

Part 4.2 Submissions from Prescribed Bodies

Name: Eastern and Midlands Regional Assembly

A7

Issues raised

The Eastern and Midland Regional Assembly notes the publication of the Issues Booklet to inform the preparation of the Wicklow County Development Plan 2021-2027 and sets out hereunder observations on behalf of the Assembly. The submission has been reviewed by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 13th December 2019.

Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region which was made on 28th June 2019. In line with the provisions of the Planning and Development Act 2000, as amended, the Planning Authority shall ensure, when making the County Development Plan, that it is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy. In this regard, the Assembly welcomes the publication of the Issues Booklet in preparation of the new Wicklow County Development Plan.

Legislative Context

As required by Section 11(2) of the Planning and Development Act 2000, as amended, the Regional Assembly received notice from the Council on November 5th 2019, of its intention to review its existing County Development Plan and to prepare a new County Development Plan for its area. Under Section 27A of the Planning & Development Act, 2000 (as inserted by Section 17 of the Planning and Development Act, 2010) the Eastern and Midland Regional Assembly, is obliged to prepare submissions / observations to be submitted to the relevant Planning Authority and copied to the Office of the Planning Regulator.

The submission of the Regional Assembly shall include, but shall not be limited to, recommendations regarding a number of matters including, policies or objectives of the Government in relation to national and regional population targets and the best distribution of residential development and related employment development with a view to promoting consistency with the RSES and assisting in drafting the Core Strategy; promoting regional development through maximising the potential of the region; planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services; and collaboration between the Planning Authority and the Regional Assembly in respect of integrated planning for transport and land use, and the promotion of sustainable transportation strategies in urban and rural areas, including the promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change. Accordingly, this report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27A of the Planning and Development Act 2000 as amended.

Ensuring Consistency with the RSES – Key Areas

Notwithstanding the requirement of the Planning Authority to ensure, when making the County Development Plan, that the Plan in its entirety is consistent with the Regional Spatial and Economic

Strategy (RSES), the following are key areas that the Assembly would like to bring attention to in order to inform the future Wicklow County Development Plan 2021-2027.

Growth Strategy of the RSES:

In preparing the forthcoming County Development Plan, it should be noted that Growth Enablers have been specified (Section 3.2) as part of the RSES to facilitate growth across the Region. Growth Enablers are underpinned by the spatial mapping of Functional Urban Areas (FUAs) within the Region. For the Eastern and Midland Region these are The Dublin Metropolitan Area, The Core Region and The Gateway Region. In this regard, the attention of the Council is brought to the appropriate general Growth Enablers for the Region, the Growth Enablers of the Dublin Metropolitan Area, the Core Region and Gateway Regions, which are relevant to County Wicklow.

In addition, when formulating the above, the future County Development Plan shall ensure consistency with RPOs 3.2 and 3.3, aimed at securing compact growth in line with the National Planning Framework.

Settlement Strategy:

The RSES defines Bray and Wicklow-Rathnew as Key Towns, within the Metropolitan Area and Core Region respectively, and the Settlement Hierarchy of the County Development Plan is required to reflect this. Acknowledgement of this as part of the Issues Booklet is welcomed by the Assembly. The Issues Booklet further acknowledges the requirement of compact growth and delivering a greater proportion of development within the existing built-up area of settlements and making better use of underutilized land including infill and brownfield sites.

In formulating the Core Strategy, the attention of the Council is brought to Chapter 4 of the RSES, including Settlement Strategy RPOs 4.1 and 4.2, and Appendix B of the RSES (SPA and County Population Tables), where population growth targets are to be applied in line with the requirements of the Implementation Road Map for the National Planning Framework issued under DHPLG Circular FPS04/2018.

Further to the above, the Council’s attention is drawn to the transitional population projections methodology, in the NPF Implementation Roadmap and National Policy Objective (NPO) 68 of the NPF which allows for up to 20% of the phased population growth targeted in Dublin city and suburbs, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area. This is further limited to the Metropolitan Key Towns of Bray, Maynooth and Swords by the RSES. In this regard, it should be noted that the range of population projections between 84,000 and 100,500 additional people, by 2031 for Dublin City Council’s administrative as set out in Appendix B of the RSES (SPA and County Population Tables) is subject to the determination of population transfer targets under NPO 68, which will be agreed in consultation with the MASP Implementation Group, as set out in Section 5.7 of the RSES.

Table 4.2 of the RSES outlines the Settlement Typologies to be included as part of the Settlement Hierarchy, which are to be defined by the County Development Plan. This includes Regional Growth Centres, Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns, Villages and Rural areas. Regarding the Key Towns of Bray and Wicklow-Rathnew, RPO 4.26 addresses the role of Key Towns within Core Strategies and this is augmented by RPOs 4.37-4.41 and 4.54-4.58 which relate to Bray and Wicklow-Rathnew respectively. Table 4.3 of the RSES provides further guidance and details policy responses for the different settlement typologies. Future County Development Plan policy should ensure consistency in this regard.

Bray, Maynooth and Swords are the Key Towns identified within the Metropolitan Area Strategic Plan (MASP) which sets out an integrated land use and transportation strategy for the sequential development of the Dublin Metropolitan Area. Bray, along with Greystones are located along the MASP’s North-South Strategic Development Corridor and Table 5.1 identifies strategic residential, employment and regeneration development opportunities, capacity infrastructure and phasing to achieve compact growth in tandem with the delivery of key public transport projects as set out in the National Development Plan. In addition, Section 5.7 of the MASP and RPOs 5.4 and 5.5 are relevant with respect to Bray as a Key Town within the Metropolitan Area and future county development plan policy should be consistent with this approach.

Section 3.1 and Appendix A of the RSES provide detail on the Asset-Based Approach to spatial development and it is considered that the Planning Authority will find this useful in formulating a Settlement Strategy for the County Development Plan that secures the proper planning and sustainable development of the area.

Issues Booklet

The Regional Assembly welcomes the explicit recognition, contained as part of the Issues Booklet, of the policy hierarchy with which the Wicklow County Development Plan is required to be consistent with, including reference to the RSES and NPF. In addition, the broad areas outlined including the Core Strategy and Settlement Hierarchy, Climate Change, Flooding and Coastal Zone Management, Housing, Economic Development and Employment, Town and Village Centres and Retail, Tourism and Recreation, Heritage, Community Development, Transportation and Infrastructure, Town and Village Plans, and Environmental Assessments, are considered to provide a robust basis for scoping out and developing the overall strategy.

This submission has detailed each of these sections below and consideration should be given to the following in order to ensure consistency with the RSES when formulating the County Development Plan.

The Vision:

While not set out within the Issues Booklet it is anticipated that a Vision for the County will be set out in the new Wicklow County Development Plan 2021-2027. In determining the overall vision of the Plan, it is recommended that the Council consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES (Chapter 2) in crafting this. The RSOs are aligned to the National Strategic Outcomes (NSOs) of Project Ireland 2040 and it should be noted that the ability to demonstrate delivery of these may potentially be linked to future funding sources.

Core Strategy and Settlement Hierarchy:

The Issues Booklet recognises that the Core Strategy must demonstrate that the development plan is consistent with National and Regional Policy such as the NPF and RSES. In doing so, the Core Strategy must include a new settlement hierarchy reflecting the spatial framework set out in the RSES. Points outlined above, under the heading ‘Ensuring Consistency with the RSES – Key Areas’ should be considered in this regard, in particular to the role of Bray and Wicklow-Rathnew as Key Towns within the Settlement Hierarchy of County Wicklow. The Assembly welcomes that the new Plan will identify Self-Sustaining Growth Towns, Self-Sustaining Towns and Towns and Villages as per the terminology set out in the RSES. The Planning Authority is also directed to RPOs 3.2 and 3.3 which requires core strategies to set out measures for compact urban growth with a focus on regeneration areas including infill and brownfield regeneration sites.

Climate Change, Flooding and Coastal Zone Management:

The Climate Change, Flooding and Coastal Zone Management Section of the Issues Booklet is a welcome addition. This is in keeping with the RSES Key Principle on Climate Action, which is supported by RSOs 6-11. Information contained at Chapters 7, 8 and 10 of the RSES will assist the Local Authority in developing related policy. Included as part of this is specific reference to the challenge of climate change and of particular relevance to County Wicklow attention is drawn to Section 7.2 which identifies primary areas of potential coastal erosion risk for the east coast (pg. 153).

The attention of the Council is also drawn to RPO 3.6 and the preceding qualifying paragraphs of the RSES, which outlines the requirement of County Development Plans to assess their impact on carbon reduction targets. To this end, it should be noted that EMRA is leading an ESPON EU research programme (QGAsP) to identify a robust method for quantifying the relative greenhouse gas emission impacts of alternative spatial planning policies, the outputs of which are anticipated in 2020, and may inform the preparation of the development plan.

Housing:

The Assembly welcomes the stated alignment of the County Plan’s housing policy with the ‘National Core Principles to guide the delivery of housing’ as set out in the NPF. Points outlined above, under the heading ‘Ensuring Consistency with the RSES- Key Areas’ should also be considered in this regard. Section 9.3 of the RSES deals specifically with ‘Housing and Regeneration’, whereas Section 4.8 of the RSES deals with housing in rural places. These sections will provide further direction to assist in formulating related housing policy for the County Development Plan.

The Assembly welcome the reference to the preparation of a Housing Need Demand Assessment (HNDA) that will inform the new Housing Strategy. RPO 9.5 outlines the commitment of the Regional Assembly to support local authorities in the provision of a Housing Need Demand Assessment. This is in keeping with National Policy Objective (NPO) 37 of the National Planning Framework. The DPHLG are currently progressing a tool and guidance on HDNA with outputs anticipated in Q1 2020.

Economic Development and Employment:

Economic Opportunity is one of the three key principles of the RSES and is supported by RSOs 12-16. The Assembly welcomes the inclusion of a section on Economic Development and Employment as part of the Issues Booklet and the recognition that County Wicklow has many competitive advantages including its strategic location within the Greater Dublin Area, key transport links including M/N11 and DART, proximity to Dublin Airport, Dublin and Rosslare ports and third level universities and institutes, a thriving tourism industry and a strong creative and cultural industry sector.

Chapter 6 of the RSES deals specifically with Economy and Employment and information contained as part of this chapter will assist the Planning Authority in developing related policy. Of particular note for County Wicklow are; the relevant stated sectoral opportunities at Section 6.4 of the RSES, RPOs 6.4-6.8 relating to the rural economy, and RPO 6.9 which supports relevant actions within the Regional Enterprise Plan related to the Mid-East. Section 6.5 also details specific sectors, such as Retail, Tourism, Marine, Low Carbon Economy and Agriculture which should be consulted in developing related plan policy. The Assembly welcomes the recognition made within the Issues Booklet of the links between the quality of urban place-making and business investment / job creation. Place-making is a key

principle of the RSES and the Assembly supports the importance of embracing the character of Wicklow’s towns and villages and promoting them as locations for new economic development.

Town and Village Centres and Retail:

The Issues Booklet refers to an extensive network of towns and villages which perform a variety of roles and functions for their residents and the wider rural hinterlands. RSES policy for Rural Places, towns, villages and the countryside are contained under Section 4.8 of the RSES and is relevant for the Planning Authority in formulating the County Development Plan. This should be considered in tandem with the points outlined above under the heading ‘Ensuring Consistency with the RSES – Key Areas’.

Reference is also made to the retail strategy and the importance of retail in terms of town centre vitality and viability. The Issues Booklet identifies that the new County Development Plan must be consistent with the retail hierarchy for the region as presented in Table 6.1 of the RSES. The Council also recognises the changing nature of retail and the challenges facing town and village centres in particular with regards to vacancy. In terms of town centre renewal the Council is directed to RPOs 6.12-6.14 which support placemaking for town centres including the revitalization of vacant spaces. RPO 4.39 promotes the consolidation of Bray town centre and the regeneration of strategic sites.

Tourism and Recreation:

The Issues Booklet highlights the County’s natural and cultural tourism and recreational amenities which are important for its social and economic well-being along with the need to guide new proposals in the best locations. RPO’s 6.15 – 6.18 support the development of related measures, plans and strategies to promote natural and cultural tourism assets and RPO 6.8 specifically supports alignment with the strategic objectives of “Ireland’s Ancient East” brand propositions. Further, RPO 4.57 promotes the development of Wicklow-Rathnew as a tourism hub having regard to its accessibility to key tourist destinations in the Region. The Issues Booklet also highlights the importance of greenways as a valuable tourism and recreational asset. The RSES identifies the significant opportunities to develop a number of flagship greenways in the region including the Blessington Lake Loop and RPOs 7.24 and 7.25 promote and support local authorities in the sustainable development of the Strategic Greenway Network.

Heritage:

The Issues Booklet highlights the rich natural and built heritage landscape of the County that will require effective management and protection. The RSES emphasises that good heritage management should be incorporated into spatial planning to promote the benefits of heritage led urban regeneration in historic towns, for example through the protection of historic urban fabric, the reuse of historic buildings and the enhancement of places of special cultural or natural interest. It should also be recognised that the built and natural heritage are key resources that will play a positive role in driving economic development in terms of tourism potential. Section 9.7 of the RSES and its related RPOs provides guidance in this regard which should assist in developing plan policy in this area. Successful initiatives such as the Wicklow Historic Town Public Realm Plan and the future public realm plan for Greystones could be extended to other towns in the County to promote placemaking, green infrastructure and economic vibrancy of historic town centres.

Community Development:

The Issues Booklet highlights the CDP role in delivering the goals of the Local Economic and Community Plan (LECP) through facilitating the delivery, improved access and enhancement of

community infrastructure and services. The Assembly notes that the Wicklow LECP will also require review in order to consider strategies and investment plans in light of the adoption of the RSES. Section 9.5 of the RSES and its related RPOs supports the importance of the role of LECPs to effectively plan for social infrastructure needs. The Council is also directed to Section 6.4 of the RSES which highlights the role of the LECP in enterprise development and the rural economy.

Health Placemaking is a key principle of the RSES and is aimed at promoting people’s quality of life through the creation of healthy and attractive places in which to live, work and visit. The information contained as part of Chapter 9 of the RSES, which details subjects including diversity, inclusivity, housing, regeneration, healthy placemaking, social opportunity, economic opportunity, access to childcare, education, health services and access to arts, culture, language and heritage, will support the Planning Authority in developing relevant policy for the future County Development Plan.

Transport & Infrastructure:

The Issues Booklet highlights that the integration of land use planning, transportation and infrastructure are essential for delivering sustainable development in County Wicklow. There is also recognition that Wicklow’s strategic road connections the N11 and N81 provide an essential means of access to the metropolitan area and will require further investment. The improvement and protection of the Ten-T network including the N11/M11 is supported by RPO 8.16 of the RSES.

The RSES recognises that the sustainable growth of the Region requires the provision of services and infrastructure in a plan led manner to ensure that there is adequate capacity to support future development. Information contained in Chapter 8 Connectivity and Chapter 10 Infrastructure will assist the Planning Authority in developing related policy. In particular, the RSES emphasises that infrastructure to deliver better connected services is vital to our continued growth, supporting businesses and enhancing our communities.

The Regional Assembly welcome the Council’s commitment to require that all new development adopts a SuDs approach, recognising that SuDs has the potential to become a vital part of the County’s green infrastructure. The Council is directed to the Guiding Principles for SuDs set out in Chapter 7 Environment & Climate which should be incorporated into the future County Development Plan.

Town and Village Plans:

The Issues Booklet identifies a number of small growth towns all of which provide important economic and social services to their populations and immediate hinterland. RSES policy for Rural Places, towns, villages and the countryside are contained under Section 4.8 of the RSES and is relevant for the Planning Authority in formulating the County Development Plan. This should be considered in tandem with the points outlined above under the heading ‘Ensuring Consistency with the RSES – Key Areas’.

Environmental Assessment:

The assembly acknowledge and welcome the statement as part of the Issues Booklet that the County Development Plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. The Assembly recommend early engagement with the relevant bodies in this regard, including the Office of Public Works, Department of Culture, Heritage and the Gaeltacht, the National Parks and Wildlife Service, the Environmental Protection Agency and Irish Water.

General

In formulating the County Development Plan, the Council are advised to give consideration to the style and legibility of the future Wicklow County Development Plan, in order to ensure that the information contained as part of the County Development Plan is as clear and accessible as possible for future users.

Conclusion

The Regional Assembly welcomes the publication of the Issues Booklet which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. The Assembly look forward to corresponding with the Council on the forthcoming stages of the County Development Plan process.

It should also be noted that the officials of the Regional Assembly are available to discuss the matters raised above and will be available throughout the County Development Plan process.

Response of Chief Executive

This is a somewhat general submission that in essence is reminding the Local Authority of its obligations with regard to consistency with the Regional Spatial and Economic Strategy and highlighting certain important sections of the Strategy. In this regard, the Local Authority is aware of the requirements of the Planning Act which states:

Section 10 (1A) *The written statement referred to in subsection (1) shall include a core strategy which shows that the development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework and the regional spatial and economic strategy and with specific planning policy requirements specified in guidelines under subsection (1) of section 28.*

Section 10 (2A) *Without prejudice to the generality of subsection (1A), a core strategy shall—*
(a) provide relevant information to show that the development plan and the housing strategy are consistent with the National Planning Framework and the regional spatial and economic strategy and with the specific planning policy requirements specified in guidelines under subsection (1) of section 28.

Section 12(18) *In this section ‘statutory obligations’ includes, in relation to a local authority, the obligation to ensure that the development plan is consistent with—*

(a) the national and regional development objectives specified in—

(i) the National Planning Framework, and

(ii) the regional spatial and economic strategy,

and

(b) specific planning policy requirements specified in guidelines under subsection (1) of section 28.

Section 27 (1) *A planning authority shall ensure, when making a development plan or a local area plan, that the plan is consistent with any regional spatial and economic strategy in force for its area.*

In addition, in the drafting of the plan, the Local Authority will consider all of the relevant sections of the Regional Spatial and Economic Strategy including those highlighted in this submission.

Growth Strategy of the RSES: The Growth Enablers identified (Section 3.2) as well as RPOs 3.2 and 3.3, are noted and will be considered in the drafting of the plan. Where relevant, they have been considered in the drafting of the proposed Core Strategy set out in part 3 of this report.

Settlement Strategy: The key towns identified in the Regional Spatial and Economic Strategy, as well as RPOs 4.1 and 4.2, Appendix B of the RSES (SPA and County Population Tables) and the agreed MASP population provisions are noted and will be considered in the drafting of the plan. Where relevant, they have been considered in the drafting of the proposed Core Strategy set out in part 3 of this report.

Tables 4.2 and 4.3 of the Regional Spatial and Economic Strategy as well as RPOs 4.26, 4.37-4.41 and 4.54-4.58 are noted and will be considered in the drafting of the plan. Where relevant, they have been considered in the drafting of the proposed Core Strategy set out in part 3 of this report.

Table 5.1, Section 5.7 and RPOs 5.4 and 5.5 of the Regional Spatial and Economic Strategy are noted and will be considered in the drafting of the plan. Where relevant, they have been considered in the drafting of the proposed Core Strategy set out in part 3 of this report.

The ‘Asset-Based Approach’ of Section 3.1 and Appendix A of the Regional Spatial and Economic Strategy are noted and will be considered in the drafting of the plan. Where relevant, they have been considered in the drafting of the proposed Core Strategy set out in part 3 of this report.

Issues Booklet

The Vision: A Vision for the County will be set out in the new Wicklow County Development Plan 2021-2027. This will take account of the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES (Chapter 2).

Core Strategy and Settlement Hierarchy: The proposed Core Strategy set out in part 3 of this report demonstrates that the development plan is consistent with National and Regional Policy such as the NPF and RSES.

Climate Change, Flooding and Coastal Zone Management: The section of the new plan dealing with these topics will be consistent with and have regard to RSES Key Principle on Climate Action, RSOs 6-11 and Chapters 7, 8 and 10 of the RSES will assist the Local Authority in developing related policy.

With regard to measuring carbon reduction, when a methodology is available, this will be considered.

Housing: Sections 9.3 and 4.8, RPO 9.5 of the Regional Spatial and Economic Strategy as well as NPO 37 of the NPF are noted and will be considered in the drafting of the plan. Where relevant, they have been considered in the drafting of the proposed Core Strategy set out in part 3 of this report.

With regard to the HNDA, the new plan will include a ‘Housing Strategy’ as currently required by legislation, and when a methodology is available for HNDA, this will be carried out.

Economic Development and Employment: Chapter 6, RPOs 12-16 9.5 and RPOs 6.4-6.8, 6.9 of the Regional Spatial and Economic Strategy are noted and will be considered in the drafting of the plan.

Town and Village Centres and Retail: Section 4.8, Table 6.1 and RPOs 4.39 and 6.12-6.14 of the Regional Spatial and Economic Strategy are noted and will be considered in the drafting of the plan.

Tourism and Recreation: RPOs 4.57, 6.8, 6.15 – 6.18, 7.24 – 7.25 of the Regional Spatial and Economic Strategy are noted and will be considered in the drafting of the plan.

Heritage: Section 9.7 and associated RPOs of the Regional Spatial and Economic Strategy are noted and will be considered in the drafting of the plan.

Community Development: Chapter 9, Sections 6.4 and 9.5 (and associated RPOs) of the Regional Spatial and Economic Strategy are noted and will be considered in the drafting of the plan.

Transport & Infrastructure: Chapters 7, 8, 10 and RPO 8.16 of the Regional Spatial and Economic Strategy are noted and will be considered in the drafting of the plan.

Town and Village Plans: Section 4.8 of the Regional Spatial and Economic Strategy is noted and will be considered in the drafting of the plan.

Environmental Assessment: Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment of the plan will be carried out as required. Consultation with the relevant agencies in these required has / will be carried out as required by statute.

Recommendations of Chief Executive

1. To agree a new Core Strategy, that is consistent with the provisions of the Regional Spatial and Economic Strategy as set out in Part 2 of this report.
2. The new County Development Plan shall be drafted to be consistent with the provisions of the Regional Spatial and Economic Strategy.

Issues raised

Thank you for your authority’s work in preparing the *Wicklow County Development Plan 2021–2027, Issues Booklet*. The Office acknowledges and welcomes the publication of this paper and your authority’s work more broadly in advancing the review of the Wicklow County Development Plan.

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the *National Planning Framework* and the *Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031*;
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some comments and observations for your authority to consider in formulating the draft development plan.

These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at draft and amended draft development plan stages.

Core Strategy & Settlement Strategy

The formulation of the core strategy in line with section 10 of the Act is the most significant element in developing your authority’s draft development plan.

The National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area are key determinants for the core strategy.

The NPF acknowledges that the strategic location of the county in close proximity to the capital city of Dublin has in part, resulted in significant development and high levels of population growth.

The NPF places emphasis on the following points in terms of managing the challenges of future growth:

‘A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.’

The NPF also signals the Government’s intention to secure more sustainable and compact urban development patterns into the future with specific targets for the delivery of new homes on infill and brownfield sites within urban areas.

As your authority will be aware, appendix B of the RSES sets out a projection of population for Wicklow, which ranges from 155,000 (low) – 157,500 (high) to 2026 and from 160,500 (low) – 164,000 (high) to 2031 and this projection is a key element for the formulation of the core strategy.

In addition, page 5 of the NPF Implementation Roadmap provides scope for headroom, not exceeding 25%, to be considered to 2026 for Wicklow where projected population growth is projected to be at or above the national average baseline.

As matters stand, the Office notes that Table 2.3 of the Wicklow County Development Plan 2016-2022 has a proposed population target of 167,000 to 2025 (derived from previous and now superseded Regional Planning Guidelines) which exceeds the high population projection for 2031 in the RSES.

Furthermore, the extant development plan’s population target of 185,000 for 2031 is between 21,000-24,500 higher than the RSES and the NPF’s county population projections of 160,500-164,000 to 2031. Taking account of the above, a key issue in preparing the next Wicklow County Development Plan will be a recalibration to take on board newer strategic planning policies in relation to population change, employment and housing location, noting that the NPF does not provide for headroom beyond 2026 and putting in place coherent and realistic planning objectives across the settlement structure of the county.

The Office therefore agrees with the statement in the Issues Booklet that the current planning policy context *‘...will require a change in our population growth strategy going forward...’* In this regard, the Office notes that a number of rural Electoral Divisions in the county recorded population increases of over 25% during the 2006-2016 period. In addition some observations are set out below which may be of use to your authority in developing the next development plan’s core strategy.

The Office welcomes the acknowledgement in the Issues Booklet that *‘it will be necessary to alter the designation, place in the hierarchy and the development strategy for the previously designated ‘growth towns’ of Bray, Wicklow – Rathnew, Arklow, Greystones – Delgany, Newtownmountkenedy and Blessington to align with the new designations set out in the RSES’.*

The current Core Strategy contains six Principal Growth Towns, whereas the RSES identifies two locations in Wicklow namely Bray and Wicklow-Rathnew as Key Towns within the Metropolitan and Core Region area and settlement hierarchy respectively.

In preparing your authority’s development plan, there is scope to prioritise the development of Wicklow-Rathnew and Bray to reflect their designations as Key Towns in RSES and capitalise on existing and planned investments in infrastructure.

Wicklow-Rathnew is a Key Town in the Core Region of the RSES and is important within a regional and county context. The RPOs for Wicklow support the development of the town as a hub for employment, training and education, film and tourism. Consistent with RSES, the development plan will need to prioritise the redevelopment of opportunity sites within the core areas in the first instance.

The Regional Policy Objectives (RPOs) for Bray acknowledge the potential for further growth in Bray supported by investment in employment and public transport in consultation with Dun Laoghaire Rathdown County Council. The RSES outlines the potential for consolidation and enhancement of the town centre and for significant local employment growth for both its residents and surrounding catchment.

Page 34 of the RSES sets out specific Growth Enablers for the Dublin Metropolitan Area (DMA) which includes Bray and Greystones with section 5.3 containing guiding principles for the growth of the DMA.

Both settlements are also part of the Metropolitan Area Strategic Plan (MASP) in Chapter 5 of the RSES which sets out a strategy to achieve growth of 1.4 million people in Dublin City and suburbs and 1.65 million people in the DMA by 2031 through the delivery of large-scale strategic development areas.

In addition to wider RSES and NPF population projections, Section 5.7 on Housing Delivery (Page 113) of the RSES states:

*‘There is a further allowance of transition population targets in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP. This shall apply only to the three Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors.
.....The determination of population targets for local authorities within the MASP in accordance with the NPF and this strategy, including the population targets for the City and the Metropolitan Key Towns, should be agreed in consultation with the MASP Implementation Group,...*’

The Office understands that the consultation referred to above is underway and that the Regional Assembly, working with all the relevant local authorities and the Department of Housing, Planning and Local Government will provide clarity on the appropriate adjustments of broad NPF and RSES population forecasts to take account of NPO 68.

Aside from the larger towns in Wicklow, smaller settlements such as Newtownmountkennedy, Aughrim and Roundwood recorded population increases well in excess of the figures for the county (4.2%) and nationally (3.8%) over the 2011-2016 census period, as well as those of Bray and Wicklow (without Rathnew).

If the development plan is to prioritise key towns and other locations that are strategic from a county perspective, it will be necessary to carefully manage the level of development land that may come forward in other more dispersed locations. In the current county development plan, some level 5 and 6 tier settlements indicate the following quanta of future theoretical development potential, which in many cases would be dependent on fresh investment in enabling infrastructure. For example:

- Ashford is a Level 5 Small Growth Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to more than double the settlement’s population.
- Aughrim is a Level 5 Small Growth Town which recorded a significant population increase over the 2011-2016 census period. There appears to be sufficient lands zoned to increase the settlement’s population by approximately 50%.
- Baltinglass is a Level 5 Small Growth Town and appears to have sufficient lands zoned to increase the settlement’s population by approximately 60%.
- Carnew is a Level 5 Small Growth Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to almost double the settlement’s population.
- Dunlavin is a Level 5 Small Growth Town where the population remained stagnant at 838 people over the 2011-2016 census period. However, there appears to be sufficient lands zoned to accommodate a further 2,000 people approximately.

