2: To improve the physical and mental health of those living and working in South Dublin.

This goal contains four objectives that aim to improve the health and well-being of those living and working in South Dublin by supporting initiatives which promote healthy lifestyles including active travel.

Objective 2.1	Work with national and local agencies to support the residents of South Dublin in improving their health, well-being, and lifestyle.
Objective 2.2	Develop opportunities to promote a healthy and active County.
Objective 2.3	Promote Healthy Eating in the County.
Objective 2.4	Work to decrease substance misuse across the county through education and supports.

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 healthy communities (RSO 4) and integrated transport and land use (RSO 6). They also demonstrate consistency with RPO 9.23 in relation to provision of health services; RPOs 9.10-9.13 in relation to healthy placemaking; RPOs 9.14-9.17 in relation to recreation and open space; RPO 4.3 in relation to consolidation and re-intensification, and; RPOs 5.2-5.3 relating to MASP sustainable transport.

Goal 3: Increase access to education, upskilling and lifelong learning to further meet the social and economic needs of residents and employers now, and into the future.

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

Objective 3.1	Support the continued development of a pre-school/creche, primary school and secondary school education ecosystem designed to break the cycle of disadvantage.
Objective 3.2	Develop more education and training opportunities to ensure that everyone living in South Dublin gains the skills they need to succeed economically and socially, and that the skills needs of local employers are met.
Objective 3.3	Develop a Life-long learning provision for the people of South Dublin.
Objective 3.4	Increase access to education for all.
Objective 3.5	Deepen connections –especially research –between TU Dublin, DDLETB and South Dublin’s businesses and communities.

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 4 in relation to healthy communities and RSO 13 in relation to improving education, skills and social inclusion. In addition, they support RPOs of the RSES including RPOs 6.25-6.27 in relation to skills and innovation; RPO 6.38 in relation to anticipating economic structural changes, particularly in relation to lifelong learning programmes, business supports and upskilling; RPOs 9.1-9.2 in relation to diverse and inclusive region; 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; RPO 9.19 regarding social infrastructure needs; RPO 9.20 which supports investment in youth services that support and target disadvantaged young people and improve their employability, and; RPO 9.22 in relation to supporting the role of Higher Education Institutions and Educational Training Boards in addressing skills shortages and life-long learning needs in the Region.

Goal 4: Fairness, collaboration and innovation to be at the core of South Dublin’s transition to becoming a low carbon County.

This goal contains four objectives that aim to enhance biodiversity, develop the green economy, increase energy efficiency and circular practices, and promote active travel and sustainable mobility.

Objective 4.1	Significantly enhance biodiversity levels across South Dublin.
Objective 4.2	Support South Dublin’s businesses and entrepreneurs to take greater advantage of opportunities in the green economy.
Objective 4.3	Make it easier for South Dublin’s residents and businesses to conserve energy, generate green energy and adopt circular economy practices.
Objective 4.4	Promote the benefits of active travel and sustainable mobility.

The draft High-Level Goal and objectives support the Key Principles of Climate Action, Healthy Placemaking, and Economic Opportunity, including RSOs in relation building climate resilience (RSO 8); biodiversity and natural heritage (RSO 11); supporting the transition to low carbon and clean energy (RSO 9); integrated transport and land use (RSO 6); sustainable management of water, waste and other environmental resources (RSO 7); healthy communities (RSO 4); enterprise and innovation (RSO 12); improve education skills and social inclusion (RSO 13), and; enhanced strategic connectivity (RSO 15). They also demonstrate consistency with RPO 3.7 in relation to sustainable growth; RPOs 5.2-5.3 relating to MASP Sustainable Transport; RPO 6.23 relating to low carbon and circular economy; RPO 6.24 in relation to the long-term sustainability of the agri-sector; RPOs 7.35-7.39 in relation to decarbonizing the energy sector; RPO 7.42 relating to decarbonising transport, and; RPO 10.25 in relation to waste management.

Goal 5: Empower communities through SMART initiatives and skills development to help make their areas better places in which to live, work and visit.

This goal contains four objectives that aim to leverage available resources and technologies to enhance cross-sectoral collaboration to create sustainable places which are economically and socially resilient.

Objective 5.1	Through leading collaboration and engagement across local government, technology providers, academia and citizens, Smart South Dublin will harness the power of digital technologies to create more efficient, sustainable and liveable urban environments and address local and global challenges.
Objective 5.2	Empower community and voluntary groups, social enterprises, NGOs and charities with training, mentoring and advice to increase their social and economic impact.
Objective 5.3	To enable a strong, inclusive and resilient economy, supported by enterprise,

	innovation and skills through the creation of places that can foster enterprise and innovation and attract investment and talent.
Objective 5.4	That start-ups, entrepreneurs and SMEs take full advantage of the available funding and training opportunities and in turn, the grants and training opportunities are continuously reviewed to ensure they meet the changing needs of the business sector.