- Tinahely is a Level 5 Small Growth Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to increase the settlement’s population by approximately 70%.
- Avoca is a Level 6 Rural Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to increase the settlement’s population by over 40%.
- Donard is a Level 6 Rural Town and appears to have sufficient lands zoned to increase the settlement’s population by approximately 50%.
- Newcastle is a Level 6 Rural Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to increase the settlement’s population by approximately 60%.
- Roundwood is a Level 6 Rural Town which recorded a significant population increase over the 2011-2016 census period. There appears to be sufficient lands zoned to increase the settlement’s population by approximately 50%.
- Shillelagh is a Level 6 Rural Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to increase the settlement’s population by approximately 60%.

Therefore, based on the estimates provided in the Issues Booklet, there appears to be sufficient lands zoned in the above level 5 and 6 tier settlements to provide for approximately 3,750 residential units or an additional 10,500 people.

A critical issue for the forthcoming development plan will therefore be to consider how appropriate such development aspirations are, both in the context of prevailing trends over time in areas exhibiting a long-term pattern of population stability, as well as wider strategic development objectives and priorities and the requirements of the Act to include a Core Strategy that is consistent with national and regional planning policy requirements.

The Office also welcomes the acknowledgement that there will need to be a considerable shift from providing densities of between 10 and 28 units per hectare on greenfield sites and to new housing formats.

Having regard to the above, there would appear to be a need to review the extent and phasing of lands currently zoned for residential development in the lower tier settlements in the context of future need and available infrastructure to support future growth. This should also have regard to extant planning permissions and settlements with a prevalence of vacant units.

The Office notes that the Retail Hierarchy on page 18 of the Issues Booklet does not make a clear distinction between the Level 3 Town And / Or District Centres of Greystones, Arklow and Blessington which are at levels 3 and 4 of the Settlement Hierarchy and the Sub-County Town Centres (Key Service Centres) of Baltinglass, Rathdrum and Newtownmountkennedy which are Level 5 Small Growth Towns in the Settlement Hierarchy. Table 6.1 Retail Hierarchy for the Region of the RSES identifies Baltinglass, Rathdrum and Newtownmountkennedy as Key Service Centres rather than Town And / Or District Centres.

The Office will provide further practical advice and technical support in the working out of the core strategy parameters above and within our statutory remit as you may require.

Given the location of Bray on the administrative boundary with Dun Laoghaire Rathdown County Council and the timing for the preparation of the Dun Laoghaire Rathdown County Development Plan 2022-2028, the Office would like to highlight the provisions of section 9(4) of the Act, which states:

In making a development plan in accordance with this Chapter, a planning authority shall have regard to the development plans of adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities except where the planning authority considers it to be inappropriate or not feasible to do so.

Having regard to the above, engagement and co-ordination with the ongoing review of the Dun Laoghaire Rathdown County Development Plan would be essential and the Office would expect to see evidence of the above in the next stage of your development plan review process.

In summary, the Office advises that the preparation of the core strategy should have due regard to the settlement typology of towns in the region and carefully consider the zoning and phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy. See Tables 4.2 and 4.3 of the RSES for further guidance.

Rural Development Strategy

The Office acknowledges that the county is predominantly rural and that these rural areas face differing development issues and challenges, from areas that are broadly stable or partly declining in population to other rural areas closer to the metropolitan area that are under considerable pressure for piecemeal and un co-ordinated rural development.

In this regard the Office agrees with the statement in the Issues Booklet about the need to manage rural housing *‘...to protect the County’s scenic landscape and natural resources, to avoid urban generated housing and to ensure the needs of those with a bona fide necessity to live in the rural area are facilitated.’*

The Office understands that updated guidance on rural housing is in development by the Department of Housing, Planning and Local Government and in the meantime, your authority’s attention is drawn to National Policy Objective 19 and Circular letter PL 2/2017 from the Department of Housing, Planning, Community and Local Government regarding Sustainable Rural Housing Guidelines for Planning Authorities 2005 and Local Needs Criteria in Development Plans.

The development plan is also an opportunity to bring forward measures aimed at revitalising underutilised parts of rural towns and villages, bringing life back in to their centres and offering an alternative to a proliferation of single houses in the countryside, which over time can undermine the vitality and viability of those towns and villages.

Economic Development & Employment

The RSES outlines the following for the Key Towns of Bray and Wicklow-Rathnew:

‘They are large economically active service and/or county towns, with high quality transport links that play an important service role for their catchments and that have the capacity to act as growth drivers to complement Dublin and the Regional Growth Centres.’

Development of planning policies and objectives consistent with the RPOs for the Key Towns of Bray and Wicklow-Rathnew and the MASP will be a key consideration in the planning for economic development of the county.

The Office notes the current development plan aims to increase the jobs ratio from 42% in 2011 to 60% in 2028 and considers that this should remain as a key consideration for the next development plan.

The Key Towns of Bray and Wicklow have a similar ratio of jobs to resident workers of 0.633 and 0.621 respectively and the RSES supports further employment growth which builds on their assets and infrastructure.

Greystones-Delgany is the second largest settlement in the county; however its ratio of jobs to resident workers of 0.321 is significantly lower than the other settlements at the upper tiers of the settlement hierarchy. The RSES supports further employment in Greystones which takes advantage of its location on the North-South corridor (DART) on the Dublin MASP. The next development plan provides an opportunity to address this imbalance consistent with the RSES.

The Office commends the council for its strategies to increase the jobs ratio in lower tier settlements such as Carnew and Dunlavin and advises that the zoning of land for residential in such settlements needs to carefully consider access to local employment in these settlements.

The Office recommends that economic development in settlements, particularly those settlements with good access to the M/N11 corridor, shall be prioritised in a sequential manner concentrating primarily on lands serviced and with a high standard of accessibility by public transport, foot and private car. This model of development will contribute to avoiding car-dependent economic development whilst ensuring that the carrying capacity and operational efficiency and national roads are safeguarded.

Transport & Infrastructure

The Issues Booklet acknowledges that public transport investment has not kept pace with population growth and this has reinforced well established car based commuting patterns.

In this regard, a key issue for the next development plan is to ensure that policies maximise the benefits of existing and planned public transport investment and that planned improvements to the national road network are not eroded by further car based commuting.

The Issues Booklet recognises the role the development plan policy framework can play to encourage and facilitate sustainable transport. The Guiding Principles for Integration of Land Use and Transport under the RSES should inform the plan, as required by RPO 8.1 and RPO 8.4. Compliance with this approach may assist your authority’s plan in meeting mandatory objective section 10(2) (n).

As outlined above, there is a need for an integrated approach to the planning and development of areas that straddle the administrative boundaries of Wicklow and Dun Laoghaire Rathdown which is evident in the *Bray and Environs Transport Study (April 2019)*. It is important that the forthcoming development plan fully reflect the recommendations and next steps outlined in the study.

As your authority will be aware, a major opportunity is currently available to ensure alignment between planning and infrastructure whereby plans at local level may be supported by capital investment where aligned with the objectives and policies of the regional and national level plans. In this regard, a central element of the NPF relates to the renewal and consolidation of underutilised parts of cities, regional and rural towns and villages (NPO3c refers). These areas can avail of existing infrastructure, or enable the investment in infrastructure for sustainable urban and rural development. In this regard, any strategy for the prioritisation of provision of water / wastewater infrastructure should be based on the growth strategy objectives under the NPF and the RSES, as referred to above.

Tourism, recreation and amenities

The Office commends the council for highlighting the importance of its landscape, coastline, rights of way and cultural assets for both tourism and conservation and the role of the development plan in respect of promoting and protecting these assets.

As outlined in the Issues Booklet, the County attracts large numbers of both domestic and overseas visitors to attractions such as Glendalough. The Office considers that balancing the need to protect its natural assets in particular against pressures for growth will be an enduring issue for the plan given the proximity of the County’s rural areas to the DMA which is forecast to grow to a population of 1.65 million by 2031.

Climate Action and Energy

Having regard to the *Climate Action Plan 2019* and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction of carbon emissions is a central planning policy issue to be addressed in the draft development plan.

The Office understands that forthcoming updates to the ‘Section 28’ Development Plan Guidelines will initiate a process of enhanced guidance for the preparation of plans. This will include guidance on the requirement under section 10(2)(n) of the Act to promote sustainable settlement and transportation strategies including measures to reduce energy demand and greenhouse gas emissions (in addition to adaptation to climate change), by virtue of the location, layout and design of new development.

Your authority will be aware that the Office’s evaluation of the development plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) in its evaluations and assessments of development plans.

In this regard, the development plan should provide sufficient clarity and certainty in terms of the said measures in order to direct any future local area plans made consequent to the proposed development plan.

Similarly, the promotion of renewable energy sources within the county in accordance with the section 28 *Wind Energy Development Guidelines 2006* and *Draft Wind Energy Development Guidelines 2019* will also be critical to ensure Ireland meets its national targets and commitments to increasing renewable energy supply and reductions greenhouse gas emissions.

Summary

The preparation of the Wicklow County Development Plan 2021-2027 is an opportunity to develop a new development strategy for a diverse, vibrant and strategically located county that will benefit from Government commitment to national and regional strategic planning and capital investment.

Response of Chief Executive

Core Strategy & Settlement Strategy

It is agreed that the formulation of the core strategy in line with section 10 of the Act is the most significant element in developing the draft development plan and the proposed Core Strategy, drafted in accordance with National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly, is set out in Part 2 of this report. The

issues and advice raised by the OPR with respect to particular settlements has been carefully considered in this exercise.

Following the acceptance of the proposed revised population growth targets, local development and zoning plans will be crafted to accord with same, and addressing the various other parameters set out in the NPF / RSES such as the need to concentrate growth in settlement cores, on brownfield sites, and at appropriate infill locations; appropriate densities will also be considered for each location and increased where possible. These will be presented as part of the proposed draft plan at a later stage of plan making.

Retail

The existing County retail hierarchy as presented in the existing County Development Plan accords with Retail Hierarchy of the Regional Planning Guidelines that prevailed at the time of the adoption of the 2016 County Development Plan. This was condensed for the purposes of the issues paper (for legibility reasons) and hence a distinction between the Level 3 Town And / Or District Centres of Greystones, Arklow and Blessington and the Sub-County Town Centres (Key Service Centres) of Baltinglass, Rathdrum and Newtownmountkennedy was not shown.

The revised County retail hierarchy will accord with the principles of the NPF and Regional Spatial and Economic Strategy.

Cooperation with DLR

The encouragement to cooperate with Dun Laoghaire Rathdown County Council (DLRCC) is noted and this process is already underway via cooperation on the Bray & Environs Transport Study, the MASP and via meetings and regular informal consultation. Submissions from DLRCC with respect to the new Wicklow CDP are considered in detail further in this chapter.

Rural Development Strategy

The Department of Housing, Planning and Local Government has advised Wicklow County Council that draft ‘development plan’ guidelines are imminent and they may address rural housing amongst other issues. In the meantime, the rural housing policies and objectives drafted will accord with existing higher order strategies and guidelines.

Economic Development & Employment

It is intended that the economic development and employment policies and objectives for the Key Towns of Bray and Wicklow-Rathnew will be consistent with the NPF and RSES, and will be framed around the key goal of strengthening the roles of these towns in the County which builds on their assets and infrastructure.

With respect to Greystones - Delgany, given its weaker economic base, as set out in the proposed Core Strategy, the focus during this plan cycle will be on moderating housing growth in favour of enhancing employment opportunities and strengthening infrastructure. Greystones is very well positioned to attract employment in this regard, with excellent transport links, water and wastewater infrastructure and a supply of zoned employment land.

With respect to smaller towns mentioned in the submission, again given the weak economic base in a number of these settlements, again the priority will be on enhancing employment opportunities and strengthening infrastructure, and carefully managing housing growth.

It is agreed that economic development in settlements, particularly those settlements with good access to the M/N11 corridor, shall be prioritised in a sequential manner concentrating primarily on lands serviced and with a high standard of accessibility by public transport, foot and private car.

Transport & Infrastructure

It is agreed that a key issue for the new development plan is to ensure that policies maximise the benefits of existing and planned public transport investment and that planned improvements to the national road network are not eroded by further car based commuting. The Guiding Principles for Integration of Land Use and Transport under the RSES will be used to inform the plan, as required by RPO 8.1 and RPO 8.4.

The opportunity currently available to ensure alignment between planning and infrastructure whereby plans at local level may be supported by capital investment (e.g. URDF, RRDF) where alignment with the objectives and policies of the regional and national level plans, is acknowledged.

Tourism, recreation and amenities

It is agreed that the need to protect natural assets in particular against pressures for growth will be an enduring issue for the plan given the proximity of the County’s rural areas to the Dublin Metropolitan Area which is forecast to grow to a population of 1.65 million by 2031.

Climate Action and Energy

The transition to a low carbon economy and the overall reduction of carbon emissions will be a planning policy issue addressed in the draft development plan. The production of guidelines in this regard is welcomed.

The recent production of *Draft Wind Energy Development Guidelines 2019* is also noted and any revisions to the existing wind energy strategy required on foot of same will be made during this plan process.

Recommendations of Chief Executive

1. To agree a new Core Strategy, that is consistent with the provisions of the NPF and Regional Spatial and Economic Strategy as set out in Part 3 of this report.
2. The new County Development Plan shall be drafted to be consistent with the provisions of the NPF and RSES.

Issues raised

Submission made by Geological Survey of Ireland, part of the DCCA.

Geological Survey Ireland, a division of Department of Communications, Climate Action and Environment, is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our website for data availability and we recommend using these various data sets, when undergoing the planning and scoping processes. Geological Survey Ireland should be referenced to as such and should any data or geological maps be used, they should be attributed correctly to Geological Survey Ireland.

These are Geological Survey Ireland’s comments on Wicklow’s current County Development Plan 2016-2022:

Heritage

- The County Geological Heritage Audit for Co. Wicklow was completed in 2014 and full details of the report can be found here.
- All of the County Geological Sites listed in the County Audit should be included as part of the new County Development Plan 2021-2027.

Climate Change, Flooding, Coastal Zone Management

- We encourage the use of our landslide susceptibility mapping data on our Map Viewer, as well as keeping up-to-date with our on-going geohazard mapping programme.
- Our Map Viewer is updated with our latest datasets and we suggest using these data in reports. A new ‘Flood Risk Map’ will be added to our online data sets, the result of a collaborative project between Geological Survey Ireland and the Environmental Protection Agency.
- We recommend using Groundwater Flooding and Karst data from our Map Viewer where appropriate.
- With climate change being an on-going process, our ‘Coastal Vulnerability Index Mapping’ data on our Map Viewer may be a useful tool with future planning and scoping requests.

Natural Resources

- We would like to draw your attention to our ‘Active Quarries’, ‘Mineral Localities’ and ‘Aggregate Potential’ layers on our Map Viewer. These can be used to promote sustainable development and reduce the carbon footprint of buildings by using local stone to build. We will be happy to assist in any way with advice on the sourcing of local building materials.
- Minerals are needed for the production of renewable energy resources; using local minerals further promotes sustainable development as the carbon footprint of sourcing materials may be reduced. Data, maps, interpretations and advice on matters related to minerals, their use and their development can be found in our Minerals section of the website.

Government of Ireland Climate Action Plan

- We recommend that geothermal potential is referenced in the County Development Plan. Ireland has widespread shallow geothermal resources for small and medium-scale heating applications for both domestic and commercial use. Ireland also has recognised potential for deep geothermal resources. Geological Survey Ireland currently supports and funds research

into this national energy resource, so we recommend keeping up to date with our data. For more information on Geological Survey Ireland’s involvement in the Climate Action Plan and geothermal potential.

Response of Chief Executive

The new County Development Plan, as with previous plans, will draw on information and datasets held by other state agencies as required, and in particular for the identification of assets / places / features in need of protection and in the Strategic Environmental Assessment (SEA) Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) processes.

Should any data or geological maps of the GSI be used, they will be attributed correctly to Geological Survey Ireland.

Heritage

- The County Geological Heritage Audit for Co. Wicklow completed in 2014 was fully incorporated in the 2016 County Development Plan in Schedule and Map 10.10 – County Geological Sites.

Climate Change, Flooding, Coastal Zone Management

- The landslide susceptibility mapping data will be utilised as required, in particular in the SEA and Wind Energy Strategy processes.
- We welcome any new sources of flood risk data and these will be utilised where relevant in the SFRA.
- The ‘Coastal Vulnerability Index Mapping’ data will be utilised where relevant in the SEA and Coastal Zone Management objectives.

Natural Resources

- The ‘Active Quarries’, ‘Mineral Localities’ and ‘Aggregate Potential’ data is noted and will be considered in the drafting of policies and objectives with regard to extraction. It is agreed that the plan should promote the use of local materials where feasible.

Government of Ireland Climate Action Plan

- It is agreed that geothermal potential should be referenced in the new County Development Plan and if data becomes available during the course of the plan making process, this can be included in the new plan.

Recommendations of Chief Executive

1. To carry out all required assessment (SEA, AA, SFRA) using best and most up to date data available and to avail of data provided by the GSI.
2. To update the list and map of all County geological sites in the new plan
3. The new plan shall promote to use of local materials where feasible
4. To include data on geothermal potential in the new plan if possible.

Issues raised

This submission relates to nature conservation and archaeology.

Nature Conservation

The Department welcomes the opportunity for early engagement in this process and wishes to provide the following observations.

1. Review of Natural Heritage Policies and Green Infrastructure Strategy

The Department recommends that as part of the process of preparation of a new County Development Plan that the current Plan’s policies and objectives, including the Green infrastructure Strategy (Appendix 14 of the current CDP), are reviewed. Such a review should take place with a view to streamlining and strengthening policies and the strategy by ensuring that they are consistent with current National and European plans, policies, objectives and guidance including:

- The Regional Spatial & Economic Strategy for the Eastern & Midland Regional Assembly 2019 Biodiversity Regional Policy Objectives and Green Infrastructure Guiding Principles.
- The National Biodiversity Action Plan 2017 – 2021.
- All-Ireland Pollinator Plan 2015 -2020.
- Ireland’s Article 17 reports 2019
- Ireland’s Summary Report for the period 2008 – 2012 under Article 12 of the Birds Directive
- The National Peatlands Strategy 2015.
- Conservation objectives for Natura 2000 sites within the plan’s zone of influence.
- NPWS Prioritised Action Framework (PAF) for Natura 2000 for the EU Multiannual Financing Period 2014-20204.
- EU’s 2013 Green Infrastructure Strategy.
- EU’s 2019 Guidance on integrating ecosystems and their services into decision-making.
- Recent planning case law in relation to the Habitats and Birds Directives

The Department welcomes the fact that Wicklow County Council members have recently voted to sign up as partners to the All-Ireland Pollinator Plan 2015 -2020. In accordance with its responsibility as an All-Ireland Pollinator Plan partner, Wicklow County Council should consider the Plan in the forthcoming development plan. There is scope to include habitat for pollinators among objectives for Open Spaces and Recreational Facilities as well as in the Council’s policy on herbicide use.

Invasive Alien Species (IAS) are a significant and increasing cost to our economy. Consideration should be given to objectives relating to Invasive Alien Species in the draft plan. This could include an action plan for the highest risk IAS, as identified in the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations (2011).

When reviewing Plan Policies and the Green Infrastructure Strategy, cross-cutting issues such as climate change, flooding and water quality should also be considered.

2. Integrated assessment

Wicklow County Council is the competent authority in relation to the screening for Appropriate Assessment, and Appropriate Assessment, if required, of the draft Plan. The Appropriate Assessment

process should take place in consultation with the teams working on the draft Plan, the Strategic Environmental Assessment (SEA) and the Flood Risk Assessment, as each process can help inform the other to ensure that the objectives and policies in the draft Plan will have no significant effects on the natural heritage. The SEA and draft plan should be guided by results of monitoring of the significant environmental effects of implementation of the previous development plan.

Environmental assessment of the draft Plan should include the impacts of nitrogen deposition on Natura 2000 sites, particularly from road, bioenergy and agriculture plan objectives. Impacts of nitrogen deposition include acidification and eutrophication which leads to biodiversity loss. The Department advises that the AA screening report should include an assessment of the impacts of nitrogen deposition on Natura 2000 sites within the draft Plan’s zone of influence. Consideration should also be given to monitoring nitrogen deposition in the SEA. Details of nitrogen deposition mapping and impacts on habitats are included in NPWS, 2019.

3. Green infrastructure network review

The incorporation of Green Infrastructure (GI) in spatial planning is one of the ways in which the National Biodiversity Action Plan seeks to address the main drivers of biodiversity loss in Ireland. The Department recommends that Wicklow’s green infrastructure network should be reviewed.

The Department encourages the free dissemination of biodiversity data and will, where possible, facilitate use of its data resource by Wicklow County Council. The Department holds significant habitat and species spatial datasets, including data collected for the most recent Article 17 conservation status reporting cycle (2019). Details of how to access data can be found on the National Parks and Wildlife Service website.

4. Greenways

The issues paper covers greenways in the Tourism and Recreation section of the Issues Paper. In the National Greenway Strategy, a greenway is described as is a recreational or pedestrian corridor for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. Greenways are generally welcomed by the Department as a positive contribution to improving the sustainable transport and tourism infrastructure of Ireland. As outlined in the National Greenway Strategy, greenways can include measures to enhance biodiversity and to provide enhancement measures for the All Ireland Pollinator Plan 2015 – 2020. However, the same risks to nature conservation interests and biodiversity are associated with greenways as with any other road development. As advised in the National Greenway Strategy, greenways should be designed to take into account, and avoid where necessary, the sensitivities of natural heritage. Project appraisal and consideration of a number of route options, as outlined in the Common Appraisal Framework for Transport Projects and Programmes, is one way of taking natural heritage into account at an early stage. Greenways should be strategic and projects will be considered for funding under the strategy, if they link to activities and locations, while in themselves not being the most scenic routes. Given the scale of housing development in the east of the county, consideration could be given to including the provision of a greenway, to be constructed in tandem with major Strategic Housing Developments, along the east coast, as a low biodiversity impact and cost effective means of providing a link between settlements and activities.

Section 68(1) of the Roads Act, 1993 (as amended) states that a “cycleway” means a public road or proposed public road reserved for the exclusive use of pedal cyclists or pedal cyclists and pedestrians’. A recent An Bord Pleanála’s inspectors report considered that a greenway and cycleway were the same thing (<http://www.pleanala.ie/casenum/303499.htm>). This means that, as well as Appropriate Assessment, proposed greenways and cycleways should be subject to what could be termed pre-

screening for EIA as set out in Article 120(1a) and (1b)) of the Planning and Development Regulations and screening for EIA as set out in Article 120(1), (1A) and (1B) of these Regulations.

As outlined in the Issues Paper, the Council have appointed consultants to examine the feasibility of building the East Coast Wicklow to Greystones Greenway, part of which lies within the Murrrough Wetlands Special Area of Conservation and the Murrrough Special Protection Area, Natura 2000 sites designated under the Habitats Directive. Objectives to facilitate the development of this greenway in the draft plan must be subject to Appropriate Assessment, which should consider the greenway’s impact on Annex 1 qualifying interest habitats.

5. Maintenance of Roads within Wicklow Mountains National Park

Objectives for the maintenance of roads, particularly the R115 (Sally Gap) and R756 (Wicklow Gap) must have due regard to the nature conservation designations in the Wicklow Uplands, namely Wicklow Mountains Special Area of Conservation and Special Protection Area and Wicklow Mountains National Park. Work such as roadside drain maintenance can have a significant negative effect on blanket bog habitat, a priority habitat for protection under the European Union Habitats Directive. Any such planned works in the Wicklow Uplands or close to any other designated Natura 2000 sites in the county should be subject to, at minimum, Appropriate Assessment screening under Article 6 (3) of the Habitats Directive.

Archaeology

1. Statutory Obligations of Local Authorities. Development Plans and the Archaeological Heritage.

The Planning and Development Act, 2000.

The Planning and Development Act, 2000 came into effect on the 11th March 2002. Local Authorities are obliged to include the conservation and protection of archaeological sites as an objective within Development Plans.

It is stated in section 10, subsection 2 (c), that:

“a development plan shall include objectives for the conservation and protection of the environment including, in particular, the archaeological and natural heritage and the conservation and protection of European sites and any other sites which may be prescribed for the purposes of this paragraph”

Thus, it is mandatory for Local Authorities to include the conservation and protection of the archaeological heritage as an objective in all Development Plans.

In addition to this, the First Schedule, Part IV, Section 6 of the Act states that objectives which may be indicated in Development Plan include:

“Protecting and preserving (either in situ or by record) places, caves, sites, features and other objects of archaeological, geological, historical, scientific or ecological interest”

The Local Government Act, 2001

Section 69 (1) of the Local Government Act, 2001 requires Local Authorities to have regard to certain matters when exercising its functions under any enactment (e.g. their planning functions including adopting Development Plans and deciding on planning applications), and those matters include:

“policies and objectives of the Government or any Minister of the Government in so far as they may affect or relate to its functions”

The Department of the Environment, Heritage and Local Government (now the Department of Culture, Heritage & the Gaeltacht) set out policies in the 1999 publication *‘Framework and Principles for the Protection of the Archaeological Heritage’*, and part of that policy is that archaeological considerations need to be taken full account of in the development process.

The European Convention on the Protection of the Archaeological Heritage (Valetta, 1992)

This Council of Europe Convention was ratified by Ireland in 1997. It requires that archaeological heritage is taken account of in the development process. This is important, as it reiterates the legal obligations of Irish planning law into a broader European context. This convention also includes the setting and context of archaeological sites as part of the archaeological heritage that requires protection. Ireland is a signatory of this Convention, and as such is legally bound by it.

2. Protecting the Archaeological Heritage as an *Objective* within the Wicklow County Development Plan

Most Development Plans have a preliminary section listing the main objectives and policies of the Development Plan. However, some Development Plans deal with each ‘element’ separately and only list the objectives and policies regarding each element in the corresponding section within the Development Plan. The Department of Culture, Heritage & the Gaeltacht requests those who include a main objectives list, to include the following objective to cover the policies for protecting the archaeological heritage. (This is expanded upon and detailed in the specific section entitled ‘Archaeological Heritage’)

A standard basic objective for protection of the archaeological heritage:

It will be an objective of the planning authority to secure the preservation (i.e.: preservation in-situ or, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological interest generally.

In securing such preservation the planning authority will have regard to the advice and recommendations of the Department of Culture, Heritage & the Gaeltacht, both in respect of whether or not to grant planning permission and in respect of the conditions to which permission, if granted, should be granted.

3. Specific Section/Chapter entitled ‘Archaeological Heritage’ as part of the Wicklow County Development Plan

Obviously the more information about the archaeological heritage that can be included in the Development Plan the better. If the Development Plan can be as clear as possible in outlining the planning restraints on archaeological sites, the possibility of developments being held up due to a concern for the archaeological impact of that development is greatly reduced.

In keeping with the Planning and Development Act, 2000, The Department of Culture, Heritage & the Gaeltacht recommends that the Wicklow County Development Plan includes a section/chapter regarding ‘Archaeological Heritage’. This should clearly outline the main planning objectives regarding the archaeological heritage of the Development Plan. Within this section/chapter, the Department of Culture, Heritage & the Gaeltacht recommends that the following items be included:

PROPOSED WORDING OF THE SECTION ON ARCHAEOLOGICAL HERITAGE WITHIN THE WICKLOW DEVELOPMENT PLAN:

DEFINITION: The archaeological heritage of County Wicklow includes structures, constructions, groups of buildings, developed sites, all recorded monuments as well as their contexts, and moveable objects, situated both on land and underwater. (*The European Convention for the Protection of Archaeological Heritage, Valetta 1992*)

This means that the archaeological heritage is not confined to the archaeological sites within the Record of Monuments and Places. It includes any archaeological site that may not have been recorded yet, as well as archaeology beneath the ground surface, as well as the context of any site.

The Archaeological Heritage is comprised of:

- Recorded sites and features of historical and archaeological importance included in the Record of Monuments and Places as established under section 12 of the National Monuments (Amendment) Act, 1994,
- Major sites of archaeological importance in State Ownership or Guardianship.
- National Monuments which are the subject of preservation orders.
- All previously unknown archaeology that becomes known (e.g. through ground disturbance, fieldwork, or the discovery of sites underwater).

General Policies

It will be the general policy of the council to apply the following principles to the archaeological heritage:

- *To protect and enhance archaeological monuments and their settings.*
- *To facilitate appropriate guidance in relation to the protection of the archaeological heritage in the area covered in the Development Plan.*
- *To provide guidance to developers and property owners regarding the archaeological implications of a proposed development.*
- *To promote pre-planning consultations in relation to the archaeological heritage with the Planning Authority and with The Department of Culture, Heritage & the Gaeltacht.*
- *To endeavour to ensure the dissemination of the results of archaeological excavation in a timely and appropriate manner.*
- *To promote public awareness of the rich archaeological heritage in the area.*

Specific Objectives

It will be an objective of the Planning Authority to secure the preservation (*in-situ* or by record) of all sites and features of historical and archaeological interest.

It will be an objective of the Planning Authority to secure the preservation (*in situ*) of town walls, embankments, town gates, bastions or ancillary fortifications or portions thereof.

It will be an objective of the Planning Authority to preserve the integrity of existing archaeological monuments in their settings including the integrity of town defences.

It will be the objective of the planning authority to ensure that development in the vicinity of a site of archaeological interest shall not be detrimental to the character of the archaeological site or its setting by reason of its location, scale, bulk or detailing.

When considering development in the vicinity of town defences, the planning authority will aim to achieve a satisfactory buffer area between the development and the town defences in order to ensure the preservation and enhancement of the amenity associated with the presence of town defences within the historic urban pattern.

The planning authority will have regard to the preservation and enhancement of the line of the town defences when considering development proposed in their vicinity. Disturbance, removal and alteration of the line of town defences shall not be considered appropriate within historic settlements identified in the Record of Monuments & Places.

It will be an objective of the Planning Authority to retain the existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins.

In securing such preservation the Planning Authority will have regard to the advice and recommendations of the Department of Culture, Heritage & the Gaeltacht, both in respect of whether or not to grant planning permission and in respect of the conditions to which permission, if granted, should be subject.

When considering development in the vicinity of all upstanding monuments including town defences, the planning authority will require the preparation and submission of an archaeological assessment detailing the potential impact of any development on both upstanding, buried structures and deposits. The report will also include a visual impact assessment to ensure adequate consideration of any potential visual impact the proposed development may have on any upstanding remains.

Designation of remains, sites and areas of archaeological interest as part of the landscape character assessment model within the lifetime of the County Development Plan.

The term ‘Archaeological Landscapes’ can include areas containing groups of monuments, or image units defined by the location of specific monuments. We would ask that the inclusion of ‘archaeological landscapes’ within the process of landscape character assessment be included as an objective in the Wicklow County Development Plan.

An objective could be worded as follows: *‘It will, within the lifetime of this Plan, be an objective of the Planning Authority to seek to include ‘archaeological landscapes’ as part of an ongoing landscape character assessment of the plan area.’*

General information which should be placed in an appropriate location within the development plan.

The Record of Monuments and Places (RMP)

The Record of Monument and Places (RMP) is a statutory audit of archaeological monuments provided for in the National Monuments Acts. It consists of a county by county set of marked-up Ordnance Survey maps and a manual listing basic information in relation to each monument or area included in the RMP. Monuments in the RMP are protected under the National Monuments (Amendment) Act 1994. The RMP is revised periodically.

Historic Towns and Town Defences

Historic Towns which have been identified by the Department of Culture, Heritage & the Gaeltacht for general protection are towns which were first identified in the Urban Archaeological Survey of County Wicklow and which have been included in the RMP.

For Wicklow these historic settlements include the following: Arklow, Bray, Burgage, Carysfort, Donaghmore, Dunlavin, Ennisboyne, Hollywood, Killickabawn, Mulsoes Court, Newcastle and Wicklow town.

The guideline boundaries for these towns are illustrated within the RMP and the Historic Environment Viewer. The area within the historic boundaries are known as Zones of Archaeological Potential, and are areas where intense archaeology is present.

Many of our historic villages, towns and cities comprise a series of streets bounded by town walls, embankments and ditches with town gates marking the entrance to and exit from the urban area.

These fortifications marked out the area of jurisdiction of the town’s authority. In some examples additional protective features, like bastions and star-shaped fortifications were built alongside or outside the original town bulwarks.

In a few rare examples, the modern urban centre has not yet fully developed within the area enclosed by the ambitious town walls. However, in most examples, lengths of town wall, gateways and in some cases town banks and ditches lie within or under the modern urban fabric. The survival of these town defences can vary. Some are relatively intact, although pierced through by modern roads and bridges, others lie buried beneath a palimpsest of later building. Protection of the town’s heritage includes the retention of existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins.

(Details of monuments within Zones of Archaeological Potential are shown on maps accompanying the Urban Archaeological Survey, which Wicklow County Council has been furnished with.)

The Department of Culture, Heritage & the Gaeltacht would like to draw your attention to the *Bruges Resolution on the Conservation of Smaller Historic Towns, (1975)*, which was adopted by the 4th ICOMOS General Assembly, which outlines the importance of preserving the features of historic towns, while allowing for the necessity of development.

Underwater Archaeology

Under the National Monuments Acts 1930-1994 all shipwrecks over one hundred years old, underwater archaeological structures, features and objects are protected. The quantification of the underwater archaeological resource is at a preliminary stage with the National Shipwreck Inventory currently being compiled. This source indicates areas of high archaeological potential within marine environments. The Record of Monuments and Places does not include all underwater archaeological sites. As a result the potential exists for development to impact negatively on our underwater cultural resource. Development Plans should therefore take account of any development and constructional impacts on riverine, lacustrine, intertidal and sub-tidal environments.

Monument or sites included in the Record of Monument and Places (RMP) located within the land holding of development proposals.

It is recommended that the following section be included in an appropriate area of the development plan (possibly in the section relating to open spaces or to residential developments).

Where a proposed development (excluding individual residential home units) includes a monument or site included in the Record of Monument and Places within the landholding we recommend that

A) The developer shall commission an archaeological assessment to establish the extent of archaeological material associated with the monument or site. This assessment shall also define the buffer area or area contiguous with the monument which will preserve the setting and visual amenity of the site.

B) The area of the monument and buffer should not be included as part of the open space requirement demanded of a specific developments but should be additional to the required open spaces.

C) If a monument or place included in the Record of Monument and Places lies within the open space requirement area for the proposed development, a conservation plan for that monument should be requested as part of the landscape/management plan for that proposed open space.

D) Should a monument or site included in the Record of Monument and Places be incorporated into a development, the monument and attendant buffer area should be ceded to Local Authority Ownership once the development and associated landscaping works are complete so that the future protection of the monument can be assured.

Specific Operational Development Control Section on ‘Archaeological Heritage’

The Minister recommends that the following section would be included in Chapter of the Development Plan dealing with “Development Control”:

- *It is the policy of Planning Authority that proposed developments that may (due to their location, size, or nature) have implications for the archaeological heritage should be subject to archaeological assessment. Such developments include those that are located at or close to archaeological monuments or sites, those that are extensive in terms of area (ground disturbance of 1/2 hectare or more) or length (1 kilometre or more) and developments that require an Environmental Impact Statement.*
- *The applicant may be formally requested, as part of the planning process to have a report prepared by an archaeologist on the archaeological implications, if any, of the proposed development. The applicant shall commission this assessment report. These archaeological assessment reports shall be submitted to the Planning Authority, and to the Department of Culture, Heritage & the Gaeltacht for their consideration prior to the planning decision.*
- *All planning permissions and other development applications, which are in or might affect sites and features of historical and archaeological interest, shall be referred to the Minister through the Department of Culture, Heritage & the Gaeltacht for comment.*
- *Referrals shall be made in adequate time to allow for the applications to be assessed, for field inspections to be completed and for comments/observations to be returned to the Planning Authority.*
- *The Ministerial recommendations will be fully considered by the Planning Authority in reaching their decision.*
- *Conditions which the Planning Authority may place on developments within the zone of archaeological potential and within close proximity to Recorded Monuments and sites may include the funding by the applicant of archaeological assessment, monitoring, testing or*

excavation within the area covered by the permission, either prior to the planning decision or prior to any development works proceeding on the site following the grant of planning permission. The preservation of all or part of the archaeological remains in the area covered by the permission may also be considered by the Planning Authority as a condition on such developments. Each planning application for development within the Area of Archaeological Potential and within close proximity to recorded archaeological sites shall be assessed on its own merits.

- *The Planning Authority will advise developers that they should, during the stages of consideration of a development project that may have a potential impact on the archaeological heritage, consult to identify all relevant issues with a view to discussing any possible difficulties.*

4. Inclusion of Recorded Monuments on Maps

The Minister recommends that the Development Plan include a record of all areas of importance for the archaeological heritage.

With regard to illustrating the archaeological heritage, it would serve for clarity’s sake to include all Recorded Monuments on the maps within the Development Plan. This would be an appropriate way to pinpoint protected areas.

The line of town defences, whether upstanding or buried and any related features such as town walls and towers, town gates, embankments, bastions or other fortifications as shown on the Urban Archaeological Survey Maps should be clearly marked on an appropriately-scaled map within the Development Plan.

It is also recommended that Archaeological Landscapes, once designated, would be illustrated on maps illustrating the Landscape Appraisal Zones.

The Minister recommends that (in keeping with our recommendations above) the authors of the Development Plan include the following appendices-

Appendix x

Sites of archaeological importance in County Wicklow in state ownership (o) or guardianship (g).

Appendix y

National monuments which are the subject of preservation orders in County Wicklow

Appendix z

References

- Framework and Principles for the Protection of the Archaeological Heritage, Government of Ireland 1999a.
- The National Monuments Acts, 1930 – 1994.
- The Planning and Development Act, 2000
- The European Convention on the Protection of the Archaeological Heritage (revised) (Valetta, 1992).
- The Record of Monuments and Places for Wicklow.
- The Urban Archaeological Survey of County Wicklow - unpublished survey by J Bradley, A Halpin, H.A. King carried out for the OPW (198x).

Response of Chief Executive

This is clearly a very detailed submission and an excellent reference for the preparation of the nature conservation and archaeology sections of a development plan. For the most part however this submission is general in nature and does not relate specifically to Wicklow related nature conservation or archaeological issues. In addition, the submission includes recommendations for a number of areas to be addressed / included in the new County Development Plan that are already explicitly addressed in the existing County Development Plan.

Nevertheless, the issues raised are responded to as follows:

Nature Conservation

1. Review of Natural Heritage Policies and Green Infrastructure Strategy

The current Plan’s policies and objectives, including the Green infrastructure Strategy, are to be reviewed as part of this plan review process, and any new / updated provisions will be consistent with National and European plans, policies, objectives and guidance.

With respect to the suggestions regarding the All-Ireland Pollinator Plan / invasive species:

- The pollinator plan will be reviewed to establish what elements of same are relevant for inclusion in the County Development Plan – it is important to point out that the County Development Plan is not the sole implementation vehicle for all Council strategies or policies.
- The possibility of including objectives for pollinators in landscaping plans for new open spaces will be considered; the introduction of pollinator species in existing open spaces (including spaces owned / managed by the Council) would be an operational matter and would be best implemented through each department / MD that manages spaces.
- The County Development Plan is a land use framework, and therefore would have no remit to address the Council use of herbicide, which would be an operational matter.
- The requested measures regarding invasive species e.g. preparation of an action plan, would appear to be more issues for the Biodiversity Plan than the County Development Plan.

2. Integrated assessment

Wicklow County Council as required by statute will carry out Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment of the new plan and has engaged professional environmental expertise (CAAS Ltd) to assist in this process. With respect to the specific comments re nitrogen deposition, this will be evaluated by consultants and addressed if required in the SEA and AA.

3. Green infrastructure (GI) network review

The Department (DHPLG) has requested that the existing GI provisions be reviewed but has not precisely indicated what aspects of the current strategy / policies required alteration / enhancement. Reference is made to ‘networks’ and the new plan can certainly include reference to and maps of any additional GI sites / networks for which there is sufficient data.

4. Greenways

The advice provided regarding greenways is noted. Any plan objectives for specific greenways will, where necessary, be subject to Appropriate Assessment as required by legislation. With respect to development of any specific greenway project, the Department’s reminder regarding statutory obligations with respect to project EIA and AA are noted.

5. Maintenance of Roads within Wicklow Mountains National Park

The current Wicklow County Development Plan explicitly acknowledges that maintenance and improvements of the R756 (Wicklow Gap) must have due regard to the Natura 2000 designation of the Wicklow Mountains. This objective underwent Appropriate Assessment as part of the current plan. The current plan does not include specific objective for the improvement of the Sally Gap and no change in this regard is recommended at this time.

Archaeology

1. Statutory Obligations of Local Authorities. Development Plans and the Archaeological Heritage

- (a) The Planning and Development Act, 2000: The statutory obligations with respect to the conservation and protection of archaeology are noted, are addressed in the current plan and will continue to be addressed in the new plan.
- (b) The European Convention on the Protection of the Archaeological Heritage (Valetta, 1992): This convention is referenced in the current County Development Plan and will continue to be addressed in the new plan.

2. Protecting the Archaeological Heritage as an *Objective* within the Wicklow County Development Plan

The current County Development Plan includes a number of objectives relating to the protection of archaeological heritage. Due consideration will be given in the drafting of the new plan to the specific wording requested by the Department.

3. Specific Section/Chapter entitled ‘Archaeological Heritage’ as part of the Wicklow County Development Plan

The current County Development Plan includes a specific section on archaeology and it would be intended to retain same in the new plan. In addition, archaeological requirements for new development are set out in the ‘Development & Design standards’ of the current plan and it is intended to retain and enhance same in the new plan.

The suggested wording / objectives for inclusion in the section on archaeology in the new plan are noted; the majority of the suggested text is already in the current plan but due regard will be given to the suggested additional text.

With regard to some of the ‘general policies’ suggested, a number of these are not land use related policies, but rather suggestions around how the Planning Authority should deliver its heritage functions (e.g. suggestions regarding advice, guidance, public awareness programmes etc) and therefore it is not recommended that they be included in the new plan - these are matters that may be more appropriately addressed in the County Heritage Plan.

In the preparation of the landscape character assessment (LCA) of the current County Development Plan, archaeology and ‘Archaeological Landscapes’ were fully integrated into the process. It is not intended to review the LCA for the new County Development Plan.

The Record of Monuments and Places (RMP) is not reproduced in the current County Development Plan due to the vast number of sites in the county, which would render a map or list indecipherable. These records are however held in the Council’s GIS system and used as a matter of course in the assessment of development proposals. The Department provides an excellent online mapping service showing all such sites and providing excellent data regarding each entry.

The current County Development Plan does however include maps and schedules of ‘areas of archaeological potential and significance’ and ‘major sites of archaeological importance in Wicklow in state ownership or guardianship’. These lists include the historic towns and zones of archaeological potential detailed in the submission.

Underwater Archaeology: The current County Development Plan makes reference to underwater archaeology and existing objectives will be retained and enhanced in accordance with the advice provided.

Monuments or sites included in the Record of Monument and Places (RMP) located within the land holding of development proposals: The suggested objective is noted and will be considered in the drafting of the new plan.

Specific Operational Development Control Section on ‘Archaeological Heritage’: The suggested text is noted and will be considered in the drafting of the new plan.

4. Inclusion of Recorded Monuments on Maps

The current County Development Plan includes a record (schedule and maps) of all areas of importance for the archaeological heritage and it is intended this will be retained in the new plan. The recommendations regarding mapping and appendices will be considered in the preparation of the new plan.

Recommendations of Chief Executive

1. The Green Infrastructure Strategy of the new County Development Plan will take into account any new data or designations in Wicklow.
2. The new County Development Plan will address recommendations of the Pollinator Plan where relevant.
3. The new County Development Plan will contain updated schedules and maps of items / places of archaeological significance.
4. The new County Development Plan will integrate the policy recommendations of the Department wherever possible.

Issues raised

In order to ensure a high quality public service across all local authorities, the development of public libraries should adhere to the *Public Library Standards and Benchmarks* which have been developed through consultation with the Local Government Management Agency and local authorities. The county librarian for Wicklow, Brendan Martin, is a member of this working group.

A link to the current version of the document is below. The working group is currently revising this to include standard and benchmarks for the renovation of existing public libraries, the construction of new public libraries and facilities required for the provision of services.

<https://www.gov.ie/en/policy-information/7468fd-public-libraries/#public-library-standards-and-benchmarking>

Response of Chief Executive

This submission is noted but would appear to be more of an issue for the libraries development programme, rather than the County Development Plan. The current County Development Plan supports the development of the library services in the County, and it is intended that the new plan will include a similar provision.

Recommendations of Chief Executive

1. To continue to provide planning policy support for the libraries development programme in the new plan.

Issues raised

This is as combined submission in relation to both the Strategic Environmental Assessment of the new County Development Plan and the content of the County Development Plan itself. The submission includes the EPAs document ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’ which is not summarised here.

The EPA is one of five statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a ‘self-service approach’ via the attached guidance document ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority land use plans. We recommend that you take these recommendations into account in preparing the Plan and SEA.

Specific Comments**Critical service infrastructure**

In proposing and in implementing the Plan, you should ensure that the Plan is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.

Climate Action

In preparing the Plan, you should take into account the need to align with national commitments on climate change mitigation and adaptation, including those set out in the new *Climate Action Plan*, as well as incorporating any relevant recommendations and measures in sectoral, regional and local climate adaptation and mitigation plans.

The Agency recently published *Ireland’s Greenhouse Gas Emissions Projections for 2018-2040* (EPA, 2019) which should be taken into account in preparing the Plan, as appropriate and relevant.

We have also published an update of our existing good practice guidance note on how to incorporate climatic factors into plans and programmes falling under the remit of the SEA Directive – *Integrating Climatic Factors into the Strategic Environmental Assessment Process in Ireland* (EPA, 2019). Key climate-related aspects to consider in the Plan and SEA, where relevant, include:

- Direct and indirect impacts of the Plan on greenhouse gas emissions and removals (Mitigation)
- Direct and indirect impacts of climate change on the implementation of the Plan, e.g. the resilience of critical water service infrastructure to flooding and drought (Adaptation)
- The linkages between mitigation and adaptation (inter-relationships).

Coastal Zone Management

The Plan should include specific coastal zone management objectives and should consider future climate scenarios in terms of predicted higher sea levels and periods of increased frequency of storm conditions and associated flooding. The Plan should ensure the protection of ecological buffers/marshlands/estuaries, in order that the effects of coastal squeeze on protected

species/designated habitats can be managed appropriately where possible. The role which estuaries and marshes play in terms of flood alleviation could also be highlighted.

Integration of transport & land-use planning

The Plan should support the need for compact growth and better integration of transport and land-use planning, including walking and cycling infrastructure, public transport, park-and-ride facilities, etc.

Sustainable Development Goals

Describing the links with the UN Agenda 2030 for Sustainable Development and the related Sustainable Development Goals (SDGs) would help to frame the Plan (and SEA) within the context of the wider sustainable development agenda and ensure that the Plan is consistent with achieving the SDGs. Relevant targets and actions in Ireland’s SDG Implementation Plan (DCCA, 2018) should be integrated as appropriate into the Plan.

Biodiversity

Wicklow County Council should promote the need to protect non-designated aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity, and to ensure appropriate control and management measures for invasive species. To help protect and/or to enhance biodiversity in the Plan area, there is merit in assessing and incorporating any relevant habitat mapping available.

State of the Environment Report – Ireland’s Environment 2016

In preparing the Plan and SEA, the recommendations, key issues and challenges described within our most recent State of the Environment Report *Ireland’s Environment – An Assessment 2016 (EPA, 2016)* should be considered, as relevant and appropriate to the Plan. We are currently preparing the next iteration of Ireland’s Environment for 2020, which should be taken into account upon its publication.

Community Engagement

One of the key messages from our last State of the Environment Report (EPA, 2016) is the importance and value of Community Engagement. In preparing the Plan and carrying out the SEA (including developing alternatives), the need to proactively engage local communities should be a core consideration.

Available Guidance & Resources

Our website contains various SEA resources and guidance, including:

- SEA process guidance and checklists
- Inventory of spatial datasets relevant to SEA
- topic specific SEA guidance (including ‘*Developing and Assessing Alternatives in SEA*’, ‘*Integrating Climatic Factors into SEA*’ and ‘*Integrated Biodiversity Impact Assessment*’)

You can access these resources at: www.epa.ie/monitoringassessment/assessment/sea/

Environmental Sensitivity Mapping (ESM) Webtool

The ESM Webtool is a new decision support tool to assist SEA and planning processes in Ireland. The tool brings together over 100 datasets and allows users to explore environmental considerations within a particular area and create plan-specific environmental sensitivity maps. These maps can help planners anticipate potential land-use conflicts and help identify suitable development locations, while also protecting the environment. The ESM Webtool is available at www.enviromap.ie.

EPA SEA WebGIS Tool

Our SEA WebGIS Tool, available through the EDEN portal (https://gis.epa.ie/EIS_SEA/), allows public authorities to produce an indicative report on key aspects of the environment in a specific geographic area. It is intended to assist in SEA screening and scoping exercises.

EPA WFD Application

Our WFD Application provides a single point of access to water quality and catchment data from the national WFD monitoring programme. The Application is accessed through EDEN <https://wfd.edenireland.ie/> and is available to public agencies. Publicly available data can be accessed via the Catchments.ie website.

EPA AA GeoTool

Our AA GeoTool application has been developed in partnership with the NPWS. It allows users to a select a location, specify a search area and gather available information for each European Site within the area. It is available at: <http://www.epa.ie/terminalfour/AppropAssess/index.jsp>

Environmental Authorities

Under the SEA Regulations, you should also consult with:

- The Minister for Housing, Planning and Local Government
- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment
- where it appears that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht, and
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

Response of Chief Executive

The CE notes the role of the EPA with respect to Strategic Environmental Assessment, the data and assistance the EPA can provide the local authority in carrying out SEA, and Wicklow County Council’s obligations with respect to SEA, consultation etc. The Council has engaged the services of environmental consultants (CAAS Ltd) to assist in the Strategic Environmental Assessment process.

The EPA document ‘*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*’ will be utilised by the Council and its consultants in the preparation of the Strategic Environmental Assessment and the plan itself.

Specific Comments

Critical service infrastructure: In the development of the new plan, particular regard will be taken of the need for adequate and appropriate critical service infrastructure to service any development proposed and authorised during the lifetime of the Plan. As set out in Part 3 of this report (Proposed Draft Core Strategy), the availability of existing or planned infrastructure, particularly water and wastewater services, are key parameters in the setting of growth targets for all settlements.

Climate Action: In the development of the new plan, particular regard will be taken of the need to align with national commitments on climate change mitigation and adaptation, including those set out in the new *Climate Action Plan, Ireland’s Greenhouse Gas Emissions Projections for 2018-2040* and *Integrating Climatic Factors into the Strategic Environmental Assessment Process in Ireland*.

Key climate-related aspects to consider in the Plan and SEA, where relevant, include:

Coastal Zone Management: The current County Development Plan includes specific coastal zone management objectives and it is intended that these will be maintained and enhanced where necessary in the new plan in light of the EPA’s advice.

Integration of transport & land-use planning: It is intended that the new plan will support the need for compact growth and better integration of transport and land-use planning, including walking and cycling infrastructure, public transport, park-and-ride facilities, etc.

Sustainable Development Goals: The UN Agenda 2030 for Sustainable Development, the related Sustainable Development Goals (SDGs) and Ireland’s SDG Implementation Plan (DCCAE, 2018) will be addressed in the new plan as relevant.

Biodiversity: The current County Development Plan promotes the need to protect non-designated aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity, and to ensure appropriate control and management measures for invasive species and it is intended that this will be maintained and enhanced in the new plan as relevant. Any available relevant habitat mapping will be utilised.

State of the Environment Report – Ireland’s Environment 2016: The recommendations, key issues and challenges described within our most recent State of the Environment Report Ireland’s Environment – An Assessment 2016 (EPA, 2016) will be considered in the preparation of the new plan and Strategic Environmental Assessment.

Community Engagement: Public consultation is a core part of the plan preparation process and the Council will continue to engage with the community at the appropriate stages of the plan making process.

Recommendations of Chief Executive

1. The new plan and associated Strategic Environmental Assessment shall take into account the recommendations, data sources and advice of the EPA.
2. In the development of the new plan, particular regard will be taken of the need for adequate and appropriate critical service infrastructure to service any development proposed and authorised during the lifetime of the Plan.
3. In the development of the new plan, particular regard will be taken of the need to align with national commitments on climate change mitigation and adaptation.
4. The new plan shall address coastal zone management.
5. The new plan will support the need for compact growth and better integration of transport and land-use planning, including walking and cycling infrastructure, public transport, park-and-ride facilities, etc.
6. The new plan shall promote the need to protect non-designated aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity.
7. The UN Agenda 2030 for Sustainable Development, the related Sustainable Development Goals (SDGs) and Ireland’s SDG Implementation Plan (DCCAE, 2018) will be addressed in the new plan as relevant.

Issues raised

OPW welcomes the opportunity to comment on the Issues Paper in the preparation of a new County Development Plan for the period 2021-2027 and acknowledges the commitment given by Wicklow County Council to carry out a Strategic Flood Risk Assessment (SFRA) as part of the Environmental Assessment with the objective of avoiding inappropriate development in areas at risk of flooding and avoiding new development increasing flood risk elsewhere. To ensure the appropriate integration of flood risk management into the County Development Plan OPW provide the following information which may inform the preparation of the Draft Plan.

Flood Risk Management

The Planning System and Flood Risk Management Guidelines for Local Authorities (2009), associated Circulars and Technical Appendices must be used to ensure that the key principles of flood risk management are adopted and that the sequential approach to managing flood risk is considered at the earliest stage in the planning process. Where uncertainty exists the precautionary approach should be taken or further more detailed assessment carried out before decisions are made. A three Stage Flood Risk Assessment process is to be followed by the Planning Authority to identify whether flood risk exists and the degree to which it is an issue and assessment to a scale proportionate to the risk then carried out. The following is an overview of this three-stage process;

Stage 1 Flood risk identification – this is to identify whether there may be any flooding or surface water management issues related to a plan area or proposed development site that may warrant further investigation.

Stage 2 Initial flood risk assessment – to confirm sources of flooding that may affect a plan area or proposed development site, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve preparing indicative flood zone maps. Where hydraulic models exist the potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment should be scoped; and

Stage 3 Detailed flood risk assessment – to assess flood risk issues in sufficient detail and to provide a quantitative appraisal of potential flood risks to a proposed or existing development or land to be zoned, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

OPW recommend that particular attention be paid to;

- Section 3.1 Planning Principles in the Planning Guidelines,
- Section 3.2 Sequential Approach in the Planning Guidelines,
- Chapters 3 and 4 relating to the Plan-making Justification Test and the Development Management Justification Test where it is intended to zone or otherwise designate land which is at moderate or high risk of flooding. Any justification tests required should be clear and concise and be accompanied by a map or figure demonstrating the site and details of the proposed changes.
- Any figures or maps, particularly those relating to flood risk or zoning should;
 - be clear and concise in nature and should include flood extents identifying Flood Zones A, B and C as appropriate,
 - Identify the previous zoning designation and proposed zoning designation.

Response of Chief Executive

The CE welcomes the advice of the OPW in relation to flood risk. The County Development Plan will be accompanied by a Strategic Flood Risk assessment in accordance with the principles and requirements of the guidelines.

Recommendations of Chief Executive

1. To carry out SFRA in accordance with '*The Planning System and Flood Risk Management Guidelines for Local Authorities*' (2009) and associated Circulars and Technical Appendices.

Issues raised

Irish Water (IW) welcomes the opportunity to comment on the Issues Paper for the preparation of a new County Development Plan for Wicklow for the period 2021-2027.

Wastewater Infrastructure

The table below gives a general comment on capacity in the main urban settlements. Prior to the completion of the draft Core Strategy (for Stage 2 Consultation), IW will have completed the 2019 Capacity Register for treatment plants in Wicklow, and will be able to discuss in more detail, the following and other settlements:

Wastewater Treatment Plant (WWTP)	Census Population (2016)	Capacity Available
Shanganagh WWTP	32,600	Capacity
Greystones WWTP	18,140	Capacity
Wicklow WWTP	13,954	Capacity
Arklow WWTP	13,163	Constrained, Project Underway
Blessington WWTP	5,520	Constrained, Project Underway
Kilcoole WWTP	4,239	Capacity
Baltinglass WWTP	2,137	Limited - Under Review
Enniskerry WWTP	1,889	Capacity
Rathdrum WWTP	1,663	Capacity
Aughrim WWTP	1,442	Constrained
Kilpedder WWTP	1,255	Very Limited Capacity
Carnew WWTP	1,052	Limited Capacity

With regard to the wastewater network, it should be noted that parts of the Bray catchment form part of the Bray-Shanganagh Drainage Area Plan, which is currently being undertaken by Irish Water. The study will identify, and make recommendations to resolve, any issues with the current network.