The draft High-Level Goal and objectives support the Key Principles of Healthy Placemaking and Economic Opportunity and also the five principles of the Economic Strategy of the RSES which are listed as smart specialisation, clustering, placemaking, orderly growth and future proof, including RSOs of the RSES in relation to healthy communities (RSO 4); creative places (RSO 5); strong economy supported by enterprise and innovation (RSO 12); enhanced strategic connectivity (RSO 15), and; global city region (RSO 14). They also demonstrate consistency with RPO 6.1 in relation to competitive and economic resilient base; RPO 6.2 in relation to unexpected opportunities for enterprise development; RPO 6.28 in relation to social enterprise; RPO 6.30 relating to smart cities, town and villages; RPO 6.31 in relation to innovation capacity, and; RPO 6.38 in relation to anticipating economic structural changes.

Goal 6: For society within South Dublin County to be more inclusive, equitable and welcoming of diversity.

This goal contains two objectives that aim to ensure that South Dublin is an inclusive and physically accessible county.

Objective 6.1	Support and promote social inclusion within the county.
Objective 6.2	Increase physical accessibility of South Dublin to all.

The draft High-Level Goal and objectives support the Key Principle of Healthy Placemaking and Economic Opportunity including RSOs in relation to sustainable settlement patterns (RSO 1), compact growth and urban regeneration (RSO 2), healthy communities (RSO 4), and education, skills and social inclusion (RSO 13). They also demonstrate consistency with RPOs 6.12-6.14 in relation to Town Centre Renewal; RPOs 9.1 and 9.2 relating to a diverse and inclusive region; RPO 9.13 in relation to inclusive social infrastructure and universal design, and; RPOs 9.18-9.19 in relation to social and economic opportunity.

3.4 Implementation

Section 1.1 of the draft LECP states that a detailed two-year Implementation Plan that identifies action owners and Key Performance Indicators (KPIs) to assist with monitoring and evaluation has been developed. In addition, section 7 of the draft LECP states that the initial prioritised actions related to the goals are included in the 2-year Implementation Plan in Chapter 8. It is further stated that a revised and updated Implementation Plan will be developed for each subsequent two-year period up to 2030, to reflect progress made and take account of newly emerging policies and programmes.

From a review of the draft LECP document, a specific Implementation Plan has not been provided for assessment. As set out in the table of contents in the draft LECP and as referred to in section 7, section

8 of the final LECP will contain the Implementation plan. As noted in the draft LECP, a prioritisation process for the implementation plan was scheduled to be completed in April 2024, after the draft LECP was issued to the Regional Assembly for consideration. In the interest of clarity, the Regional Assembly notes that an Implementation Plan is required by the LECP Guidelines 2021 and should therefore be prepared and form part of the draft LECP document. Furthermore, sections on 'Implementation Arrangements' and 'Monitoring and Evaluation' should also be included in the final LECP in line with the LECP Guidelines 2021 (see Appendix 2 of the Guidelines).

4.0 Evaluation of Consistency with the South Dublin County Development Plan 2022–2028

Section 44 of the Local Government Reform Act 2014 (amending Section 66C of the Local Government Act 2001) states that LECPs should be consistent with the core strategy and objectives of the Development Plan, in this respect the South Dublin County Development Plan 2022–2028. Given that the South Dublin County Development Plan 2022–2028 was deemed to be consistent with the RSES by way of the submission made by EMRA on the 10th of September 2021, the Regional Assembly therefore considers that an analysis of the RSES is deemed sufficient in order to demonstrate consistency. The draft LECP provides a high-level summary of the strategic purpose and key priorities of the South Dublin County Development Plan (CDP) 2022–2028 and the Regional Assembly welcomes the statement at section 1.7 of the draft LECP that the draft LECP fully aligns with the provisions of the current County Development Plan. Notwithstanding, it is considered that more in-depth commentary should be provided in order to clearly demonstrate that the LECP is consistent with the core strategy and objectives of the South Dublin County Development Plan 2022–2028, in accordance with the LECP Guidelines 2021.