Water Infrastructure

Wicklow has 35 water resource zones and the supply across the county is managed using the interconnectivity between the zones. The National Water Resources Plan team are currently assessing the optioneering proposals for the 25 year plan, to address the water need for Wicklow county to deliver secure, reliable and sustainable long-term water supplies which facilitate domestic and economic development (subject to the constraints of the Irish Water Capital Investment Programme).

Suggested Text for the draft CDP

With reference to the current CDP, we suggest the inclusion of the following updated text (or similar) for Chapter 9 Infrastructure.

Context: Irish Water is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of Irish Water to provide both drinking water and wastewater capacity to facilitate growth in accordance with core strategies at county level, and with national and regional planning policies and objectives (subject to the constraints of the Irish Water Capital Investment Programme). Wicklow County Council retains its role in facilitating the provision of adequate water services, in conjunction with Irish Water, at a local level, through Service Level Agreements (SLAs).

The National Water Resources Plan: Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country.

The Water Services Strategic Plan: In 2015 Irish Water published its Water Services Strategic Plan (WSSP), which sets out strategic objectives for the delivery of water services over a 25 year period and sets a context for investment and implementation plans. This plan is reviewed every five years. Irish Water and Wicklow County Council will continue to work together to identify the water services required to support planned development in line with national and regional planning policies for inclusion in the Irish Water Capital Investment Plans.

Irish Water Capital Investment Plan: The Capital Investment Programme (CIP) of Irish Water outlines the indicative priorities and investments in water services infrastructure over the plan period. This CIP aims to deliver improvements in drinking water quality, leakage, wastewater compliance, business efficiencies and customer service. The CRU review and approve the CIP, the next programme will cover the period from 2020 – 2024.

Suggested Policies – Water Supply & Distribution

It is the policy of the Council to work in conjunction with Irish Water to protect existing water infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water services infrastructure to facilitate future growth.

Objective 1

To protect both ground and surface water resources and to work with Irish Water to develop and implement Water Safety Plans to protect sources of public water supply and their contributing catchment.

Objective 2

To ensure that adequate water services will be available to service development prior to the granting of planning permission for those developments and to require developers to consult Irish Water regarding available capacity, prior to applying for planning permission.

Objective 3

To minimise wastage of water supply by requiring new developments to incorporate water conservation measures

Objective 4

Provide guidance and advice regarding the protection of water supply to private wells with the overall responsibility remaining with the householder.

Objective 5

Promote the sustainable use of water and water conservation in existing and new development within the County and encourage demand management measures among all water users.

Suggested Policies – Wastewater Collection and Treatment

It is the policy of the Council to work in conjunction with Irish Water to protect existing wastewater infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new wastewater services infrastructure to facilitate future growth.

Objective 6

Liaise with and work in conjunction with Irish Water during the lifetime of the plan for the provision, extension and upgrading of waste water collection and treatment systems in all towns and villages of the County to serve existing populations and facilitate sustainable development of the County, in accordance with the requirements of the Settlement Strategy and associated Core Strategy.

Objective 7

Liaise with Irish Water to ensure the provision of wastewater treatment systems in order to ensure compliance with existing licences, *EU Water Framework Directive, River Basin Management Plans, the Urban Waste Water Directive and the EU Habitats Directive.*

Objective 8

To prohibit the discharge of additional surface water to combined sewers and promote Sustainable Urban Drainage Systems (SUDs) and solutions to maximise the capacity of towns with combined drainage systems.

Objective 9

To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems.

Objective 10

To promote the changeover from septic tanks to collection networks in all cases where this is feasible (subject to connection agreements with Irish Water) and that all new developments utilise and connect to the public wastewater infrastructure.

Objective 11

To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area, and to ensure that appropriate flood management measures are implemented to protect property and infrastructure

Objective 12

To refuse residential development that requires the provision of private waste water treatment facilities, other than single house systems.

Objective 13

To ensure that private wastewater treatment plants, where permitted, are operated in compliance with their wastewater discharge licence, in order to protect water quality. (*EPA’s Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended*).

Suggested Policies – Water Quality and Groundwater Protection

The Council supports the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, the Council supports mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans.

Objective 14

Manage, protect and enhance surface water and groundwater quality to meet the requirements of the EU Water Framework Directive.

Objective 15

Ensure, through the implementation of the River Basin Management Plan(s), and any other associated legislation, the protection and improvement of all drinking water, surface water and ground waters throughout the county.

Objective 16

The provision of individual septic tanks and treatment plants will be strongly discouraged, to minimise the risk of groundwater pollution.

Objective 17

When identifying areas for development, to ensure that full consideration is given to the level of investment that will be required in the provision of water services – particularly in environmentally sensitive areas - to ensure that the provision of water services does not negatively impact on habitat quality, species diversity or other environmental considerations.

Response of Chief Executive

The information regarding wastewater capacity and upgrades planned is noted and will be taken into account in the formulation of the new Core Strategy and the Strategic Environmental Assessment.

Suggested text for the draft County Development Plan: The suggested text is noted and will be considered in the review of the plan.

Suggested Policies – Water Supply & Distribution, Wastewater Collection and Treatment and Water Quality and Groundwater Protection: The suggested policies are noted and will be considered in the review of the plan.

Recommendations of Chief Executive

1. To integrate the suggested policies and objectives of IW into the new plan where appropriate.

Issues raised**Legislative Context**

Section 31B of the Planning and Development Act (2000, as amended) states that where a notice is received by the NTA of the intention of a planning authority to review its development plan and prepare a new development plan, it shall prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority. This report shall address, but shall not be limited to—

- a) the transport investment priorities for the period of the development plan;
- b) the scope, if any, to maximise the performance of the transport system by effective land use planning;
- c) recommendations regarding the optimal use, location, pattern and density of new development taking account of its transport strategy; and
- d) recommendations on the matters to be addressed in the development plan to ensure effective integration of transport and land use planning.

Transport Planning Context

The NTA, in cooperation with Wicklow County Council, Dún Laoghaire-Rathdown County Council and Transport Infrastructure Ireland, published the Bray and Environs Transport Study in 2019. This study set out in detail a number of further measures at the local level, elaborating on those contained in the Transport Strategy for Bray and surrounding areas. It is recommended that the findings of this study are taken into consideration in the preparation of the Draft County Development Plan.

(i) Transport Investment Priorities for County Wicklow

The transport investment priorities for County Wicklow are set out in the Transport Strategy which applies to the period 2016 to 2035, and further developed for Bray and surrounding areas in the 2019 Bray and Environs Transport Study. In order that the Draft Development Plan fulfils its requirement for consistency with the Transport Strategy objectives, it is recommended that the following schemes are included. These schemes comprise the transport priorities for the period of the Development Plan up to 2026 and beyond to 2035:

1. Public Transport

- a. Facilitation of increased rail service frequency on the south east corridor as part of the DART Expansion Programme;
- b. Station upgrades and enhancements;
- c. Other works to maintain the operational efficiency and safety of the railway network and additional works to enhance service provision;
- d. Luas to Bray;
- e. Interchange at Bray Station;
- f. BusConnects Bray to UCD Core Bus Corridor;
- g. Priority for bus on Lower Dargle Road;
- h. Further priority measures for bus services from Fassaroe to Bray town centre and DART station;
- i. Busway from Fassaroe to Old Connaught over County Brook at Ballyman Glen;
- j. Public Transport, Pedestrian and Cycle Bridge and link from the Golf Club Lands to Bray DART Station;
- k. Upgrades to bus stops, shelters and interchange facilities at key bus and bus/rail hubs; and

- I. Enhancement of the Rural Transport service.

2. Cycling

- a. The implementation of the GDA Cycle Network Plan;
- b. Cycle and Pedestrian Bridge over the N11 from Fassaroe;
- c. Provision for sufficient on-street public cycle parking at key destinations such as bus and rail stations, schools, colleges, hospitals and large workplaces, particularly in urban areas;
- d. Implementation of a comprehensive cycle route signage programme in conjunction with the development of the cycle network; and
- e. Cooperation with other agencies in the enforcement of laws in relation to parking on cycle lanes and cycle tracks.

3. Walking

- a. Provision of a safer, more comfortable and more convenient walking environment for those with mobility, visual and hearing impairments, and for those using buggies and prams;
- b. Development, in collaboration with the NTA, of a strategic pedestrian network plan, encompassing the main urban centres of the county, which will identify the key pedestrian linkages in those areas;
- c. Enhancement of pedestrian movement along the strategic pedestrian routes by widening footpaths where appropriate, providing better surfacing and by removing unnecessary poles, signs, street cabinets, advertising and other street clutter;
- d. Identification and implementation of pedestrianisation schemes where appropriate, particularly in central areas of high pedestrian footfall, such as shopping streets;
- e. Revision of road junction layouts, where appropriate, to provide dedicated pedestrian crossings, reduce pedestrian crossing distances, provide more direct pedestrian routes, and reduce the speed of turning traffic;
- f. Reduce waiting time for pedestrians at crossings in urban centres;
- g. Delivery of pedestrian information and wayfinding signage in urban centres across the GDA;
- h. Evaluation, and where appropriate, introduction of lower speed limits on residential streets and in urban centres;
- i. Cooperation with other agencies in the enforcement of laws in relation to parking on footpaths;
- j. Pedestrian permeability provision in new developments, and the maintenance, plus enhancement where appropriate, of such arrangements in existing developments; and
- k. The maintenance of enhancement of permeability and accessibility of public transport stops and stations for local communities.

4. Roads

- a. Capacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford);
- b. Delivery of Wicklow County Council Part 8 N11 capacity and safety upgrades, as approved;
- c. Interim Traffic Management Measures Framework to protect strategic function of the N/M11 arising from the initial phased development of Fassaroe;
- d. New Road Bridge from Herbert Road to Upper Dargle Road;
- e. The development of a Traffic Management Plan for Bray Town Centre;
- f. Provision of necessary upgrades to the national secondary road network in line with the “Principles of Road Development” set out in section 5.8.3 of the Transport Strategy;
- g. Various signage, safety interventions, junction improvements and local reconfigurations on the national road network; and
- h. Enhancement of regional and local roads in line with sections 5.8.2 and 5.8.3 of the Transport Strategy;

5. Other
 - a. Implementation of Demand Management measures in line with section 5.9 of the Transport Strategy; and
 - b. Park and Ride facilities according to the emerging investment programme of the NTA’s Park and Ride Office.

While the manner in which these schemes are provided for in the County Development Plan is a matter for the local authority, the NTA recommends that the maximum level of clarity possible is provided by the use of and reference to the above wording, or to the texts of the Transport Strategy and/or the Bray and Environs Transport Study.

(ii) The Scope to Maximise the Performance of the Transport System by Effective Land Use Planning

The scope to maximise the performance of the transport system through land use planning will be determined by the extent to which the local authority directs development into those locations which facilitate the prioritisation of public transport, walking and cycling. The NTA recommends therefore that the Draft County Development Plan Core Strategy allocates population and employment growth into settlements which can demonstrate capacity to absorb such growth in a sustainable manner, and will benefit from enhanced transport infrastructure and services as part of the Transport Strategy, in accordance with the objectives of the National Planning Framework and Regional Spatial and Economic Strategy.

(iii) Recommendations Regarding the Optimal Use, Location, Pattern and Density of New Development

Chapter 7 of the Transport Strategy sets out the principles regarding the optimal use, location, pattern and density of new development. The NTA recommends that these principles, set out below, are fully taken into account in the draft County Development Plan:

Strategic Planning Principles

- Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations;
- To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised;
- High volume, trip intensive developments, such as offices and retail, should primarily be focused into Bray, Greystones, Wicklow and Arklow;
- Except in limited circumstances, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high capacity public transport;
- The strategic transport function of national roads, including motorways, should be protected by the full implementation of the “Spatial Planning and National Roads - Guidelines for Planning Authorities”;
- All non-residential development proposals should be subject to maximum parking standards and based on public transport accessibility;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied; and
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

Application

These principles can most effectively be applied by focussing growth into medium to high density residential, commercial and mixed-use developments on high-capacity public transport corridors, with an emphasis on existing rail lines. The NTA recommends that these principles are applied to the development of the Core Strategy and to the review of any zoning which is undertaken as part of the County Development Plan process. In the case of zonings that are to be reviewed as part of future Local Area Plans, the NTA recommends that the County Draft Development Plan includes policies and objectives which ensure that the above principles are applied as part of such exercises.

(iv) The Matters to be Addressed in the Development Plan to Ensure Effective Integration of Transport and Land Use Planning

It is recommended that the County Development Plan sets out clearly the manner in which land use plans will ensure that the transport matters above have been fully considered. There are a number of ways in which this will be achieved, as follows:

- Review of NTA Transport Strategy for the Greater Dublin Area – the Transport Strategy is required to be reviewed every 6 years. As such, a review will commence and be complete within the timeframe of this County Development Plan. The alignment and consistency of the County Development Plan and the Transport Strategy is of paramount importance to the effective integration of transport and land use planning, and it is recommended that this relationship is clearly set out in the plan. The NTA will work closely with Wicklow County Council and all other relevant agencies in defining the manner of this relationship given that the current Transport Strategy is the first to be prepared and approved under the Dublin Transport Authority Act, 2009 and that the next Transport Strategy and Wicklow Draft County Development Plan will be the first prepared under the provisions of the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly.
- Local Transport Plans – the NTA is committed to the preparation of local transport plans for large settlements within Wicklow. These documents will set out the local application of the transport priorities and associated measures outlined above. Each plan will be based on a set of clear objectives; the most recent demographic and travel information; and take into account the policies and objectives of Wicklow County Council, insofar as they align with those of the NTA. By undertaking such plans, the effective integration of land use and transport provided for by the Transport Strategy at the regional level, will be provided for at the local level through close cooperation between the NTA and the Wicklow County Council. It is recommended that the Draft County Development Plan sets out an approach to this matter by reference to these plans.

Response of Chief Executive

- 1. Legislative Context:** The CE notes the legislative context of the NTA’s submission, and it is intended that the new plan will address:
 - the transport investment priorities for the period of the development plan;
 - the scope, to maximise the performance of the transport system by effective land use planning;
 - recommendations regarding the optimal use, location, pattern and density of new development taking account of its transport strategy; and
 - recommendations on the matters to be addressed in the development plan to ensure effective integration of transport and land use planning.

2. **Transport Planning Context:** The CE notes the contents of the Bray and Environs Transport Study of 2019; it is intended that those aspects of the study that are relevant for the new County Development Plan (i.e. have a wider significance than for local transportation in Bray only) will be addressed in the new plan.
3. **Transport Investment Priorities for County Wicklow:** The transport investment priorities for County Wicklow set out in the Transport Strategy 2016 to 2035 will be taken into account in the preparation of the new plan.

Public Transport: A number of the schemes / improvements listed in the submission are included in the current plan; this will be reviewed, improved and expanded as required in light of this submission and new programmes since the adoption of the current plan in 2016.

Walking and Cycling: Particularly due to climate change and health concerns, there is a much stronger focus today on sustainable modes of transport, particularly on walking and cycling. It is recommended that the provisions of the current County Development Plan be significantly enhanced to address this area and in this regard, the advice and recommendations of the NTA will be taken on board insofar as is possible in the new plan.

Roads: A number of the schemes / improvements listed in the submission are included in the current plan; this will be reviewed, improved and expanded as required in light of this submission and new programmes since the adoption of the current plan in 2016.

Other: The Demand Management measures outlined in this submission in line with Section 5.9 of the Transport Strategy will be considered in the drafting of the new plan; Wicklow County Council will maintain close contact with the NTA with regard to the emerging investment programme for Park and Ride facilities and this will be addressed in the new plan where possible.

4. **The Scope to Maximise the Performance of the Transport System by Effective Land Use Planning:**

The policies, objectives and zonings that will be set out in the new plan will have at their core the need to direct development into those locations which facilitate the prioritisation of public transport, walking and cycling. It is intended that the new plan (as set out in the proposed draft Core Strategy detailed in Part 2 of this report) will target housing and employment growth into settlements which can demonstrate capacity to absorb such growth in a sustainable manner.

5. **Recommendations Regarding the Optimal Use, Location, Pattern and Density of New Development**

The principles set out in chapter 7 of the Transport Strategy will be taken into account in the draft County Development Plan and in particular in the Core Strategy.

6. **The Matters to be Addressed in the Development Plan to Ensure Effective Integration of Transport and Land Use Planning**

It is intended that the new plan will set out as clearly as possible how the Transport Strategy has influenced the plan and how transport matters are addressed.

Recommendations of Chief Executive

1. The new plan shall fully take into account the provisions of the NTA Transport Strategy, including the transport investment priorities, and the advice and recommendations of this submission.
2. The policies, objectives and zonings that will be set out in the new plan will have at their core the need to direct development into those locations which facilitate the prioritisation of public transport, walking and cycling.
3. To target housing and employment growth into settlements which can demonstrate capacity to absorb such growth in a sustainable manner.
4. The provisions of the current County Development Plan regarding walking and cycling to be significantly enhanced and in this regard, the advice and recommendations of the NTA will be taken on board insofar as is possible in the new plan.
5. Notwithstanding the fact that these matters are already addressed in the Bray MD Local Area plan 2018, the new County Development Plan shall provide more information and policy support relating to the development of the Regional Spatial and Economic Strategy designated ‘strategic sites’ in Bray (Bray golf club and Fassaroe) and the transportation intervention that are needed to support same as set out in the Bray & Environs Transport Study.

Issues raised

The Authority welcomes consultation on the review of the Council’s Development Plan and the preparation of a new County Development Plan. The Authority submits the following observations for the Councils consideration which may inform the preparation of the Draft County Development Plan.

1. MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T regulations target a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). The TEN-T regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport, co-ordinated to achieve integrated and intermodal long-distance travel routes across Europe.

The M/N11 corridor is a strategic road corridor of national significance providing access to the south east of the country, in addition to providing access to international markets for freight and tourist traffic through Rosslare Euro-port. The Council will be aware that the national primary road corridor is identified as part of the TEN-T Comprehensive Network. Such a designation has repercussions and action requirements for policies and objectives which should be considered in the preparation of the new County Development Plan. The international dimension is reflected in the Eastern and Midland Assembly Regional Spatial and Economic Strategy (EMRA RSES) Regional Policy Objective RPO 8.16.

RPO 8.16: Support the improvement and protection of the TEN-T network to strengthen access routes to Ireland’s ports, including investment in the ongoing development of the N11/M11 to improve connectivity to Rosslare and improvements to the Dublin-Wexford Rail line.

In addition to the M/N11, the N81, national secondary road, facilitates important regional and inter-regional connectivity within and through County Wicklow.

Project Ireland 2040 | National Development Plan, 2018 – 2027, outlines the investment priority to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the National Planning Framework.

The routes identified above are important strategic national roads and give access to regional and international markets, including through strategic airport and port locations as well as linking with other strategic national roads.

It is of particular importance that policies and objectives are drafted which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve economic competitiveness and regional accessibility by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

There is a critical need to manage these assets in accordance with national and regional policy as outlined in Smarter Travel (DTTAS, 2009), (SFILT) Investing in our Transport Future (DTTAS, 2015), the provisions of the Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning

Authorities (2012), Project Ireland 2040 and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES).

TII requests that the County Development Plan reflects the foregoing provisions of official policy and national objectives in relation to spatial planning and national roads.

2. DEVELOPMENT AND CORE STRATEGY

As demonstrated in this submission, the Authority seeks to ensure that the carrying capacity, operational efficiency, safety and national investment made in national roads in Wicklow continue to be safeguarded and that the relevant policies/objectives included in the County Development Plan are developed to reflect this.

In particular, the Authority requests that the Council consider the implications of land use policies on the strategic national road network in the area as a criterion in determining the future land use zoning strategy to be outlined in the Draft Development Plan and the respective Core Strategy.

The Authority respectively points out that although a requirement may be identified for the development of a particular location, any local transport function of national roads in respect of such areas is, and must continue to be, secondary to the role of these roads in catering for strategic traffic. Such an approach, consistent with the provisions of official policy, supports access to markets and economic growth. In addition, proposals should not be developed that are to the detriment of the investment in national infrastructure, by eroding or undermining that investment, which is required to service the Country’s major inter-urban and inter-regional transport requirements and underpins economic competitiveness.

Policies and objectives in identified urban growth areas can be developed and adopted so as to avoid undermining the strategic transport function of national roads. Measures to cater for the needs of local traffic and local development related traffic are appropriately addressed within a framework of providing an adequate local transportation infrastructure. The Development Plan is the policy document to set this framework at county level. Where strategic frameworks for development proposals are agreed, e.g. Fassaroe, any agreed measures or approaches to development and development phasing should be included in the Development Plan in the interests of clarity.

In accordance with Government policy, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development being framed within a coherent integrated land use and transportation strategy. In addition to the review of the extent and location of residential lands in accordance with core strategy requirements, the Council may consider it appropriate to review the extent and location of industry, employment and other commercial type land uses to prepare a co-ordinated and integrated land use pattern; the Guidance Note on Core Strategies published by the DoECLG (2010) contains advice on this requirement, page 8 refers.

The Authority recommends that residential, retail, and employment objectives especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car so that the variety of residential, enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society.

This will be particularly relevant to Bray and Wicklow – Rathnew identified as Key Towns in the EMRA RSES while ensuring the complementary objective of supporting the improvement, and protection, of the EU TEN-T network and the strategic function of the M/N11.

Similarly, the Council should consider the development objectives and zoning designations located at and in the vicinity of junctions on the M/N11 strategic road corridor currently included in the Wicklow County Development Plan, 2016 – 2022, including Objectives EMP 12 and CD 17 and associated lands. TII recommends a review of such proposals in the interests of adherence to the provisions of the foregoing official policy.

As indicated in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including major junctions and interchanges, development plans should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future by:

- protecting undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements;
- ensuring that capacity enhancements and or traffic management measures will be put in place to facilitate new development; and
- improving operational efficiency of the regional and local road and transportation infrastructure – e.g. where appropriate, promoting new regional and local road networks and alternative modes.

The Council is also advised that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising to the national roads network to accommodate local development proposals will be borne by the local authority and will not be funded by TII and thus should be integrated within future local development contributions schemes.

In TII’s opinion, the co-ordination of land use planning and transportation will be critical to achieving the complementary objectives of compact urban growth while safeguarding the strategic function of the M/N11 Corridor.

In that regard, TII acknowledges the Regional Policy Objectives related to Bray in the EMRA RSES including the promotion of the consolidation of the town centre (RPO 4.39) and the acknowledgement that the development of Bray – Fassaroe should be undertaken in collaboration between Wicklow County Council, Dún Laoghaire-Rathdown County Council and the transport agencies to ensure delivery of enabling transportation infrastructure and services (RPO 4.40).

a. Development at national road junctions

In addition to the Core Strategy and general development strategy safeguarding the strategic inter-urban and inter-regional function of national roads, as outlined above, it will be important for the Council to exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

Proposals for development and land use zoning designations at national road interchanges and junctions require careful consideration and any proposals should be prepared in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines. TII remains

available to assist the Council in preparing Strategic Transport Assessments to address development proposals in the proximity of national roads where such proposals are demonstrated as being in accordance with the provisions of official policy in the first instance. The Council will be aware that Section 2.7 of the DoECLG Guidelines do not extend to include retail and residential development.

As outlined, Draft Development Plan policies should reflect and safeguard the strategic role of the national road network and associated junctions in catering for the safe and efficient movement of inter-urban and inter-regional traffic. Planning authorities, in considering proposals for zonings adjacent or close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres.

It should be noted that whilst the Authority recommends that traffic and transport assessments be carried out for individual planning applications as part of the development management process, this is not a substitute for a prior overall transport assessment of areas where the planning authority is determining fundamental issues of land use and transportation. Leaving the overall transport assessment of areas to individual applicants' transport assessments is considered highly inappropriate and would lead to a piecemeal and unsustainable approach to development in the vicinity of the strategic national road network. Such an approach is particularly relevant for planned growth areas in the County and within the higher tiered settlements.

The Council will be aware that Section 8.3 of the EMRA RSES outlines the policy to apply the guiding principle that the strategic transport function of national roads and associated junctions should be maintained and protected in statutory land use plans. Therefore, as outlined above, in the context of official policy there is a requirement to carefully consider a review of Objectives EMP 12 and CD 17 and associated lands in the existing Development Plan. In TII’s opinion, this matter requires careful consideration and the preparation of appropriate evidence based analysis to ensure the continued development of Key Towns in the Region and other settlements in the County complementary with maintaining the strategic transport function of national roads and associated junctions.

It is the Authority’s opinion that the Council should give consideration to undertaking appropriate Area Based Transport Assessment and/or Strategic Transport Assessment (STA) to support the preparation of the Draft County Development Plan, particularly, in relation to areas of planned development which have an interface with the national road network. Section 1.4 of the NRA/TII Traffic and Transport Assessment Guidelines (2014) refers. In addition, guidance is also available in TII Publications PE-PDV-02046 Area Based Transport Assessment (ABTA) Guidance Notes, jointly prepared by TII and the NTA.

TII also notes the requirement to undertake Local Transport Plans for Arklow, Wicklow – Rathnew and certain large settlements or development areas within the Dublin Metropolitan Area included in the EMRA RSES. TII would welcome consultation with the Council in relation to such proposals where there may be implications for the national road network.

b. Access to national roads

The DoECLG Spatial Planning and National Roads Guidelines also advise, Section 2.5 refers, that development plans should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply. It is requested that this official policy provision is reflected in the Development Plan.

There is also a requirement to co-ordinate proposed zoning designations and/or access strategies in the Development Plan and accompanying settlement plans, as appropriate, with speed limits on national roads.

c. ‘Exceptional Circumstances’

Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be plan led, done in consultation with and subject to the agreement of TII in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines.

The Council may also wish to consider cases relating to any planned strategic infrastructure development proposals. TII would welcome and is available to discuss proposals in relation to Section 2.6 of the Guidelines with the Executive of Wicklow County Council for incorporation into the new Development Plan. It will be important that the appropriate evidence base is developed to support any proposals in this regard.

3. TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES

As you are aware the Authority is developing/progressing road schemes and improvements within County Wicklow, details of which should be considered for incorporation into the review of the County Development Plan. The following scheme is included as a Scheme in Pre-Appraisal/Early Planning in Project Ireland 2040|National Development Plan, 2018 – 2027;

▪ **M11 from Junction 4 M50 to Kilmacanogue**

In addition to the above, a number of road schemes nationally are suspended. In County Wicklow the N81 Tallaght to Hollywood Cross Scheme is one such scheme.

The Authority’s other priorities in relation to national roads are the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date.

Planning authority policies and objectives, including rezoning of lands, should not compromise the road planning and route option evaluation process in circumstances where road scheme planning is underway and potential routes have been identified and brought to the attention of the planning authority, including schemes that may currently be suspended. Similarly, development strategies or rezoning proposals should not have the effect of altering the function of these routes or importantly, increase the cost of land to be acquired or under active consideration as a route option for a national road scheme. Such proposals, while potentially bringing major financial gains to the property owners involved, would be at variance with the broader public interest and would, by significantly increasing the cost of the land to be acquired for road schemes, reduce the funding available to the Authority for road construction and improvement work generally.

The Council may also consider it appropriate to identify any local improvements to national roads planned by the Council over the term of the Development Plan that may be incorporated into the adopted plan. The Authority advises that while any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements. Any additional connectivity to national roads should be developed in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012).

Related to the foregoing, the Authority requests the inclusion of policies and objectives in the Development Plan that provide for the following:

- objectives providing for development of the relevant national road schemes,
- a policy to protect routes of national road schemes free from adverse development that may compromise the development of route options or the construction of preferred routes, or add to the overall costs associated with proposed schemes.

The Council will be aware that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances and taking account of the Exchequer financial position and levels of funding available to the Authority, the relative priority or timeframe for national road schemes may be subject to alteration.

4. OTHER SPECIFIC POLICIES AND OBJECTIVES

a. Road Safety

The Road Safety Authority’s Road Safety Strategy, 2013 – 2020, builds on existing road safety interventions, but reframes the way in which road safety is viewed and managed in the community. It addresses all elements of the road transport system in an integrated way with the aim of ensuring collision energy levels are below what would cause fatal or serious injury. It requires acceptance of shared overall responsibilities and accountability between system designers and road users and it stimulates the development of innovative interventions and new partnerships necessary to achieve ambitious long term road safety targets.

Therefore, the design of development proposals must address the functionality and safety of the road needs. Two processes specifically address these design concerns: Road Safety Impact Assessment (RSIA) and Road Safety Audit (RSA).

- **Road Safety Impact Assessment (RSIA)** is described in the EU Directive on Road Infrastructure Safety Management (EU RISM) 2008/96/EC as a strategic comparative analysis of the impact of a new road, or for substantial modifications to an existing road, on the safety performance of the road network (refer to TII Publications Planning and Evaluation PE-PMG-02001 Road Safety Impact Assessment).
- **Road Safety Audit (RSA)** involves the evaluation of road schemes during design, construction and early operation to identify potential hazards to all road users. RSA is to be carried out on all new national road infrastructure projects and on any schemes/proposal which results in a permanent change to the layout of a national road (refer to TII Publications GE-STY-01024 Road Safety Audit).

RSIA is a separate process to RSA. While RSA examines the safety aspects within a scheme, RSIA considers the safety impact of a scheme on the surrounding road network. RSIA and RSA both work to improve the safety performance of new roads and existing roads that require modifications due to projects or proposals. Both have consequences for the design and layout of any project.

b. Traffic and Transport Assessment (TTA)

As referenced in the observations above, the Authority recommends that planning applications for significant development proposals should be accompanied with TTA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with other relevant developments on the road network. Guidance in relation to TTA is given in the “Traffic

Management Guidelines”. To assist with TTA, the Authority has updated the Traffic and Transport Assessment Guidelines (2014), which are available at www.tii.ie and could be referenced in the Draft Plan as appropriate guidance. The Guidelines also include recommendations on the requirement for sub-threshold traffic and transport assessments.

The Council are requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Draft Development Plan relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.

c. Service Areas

The planning authority will be aware that Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines indicates the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and also addresses road side service facilities on non-motorway national roads and their junctions. Comments, above, in relation to development at national road junctions may also be pertinent in the case of such development proposals.

The Council will be aware that the Authority has issued the TII Policy on Service Areas (August, 2014). Section 1.4 of the Policy outlines the roles of the Authority and planning authorities in relation to the provision of service areas.

The Authority would welcome the provisions of the TII Service Area Policy (2014) and the DoECLG Guidelines reflected in the Draft County Development Plan.

d. Signage

TII has also issued the Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011). The purpose of this document is to outline TII’s policy on the provision of tourist and leisure information signs on national primary and national secondary roads in Ireland.

With respect to the new Development Plan, the Planning Authority is also referred to Section 3.8 of the DoECLG’s Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. The Authority would welcome the provisions of the TII Policy and the DoECLG Guidelines incorporated into the new Development Plan.

e. Noise

The Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Plan. The Authority advises that it requires that development proposals identify and implement noise mitigation measures, where warranted. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.

Conclusion

Having regard to the foregoing, the Authority recommends that the development objectives included in the Draft Development Plan reflect the provisions of the DoECLG’s Spatial Planning and National Roads Guidelines which indicates the importance of developing an evidence based approach at development plan stage for proposals with implications for the on-going safe and efficient operation of national roads.

In summary, the Planning Authority is advised to ensure in the review of the County Development Plan:

- The protection of the safety, carrying capacity and efficiency of the existing and future national roads network is maintained,
- Future National Road Scheme planning is provided for and schemes are safeguarded, and;
- An integrated approach to land use and transportation solutions throughout the County should be undertaken such that local traffic generated by developments is catered for primarily within the framework of the local (i.e. non-national) road network.

Response of Chief Executive

1. MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

The Chief Executive notes that the N/M11 is a strategic road corridor of national significance which forms part of the important Trans-European Transport Network; this is reflected in the provisions of the current County Development Plan which will be retained and enhanced if necessary in the new plan. In addition, the provisions of the new plan as they relate to the N/M11 will reflect the policies set out in the NPF and RSES, as well as the NTA Transport Strategy for the GDA 2016-2035, Smarter Travel (DTTAS, 2009), Investing in our Transport Future (DTTAS, 2015), and the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

2. DEVELOPMENT AND CORE STRATEGY

It is the intention that the provisions of the new plan will ensure that the carrying capacity, operational efficiency, safety and national investment made in national roads in Wicklow continue to be safeguarded and that the relevant policies/objectives included in the County Development Plan will reflect this; this includes provisions relating to developments on or near national road junctions.

In addition, it is intended that policies and objectives for urban growth areas will be crafted to avoid undermining the strategic transport function of national roads.

With respect to ‘strategic frameworks’ for the development of strategic sites (such as Fassaroe in Bray), it is not considered appropriate to ‘lock’ any currently agreed measures, phasing plans etc regarding such sites into the County Development Plan as options / measures may change for such areas during the lifetime of any development plan and flexibility should therefore be allowed.

The new Core Strategy will be drafted to comply with statutory provisions, Government guidance and higher order strategies / policies such as the NPF and RSES. This will entail an approach that concentrates development in established urban areas and designated development centres framed within a coherent integrated land use and transportation strategy. This will apply to all forms of development, such as industry and employment as mentioned in this submission.

It is intended that the new plan will provide guidance (to be read in conjunction with the myriad of guidance from the TII, NTA, DoHPLG etc) for developers to ensure a high standard of access by public transport, foot / bicycle and private car (to a lesser extent), so that the variety of residential, enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society.

With respect to EM12 (employment zones outside of settlements, a number on or close to national roads), and CD17 (objective for residential care facilities for the elderly at Ballinahinch Newtownmountkennedy and Killickabawn, Kilpeddar) these objectives and the current list of sites were accepted by the Minister in the making of the current County Development Plan as not being in

contravention of higher order strategies, guidelines or proper planning and sustainable development. Nevertheless, the Council will undertake a review of the appropriateness of these zones.

The role of the TII is as a provider of transportation services i.e. *“to deliver transport infrastructure and services, which contribute to the quality of life to the people of Ireland and support the country’s economic growth”* and this includes delivering new and improving existing national road infrastructure, including bearing the cost of same, suitable to meet the demands of new development envisaged by the NPF. It is considered that that the costs of possible future land acquisition, additional road infrastructure or environmental mitigation measures on the national road network arising due to new development, (being development that accords with the requirements and principles of the NPF, RSES and County Development Plan), is not a burden to be borne by the local authority and integrated within future local development contributions schemes. Each policy and objective, and the development that flows from same, must be based on proper planning and sustainable development criteria.

a. Development at national road junctions

The CE notes the TII’s request that the Council should exercise care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions. The CE notes however that all development, whether in proximity to national road / national road junctions or not, can give rise to new traffic on the national road network and the key therefore to protect the capacity of the national road network is to endeavour to craft development patterns that allow and encourage movement (particular local movements) by routes other than the national road.

The current County Development Plan (Objective TR15) requires the carrying out of Traffic and Transport Assessments / Traffic Impact Assessments in accordance with the thresholds set out in *‘Design Manual for Roads and Bridges’* the *‘Traffic & Transport Assessment Guidelines’* (TII) and the *‘Design Manual for Urban Roads and Streets’* (DoECLG & DoTTS) and it is intended that this objective will be retained in the new plan.

It is agreed that the carrying out of such assessments for individual applications should not be a substitute for overall transport assessment of areas during the preparation of development plans. With respect to the suggestion that *‘Area Based Transport Assessment’* and/or *‘Strategic Transport Assessment’* (STA) should be carried out to support the preparation of the County Development Plan, it is considered that such assessments are not necessarily appropriate or practical at this scale of plan making; with respect to the larger towns in the County (Levels 1-3 in the proposed new settlement hierarchy - Bray, Wicklow-Rathnew, Arklow, Greystones-Delgany, and Blessington), future LAPs prepared post adoption of the County Development Plan will include any required transport assessments and local transport strategies / plans as envisaged by the Regional Spatial and Economic Strategy; and with respect to other smaller settlements (the plans for which will form part of the new County Development Plan), the development and growth strategy for each (which will entail only moderate levels of growth) will be particularly influenced by accessibility and transport factors, which will be assessed for each town as part of the RSES *‘asset based’* assessment.

b. Access to national roads

The current County Development Plan addresses the DoECLG Spatial Planning and National Roads Guidelines objectives with regard to the avoidance of the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to

which speed limits greater than 50kph apply and it is intended that this will be retained and amended to reflect current guidelines as necessary in the new plan.

c. ‘Exceptional Circumstances’

The current County Development Plan sets out circumstances where a less restrictive approach to the control of development accessing national roads may apply; it is intended to retain this in the new plan and amended if necessary to accord with current guidance.

The current County Development Plan does not identify any specific planned strategic infrastructure development proposals. The new plan will have regard to the provision of Section 2.6 of the guidelines should policies / objectives be included in the plan in this regard.

▪ **TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES**

The CE notes the information provided regarding planned national road schemes in Wicklow. The N/M11 scheme is addressed in the current County Development Plan and it is intended that these objectives will be retained and enhanced if necessary in the new plan.

It is noted that the N81 Tallaght to Hollywood Cross Scheme is a suspended scheme. However, as the County’s second national road and the main transport corridor in the west of the County the upgrade of this road is of considerable importance to the citizens of Wicklow. It is intended that the plan will retain an objective for the delivery of this project.

It is accepted that policies and objectives, including rezoning of lands, should not compromise the road planning and route option evaluation process in circumstances where road scheme planning is underway and potential routes have been identified and brought to the attention of the planning authority, including schemes that may currently be suspended. The current County Development Plan includes objectives in this regard and it is intended that such provision be retained and enhanced if necessary in the new plan.

It is agreed that development strategies or rezoning proposals should not have the effect of altering the function of national roads or increase the cost of land to be acquired or under active consideration as a route option for a national road scheme.

With respect to ‘local’ improvements to national roads that may be planned by the Council, it is assumed that this refers mainly to possible improvements off the main national road line, at interchanges (such improvements are provided for in the current County Development Plan at Glen Of the Downs and Ballyronan for example.) The TII will of course be invited to give their opinion to the Council as to the appropriateness as such objectives should they be included in the new draft plan.

▪ **OTHER SPECIFIC POLICIES AND OBJECTIVES**

a. Road Safety

The CE notes the information provided regarding Road Safety Impact Assessments (RSIA) and Road Safety Audits (RSA). The current County Development Plan (Objective TR16) requires the carrying out of RSAs and RSIAs on the request of the Planning Authority and it is intended that this objective will be retained and enhanced if necessary in the new plan.

b. Traffic and Transport Assessment (TTA)

The CE notes the information provided regarding Traffic and Transport Assessments (TTA). The current County Development Plan (Objective TR15) requires the carrying out of Traffic and Transport Assessments / Traffic Impact Assessments in accordance with the thresholds set out in ‘*Design Manual for Roads and Bridges*’ the ‘*Traffic & Transport Assessment Guidelines*’ (TII) and the ‘*Design Manual for Urban Roads and Streets*’ (DoECLG & DoTTS) and it is intended that this objective will be retained in the new plan.

c. Service Areas

The CE notes the TII Policy and the DoECLG Guidelines as they relate to Service Areas. The current County Development Plan (Development & Design Standards) references same and it is intended that this will be retained and enhanced if necessary in the new plan.

d. Signage

The CE notes the TII Policy on the Provision of Tourist & Leisure Signage on National Roads. The current County Development Plan (Objective AS2) references same and it is intended that this will be retained and enhanced if necessary in the new plan.

e. Noise

The CE notes S.I. No. 140 of 2006 Environmental Noise Regulations. The current County Development Plan (Objective TR22) references same and it is intended that this will be retained and enhanced if necessary in the new plan.

Conclusion

It is intended that the development objectives included in the Draft Development Plan will reflect the provisions of the DoECLG’s Spatial Planning and National Roads Guidelines

Recommendations of Chief Executive

1. The new Core Strategy (as proposed in Part 2 of this report) shall take into account:
 - Project Ireland 2040 – the National Planning Framework and the National Development Plan 2018-2027
 - Regional Spatial and Economic Strategy for the Eastern and Midlands Region
 - NTA Transport Strategy for the GDA 2016-2035,
 - Smarter Travel (DTTAS, 2009),
 - Investing in our Transport Future (DTTAS, 2015)
2. The policies, objectives and design standards of the new plan will take into the account:
 - Project Ireland 2040 – the National Planning Framework and the National Development Plan 2018-2027
 - Regional Spatial and Economic Strategy for the Eastern and Midlands Region
 - DoECLG’s Spatial Planning and National Roads Guidelines for Planning Authorities (2012).
 - NRA / TII Traffic and Transport Assessment Guidelines (2014)
 - PE-PDV-02046 Area Based Transport Assessment (ABTA) Guidance Notes, jointly prepared by TII and the NTA.
 - RSA Road Safety Strategy 2013-2020
 - TII Policy on the Provision of Tourist & Leisure Signage on National Roads
 - TII Service Area Policy (2014)

- S.I. No. 140 of 2006 Environmental Noise Regulations
- The Bray & Environs Transport Study 2019

Issues raised**INTRODUCTION AND EXECUTIVE SUMMARY**

As populations continue to grow, both urban and rural areas are often faced with increasing pressures and problems. The new Wicklow County Development Plan (CDP) should represent a catalyst for positive change and facilitate the development of the county in a plan-led, sustainable manner. The CDP should strive to establish a coherent framework for the coordinated sustainable economic, social, cultural and environmental development of the county in line with the UN Sustainable Development Goals.

Below is a summary of An Taisce’s overall recommendations for the new Wicklow CDP.

1. Strategic Planning and Zoning

- The CDP must comply with methodical and evidence-based approaches to land-use zoning and settlement planning included under the Planning and Development Act 2010 (PDA) which require a demonstrated rational assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance.
- Land zoned for residential development must be located in close proximity and/or be well connected by public transport corridors (rail or bus) to existing and/or proposed services (e.g. schools, retail, community/health centres, sports/amenity facilities, etc.) and employment sites.
- Following an evidence-based assessment of the quantum of zoned land within the CDP areas, where there is surplus supply, an appropriate quantum of land must be de-zoned, down-zoned or phased in accordance with the provision of the PDA 2010.
- The Planning Authority (PA) must only apply considerations of proper planning and sustainable development (i.e. sequential approach, flooding, etc.) in zoning, phasing, de-zoning or downzoning land and disregard all other considerations including private interests or potential commercial or rate-generating revenue.
- The sequential approach must be applied to the zoning of all land and the review of zoning in accordance with the PDA 2010 (including the phasing, de-zoning or downzoning land).
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.
- Following any future precedential decision from An Bord Pleanála which overturns a PA decision, a review should be undertaken to examine the basis on which the decision was made, and a report presented to Councillors on required amendments to the CDP. This was a key conclusion of the (formerly) Department of Environment, Community and Local Government “Planning Review Report” (2015).

2. Sustainable Land Use and Transport

- The PA must ensure that proactive measures are included in the CDP to promote settlement nucleation and to protect rural areas from a proliferation of car dependent, dispersed, urban-generated settlement.
- The PA must ensure that the planning, development and design of our towns, cities and schools encourages a shift from car-orientated urban patterns to walkable, cycleable, and transit-

orientated development patterns. The CDP should include strong, enforceable policies that would promote compact towns and cities where distances between origins and destinations are shorter and with walking, cycling and public transport prioritised. This reshaping of our built environment will also help reverse inactivity levels in Ireland.

- In accordance with the Sustainable Residential Development Guidelines in Urban Areas, the CDP must include policies to prohibit large-scale suburban type development proposals. Only development proposals commensurate with local physical infrastructure and social capital carrying capacity should be permitted.
- The CDP must include policies to provide alternatives to unsustainable, urban generated dispersed one off housing, including for example, a serviced site policy.
- The CDP should utilise the seven location test standards for community integration for new housing outlined in Box 5.2 of the National Spatial Strategy. Unlike sustainability/quality of life indicators, these should be threshold standards without which no development should be permitted. This requires that zoning and decisions for new housing be conditional on integration with existing communities, affordability and mix of housing types, walking and cycling access to local services and schools, public transport access to employment locations and availability of recreation facilities.
- A greenbelt policy should be implemented in peri-urban areas in the vicinity of the CDP boundary with strict restrictions on urban generated one-off housing to prevent ribbon development and uncontrolled sprawl.
- The CDP needs to set our clear strategy and policies to coincide with existing strategies and frameworks which promote a built environment that encourages opportunities for physical activities including ‘Smarter Travel’, ‘The National Cycle Policy Framework’, ‘A Healthy Weight for Ireland, Obesity Policy and Action Plan’, ‘A Framework for Improve Health and Wellbeing 2013-2025’ and ‘Get Ireland Active! National Physical Activity Action Plan for Ireland’.
- A local transport plan must be prepared alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action.
- The CDP must include permeability and way finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria to selecting all land zoned for new development connecting with key services and amenities such as schools, shops, parks etc. (See Green Infrastructure approach below).
- The CDP must be carefully aligned with the regional transport strategies of the National Transport Authority (NTA), particularly with respect to rail infrastructure and bus services.
- Mobility Management Plans must be made mandatory through the development management process for all planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of Smarter Travel will be achieved through the development proposal.

3. Addressing the Climate Emergency

- A primary objective of the CDP must be to break Wicklow’s dependence on fossil fuels, stop the county’s contribution greenhouse gas emissions, and prepare Wicklow with the resilience to thrive in a time of energy and climate uncertainty.
- The CDP must include targeted and timetabled policies for the above.
- The PA should prepare a strategy which would see the electrical generation needs of the county primarily met by renewable sources in accordance with our national obligations for 2030, including use of local renewable energy sources, district heating and combined heat and power, and energy demand reduction measures.

- Look to examples in other countries such as France, which requires all new buildings in commercial areas to be partially covered by either solar panels or green roofs.

4. Green Infrastructure

- The CDP should adopt a Green Infrastructure approach and include a section entitled Green Infrastructure modelled on the content of the Fingal County Development Plan 2010 – 2016 (Chapter 3).

5. Economic, Employment and Retail Development

- Ireland’s principle resource is our abundant availability of fertile agricultural land. The CDP must include policies to promote sustainable agriculture, particularly the production of vegetables.
- The CDP should include a policy for the promotion of local farmers’ markets and identify locations where farmers’ markets can take place.
- Out-of-town commercial and/or retail development must be strictly prohibited. Where it has been permitted historically, car parking charges must be made mandatory to level the playing field and the unfair competitive advantage accruing to ‘big box’ out-of-town retailer from free car parking and publicly subsidized road infrastructure.
- The PA should take an active role in site assembly for new retail development on brownfield and infill sites, including using CPO powers where necessary to provide for the sensitive revitalisation of town centres.
- The PA should require the introduction of car parking charges for out-of-centre retail development and introduce a corresponding S.48 waiver for development contribution levies in lieu of off-street car parking for new retail development in town centre locations.
- The CDP must include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.
- The CDP should include a policy which restricts large floor-plate multiples, which are dependent on complex oil-dependent supply chains, in favour of smaller floor-plate local shops.

6. Water

- The CDP must include a suite of integrated policy measures to ensure that the PA’s legal obligations under the Water Framework Directive and the operable River Basin Management Plans are achieved.
- The CDP must be fully consistent with the PA’s legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007).
- Circular Letter PD7/09 issued by the (formerly) Department of Environment, Heritage and Local Government sets out the “Combined Approach” and requires that planning permission should not be granted to development proposals where there is insufficient cumulative capacity within the relevant wastewater treatment plant. This further underlines the imperative for new development to be channelled to targeted development centres where the appropriate physical infrastructure is planned or present.
- The CDP must include policies to provide alternatives to unsustainable urban generated dispersed one-off, including, for example, a serviced site policy (see Limerick County Council’s Serviced Site Policy).
- The PA must ensure that all private wastewater treatment proposals comply with the EPA Code of Practice and other related regulations.

- The CDP must de-zone or down-zone lands categorized in ‘Flood Zone A’ of ‘Flood Zone B’ applying the sequential approach. Where the zoning of recognised flood prone areas is retained, a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out.
- The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be made mandatory for all new development proposals.

7. Natural, Cultural and Built Heritage

- The CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law, particularly with regard to the Habitats and Birds Directives.
- Achieving adherence to the PA’s legal obligations under the Habitats Directive and other environmental legislation cannot be achieved without the preparation in tandem with the CDP of a full Strategic Environmental Assessment and Habitats Directive Assessment.
- The policy recommendations of the National Biodiversity Plan 2017-2021 should be fully incorporated into the CDP.
- The most significant demesnes and designed landscape in the county should be identified and planning policies applied to maintain and enhance their special character and significance in considering agricultural, recreational or other development.
- The CDP should seek to designate more ACAs and Special Planning Control Schemes.
- S.48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation.
- Important views and prospects must be protected.
- The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.

1.0 STRATEGIC PLANNING AND ZONING

The location of residential zoned lands needs to be informed by the CDP’s Core Strategy, key elements of the Regional Planning Guidelines, and the National Planning Framework.

In accordance with the provisions of the Planning and Development (Amendment) Act 2010 (PDA), it is a mandatory legal requirement that the land-use zoning and other provisions of CDPs are consistent with the relevant Regional Planning Guidelines, the National Planning Framework, and S.28 Ministerial Guidelines issued under the Planning Acts 2000-2010. Any vagueness or let-out clauses contained in a CDP can cause interpretation problems for the public, developers and officials and can result in delays in the planning process.

1.1 LAND-USE ZONING

The zoning of land for appropriate and sustainable uses is at the heart of planning. The Planning Authority must recognise that its own interest is only effectually achieved through integration with its region and surrounding area.

The inappropriateness of zoning objectives in many instances becomes a reality at appeal to An Bord Pleanála. The Board routinely disregards zoning objectives, which are not in accordance with the principles of proper planning and sustainable development. This can undermine confidence in the planning system and lead to misplaced investment decisions by private investors, significant costs, conflict with local communities, and can ultimately be counterproductive.

The prioritisation of future development towards efficient, compact and walkable serviced locations in accordance with the sequential approach and infrastructure capacity is a necessity.

Strategic Planning and Zoning Recommendations

- The CDP must comply with methodical and evidence-based approaches to land-use zoning and settlement planning included under the Planning and Development Act 2010 (PDA) which require a demonstrated rational assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance.
- Land zoned for residential development must be located in close proximity and/or be well connected by public transport corridors (rail or bus) to existing and/or proposed services (e.g. schools, retail, community/health centres, sports/amenity facilities, etc.) and employment sites.
- Following an evidence-based assessment of the quantum of zoned land within the CDP areas, where there is surplus supply, an appropriate quantum of land must be de-zoned, down-zoned or phased in accordance with the provision of the PDA 2010.
- The Planning Authority (PA) must only apply considerations of proper planning and sustainable development (i.e. sequential approach, flooding, etc.) in zoning, phasing, de-zoning or downzoning land and disregard all other considerations including private interests or potential commercial or rate-generating revenue.
- The sequential approach must be applied to the zoning of all land and the review of zoning in accordance with the PDA 2010 (including the phasing, de-zoning or downzoning land).
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.
- Following any future precedential decision from An Bord Pleanála which overturns a PA decision, a review should be undertaken to examine the basis on which the decision was made, and a report presented to Councillors on required amendments to the CDP. This was a key conclusion of the (formerly) Department of Environment, Community and Local Government “Planning Review Report” (2015).

SUSTAINABLE LAND USE AND TRANSPORT

A defining pattern of spatial development in Wicklow and around Ireland in recent decades has been of a sprawling, uncoordinated nature where land has been developed in a “leapfrog” low-density pattern. This type of land-use development has created places that lack adequate public facilities, have diminished liveability and, crucially, are dependent on private cars for long commutes, particularly into Dublin. Heavy reliance on private car travel has significant adverse impacts on health and wellbeing as it promotes sedentary lifestyles. Sprawling settlements and car dependence also contribute significantly to Ireland’s greenhouse gas emissions. This must be addressed in order to ensure that the country meets its EU climate change obligations and breaks its dependence on fossil fuels.

Therefore, the CDP must take the lead in ensuring that the planning, development, and design of Wicklow’s towns and settlements encourages a shift from dispersed, car orientated settlement patterns to walkable, cycleable, and transit-orientated development patterns.

To accomplish these goals, the CDP should include strong and enforceable policies to promote compact towns where distances between origins and destinations are shorter and where walking, cycling and public transport are prioritised. This will help ensure the efficient delivery of services and infrastructure, enhance social capital, create compact and walkable communities, and protect the natural environment. The CDP must also align with regional and national plans and strategies such as the Smarter Travel framework in order to implement such policies.

2.1 LAND USE AND SETTLEMENT PATTERNS

It is imperative that the CDP addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated urban forms. The most sustainable form of rural development is the village/small town cluster, which allows for easy access to services and infrastructure, increases the social and economic vitality and viability of the area, creates well-connected and permeable transport networks, and maintains the integrity of the natural environment. Consolidated settlement also brings about a critical mass of people, which facilitates the development or enhancement of public transport in the area.

The PA must also address the prevalence of one-off and dispersed housing in Wicklow, which creates an unsustainable housing pattern and promotes car dependency. The County Development Plan has a key role to play in providing suitable housing choices and alternatives to one-off housing. For example, it should be a specific objective of the CDP to deliver suitable locations for serviced sites with access to piped infrastructure for those wishing to build their own houses (see diagram below). Development should also be consolidated in and around already serviced areas providing access to shops, schools, workplaces, etc. We would refer the PA to the report prepared by the Environmental Protection Agency – Sustainable Rural Development: Managing Housing in the Countryside 2010. The recommendations of this report should be incorporated directly into the CDP.



Furthermore, lessons should be learned from what was a systemic failure to apply the seven test requirements for housing location in urban areas as required by the National Spatial Strategy 2002-2020 (Box 5.2 in the Strategy and copied below). An Taisce considers these seven tests to be well-considered measures to ensure that new housing is provided sustainably. We recommend that the PA use and expand upon them in CDP as a baseline for quantifiable improvement of housing planning. Moreover, in light of the deepening national housing crisis, the CDP must also focus heavily on requirements for the provision of social housing.

Evaluation Considerations	
The Asset Test	Are there existing community resources such as schools, etc. with spare capacity?
The Carrying Capacity Test	Is the environmental setting capable of absorbing development in terms of drainage, etc.?
The Transport Test	Is there potential for reinforcing usage of public transport, walking and cycling?
The Economic Development Test	Is there potential to ensure integration between the location of housing and employment?
The Character Test	Will the proposal reinforce a sense of place and character?
The Community Test	Will the proposal reinforce the integrity and vitality of the local community and services that can be provided?
The Integration Test	Will the proposal aid an integrated approach to catering for the housing needs of all sections of society?

Table 1: Tests for housing locations in urban areas from the National Spatial Strategy 2002

2.1.2. Sequential Approach to Development

The prioritisation of future development in Wicklow’s towns towards efficient, compact, walkable, and serviced locations in accordance with the sequential approach and existing infrastructural capacity is imperative.

The town planning in the CDP should be guided by the existing essential social infrastructure (schools, community facilities, etc.) and physical infrastructure (transport, water services, communications, etc.), including realistic prospects for addressing capacity constraints. Where services are not available, there should be a reasonable expectation of their provision in the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure within the plan period or a reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development. The Planning Authority must engage with the providers of essential physical and social infrastructure and ensure that the town-specific policies are based on realistic assessments regarding the funding and timing of such infrastructure, recognising that some levels of strategic infrastructure may take a number of cycles to provide.

2.2 ACHIEVING A MODAL SHIFT IN TRANSPORTATION

To achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for citizens, it is imperative that the CDP addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated urban forms. A crucial aspect of this is investment in public transport, walking and cycling is maintained and improved in order to offer communities a viable alternative to private cars.

The PA should have regard to “Smarter Travel – A Sustainable Transport Future,” which was launched in February 2009. This policy framework, which was the subject of extensive public consultation, includes five key goals:

- (i) to reduce overall travel demand,
- (ii) to maximise efficiency of the transport network,
- (iii) to reduce reliance on fossil fuels,
- (iv) to reduce transport emissions, and
- (v) to improve accessibility to transport.