5.0 Other Considerations

A number of clerical errors and anomalies are evident in the draft LECP document. In this respect, sections 1.1 and 1.7 of the draft LECP refer to the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region covering the period 2020-2032. This is incorrectly referenced as the adopted RSES covers the period 2019-2031. Furthermore, sections 1.1 and 1.5 refer to the Eastern and Midlands Regional Assembly. This is incorrect as the name of the organisation is Eastern and Midland Regional Assembly ('Midland' is singular). In section 3.4 of the draft LECP an incorrect reference is made to nine local authorities in the EMRA region, whereas there are twelve local authorities under the jurisdiction of EMRA.

In section 4.5 of the draft LECP, the first sentence is "Despite its relatively small size, County Louth is rich in land and marine-based natural assets." This sentence has clearly been included in error since the draft LECP is for South Dublin. Furthermore, South Dublin is a landlocked local authority area and does not therefore have marine-based natural assets. Also in section 4.5, the Royal Canal Greenway is included in the list of scenic greenways in South Dublin, while the River Liffey Greenway is not included. Since the Royal Canal does not pass through South Dublin County, this is an anomalous reference.

Furthermore, while the Regional Assembly welcomes the detailed overview of consultation findings in

Section 6.2, the inclusion of the full consultation report as part of the main body of the framework document is not required by the LECP Guidelines 2021. The suggested outline for framework LECPs included at Appendix 2 of the LECP Guidelines 2021 indicates that public consultation information should be included in the Appendices of the LECP.

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

1. Section 3.4 of the draft LECP should be expanded upon to include an outline of the 16 Regional Strategic Outcomes (RSOs) and the three cross-cutting Key Principles of the Regional Spatial and Economic Strategy. Furthermore, the final LECP should make reference to Strategic Development Areas and Corridors, and Strategic Employment Development Areas, in the administrative area of South Dublin as set out in Tables 5.1 and 5.2 of the Regional Spatial and Economic Strategy relating to the MASP.

Reason: To ensure consistency between the South Dublin 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 Tallaght and Liffey Valley as Level 2 [Major Town Centres and County (Principal) Town Centres], and Adamstown, Crumlin (Ashleaf), Clonburris, Clondalkin, Citywest, Kilnamanagh, Lucan and Rathfarnham as Level 3 [Town and/or District Centres and Sub- County Town Centres (Key Service Centres)] within the retail hierarchy.

Reason: To ensure consistency between the South Dublin 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.

3. The final LECP should provide more in-depth commentary in order to clearly demonstrate that the LECP is consistent with the core strategy and objectives of the South Dublin County Development Plan 2022-2028.

Reason: To clearly demonstrate consistency between the LECP and the core strategy and the objectives of the development plan of the local authority as required under Section 44 of the Local Government Reform Act 2014.

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

1. 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. The final Implementation Plan should indicate, for each action, the potential funding sources (programmes

and funding streams) available, as well as the availability of other relevant resources.

Reason: The LECP Guidelines 2021 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 include details in relation to ‘Implementation Arrangements’ and ‘Monitoring and Evaluation’ in accordance with Section B of the LECP Guidelines 2021.

Reason: The LECP Guidelines 2021 state that each local authority should draw up implementation arrangements to suit the content of its plan and local circumstances and similarly provide for monitoring and evaluation of the implementation of the LECP.

3. The final LECP should ensure alignment of High-Level Goals and objectives with the National Climate Action Plan 2024 and the South Dublin County Council Climate Action Plan 2024–2029.

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.

4. The Socio-Economic Analysis at section 4 should be updated to include total county level figures for employment (labour force, unemployment rate, principal economic status and key industries) in addition to the disaggregated figures provided in the draft LECP. Section 4 of the final LECP should also be updated to include authoritative public information on enterprise and FDI in South Dublin.

Reason: To provide a more complete socio-economic profile for South Dublin in the interest of best practice and in accordance with the recommendations of the LECP Guidelines 2021.

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

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

6. The appendices of the final LECP should include full details of the public consultation information (including information on the dates or timeframe across which the consultation took place and the number of participants and/or responses received 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 South Dublin is consistent with Section 66C (2)(a)(i)(I) and Section 66C (3)(a)(i)(I) of the Local Government Reform Act 2014, which, as detailed in the LECP Guidelines 2021, requires that a report should be included in the LECP on this stage.

7.0 Conclusion

The Eastern and Midland Regional Assembly (EMRA) welcomes the progression of the Local Economic and Community Plan to a draft document and considers the objectives to be consistent with the RSES

and the South Dublin County Development Plan 2022–2028. Subject to the amendments listed in Section 6.0 of this report being incorporated into the finalised LECP, the Regional Assembly considers that the document would be consistent with the policies and objectives of the Regional Spatial and Economic Strategy 2019-2031 and the South Dublin County Development Plan 2022–2028.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
10th May 2024