Circular PSSP-4-2010 to all planning authorities determined that Smarter Travel relates to proper planning and sustainable development under Section 9(6) of the Planning & Development Act 2000 and must therefore be incorporated into the specific policies and objectives of the CDP. The Smarter

Travel policy requirements will necessitate a considerable shift away from dispersed settlement patterns towards consolidation and compact urban forms. The targets included in the Smarter Travel policy to significantly increase sustainable modal choices and reverse car dependency are challenging but urgently required in the CDP.

The efficacy of said policies should be bolstered by preparing a local transport plan alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action. Furthermore, Mobility Management Plans must be made mandatory through the development management process for planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of Smarter Travel will be achieved through the development proposal.

In the context of land use planning, the most effective means to achieve these objectives is to prevent inefficient and unsustainable car-based development sprawl i.e. planning for the best use of land to benefit from investment of public funds in physical infrastructure, including public transport infrastructure.

2.2.1 Promoting Walking and Cycling

Advancing walking and cycling as alternatives to private car use will align with the Smarter Travel policy and prove crucial to the sustainable development of Wicklow. It will also contribute to improving the health and wellbeing of the county’s population.

Car dependency has several key health impacts:

- Driving contributes to air pollution, and air pollution causes morbidity and mortality.
- High car dependency and long commutes decreases leisure time and contributes to sedentary lifestyles. This has long been associated with physical health consequences such as obesity and cardiovascular disease as well as mental health impacts including anxiety and depression.
- Increased vehicle miles travelled and increased car dependency heightens the chances of road traffic accidents, fatalities and injuries.

In Ireland specifically, a number of studies and action plans done in recent years outline the population’s general health and participation in physical activity. It has been concluded that the Irish population is not meeting recommended physical activity levels. The World Health Organisation has highlighted that the use of “passive” modes of transport are associated with increased inactivity levels as well as poor air quality, traffic congestion, and a lack of adequate walking and cycling infrastructure.

A correlation can be made between the physical inactivity levels in Ireland and the level of our population that are over overweight or obese. The Department of Health (2016) have highlighted that only 40% of the Irish population have a healthy weight. If this trend continues, Ireland will face an increase in chronic diseases associated with obesity and therefore a rise in related healthcare costs. Moreover, physical inactivity and obesity are modifiable risk factors for many chronic diseases.

The shape of the built environment can influence everyday lifestyle choices that affect personal health and wellbeing. Therefore, it needs to be reshaped in a way that will actively encourage walking, cycling, and other forms of recreation to help reverse inactivity levels and the worrying trend of obesity.

The National Physical Activity Plan for Ireland emphasises the importance of the built environment in encouraging active transport options. The targets laid out in Action Area Four of the plan states that local authorities should prioritise the development of walking and cycling infrastructure, for example,

through the creation of connected cycle and footpath networks as well as the development of local and regional parks.

An Taisce recognises that developing strong pedestrian and cycle networks in small towns and rural areas may present various challenges. However, there are a number of existing national guidance and policy documents that can assist with passive transport planning in Wicklow.

The National Cycle Policy Framework includes practical measures to help achieve these objectives. The framework takes a methodical approach to investment and has a robust research base. Better catering for cyclists and pedestrians must follow the hierarchy of provision, which starts with cutting speed and altering traffic patterns as follows:

1. Reduce traffic speed and enforce the law.
2. Reduce traffic volume, particularly HGVs.
3. Redesign poorly-configured junctions and better manage traffic.
4. Increase road space for cyclists and pedestrians (with wider inside lanes for example).
5. Consider dedicating hard shoulders to cyclists.
6. Having considered and, where feasible, undertaken all of the above, are there roads or streets that would benefit from the installation of on-road cycle lanes? Are there alignments that can be considered for off road cycle lanes?

The Design Manual for Urban Roads and Streets provides comprehensive guidance on road design and details the differences in appropriate cycling facilities based on road size, the volume and speed of traffic, etc. (see section 4.3, and especially section 4.3.5). This manual also contains information on effective street design for pedestrian use. The Rural Cycle Scheme Design document also provides in-depth guidance on the types, layout, placement, and design of cycling infrastructure. Further information can be found in the National Cycle manual.

Detailed transport planning is especially important in the areas newly zoned for residential development where streets should be designed to facilitate pedestrian and cycle travel. The design concepts for these areas should provide more specific information as to what type of facilities will be provided along the designated pedestrian/cycle routes.

Sustainable Land Use and Transport Recommendations

- The PA must ensure that proactive measures are included in the CDP to promote settlement nucleation and to protect rural areas from a proliferation of car dependent, dispersed, urban-generated settlement.
- The PA must ensure that the planning, development and design of our towns, cities and schools encourages a shift from car-orientated urban patterns to walkable, cycleable, and transit-orientated development patterns. The CDP should include strong, enforceable policies that would promote compact towns and cities where distances between origins and destinations are shorter and with walking, cycling and public transport prioritised. This reshaping of our built environment will also help reverse inactivity levels in Ireland.
- In accordance with the Sustainable Residential Development Guidelines in Urban Areas, the CDP must include policies to prohibit large-scale suburban type development proposals. Only development proposals commensurate with local physical infrastructure and social capital carrying capacity should be permitted.
- The CDP must include policies to provide alternatives to unsustainable, urban generated dispersed one off housing, including for example, a serviced site policy.
- The CDP should utilise the seven location test standards for community integration for new housing outlined in Box 5.2 of the National Spatial Strategy. Unlike sustainability/quality of life

indicators, these should be threshold standards without which no development should be permitted. This requires that zoning and decisions for new housing be conditional on integration with existing communities, affordability and mix of housing types, walking and cycling access to local services and schools, public transport access to employment locations and availability of recreation facilities.

- A greenbelt policy should be implemented in peri-urban areas in the vicinity of the CDP boundary with strict restrictions on urban generated one-off housing to prevent ribbon development and uncontrolled sprawl.
- The CDP needs to set out clear strategy and policies to coincide with existing strategies and frameworks which promote a built environment that encourages opportunities for physical activities including ‘Smarter Travel’, ‘The National Cycle Policy Framework’, ‘A Healthy Weight for Ireland, Obesity Policy and Action Plan’, ‘A Framework for Improve Health and Wellbeing 2013-2025’ and ‘Get Ireland Active! National Physical Activity Action Plan for Ireland’.
- A local transport plan must be prepared alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action.
- The CDP must include permeability and way finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria to selecting all land zoned for new development connecting with key services and amenities such as schools, shops, parks etc. (See Green Infrastructure approach below).
- The CDP must be carefully aligned with the regional transport strategies of the National Transport Authority (NTA), particularly with respect to rail infrastructure and bus services.
- Mobility Management Plans must be made mandatory through the development management process for all planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of Smarter Travel will be achieved through the development proposal.

3. ADDRESSING THE CLIMATE EMERGENCY

Climate change is the defining challenge of our time. Wicklow recognised this when it became the first county in Ireland to declare a climate emergency. The impacts of climate change will vary across the globe, but research and climate modelling indicate that Ireland and County Wicklow will experience the following most acutely, especially at the local level:

- Increased intensity and frequency of storms
- Increased risk of flooding, particularly large flood events
- Water stress and shortages
- Degraded water and air quality
- Biodiversity losses and shifts (including changes that could significantly impact agriculture)

To address these impacts and meet mandatory EU emissions reduction targets for 2030, Ireland needs a coordinated effort in all counties to embrace low carbon development increase the country’s climate resilience.

Climate change is influenced by an array of themes spanning all development-related sectors. Therefore, spatial planning is an ideal framework for the PA to use in efficiently integrating and implementing climate change responses across multiple sectors. The primary objectives of the CDP must be to mitigate Wicklow’s contribution to climate change by reducing greenhouse gas (GHG) emissions, breaking the county’s dependence on fossil fuels, and adapting the area’s natural and built

systems to have the resilience to thrive in a time of energy and climate uncertainty. These measures will not only address climate change but also provide a range of benefits to local communities.

The scale of change needed to meet Ireland’s commitments under EU law and the Paris Agreement is enormous. It is imperative that CDP contribute to meeting sectoral targets at regional, county, city, and local levels. These should be measured against the targets outlined in the Paris Agreement and Climate Action and Low Carbon Development Act (2015) with regard to electricity generation, renewables share, transportation, agriculture, building energy use, etc. Actions in the CDP towards these goals must be targeted, timetabled and quantifiable.

In 2017, transport accounted for 19.8% of Ireland’s greenhouse emissions according to the EPA (2019). Therefore, further infrastructure investment in roads (outside of road infrastructure maintenance) to serve energy inefficient and emission-generating private motorised vehicles is untenable. Shaping of our society and economy around fossil fuel based transport (i.e. dispersed settlement patterns, suburban sprawl, export growth) will inevitably undermine our position in emission reduction.

Carbon emissions in other sectors also need to be addressed and reduced. According to the SEAI’s Residential Energy Roadmap, our homes account for more than a quarter of Irish energy related carbon emissions. During the next decade, we must continue to push the envelope towards cutting edge building standards for new homes.

The floor size of a given house is a factor that determines associated energy use and costs per dwelling. House sizes impact on the amount of energy demanded in the residential sector as bigger dwellings tend to have a larger demand for heating due to their greater wall surface area and therefore higher heat loss. The number and size of large one off or non-estate dwellings that have been built in recent years are contributing to our high demand for energy. In 2015, the average floor area of non-estate houses granted permission was 243 square metres, compared to 143 square metres for houses in estates and 95 square metres for flats. New builds should take account of landform, orientation, and massing in order to minimise energy consumption.

3.1 LEGAL REQUIREMENTS FOR ACTION

The PDA 2010 includes a mandatory objective for development plans as follows [Section 10(2) of the 2000 Act as amended by Section 7 of the Planning and Development (Amendment) Act 2010]:

“The promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to:

- i. Reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resource,*
- ii. Reduce anthropogenic greenhouse gas emissions, and*
- iii. Address the necessity of adaptation to climate change.*

In particular, having regard to location, layout and design of new development.”

Additionally, Section 15 of the Climate Action and Low Carbon Development Act 2015 requires that all Government Departments and public bodies shall in the exercise of their functions have regard to *“the objective of mitigating greenhouse gas emissions and adapting to the effects of Climate Change in the State.”*

Therefore, the PA has a legal obligation to respond to the challenges of climate change through development which reduces energy demand, supports sustainable modes of transport to reduce the locality’s carbon footprint and advances approaches such as green infrastructure to provide multifunctional adaptation solutions. Such development will minimise Wicklow’s greenhouse gas

emissions and help the area manage the effects of climate change, with particular reference to land use, energy, transport, water resources, flooding, waste management, and biodiversity.

Making climate action a crucial component of the CDP’s core strategy, policies and objectives goes beyond the legal requirement of addressing climate change; they will provide an array of benefits to local communities and individuals such as:

- Significantly lowered energy costs
- Increased physical and mental wellbeing through the provision of green space as well as walkable and cycle-friendly communities
- Substantially decreased flood risk (also decreased damage and costs from the storms and floods that do occur)
- Improved air quality and respiratory health
- Improved water quality
- Decreased traffic congestion
- Employment opportunities, for example, in renewable energy
- Increased liveability and vibrancy of communities

Addressing the Climate Emergency Recommendations

- A primary objective of the CDP must be to break Wicklow’s dependence on fossil fuels, stop the county’s contribution greenhouse gas emissions, and prepare Wicklow with the resilience to thrive in a time of energy and climate uncertainty.
- The CDP must include targeted and timetabled policies for the above.
- The PA should prepare a strategy which would see the electrical generation needs of the county primarily met by renewable sources in accordance with our national obligations for 2030, including use of local renewable energy sources, district heating and combined heat and power, and energy demand reduction measures.
- Look to examples in other countries such as France, which requires all new buildings in commercial areas to be partially covered by either solar panels or green roofs.

4.0 GREEN INFRASTRUCTURE

The Institute for European Environmental Policy (IEEP) recently explored the links between access to nature and health inequalities in Europe. In their 2017 report “Nature for Health and Equity” it was found that a “lack of access to nature and natural areas contributes to health inequality and improving it is key to tackling these challenges”.

This point has been reiterated by the EPA 2016 report “Health Benefits from Biodiversity and Green Infrastructure” which states that *“human health and wellbeing depends on a healthy environment; therefore, management of such a key natural resource has (1) strategic importance for human health (Wolch et al., 2014) and (2) the potential to contribute to the Irish economy (Bullock et al., 2008; EPA, 2012a; EPA, 2016).”*

GI can be defined as the physical environment within and between our cities, towns and villages. It is a network of multi-functional open spaces, including formal parks, gardens, woodlands, green corridors, waterways, street trees, and open countryside. It comprises all environmental resources and contributes towards sustainable resource management. This includes a holistic approach to developing the landscape inclusive of other influences such as ecological development; improving air,

water and soil quality; flood protection; access provision and linkages; climate change amelioration; pollution control and quality of life issues, in a sustainable and ongoing manner.

The GI approach should be incorporated into the planning and development process and should become the accepted way to plan and manage urban spaces, reversing the trend of urban societies becoming disconnected from the natural environment.

GI can also play an important part in fulfilling Ireland’s obligation under the EU Habitats Directive to ensure provision is made to adequate linkages between Natura 2000 sites thereby preventing habitat fragmentation.

Green Infrastructure Recommendation

- The CDP should adopt a Green Infrastructure approach and include a section entitled Green Infrastructure modelled on the content of the Fingal County Development Plan 2010 – 2016 (Chapter 3).

5.0 ECONOMIC, EMPLOYMENT AND RETAIL DEVELOPMENT

A key factor for the future economic, social and environmental prosperity of County Wicklow is the creation of an appropriate critical mass of population in the targeted settlement centres. The key locational criteria for new employment generating enterprises are urban centres with sufficient agglomerations of scale to support a range of vital support services and infrastructure (e.g. broadband, water services, social capital, etc.) for both the enterprise and individual employees. The new CDP needs to address the location of current employment trends, with an analysis of future demand.

5.1 RURAL ENTERPRISE

An Taisce strongly supports local and rural enterprise which serves local population catchments. Small-scale enterprises and employment opportunities based on the sustainable use of indigenous local resources, particularly agriculture, agri-business and forestry are important in building local community resilience. To address the climate and biodiversity crises, the CDP should focus on the development of sustainable agriculture and forestry through the production of vegetable crops and the planting of native woodland.

5.2 RETAIL DEVELOPMENT

Over the past decade there has been sustained pressure from multiple retail operators for out-of-town big box retailing and to circumvent the sequential approach. The key drivers of this trend are convenient access to publicly subsidised road networks, increased price competition and the ability to provide significant amounts of free surface car-parking.

The granting of out-of-town centres as resulted in the decimation of historic town centres and the loss of many long-established local retailers. This in turn has had a knock-on impact for built heritage, social capital and quality of life. To protect the vitality of Wicklow’s town centres while promoting economic development, An Taisce make the following recommendations regarding retail and commercial development:

Economic, Employment and Retail Development Recommendations

- Ireland’s principle resource is our abundant availability of fertile agricultural land. The CDP must include policies to promote sustainable agriculture, particularly the production of vegetables.
- The CDP should include a policy for the promotion of local farmers’ markets and identify locations where farmers’ markets can take place.
- Out-of-town commercial and/or retail development must be strictly prohibited. Where it has been permitted historically, car parking charges must be made mandatory to level the playing field and the unfair competitive advantage accruing to ‘big box’ out-of-town retailer from free car parking and publicly subsidized road infrastructure.
- The PA should take an active role in site assembly for new retail development on brownfield and infill sites, including using CPO powers where necessary to provide for the sensitive revitalisation of town centres.
- The PA should require the introduction of car parking charges for out-of-centre retail development and introduce a corresponding S.48 waiver for development contribution levies in lieu of off-street car parking for new retail development in town centre locations.
- The CDP should include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.
- The CDP should include a policy which restricts large floor-plate multiples, which are dependent on complex oil-dependent supply chains, in favour of smaller floor-plate local shops.

6.0 WATER

The PDA 2010 includes specific mandatory objectives to ensure the integration of water quality management requirements into the physical planning process. The management of surface and ground water in accordance with the provisions of the EU Water Framework Directive (WFD) will be one of the most crucial overarching challenges for the PA in this CDP. Human activities have led to deterioration in water quality over many years. Ireland faces an immense challenge in achieving ‘good’ status in all water bodies as required by the WFD.

In December 2019, the EPA published its latest report on Water Quality in Ireland 2013- 2018. The report reveals that water quality in Ireland is declining after a period of relative stability in the last assessment in 2017. Only 52.8% of Irish surface waters (rivers, lakes, estuaries and coastal waters) are currently in satisfactory ecological condition, with an overall 4.4% net decline in surface water body status since 2010-2015.

Rivers have declined 5.5% (net) with high status rivers being particularly adversely impacted. The number of poor status rivers has increased by 33% since 2009 and at least 25% had rising nutrient concentrations between 2013 and 2018.

The achievement of our Water Framework Directive obligations will have linked benefits in the protection and enhancement of biodiversity, combating climate change, improving human health, protecting landscape, and creating more sustainable settlement patterns. Irish legislation now provides that local authorities can be sued for failing to meet water quality standards.

6.1 MUNICIPAL WASTEWATER TREATMENT

After agriculture, wastewater discharges to water from human settlements, including towns, villages and rural houses, is generally the biggest source of water pollution. For example, in 2012, the relative

contribution of nitrogen and phosphorus to surface waters was 5% of nitrogen and 30% of phosphorus from wastewater discharges. The Implementation Review County Report issued by the European Commission highlighted Ireland’s position stating there are substantial implementation issues in Ireland when it comes to the Urban Waste Water Treatment Directive (EC, 2017).

Municipal sources of pollution accounted for 28% of the river and canal sites with slight pollution. The majority of these cases were due to suspected nutrient losses from municipal wastewater treatment plants. Municipal wastewater accounted for 39% of the moderate pollution in our rivers and canals. Municipal wastewater treatment plants are the suspected cause of pollution for eight of the 13 seriously polluted river sites (bad ecological status). Serious pollution resulting from urban wastewater and industrial pollution was reduced to 17 km of river channel length. This was down from 53 km in 2009. Urban wastewater treatment (UWT) also accounted for 4.9% of N and 28.7% of P in the marine environment (EPA, 2015). Wastewater discharges, emergency discharges from storm water outfalls, and drainage from domestic wastewater systems are the greatest issue for bathing water quality in Ireland. In 2014 there were 27 incidents related to sewage pollution (EPA 2015). Wastewater discharges were considered a contributing factor to the poor classification of all seven of the 136 EU identified bathing waters which failed to comply with minimum water quality standards and were classified as ‘poor’ in 2014. These pollution incidences have serious impacts on the environment, human health and tourism.

6.2 PRIVATE WASTEWATER TREATMENT

Despite the proliferation of dispersed settlement, much of the soil conditions throughout Ireland are unsuited to private on-site wastewater disposal. The legacy of this inappropriate development will be a significant challenge for the achievement of our binding Water Framework Directive targets.

The PA has binding legal obligations under the European Communities Environmental Objectives (Groundwater) Regulations 2010 and European Communities Environmental Objectives (Surface water) Regulations 2009. The EPA have issued a Code of Practice for private wastewater treatment, and PAs must adhere to a stringent compliance regime with respect to all on-site private waste water treatment facilities. These requirements coupled with other environmental regulations will mean that achieving planning permission for one off dwellings will be increasingly more difficult. The CDP must deliver appropriate alternative locations for those wishing to live in self-build properties.

6.3 SURFACE WATER

The Intergovernmental Panel for Climate Change (IPCC) has predicted that Ireland will experience more intense and prolonged rainfall events as the climate crisis worsens. This has been evidenced by the recent serious rainfall events and flooding throughout Ireland, including in Wicklow.

The (formerly) Department of the Environment, Heritage & Local Government also issued the Flood Risk Assessment and Management Guidelines under Section 28 of the PDA 2010 on the management of flood risks and the planning system. This allows for the de-zoning or down-zoning of lands where their development would comprise an unacceptable flood risk.

Conventional hard-engineered storm water management systems to drain surface run-off from asphalt, concrete, and roof tiles are costly to implement and maintain. They also frequently fail causing urban flooding and degradation of water quality. Sustainable Urban Drainage Systems (SUDS) are now becoming the norm throughout Ireland. These systems aim to replicate greenfield run-off rates and include measures such as permeable paving, soft detention basins (swales), rainwater harvesting, and green/brown roofs.

Water Recommendations

- The CDP must include a suite of integrated policy measures to ensure that the PA’s legal obligations under the Water Framework Directive and the operable River Basin Management Plans are achieved.
- The CDP must be fully consistent with the PA’s legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007).
- Circular Letter PD7/09 issued by the (formerly) Department of Environment, Heritage and Local Government sets out the “Combined Approach” and requires that planning permission should not be granted to development proposals where there is insufficient cumulative capacity within the relevant wastewater treatment plant. This further underlines the imperative for new development to be channelled to targeted development centres where the appropriate physical infrastructure is planned or present.
- The CDP must include policies to provide alternatives to unsustainable urban generated dispersed one-off, including, for example, a serviced site policy (see Limerick County Council’s Serviced Site Policy).
- The PA must ensure that all private wastewater treatment proposals comply with the EPA Code of Practice and other related regulations.
- The CDP must de-zone or down-zone lands categorized in ‘Flood Zone A’ of ‘Flood Zone B’ applying the sequential approach. Where the zoning of recognised flood prone areas is retained, a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out.
- The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be made mandatory for all new development proposals.

7.0 NATURAL, CULTURAL AND BUILT HERITAGE

Wicklow is very rich in both natural and built heritage, and it is imperative that these be protected in the policies and objectives of the CDP.

7.1 NATURAL ENVIRONMENT

As highlighted in ‘Our Sustainable Future, a Framework for Sustainable Development for Ireland’, increasing prosperity, in Ireland and across the world, has allowed many people to enjoy the benefits of goods and services which were once available to just a few. While this shared prosperity represents huge progress, it does so at a cost of unsustainable patterns of consumption and production. The pressures on resources - raw materials, minerals, metals, food, water, soil, biodiversity, air, biomass and ecosystems - continue to increase. This enduring, negative trend endangers the availability of natural resources and impacts negatively on the quality of our environment and on human health and biodiversity, both within Europe itself and globally.

The 2018 “Living Planet Report” from the World Wildlife Fund¹⁶ presented a very bleak picture of the state of global biodiversity. There has been an overall 60% decline in species population size in just over 40 years (1970-2014). This decline is at 83% for freshwater species.

Ireland has a poor record when it comes to protecting the natural environment. The sprawling nature of development and settlement pattern is a driving force for habitat fragmentation, biodiversity loss, agricultural land loss and is contributing to climate change. The 2019 report on “The Status of EU Protected Habitats and Species in Ireland” (prepared every six years as required by Article 17 of the EU Habitats Directive) illustrates the poor condition of Ireland’s biodiversity. Out of Ireland’s 59 protected

habitats, 85% were assessed as being in an unfavourable conservation status and 46% suffering from ongoing declines. The report highlighted agriculture and development (housing, commercial, industrial, and recreational) as two of the primary threats facing these habitats.

Wicklow has fifteen Special Areas of Conservation (SACs) and four Special Protection Areas (SPAs). Therefore, the CDP should lay out specific actions to ensure that the protection of these designated sites, as well as biodiversity more generally, is upheld in the planning process at all levels.

7.2 BUILT AND CULTURAL HERITAGE

Ireland’s unique built and cultural heritage is increasingly threatened with destruction. Ireland is a signatory to UNESCO’s Convention Concerning the Protection of the World Cultural and Natural Heritage ratified by Ireland in 1991 and the Grand Convention ratified in Ireland in 1995. These conventions provide the basis for our national commitment to the protection of architectural heritage, the importance of “handing down to future generations a system of cultural references”. To be effective, it relies on its signatory countries implementing their own national protective regimes.

The CDP should ensure the effective promotion of the Architectural Heritage provisions of Planning and Development Act 2000 and therefore the protection of Wicklow’s built heritage, including Architectural Conservation Areas (ACAs) and Protected Structures. The CDP should include policies for monitoring buildings at risk and using the provision of Section 59 of the PDA 2010 to serve notices of endangerment to negligent property owners.

Natural, Cultural and Built Heritage Recommendations

- The CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law, particularly with regard to the Habitats and Birds Directives.
- Achieving adherence to the PA’s legal obligations under the Habitats Directive and other environmental legislation cannot be achieved without the preparation in tandem with the CDP of a full Strategic Environmental Assessment and Habitats Directive Assessment.
- The policy recommendations of the National Biodiversity Plan 2017-2021 should be fully incorporated into the CDP.
- The most significant demesnes and designed landscape in the county should be identified and planning policies applied to maintain and enhance their special character and significance in considering agricultural, recreational or other development.
- The CDP should seek to designate more ACAs and Special Planning Control Schemes.
- S.48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation.
- Important views and prospects must be protected.
- The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.

8.0 STRATEGIC ENVIRONMENTAL ASSESSMENT

The preparation of a draft Development Plan requires Strategic Environmental Assessment (SEA) under the SEA Directive by Wicklow County Council. An Taisce highlights the following key articles:

Article 5 requires the preparation of an Environmental Report “in which the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into

account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.”

Article 6 provides for public consultation.

Article 8 on “Decision Making” requires that “the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.”

Article 9(1)(b) on “Information on the Decision” requires that “a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted in the light of other reasonable alternative dealt with.”

Wicklow County Council has a legal obligation to ensure that the SEA process is robust, effective, and identifies all likely significant effects on the environment under the range of considerations set out in the Annexes to the SEA Directive. To ensure integration of environmental considerations into the plan, a general policy or land use zoning should not be maintained where likely significant effects on the environment are identified.

9.0 IMPLEMENTATION AND MONITORING

In the absence of rigorous application of policy, the divergence between policy and practice results in unsustainable, economically inefficient, structurally weak and spatially dispersed settlement patterns. Therefore, it is of paramount importance that the PA moves beyond policy objectives within the text of the CDP and towards robust targets, actions and measures to achieve the tangible implementation of the plan’s objectives and policies. The success or otherwise of the forthcoming CDP can only be judged against quantifiable and implementable criteria which are subject to ongoing monitoring. This will be fundamental in creating a low carbon, low energy, sustainable, and healthy society.

Response of Chief Executive

This is a long and very detailed submission from An Taisce, covering very wide range of issues. For the most part, An Taisce is reminding the Council of its obligations under various Directives, Acts, Guidelines etc that the Council must as a matter of course address and comply with. In addition, the submission makes recommendations for new matters to be addressed in the plan that are addressed in the current plan (and plans before that).

The CE generally welcomes the advice of An Taisce and advises that the draft plan being prepared and to be recommended to the members will address all of the matters raised.

With regard to the specific points raised:

INTRODUCTION AND EXECUTIVE SUMMARY

It is agreed that the provisions of the County Development Plan should aim to give rise to positive change and facilitate the development of the county in a plan-led, sustainable manner.

1. Strategic Planning and Zoning

- As required by the Planning Act and Ministerial Guidelines, the new plan, as with previous plans, will adopt a methodical and evidence-based approach to land-use zoning and settlement planning including demonstrating a rational assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance. The Planning Authority will only apply considerations of proper planning and sustainable development (i.e. sequential approach, flooding, etc.) in zoning, phasing, de-zoning or down zoning land and will disregard all other considerations including private interests or potential commercial or rate-generating revenue.
- It is intended that any land zoned for residential development will be located in close proximity and/or be well connected to existing / planned services (e.g. schools, retail, community/health centres, sports/amenity facilities, etc.) and employment sites.
- It is intended that lands identified for employment development will be located proximate to existing or proposed residential areas.
- The “Planning Review Report” recommended new processes that might be utilised when a decision of the Planning Authority is overturned by the Board and that these should be set out in revised / updated Development Management Guidelines. As a matter of course, the Planning Authority considers carefully the implications of any such decisions and where a change in policy is required, this is considered during each plan review phase.

2. Sustainable Land Use and Transport

- It is intended that the new plan will promote settlement nucleation and to protect rural areas from a proliferation of car dependent, dispersed, urban-generated settlement.
- It is intended that the new plan will have, as a key ‘plan dynamic’ the encouragement of a shift from car-orientated urban patterns to walkable, cyclable, and transit-orientated development patterns.
- It is intended that the new plan, as with the current plan, will address development ‘scale’ depending on the type and size of settlement, and will address, via its Core Strategy and development policies and objectives, the need for new development scale to be commensurate with local physical infrastructure and social capital carrying capacity.
- The current County Development Plan does not provide for urban generated dispersed one off housing, and this will be maintained in the new plan.
- It is not intended that the new plan will utilise standards or methodologies from the now replaced NSS but the principles are noted and accepted.
- All locations outside of the designated settlement boundaries in Wicklow are deemed ‘rural areas’ where strict rural housing policies already apply. It is not considered necessary to formally designate same as ‘greenbelts’ which may have unplanned impact on other development forms that may be desired in rural areas (such as energy generation).
- It is agreed that the new plan should be consistent with and have regard to higher order plans and strategies and the plan / strategies of other agencies including ‘Smarter Travel’, ‘The National Cycle Policy Framework’, ‘A Healthy Weight for Ireland, Obesity Policy and Action Plan’, ‘A Framework for Improve Health and Wellbeing 2013-2025’ and ‘Get Ireland Active! National Physical Activity Action Plan for Ireland’.
- Local Transport Plans are intended to establish and give expression at the local level to integrated land use and transportation policies and objectives at the national and regional levels. Therefore this is more appropriate in the preparation of Local Area Plans rather than the

County Development Plan. It is intended that LAPs that are prepared following the adoption of this County Development Plan will be accompanied by LTPs.

- It is considered that permeability and way finding studies are more appropriately prepared for in local, rather than county plans. It is intended that LAPs that are prepared following the adoption of this County Development Plan will be accompanied by LTPs which will address these types of issues.
- The new plan will be aligned, as is required, with regional transport strategies of the National Transport Authority (NTA).
- The current County Development Plan requires the provision of Mobility Management Plans (MMP) for certain employment developments in accordance with the advice of the NTA which describes MMPs as a plan that *‘normally brings together a package of measures tailored to the needs of an individual work site or a collection of work sites. This package generally includes measures to promote and improve the attractiveness of using public transport, cycling, walking, carsharing, flexible working or a combination of these as alternatives to drive-alone journeys to work’*. These are not generally relevant for smaller scale development such as one-off houses

3. Addressing the Climate Emergency

- It is intended that the new plan will address climate change more prominently than already addressed in the current County Development Plan, with the aim of reducing dependence on fossil fuels, reducing greenhouse gas emissions, and enhancing climate resilience. The Council has already adopted a County Climate Adaptation Plan and is in the process of preparing a Mitigation Plan. These separate plans / strategies are the most appropriate strategies through which to drive the delivery of climate change measures in the County. Where these strategies identify actions to be delivered through planning / land use plans, these will be integrated in the new plan.
- The current County Development Plan explicitly promotes the generation of renewable energy and it is intended that these provisions will be maintained and enhanced in the new plan.
- The current County Development Plan addresses energy efficiency in buildings and it is intended that these provisions will be maintained and enhanced in the new plan.

4. Green Infrastructure

- The current County Development Plan addresses ‘Green Infrastructure’ both within the chapters of the plan and in a separate appendix to the plan. The submission does not make it clear what aspect of the current approach they believe should be altered. It is intended that the current provisions will be maintained and enhanced in the new plan.

5. Economic, Employment and Retail Development

- The current County Development Plan addresses and promotes sustainable agriculture, including horticulture and it is intended that these provisions will be maintained and enhanced if necessary in the new plan.
- The current County Development Plan includes a policy on local farmers’ markets and it is intended that this provision will be maintained and enhanced if necessary in the new plan. Without more detailed study it is not considered appropriate to identify specific locations at this level of plan making.
- The current County Development Plan sets out the policy regarding out-of-town commercial and/or retail development, which accords with the Retail Planning Guidelines These Ministerial

guidelines, issued under Section 28 of the Act, do not *prohibit* out-of-town commercial and/or retail development. Specifically it is the intention to retain Retail Development Objective RT 23 in this regard.

With respect to parking charges at existing out of centre locations, while it is agreed that abundant and free parking at such location can make these more attractive than town centres and may undermine the viability of town centres, it would not appear to be legally feasible to require a paid parking regime at existing private car parks and indeed it may be problematic to insist on paid parking at any new edge or out of centre shopping facilities that might be developed in Wicklow without there being national legislative or policy support for same.

- Wicklow County Council has indeed taken an active role in site assembly for new retail development on brownfield and infill sites such as the Florentine site in Bray and will continue to be proactive in this area where opportunities arise.
- While the current County Development Plan includes objectives regulating the uses of retail warehousing development, there is merit in the suggestion that objectives could be enhanced to restrict future changes of use to non-bulky goods.
- The current County Development Plan includes objectives regarding the scale and location of possible future retail warehousing which accord with the Retail Planning Guidelines and it is intended that these provisions will be retained and improved if necessary, but maintained in accordance with current Guidelines, in the new plan.

6. Water

- The current County Development Plan includes a range of policies and objectives relating to the Water Framework Directive and the River Basin Management Plans; it is intended that these provisions will be retained and improved if necessary in the new plan.
- The Council’s legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007) are acknowledged. However, with respect to wastewater treatment plants, these are now the responsibility of Irish Water.
- The current County Development Plan addresses requirements surrounding private wastewater treatment systems, and in particular the EPA Code of Practice and other related regulations. It is intended that these provisions will be retained and improved if necessary in the new plan.
- The zoning provisions of the new plan will be guided by the SFRA that will be carried out and zoning in areas at risk of flooding will only be carried out in accordance with the ‘*Planning System and Flood Risk Management Guidelines*’.
- The current County Development Plan requires the use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting, and it is intended that these provisions will be retained and improved if necessary in the new plan.

7. Natural, Cultural and Built Heritage

- It is intended that the new plan, as required by statute, will adhere to obligations under EU law, particularly with regard to the Habitats and Birds Directives.
- As required by statute, the plan will undergo Strategic Environmental Assessment and Appropriate Assessment.

- The current County Development Plan addresses biodiversity and it is intended that these provisions will be retained and improved if necessary having regard to the National Biodiversity Plan 2017-2021 in the new plan.
- With respect to significant demesnes and designated landscapes, those of significance that are associated with demesne houses are generally already included in the Record of Protected Structures. Such designation includes the historic curtilages associated with these estates, but until and unless such estates are professionally surveyed and assessed, it is not appropriate to identify the extent of the estates / landscapes associated with same that should also be protected. Data sources regarding significant demesnes and designed landscape (such as the NIAH) will be reviewed as part of this plan review process to determine if there are additional historic houses estates that should be protected in the new plan.
- Proposal for new ACAs will be evaluated as part of this plan review process.
- County Wicklow’s Section 48 development levy scheme allows for a 50% reduction in levies for protected structures
- The current County Development Plan addresses views and prospects worthy of protection and it is intended that these provisions will be retained and improved if necessary in the new plan.
- The CE is cognisant of the requirements of the Architectural Heritage Protection Guidelines for Planning Authorities.

1.0 STRATEGIC PLANNING AND ZONING

The location of residential zoned lands will be guided by the new Core Strategy, drawn up in accordance with the provisions of the Planning Act, Ministerial guidelines, and relevant higher order strategies (reference is made in this submission to the Regional Planning Guidelines which have now been superseded)

1.1 LAND-USE ZONING

It is intended that the provisions of the new plan, including zoning provisions, will be in accordance with the principles of proper planning and sustainable development and shall be compliant with the guidelines issue by Minister i.e. the plan shall

- *Create a clear strategic framework for the proper planning and sustainable development of the area over the duration of the plan, consistent with longer- term planning and sustainable development aims, including those set out in the National Spatial Strategy and any Regional Planning Guidelines* in force.*
- *Set out an over-arching vision for the development of the area to which the plan relates.*
- *Give spatial expression to the economic, social and cultural aims of the County or City Development Strategy*.*
- *Be grounded in public and political consensus around the plan’s strategic framework*
- *Provide a clear framework for public and private sector investment in infrastructure and in development in the area, having regard to both national and regional plans and policies.*
- *Protect and enhance the amenities of the area.*
- *Offer clear guidance to developers in framing development proposals and to the planning authority in assessing such proposals.*
- *Establish a policy framework within which more detailed plans (such as local area plans or plans for architectural conservation areas) can be drawn up for specific parts of the planning authority’s area.*
- *Be capable of implementation and monitoring.*

- *Development plans should be user friendly, logical, internally consistent and up-to-date and in a format which is suitable for hardcopy, Internet and CD versions.*

It is intended that the new plan will prioritise development in efficient, compact and walkable serviced locations in accordance with the sequential approach and infrastructure capacity.

Strategic Planning and Zoning Recommendations

- It is intended that the new plan will adhere to the methodical and evidence-based approaches to land-use zoning and settlement planning included under the Planning and Development Act
- In order to accord with the provisions of the NPF and new growth targets set by the NPF ‘Roadmap’ a review of the amount of land zoned for housing will be carried out for all settlements. It is intended that in determining where land should remain zoned for housing, the priority will be given to lands that are well connected to public transport and local services.
- It is intended that the new plan will make provision for employment generating activities, whether that be in the established town centres and commercial areas, or on greenfield lands. In the identification of appropriate greenfield for such designation, priority again will be given to lands close to where people are or will be living and that are well connected to public transport and local services.
- As a matter of course, all decisions from An Bord Pleanála that are at variance with a council decision are carefully considered by the executive with a view to determining if such a decision forms precedent. Where a change in policy is required, this is considered during each plan review phase.

SUSTAINABLE LAND USE AND TRANSPORT

As above, in order to accord with the provisions of the NPF and new growth targets set by the NPF ‘Roadmap’ revisions to the quantum and location of land zoned for housing will be necessitated. It is intended that in determining where land should remain zoned for housing, the priority will be given to lands that are well connected to public transport and local services, and increased densities will be required.

In this manner and in conjunction with enhanced design standards, it is intended that the new plan will drive a shift towards more sustainable, walkable and cyclable communities.

2.1 LAND USE AND SETTLEMENT PATTERNS

It is intended that the new plan, in accordance with the principles of the NPF, will continue its current policy of directing new development into designated growth centres, and limited / managing growth elsewhere, including dispersed development. Wicklow County Council has, since 1989 (therefore making it one of the first in the country) has had clear policies to control dispersed rural growth, to ensure only those with a bona fide necessity for a rural house were considered for permission in the open countryside. This is now national policy and this will continue to be implemented in the new plan.

In addition, Wicklow County Council has for many development plans promoted development in towns and villages and clearly set defined boundaries and growth targets for same. In setting the designation of each town or village in the settlement hierarchy and therefore identifying the most appropriate growth Strategy, Wicklow County Council has for many development plans ;‘audited’ the

services available in each settlement, with those having the highest range of services being identified for the most growth. Care must be taken however to ensure that promotion of development in smaller towns and villages does not redirect growth away from larger settlements that have the highest capacity for growth. In this regard, the current plan, as with previous plans, includes controls in relation to eligibility to build in such settlement and these will be reviewed as part of the plan review process.

The submission indicates that Wicklow County Council should address the prevalence of one-off dispersed rural housing in the county. The proportion of population living in rural areas in Co. Wicklow (that is outside of any town greater than 1,500 population, which is the CSO definition of ‘rural’) at 35% is in fact lower than neighbouring counties of Wexford (61%) and Carlow (51%); it is comparable to Kildare (32%) and is lower than Meath (41%). Rural housing has been regulated in Wicklow for a long time and will continue to be so in accordance with Government policy.

With regard to the suggestion regarding the provision of serviced sites, that is supported and subject to a funding stream being made available, the Local Authority could consider purchasing land in smaller town and villages where piped services are available. However, it must be borne in mind that nearly all such smaller towns and villages have very limited public transport provision, and such development would likely remain car dependent and therefore would generally be considered unsustainable locations for development.

With regard to the seven test requirements for housing location in urban areas as required by the National Spatial Strategy 2002, while this Strategy has been superseded, we welcome An Taisce drawing our attention to these principles, which will be considered in the crafting of the new plan.

With respect to social housing, the County Development Plan and the associated Housing Strategy as a high level and general document, will address housing of all types within the county. However, the delivery of social housing is a matter for the Council’s Housing Directorate and the Department of Housing, Planning and Local Government.

2.1.2. Sequential Approach to Development

It is agreed that future development should be located in efficient, compact, walkable, and serviced locations in accordance with the sequential approach and existing infrastructural capacity. It is further agreed that planning should be guided by social infrastructure and physical infrastructural capacity. It is intended that the new plan shall be guided in this regard by the principles set out in the NPF and Regional Spatial and Economic Strategy, which has developed an ‘asset base’ approach. As part of the proposed new ‘Core Strategy’ set out in Part 2 of this report, an assessment has been carried out of all towns in the County, in order to establish how they should be designated in terms of the new settlement hierarchy, and what their growth parameters should be in light of this assessment of capacity.

2.2 ACHIEVING A MODAL SHIFT IN TRANSPORTATION

As set out previously, it is intended the new plan will encourage a shift towards more consolidated urban forms and improved access to sustainable form of transport.

The new plan will take into account a range of transportation strategies and policies including ‘Smarter Travel’ as suggested.

Local Transport Plans are intended to establish and give expression at the local level to integrated land use and transportation policies and objectives at the national and regional levels. Therefore this is more appropriate in the preparation of Local Area Plans rather than the County Development Plan. It is intended that LAPs that are to be prepared following the adoption of this County Development Plan will be accompanied by LTPs.

The current County Development Plan requires the provision of Mobility Management Plans (MMPs) for certain employment developments in accordance with the advice of the NTA which describes MMPs as a plan that *‘normally brings together a package of measures tailored to the needs of an individual work site or a collection of work sites. This package generally includes measures to promote and improve the attractiveness of using public transport, cycling, walking, car sharing, flexible working or a combination of these as alternatives to drive-alone journeys to work’*. These are not generally relevant for smaller scale development such as one-off houses

2.2.1 Promoting Walking and Cycling

It is agreed that the provisions of the new plan should advance walking and cycling as alternatives to private car use and the provisions of the National Cycle Policy Framework, as well as the National Cycle manual and DMURS, will be considered in the crafting of the new plan.

Sustainable Land Use and Transport Recommendations

- It is intended that the new plan, as with previous plans, will promote settlement nucleation and protect rural areas from inappropriate development
- It is intended that the new plan, as with previous plans, will promote walkable, cyclable and transit-orientated development patterns
- The guidelines on ‘Sustainable Residential Development in Urban Areas’ do not include a prohibition on large scale development. The current County Development Plan as outlined in Housing Development Objectives HD2, HD3, HD8 and HD17 and Transportation Objective TR15, as well as the ‘Development Design Standards’ in Appendix 1 set out detailed policy and design guidance applied when larger scale development is being considered. It is intended that these provisions shall be retained and enhanced where necessary in the new plan.
- The current County Development Plan provides for a range of housing locations from our level 1 settlement of Bray down to small villages and rural hamlets. The current County Development Plan also already supports the development of serviced sites as presented in existing Housing Objective HD18. It is intended that these provisions shall be retained and enhanced where necessary in the new plan.
- All locations outside of the designated settlement boundaries in Wicklow are deemed ‘rural areas’ where strict rural housing policies already apply. It is not considered necessary to formally designate same as ‘greenbelts’ which may have unplanned impact on other development forms that may be desired in rural areas (such as energy generation).
- It is agreed that the new plan should be consistent with and have regard to higher order plans and strategies and the plan / strategies of other agencies including ‘Smarter Travel’, ‘The National Cycle Policy Framework’, ‘A Healthy Weight for Ireland, Obesity Policy and Action Plan’, ‘A Framework for Improve Health and Wellbeing 2013-2025’ and ‘Get Ireland Active! National Physical Activity Action Plan for Ireland’.
- Local Transport Plans are intended to establish and give expression at the local level to integrated land use and transportation policies and objectives at the national and regional levels. Therefore this is more appropriate in the preparation of Local Area Plans rather than the

County Development Plan. It is intended that LAPs that are prepared following the adoption of this County Development Plan will be accompanied by LTPs.

- It is not intended that the County Development Plan will include permeability and way finding studies for every settlement in the County but rather, the principles of such studies will be utilised in the determination of the optimal land for future development and zoning in all urban settlements.
- The new plan will be aligned, as is required, with regional transport strategies of the National Transport Authority (NTA).
- The current County Development Plan requires the provision of Mobility Management Plans (MMPs) for certain employment developments in accordance with the advice of the NTA which describes MMPs as a plan that *‘normally brings together a package of measures tailored to the needs of an individual work site or a collection of work sites. This package generally includes measures to promote and improve the attractiveness of using public transport, cycling, walking, car sharing, flexible working or a combination of these as alternatives to drive-alone journeys to work’*. These are not generally relevant for smaller scale development such as one-off houses

3. ADDRESSING THE CLIMATE EMERGENCY

The current County Development Plan addresses climate change in some detail and it is intended that the new plan will expand on this where necessary. It must be borne in mind however that the County Development Plan, which is concerned with land use only and spatial planning, is only one in a suite of strategies and policies, by both the Local Authority and other state agencies that aim to address this challenge.

3.1 LEGAL REQUIREMENTS FOR ACTION

The new plan will accord with the requirements of the Planning Act and in particular the mandatory objectives as set out in this submission relating to sustainable settlement patterns and transportation. All avenues will be utilised to help drive a shift towards reducing energy demand, supporting sustainable modes of transport and supporting enhancement of green infrastructure; as well as address the effects of climate change, with particular reference to land use, energy, transport, water resources, flooding, waste management, and biodiversity.

Addressing the Climate Emergency Recommendations

- It is the goal of the Council to craft a development plan that contributes towards a reduction in fossil fuel use primarily by, but not limited to, driving changes in settlement patterns, transportation, building design, and energy generation. However, as above, the County Development Plan is just one in a suite of national and local government strategies that can contribute this goal.
- With respect to electricity generation, the new plan, as with the current plan will promote the generation of renewable energy at the optimal locations in the county and in accordance with the highest standards. The County Development Plan will however have no role in ensuring that any such energy generated in the County will be used in the County – all electricity generated goes into the national grid and its distribution is controlled by Eirgrid.
- The new plan, as with the current plan, will promote the development of energy efficient buildings, which is a national objective and is dealt with in some detail in the 2017 amendment to Part L (Conservation of Fuel and Energy) of the Building Regulations, which provide for the

implementation of requirements of Articles 2,3 4, 6 (part of), 7, 8, 9(3,b) of the EU Energy Performance of Buildings Directive – EPBD (recast) (2010/31/EU of 19 May 2010).

These requirements include:

- application of a methodology for the calculation of the energy performance of buildings on the basis of a general framework set out in Annex I to the EPBD (recast).
- setting of minimum energy performance requirements for buildings and the application of these requirements to new buildings to achieve Nearly Zero Energy Buildings;
- ensuring where buildings undergo major renovation that the renovated systems and components meet minimum thermal performance requirements in so far as this is technically, functionally and economically feasible.
- ensuring that when a building element that forms part of the building envelope and has a significant impact on the energy performance of the building envelope, is retrofitted or replaced, the energy performance of the building element meets minimum energy performance requirements in so far as this is technically, functionally and economically feasible.

The NZEB (nearly zero energy building) standard will apply to all new buildings occupied after the 31st December 2020. For Public Sector bodies, the standard will apply to all new buildings owned and occupied by the 31st December 2018. As with previous Building Regulations there are transitional arrangements in place where buildings are occupied after these dates but work commenced prior to 31st December 2018 for Non Domestic Buildings and 31st October for Domestic Buildings.

For all new non-residential builds, such as community centres, an equivalent to a 60% improvement in energy performance on the 2008 Building Regulations is required. This means an improved energy performance for the fabric, services and lighting specification. It also introduces a mandatory requirement for renewable sources. The renewable sources must in general provide 20% of the primary energy use, however there is flexibility where the building is more energy efficient than the regulations. This typically corresponds to an A3 Building Energy Rating.

In light of the national Building Regulations and these NZEB requirements, it is not considered necessary for the County Development Plan to separately require the installation of solar panels on all new buildings.

4.0 GREEN INFRASTRUCTURE

The current County Development Plan addresses Green Infrastructure and the ‘GI approach’ espoused in this submission. The current provisions will be reviewed and enhanced in the new plan if necessary.

In addition, it is recommended that the new plan includes a health and well-being ‘audit’ which will allow the key factors that contribute to community well-being, such as access to green space, to be identified and addressed where possible in the new plan.

5.0 ECONOMIC, EMPLOYMENT AND RETAIL DEVELOPMENT

It is agreed that a key factor for the future economic, social and environmental prosperity of County Wicklow is the creation of an appropriate critical mass of population in targeted settlement centres,

and this is the approach that will be recommended in the new plan, in accordance with the provisions of the NPF and RSES.

The current plan adopts a clear approach to economic development, whereby locations with the best services are prioritised (such as Bray, Wicklow – Rathnew, Greystones, Arklow and Blessington) for development and this strategy shall be reviewed and updated in line with the NPF and RSES. The economic strength and potential of all towns will form part of the ‘asset based’ assessment of all settlements in the County, as set out in the RSES, upon which the new settlement and development strategy will be based.

5.1 RURAL ENTERPRISE

The current County Development Plan supports appropriate rural enterprise and it is intended that these provisions will be retained and enhanced in the new plan as necessary. With respect to forestry and farming, while the current County Development Plan promotes sustainable agriculture, including horticulture and it is intended that these provisions will be maintained and enhanced if necessary in the new plan; however, the plan has little role in how farm lands are actually used and what crops / species are planted, and it would be beyond the scope for the plan to endeavour to control this.

5.2 RETAIL DEVELOPMENT

It is accepted that out of town retailing can have significant adverse effects on existing historic town centres. The current County Development Plan, in accordance with Ministerial guidelines on retail, requires rigorous justification tests to be passed before considering permission for such developments.

Economic, Employment and Retail Development Recommendations

- The current County Development Plan promotes sustainable agriculture, including horticulture and it is intended that these provisions will be maintained and enhanced if necessary in the new plan
- The current County Development Plan includes a policy on local farmers’ markets and it is intended that this provision will be maintained and enhanced if necessary in the new plan.
The current County Development Plan sets out the policy regarding out-of-town commercial and/or retail development (RT23) which accords with the Retail Planning Guidelines. These Ministerial guidelines, issued under Section 28 of the Act, do not *prohibit* out-of-town commercial and/or retail development.
- With respect to parking charges at existing out of centre locations, while it is agreed that abundant and free parking at such location can make these more attractive than town centres and may undermine the viability of town centres, it would not *appear to* be legally feasible to require a paid parking regime at existing private car parks and indeed it may be problematic to insist on paid parking at any new edge or out of centre shopping facilities that might be developed in Wicklow without there being national legislative or policy support for same.
- Wicklow County Council has indeed taken an active role in site assembly for new retail development on brownfield and infill sites, such as the Florentine site in Bray and will continue to be proactive in this area where opportunities arise.
- While the current County Development Plan includes objectives regulating the uses of retail warehousing development, there is merit in the suggestion that objectives could be enhanced to restrict future changes of use to non-bulky goods.

- The current County Development Plan includes objectives regarding the scale and location of possible future retail warehousing which accord with the Retail Planning Guidelines and it is intended that these provisions will be retained and improved if necessary, but maintained in accordance with current Guidelines, in the new plan.
- The current County Development Plan and the new plan can certainly promote the development of local shops, but it would not accord with Ministerial guidelines to ‘ban’ or limit the development of ‘large floor-plate multiples’ where that development otherwise complies with the Retail Planning Guidelines and the County Retail Strategy. The current plan includes a range of Retail Objectives (RT1, RT9, RT10, RT23, RT25), which aim to support smaller and town centre based retail and it is intended that these or similar provisions will be provide in the new plan:

6.0 WATER

The current County Development Plan addresses water quality management and the EU Water Framework Directive as they are applicable to a spatial, land use plan and it is intended that these provisions will be retained and enhanced in the new plan.

6.1 MUNICIPAL WASTEWATER TREATMENT

The information provided in the submission is noted. Irish Water is now responsible for the management of municipal wastewater.

6.2 PRIVATE WASTEWATER TREATMENT

The Local Authority’s legal obligations under the European Communities Environmental Objectives (Groundwater) Regulations 2010 and European Communities Environmental Objectives (Surface water) Regulations 2009 are noted, as is the EPA’s Code of Practice for private wastewater treatment, which is referenced clearly in the current County Development Plan (e.g. Objective WI7):. It is intended that these provisions will be retained or enhanced where necessary in the new plan.

The current County Development Plan provides for a range of options for those wishing to self-build, that would not require the provision of on-site effluent disposal system, in particular the majority of the town and villages from current levels 1-7 in the County settlement hierarchy. For those wishing a semi-rural lifestyle, settlements particularly in Levels 5, 6 and 7 can provide this.

6.3 SURFACE WATER

The current County Development Plan fully implements the provisions of the ‘*Planning System and Flood Risk Management Guidelines*’ and the new plan will continue this approach. The zoning provisions of the new plan will be guided by the SFRA that will be carried out and zoning in areas at risk of flooding will only be carried out in accordance with the guidelines.

The current County Development Plan requires the use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting, and it is intended that these provisions will be retained and improved if necessary in the new plan.

Water Recommendations

- The current County Development Plan includes a range of policies and objectives relating to the Water Framework Directive and the River Basin Management Plans; it is intended that these provisions will be retained and improved if necessary in the new plan.
- The Council’s legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007) are acknowledged, as is Circular Letter PD7/09 issued by the (formerly) Department of Environment, Heritage and Local Government. However, with respect to wastewater treatment plants, these are now the responsibility of Irish Water.
- With regard to the suggestion regarding the provision of serviced sites, that is supported and subject to a funding stream being made available, the Local Authority could consider purchasing land in smaller town and villages where piped services are available. However, it must be borne in mind that nearly all such smaller towns and villages will have very limited public transport provision, and such development would likely remain car dependent and therefore would likely still be considered unsustainable locations for development.
- The current County Development Plan addresses requirements surrounding private wastewater treatment systems, and in particular the EPA Code of Practice and other related regulations. It is intended that these provisions will be retained and improved if necessary in the new plan.
- The zoning provisions of the new plan will be guided by the SFRA that will be carried out. Zoning in areas at risk of flooding will only be carried out in accordance with the *‘Planning System and Flood Risk Management Guidelines’*.
- The current County Development Plan requires the use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting, and it is intended that these provisions will be retained and improved if necessary in the new plan.

7.0 NATURAL, CULTURAL AND BUILT HERITAGE

7.1 NATURAL ENVIRONMENT

The current County Development Plan provides a range of objectives (Objectives NH1 – NH12) regarding the protection of Natura 2000 sites, and other sites of natural heritage importance whether designated or not, and it is intended that these provisions shall be retained and enhanced as necessary in the new plan.

7.2 BUILT AND CULTURAL HERITAGE

The current County Development Plan provides a strong and wide reaching range of policies and objectives aimed at ensuring the protection and enhancement of the built and cultural heritage of the County (Objectives BH1 – BH19) and it is intended that these provision shall be retained and enhanced if necessary in the new plan.

The Planning Authority utilises its powers under Part IV of the Planning Act where necessary including the issuing of notices under Sections 59 and 60.

Natural, Cultural and Built Heritage Recommendations

- It is intended that the new plan, as required by statute, will adhere to obligations under EU law, particularly with regard to the Habitats and Birds Directives.

- As required by statute, the plan will undergo Strategic Environmental Assessment and Appropriate Assessment.
- The current County Development Plan addresses biodiversity and it is intended that these provisions will be retained and improved if necessary having regard to the National Biodiversity Plan 2017-2021 in the new plan.
- With respect to significant demesnes and designated landscapes, those of significance that are associated with demesne houses are generally already included in the Record of Protected Structures. Such designation includes the historic curtilages associated with these estates, but until and unless such estates are professionally surveyed and assessed, it is not appropriate to identify the extent of the estates / landscapes associated with same that should also be protected. Data sources regarding significant demesnes and designed landscape (such as the NIAH) will be reviewed as part of this plan review process to determine if there are additional historic houses estates that should be protected in the new plan.
- Proposals for new ACAs will be evaluated as part of this plan review process.
- County Wicklow’s Section 48 development levy scheme allows for a 50% reduction in levies for protected structures
- The current County Development Plan addresses views and prospects worthy of protection and biodiversity and it is intended that these provisions will be retained and improved if necessary in the new plan.
- The CE is cognisant of the requirements of the Architectural Heritage Protection Guidelines for Planning Authorities.

8.0 STRATEGIC ENVIRONMENTAL ASSESSMENT

Wicklow County Council is aware of its legal obligations under statute to carry out a Strategic Environmental Assessment and Appropriate Assessment of the new County Development Plan.

9.0 IMPLEMENTATION AND MONITORING

Wicklow County Council is aware of its obligations with respect to the implementation of the provisions of the plan.

Implementation of the plan will be achieved by:

- Application of the objectives and standards of the plan in the assessment of all applications for planning permission, including Local Authority development.
- Investment in infrastructure underpinning the development objectives of the plan. In this regard, the ‘Core Strategy’ of the plan shall set the priorities for the provision and improvement of infrastructure by both the Local Authority and other agencies, subject to the availability of funding.
- Integrating the strategies, policies and objectives of the plan with lower order plans such as local area plans and action area plans.
- Ongoing monitoring of the strategies and objectives of the plan and identifying any needs for adjustment of objectives over the lifetime of the plan and in future reviews.

As far as practicable, every effort will be made to craft objectives that are specific, measurable, achievable and realistic. All of the objectives of the plan have been written with the specific aim of fulfilling the ‘Core Strategy’ of the plan.

Recommendations of Chief Executive

1. The new plan will adopt a methodical and evidence-based approach to land-use zoning and settlement planning including demonstrating a rational assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance.
 The Planning Authority will only apply considerations of proper planning and sustainable development (i.e. sequential approach, flooding, etc.) in zoning, phasing, de-zoning or down zoning land and will disregard all other considerations including private interests or potential commercial or rate-generating revenue.
 Any land zoned for residential development will be located in close proximity and/or be well connected to existing / planned services (e.g. schools, retail, community/health centres, sports/amenity facilities, etc.) and employment sites. The new plan will have as a key ‘plan dynamic’ the encouragement of a shift from car-orientated urban patterns to walkable, cyclable, and transit-orientated development patterns.
 Lands identified for employment development will be located proximate to existing or proposed residential areas.
 The new plan will promote settlement nucleation and policies to protect rural areas from a proliferation of car dependent, dispersed, urban-generated settlement.
 The new plan will address development ‘scale’, depending on the type and size of settlement, and will address, via its Core Strategy and development policies and objectives, the need for new development scale to be commensurate with local physical infrastructure and social capital carrying capacity.
 The new plan will maintain the current strategy, subject to any changes required to comply with the new NPF and RSES, of suitably managing rural housing and resisting urban generated dispersed rural housing
2. The new plan shall be consistent with and have regard to higher order plans and strategies and the plan / strategies of other agencies including ‘Smarter Travel’, ‘The National Cycle Policy Framework’, ‘A Healthy Weight for Ireland, Obesity Policy and Action Plan’, ‘A Framework for Improve Health and Wellbeing 2013-2025’ and ‘Get Ireland Active! National Physical Activity Action Plan for Ireland’. The new plan will be aligned, as is required, with regional transport strategies of the National Transport Authority (NTA).
3. The new plan will address climate change more prominently with the aim of reducing dependence on fossil fuels, reducing greenhouse gas emissions, and enhancing climate resilience. The new plan will explicitly promote the generation of renewable energy The new plan will address energy efficiency in buildings
4. The new plan will address the Water Framework Directive and the River Basin Management Plans. The new plan will address requirements surrounding private wastewater treatment systems, and in particular the EPA Code of Practice and other related regulations.
5. The zoning provisions of the new plan will be guided by the Strategic Flood Risk Assessment (SFRA) that will be carried out. Zoning in areas at risk of flooding will only be carried out in accordance with the ‘*Planning System and Flood Risk Management Guidelines*’. The new plan shall address Urban Drainage Systems (SUDS) and rainwater harvesting
6. The new plan will adhere to obligations under EU law, particularly with regard to the Habitats and Birds Directives. The new plan shall address biodiversity. The new plan shall address views and prospects worthy of protection. The new plan shall address the Architectural Heritage Protection Guidelines for Planning Authorities.

Issues raised

Dun Laoghaire-Rathdown acknowledges the current review of the Wicklow County Development Plan and the preparation of the nascent Wicklow County Development Plan 2021-2027. Given that Dun Laoghaire-Rathdown has commenced its own County Development Plan (3 January 2020) we look forward to working closely and collaboratively with Wicklow County Council over the coming months - as the respective Draft Plans are advanced - on matters of mutual and common interest.

At this Pre-Draft stage it is noted that primary focus of submissions should be in relation to the policies and objectives that will ultimately deliver an overall strategy for the proper planning and sustainable development of the area covered by the Development Plan. Dun Laoghaire-Rathdown is conscious that our two counties adjoin each other and, indeed, a portion of Bray Town falls within the jurisdiction of Dun Laoghaire-Rathdown. The planned growth area of Old Conna also interfaces with Bray itself and is specifically identified in Chapter 4 of the RSES - in tandem with Fassaroe - as contributing to fulfilling the growth potential of Bray's Key Town status. The synergies between Wicklow and DLR in the Bray Environs area are also highlighted and embedded in both RPO 4.37 and RPO 4.40 of the RSES. DLR strongly supports the collaborative approach advocated in these RPOs and would welcome constructive engagement with WCC - to accelerate the delivery of key transport infrastructure necessary to open up the zoned development lands west of Bray Town.

Dun Laoghaire-Rathdown would request that the Wicklow Draft CDP address the following:

(1) Provision of Strategic Infrastructure Required to Deliver Strategic Development Areas and Corridors - as Prescribed in the RSES.

Table 5.1 'Strategic Development Areas and Corridors and Capacity Infrastructure and Phasing' of the RSES identifies what it calls "*South County Dublin - North Wicklow - development of new residential communities at Woodbrook-Shanganagh and Bray Golf Course and Harbour Lands along with Bray Fassaroe*" and "*....the westward expansion of Bray at Old Connaught (Dun Laoghaire) and Bray Fassaroe (Wicklow) lands*" as key development areas. Short-to-medium term phasing and specific enabling infrastructure including "*High capacity bus between Bray and Fassaroe, distributor Road, N11/M11 upgrades, new bridge to Old Connaught, waste water upgrades, local and wider water network and storage upgrades.*" are identified. Longer term (post -2027) enabling infrastructure revolves around the Green Line Luas Extension to Bray

In order to accord with both the NPF and the RSES the stated enabling infrastructure necessary to deliver on the above growth areas should be namechecked and clearly identified in the draft County Development Plan .

As you are aware the National Transport Authority published the 'Bray and Environs Transport Study' in April 2019. This Study seeks to facilitate and support the land use objectives of both Wicklow and DLR. Section 2.3 of the Study identifies various specific transport elements that are necessary to deliver the full build out of development areas in both Wicklow and DLR. Sections 3.4 and 3.8 provide greater detail in this regard.

For the full build out of Fassaroe several items are listed including the Busway from Fassaroe to Old Connaught over the County Brook at Ballyman Glen. This piece of infrastructure is required not only for the full build out of Fassaroe but will impact on and clearly have consequences for Old Connaught. It should be included in the Draft Wicklow CDP and regard should be had to same in any Appropriate Assessment screening or NIS of the Draft Plan . For its part DLR will, recommend to the Members, including the Fassaroe/Old Conna Busway in the Draft DLR CDP. DLR would support and welcome collaborative liaison with WCC on the delivery of this item of strategic infrastructure.

Also included in the 'Bray and Environs Transport Study' are a suite of proposed upgrades and improvements to the N11/M11 corridor between Junctions 4 and 14. Again , these objectives should be included in any Draft CDP.

It is noted that the NTA recommend that the statutory plans of Wicklow County Council and Dun Laoghaire-Rathdown "... *reflect this Study fully*" . DLR would, consequently, welcome the inclusion of the various objectives of the Study - and more specifically on the required items of necessary strategic infrastructure - in the Draft Wicklow CDP.

(2) Liaison with Dun Laoghaire-Rathdown on Bray's Role as a Key Town - as identified in the RSES

Bray is one of three Key Towns identified in the Metropolitan area in the RSES. RPO 4.26 of the RSES recommends that the Core Strategy of the Wicklow CDP shall support objectives to achieve a minimum of 30% of housing in Key Towns by way of compact growth through the identification of key sites for regeneration .

The town of Bray straddles two jurisdictions - Wicklow and Dun Laoghaire -Rathdown - albeit only a small portion falls in the Dun Laoghaire-Rathdown administrative area. Notwithstanding the ongoing work of the MASP Technical Working group, Dun Laoghaire-Rathdown would nonetheless welcome liaison with WCC on proposals for Bray as a Key Town. It is also acknowledged that NPO 68 of the NPF and the MASP contained in the RSES allows for 20% of the targeted growth for the city to be transferred to the three Key Towns of Swords, Maynooth and Bray.

Dun Laoghaire-Rathdown would welcome ongoing liaison with Wicklow County Council over the coming months with a view to ensuring a degree of alignment and consistency is achieved in our respective Draft Development Plans on areas of mutual and common interest at the interface of the two Counties.

Response of Chief Executive

The CE welcomes the submission from DLR and is committed to working closely with this neighbouring Authority on the realisation of shared goals and objectives, particularly with regard to Bray and Fassaroe. This close relationship is already well established through the RSES and MASP working groups, as well as the recently completed Bray & Environs transport study. In addition, the Transportation, Water and Emergency Services team of Wicklow County Council is working very closely with DLR colleagues, as well as the NTA and TII, on implementing the provisions of the transport study.

The County Development Plan review will include a review of all roads and transportation objectives, in light of any changes in Government / NTA / TII policy, any new studies and data prepared by

Wicklow County Council or any other state agencies, and the progression of any new projects since the adoption of the last County Development Plan. In this regard, it is intended to carry out an assessment of the provisions of the Bray and Environs Transport Study, to so determine whether any of the infrastructure objectives have a County or regional / strategic dimension such that they need to be highlighted in the County Development Plan rather than only in the Bray Municipal District Local Area Plan.

With regard to the bridge over the County Brook as highlighted in this submission, an implementation plan currently being agreed between Wicklow County Council and the TII, regarding Fassaroe, will identify at what stage in the development of Fassaroe this bridge is likely to become necessary. When this has been determined, this can be addressed in the County Development Plan if deemed necessary.

Recommendations of Chief Executive

1. To review and update as necessary roads and transportation infrastructure provisions of the County Development Plan in light of any changes in Government / NTA / TII policy, any new studies and data prepared by Wicklow County Council or any other state agencies, and the progression of any new projects since the adoption of the last County Development Plan, including but not limited to:
 - Project Ireland 2040 (National Planning Framework and National Development Plan)
 - Regional Spatial and Economic Strategy 2019-2031
 - NTA Greater Dublin Area Transport Strategy 2016-2035
 - NTA Statement of Strategy 2018-2022
 - NTA Integrated Implementation Plan 2019-2024
 - Bray and Environs Transport Study 2019 (NTA / TII / WCC / DLR)
 - M11 / N11 Corridor Study Needs Assessment Report TII 2017
 - N11/M11 Junction 4 to Junction 14 Improvement Scheme documentation and reports
2. To review and update as necessary the objectives for Bray in light of the NPF and Regional Spatial and Economic Strategy, including the forthcoming MASP implementation plan.
3. To continue to liaise closely with DLR on all common matters.

Issues raised

EirGrid is a prescribed authority for the purposes of Section 11 (2) of the Planning and Development Act 2000, as amended and has been involved in the making of Project Ireland 2040 (National Planning Framework) and the Eastern and Midlands Regional Spatial and Economic Strategy in which the strategic issue of the future development of Ireland’s electricity transmission grid was highlighted and extensively addressed in Section 10.3. It is requested the future development plan is in so far as is practicable consistent with such national plans, policies or strategies as the Minister determines relate to proper planning and sustainable development.

EirGrid’s Function

EirGrid is responsible for the safe, secure and reliable transmission of electricity – now and in the future. EirGrid develops, manages and operates the electricity transmission grid. This brings power from where it is generated to where it is needed throughout Ireland. The grid also supplies power to industry and businesses that use large amounts of electricity and powers the distribution network. The distribution network in turn supplies electricity to homes, businesses, schools, hospitals, and farms.

EirGrid’s function as the national electricity Transmission System Operator (TSO) is set out in the *European Communities (Internal Market in Energy) Regulations, 2000 - SI 445/2000*. Article 8(1) (a) gives EirGrid as TSO, the exclusive statutory function:

“To operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical, and efficient electricity transmission system, and to explore and develop opportunities for interconnection of its system with other systems, in all cases with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment.”

The transmission system on the island of Ireland refers to the higher capacity electricity network and primarily comprises substations and circuits at 400 kV (i.e. 400,000 Volts), 220 kV, and 110 kV (in Northern Ireland, transmission infrastructure also occurs at 275 kV). EirGrid’s (2016) Transmission System Map (ENCL1) is enclosed.

Co. Wicklow is part of the Greater Dublin Area transmission system and is a major load centre on the Irish transmission system. The main urban demand centres are composed of a mix of residential, commercial and industrial demand, which is expected to grow up to 2025 and beyond.

The 500 MW East West Interconnector is connected to the transmission system at Woodland via the 400 kV substation at Portan, Co. Meath and a pump storage facility is located at Turlough Hill, Wicklow. The existing regional transmission network is comprised of 400 kV, 220 kV and 110 kV infrastructure.

The transmission network has to meet a number of diverse power flows that can vary depending on the generation dispatch, network demand, interconnector flows and network topology. The network can be subject to high inter-regional power transfers from both north to south and south to north. We are currently investigating grid development options for connecting the Woodland and Dunstown 400kV substations, to increase the capacity of the often congested and highly loaded Dublin transmission network.

This will enable the transmission system to safely accommodate more diverse power flows and also facilitate future load growth in the area. These projects will strengthen the network for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if

the region is to continue to develop as an ICT hub and attract high technology industries that depend on a reliable, high quality, electricity supply.

Policy-Led Plan

The electricity transmission grid’s importance in supporting our society and economy should not be understated in the forthcoming draft. EirGrid notes and welcomes reference and emphasis placed on climate action and energy in the issues paper. EirGrid considers that policies and objectives which support a safe, secure and reliable supply of electricity need to be explicit in the draft in order to assist EirGrid in the successful implementation of its Grid Development Strategy - Your Grid, Your Tomorrow (2017) (ENCL2). This is imperative to meeting national targets for electricity generation, climate change targets, and security of energy supplies.

In this context the policies and objectives in the adopted Regional Spatial and Economic Strategy (Section 10.3 Energy) should be reviewed and considered as an example of robust and sustainable policies and objectives. The planning authority may consider these adequate for inclusion in the forthcoming draft. An extract of the relevant sections of the Regional Spatial and Economic Strategy is attached for convenience. Regional Policy Objective 10.19-10.24 of the RSES should be included, where applicable, in the forthcoming plan.

EirGrid also requests the draft be explicit as to how the various Government (and State Agency) policy documents have been considered in the preparation of the draft, and how they have informed the policy and objectives. A section should be included in the draft setting out how these policy documents have been considered in a holistic and integrated way to inform subsequent plan policy. This gives a clear policy-led foundation to the plan, which will prove invaluable as it subsequently informs the strategies, policies and objectives of local authority plans and public and private projects.

In terms of electricity transmission there are a number of important Government Policy documents namely:

- Department of Communications, Energy and Natural Resources (2015) White Paper on Energy: Ireland’s Transition to a Low Carbon Energy Future 2015-2030;
- Department of Communications, Energy and Natural Resources (2019) Climate Action Plan;
- EirGrid’s (2017) Grid Development Strategy - Your Grid, Your Tomorrow;
- EirGrid (2017) Tomorrow’s Energy Scenarios 2017: Planning our Energy Future.

In this regard, the Department of Communications, Energy and Natural Resources (2015) White Paper on Energy titled Ireland’s Transition to a Low Carbon Energy Future 2015-2030 reaffirms the Government’s position on energy matters and should be relied upon as a source for policy formulation for energy in the draft. The White Paper acknowledges that developing, maintaining, and upgrading the grid is essential to meeting its short, medium and longer-term objectives. It also has considerable regard to wider emerging EU Policy which promotes smart low-carbon economies centred on energy efficiency. This policy in turn acknowledges the role of sustainable development of individual country’s transmission grids to assist in their delivery.

The Climate Action Plan 2019, published on June 17th, 2019 by the Department of Communications, Climate Action and Environment, sets out a ‘roadmap’ to achieve a net zero carbon energy system by 2050. This Plan builds on the policy framework, measures and actions set out in the National Mitigation Plan, Project Ireland 2040 and the draft National Energy and Climate Plan in order to create a resilient, vibrant and sustainable country. The plan acknowledges that Ireland has to date been very successful in deploying renewable electricity with 30.1% of electricity produced from renewable sources in 2017. As of the 28th of March, 2019, the Irish government has confirmed that Ireland will now aim for at least 70% of Ireland’s electricity supply to be generated from renewables by 2030. This aim is increased from the current target for 2030 which was 55% (RES-E) in Project Ireland 2040.

The plan notes that demand for electricity is forecasted to increase by 50% above existing capacity in the next decade. Therefore, in order to achieve the target of 70% in the context of rising energy demand, significant progress in renewable electricity deployment will need to continue, with an increased deployment rate of all renewable electricity technologies.

- At least 3.5 GW of offshore renewable energy;
- Up to 1.5 GW of grid-scale solar energy; and
- Up to 8.2 GW total of increased onshore wind capacity

The Climate Action Plan states that increased levels of renewable generation will require very substantial new infrastructure, including grid infrastructure.

EirGrid’s (2017) Grid Development Strategy - Your Grid, Your Tomorrow is consistent with the Government White Paper on Energy and Climate Action 2019 and should also be incorporated/referenced in the plan. The Grid Development Strategy is also set in the context of Government Policy, in particular the Department of Business, Enterprise and Innovations (2017) Action Plan for Jobs 2017 and the Irish Development Authority’s (IDA) (2015) strategy, Winning: Foreign Direct Investment 2015-2019. The Grid Development Strategy acknowledges the need to achieve a balance between social, environmental and economic factors. On the basis of this need the Grid Development Strategy is underpinned by three Statements as follows:

Strategy Statement 1	Strategy Statement 2	Strategy Statement 3
Inclusive consultation with local communities and stakeholders will be central to our approach.	We will consider all practical technology options.	We will optimise the existing grid to minimise the need for new infrastructure.

It is important that the draft plan reflects EirGrid’s need for robust policies to develop the electricity grid in a safe and secure way. This is necessary to meet projected demand levels; to meet Government Policy; and to ensure a long-term, sustainable and competitive energy future for Ireland. The draft plan should facilitate the development of grid reinforcements including grid connections and a transboundary network into and through the county and between all adjacent counties and to support the development of international connections.

An increased strategic spatial focus will be of the utmost benefit in facilitating EirGrid to successfully plan for the future transmission network and is of particular importance in EirGrid’s (2017), recently published, Tomorrow’s Energy Scenarios 2017: Planning our Energy Future (ENCL4) which brings together a wide range of factors which can influence the evolution of the electricity sector. One of EirGrid’s roles is to plan the development of the electricity transmission grid to meet the future needs of society. The key to this process is considering the range of possible ways that energy usage may change in the future through scenario planning.

The increased spatial focus in the draft plan and the identification of suitable locations at a regional level for larger generation (i.e. renewable energy) and demand centres (i.e. data centres) is a key consideration and importance in formulating energy scenarios into the future and in identifying the optimum grid development solutions. It should be the intention of the draft plan to have this level of spatial focus and that an appropriate context is set in the draft plan to ensure that such development is directed to spatially suitable locations (e.g. a larger demand centre such as data centres should be directed to spatially suitable locations to ensure efficient use of the existing transmission network).

Wicklow is a seaboard county and should ensure consistency and alignment between the upcoming National Maritime Spatial Plan and regional approaches to marine spatial planning and to integrate

the Marine Strategy Framework Directive and Marine Spatial Planning implementation into future land use plans in recognition of the opportunity to harness Ireland’s ocean potential. Generally the plan should support the sustainable development of Ireland’s offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources ‘Offshore Renewable Energy Development Plan’ and any successor thereof including any associated domestic and international grid connection enhancements. Regional Policy Objective 10.24 of the RSES should be included in the forthcoming plan.

Conclusion

The development of the transmission grid as summarised above and outlined in detail in EirGrid’s Grid Development Strategy - Your Grid, Your Tomorrow (2017) and associated Technical Report (2017) (ENCL3), is of critical importance to support the economy and society, as well as to realise the transformation of Ireland’s energy system to meet climate change and energy obligations. Electricity infrastructure is critical for regional and local economic and spatial development.

To ensure Ireland’s sustainable development and growth, EirGrid requires appropriate and robust policy and objectives for planning the national grid infrastructure and prioritising it appropriately in order to deliver national, regional and local benefit. In this regard, EirGrid requests that the importance of the grid is acknowledged as a strategic issue.

EirGrid is available to collaborate with the planning authority and to provide expert and focused input into the preparation of the draft plan, particularly from a strategic energy policy perspective. Should you have any comments in regard of this submission please contact the undersigned. EirGrid once more welcomes the opportunity to participate in the making of the plan and looks forward to further engagement.

Response of Chief Executive

Strategy and policy provisions:

The content of this submission from EirGrid is noted and welcomed. The new County Development Plan, as with previous plans, will aim to support EirGrid in the services it provides. In addition, the new plan will, as required, be consistent with the policy objectives and provisions of the NPF / National Development Plan and the Regional Spatial and Economic Strategy as they apply to strategic infrastructure such as the national grid.

EirGrid’s request that the policies and objectives which support a safe, secure and reliable supply of electricity be explicit in the new plan are noted and acknowledged. The current plan includes text and objectives (Section 9.5 and Objectives’ CCE17 – 19) which are considered to do just that and were drawn up during the last plan following consultation, including meeting, with Eirgrid. It is intended that these of similar provisions will be retained and enhanced where necessary in the new plan, and will take in account the provisions of objectives RPO 10.19 – 10.264 of the Regional Spatial and Economic Strategy. :

In the drafting of the new plan, regard will, as a matter of course be had to all relevant Government and Ministerial policy documents, such as those listed in this submission i.e.

- Department of Communications, Energy and Natural Resources (2015) White Paper On Energy: Ireland’s Transition to a Low Carbon Energy Future 2015-2030;
- Department of Communications, Energy and Natural Resources (2019) Climate Action Plan;
- EirGrid’s (2017) Grid Development Strategy - Your Grid, Your Tomorrow;
- EirGrid (2017) Tomorrow’s Energy Scenarios 2017: Planning our Energy Future.

It would however make the plan too cumbersome and difficult to read to have to explain in some detail exactly how each and every Government or Ministerial strategy has been integrated into the provisions of the new plan. All such policy will be carefully considered and appropriate policy and objectives recommended for inclusion in the new plan in light of same.

Spatial dimension:

With regard to the spatial aspect of the plan, as they relate to larger scale generation and demand locations, the current County Development Plan provides for:

- A clear Wind Energy Strategy, which details the most favoured locations for new land based wind energy generation;
- Support for off-shore wind energy generation as it relates to on-shore support infrastructure;
- A requirement that all larger scale industry, including data centres, be located on zoned employment land;
- A requirement that all larger scale commercial and residential development be located on zoned land in our larger towns.

However, there are aspects of the plan that relate to larger scale generation and demand that have no ‘spatial dimension’ as the future locations of same cannot be definitively determined, such as larger scale solar energy generation, for which there is currently no national guidelines nor a methodology for providing a spatial plan for same.

Off shore:

In the development of the new plan, regard shall be had for the provisions of the forthcoming National Maritime Spatial Plan and the Marine Strategy Framework Directive. It is intended that the new plan will, as with previous plans, support the sustainable development of Ireland’s offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources ‘Offshore Renewable Energy Development Plan’ and any successor thereof including any associated domestic and international grid connection enhancements.

Recommendations of Chief Executive

1. To review and enhance where necessary the provision of the County Development Plan with regard to electricity transmission and supply, with particular reference to:
 - National Planning Framework / National Development Plan
 - Regional Spatial and Economic Strategy
 - Department of Communications, Energy and Natural Resources (2015) White Paper On Energy: Ireland’s Transition to a Low Carbon Energy Future 2015-2030;
 - Department of Communications, Energy and Natural Resources (2019) Climate Action Plan;
 - EirGrid’s (2017) Grid Development Strategy - Your Grid, Your Tomorrow;
 - EirGrid (2017) Tomorrow’s Energy Scenarios 2017: Planning our Energy Future.
 - Forthcoming National Maritime Spatial Plan and the Marine Strategy Framework Directive
2. To ensure that the new plan supports the operations of the National Grid and the improvement of same.
3. To review and update where necessary plan provisions regarding energy generation, in particular renewable energy generation.

4. To ensure that the new plan promotes high energy demand development at the best locations, most accessible to the National Grid.

Issues raised

The Authority welcomes the publication of the Issues Paper and thanks the County Council for the opportunity to comment on this document and to facilitate engagement with the local authority during the course of the formulation of the new County Development Plan.

This submission seeks to ensure that the emerging County Development Plan is adequately informed and takes due consideration of tourism as one of the most important and indigenous economic sectors in the county, the region and nationally. FI is particularly keen to see a cross sectoral approach between tourism and other sectors and the need for integrated planning policies and strategies.

Attached Paper entitled Developing Tourism in Wicklow produced by Fáilte Ireland, which should be read in consultation with this submission.

The Significance of Tourism to the Irish Economy

Tourism is one of the largest and most important sectors of the national economy, providing employment for approximately 260,000 people. In 2018, out-of-state (Overseas and North Ireland) tourist expenditure amounted to €5.6 billion. With a further €1.7 billion spent by overseas visitors on fares to Irish carriers, foreign exchange earnings were €7.4 billion. Domestic tourism expenditure amounted to €2 billion, making tourism a €9.4 billion industry. Before allowing for receipts paid to Irish air and sea carriers by overseas tourists, the government earned estimated revenue of €1.8 billion through taxation of tourism. This grows to €2.2 billion when carrier receipts are factored into the analysis, of which €1.7 billion came from out-of-state tourism and the balance from domestic tourism. In 2018 the tourism industry accounted for 4.0% of all tax revenue.

With regard to County Wicklow, Fáilte Ireland’s figures indicate that in 2017 275,000 overseas visited the county generating revenue of €73m with a further 319,000 domestic visitors generating an estimated €49m in revenue. Wicklow is part the Ireland’s Ancient East brand.

A successful tourism sector also creates significant benefits for many other sectors such as agriculture, food and drinks, accommodation providers, transport and retail. For this reason tourism is a particularly important activity and spatial land use in its own right to be accommodated within the emerging County Development Plan notwithstanding its contribution to enhancement of Quality of Life and the enhancement of places of residence, work and play and can positively affect both physical and mental wellbeing which is a key principle of the Eastern and Midland Regional Spatial & Economic Strategy (RSES).

Fáilte Ireland seek to ensure the following in the context of the emerging County Plan:

- To acknowledge and recognise tourism as a key economic driver for the county which supports job creation and sustains communities;
- To provide a dedicated tourism chapter including policies and objectives for tourism;
- Tourism should be planned for as a spatial land use. Tourism features should be mapped in the County Development Plan in a similar way that other functions and roles are presented.
- Key nodes of tourism activity in the County should be identified – both existing and proposed specific tourism centres (major tourism attractions, outdoor activities etc.);

- Existing transport links between nodes and identified trails – whether walking, cycling or road based including greenways and blueways should also be identified.
- Strategic tourism centres (principal towns containing tourist facilities) where key services such as accommodation providers etc. are located. Further guidance is available at: <http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Publications/Failte-Ireland-Tourism-Destination-Towns-Guidelines.pdf?ext=.pdf>.
- Sensitive environments where the provision of services and development must be sensitive and appropriate to the robustness / sensitivity of the receiving environment and in particular its existing tourism significance;
- Areas of unrealised tourism potential where proactive policies will aim to encourage the development of this sector;
- Branding – reference and use of Fáilte Ireland Tourism Brand(s) logos (Ireland’s Ancient East) applicable to the county;
- Proactive planning policies including provision of supporting infrastructure such as visitor car parking, toilets, café or catering facilities – particularly in sensitive locations;
- Sustainable travel between sites with the promotion of public transport along key routes; Informed design and location guidelines for the development of tourism related facilities in sensitive amenities. Key to this would be the consideration of particularly special areas which may not normally be considered – such as the proposed views of proposed developments from riverside, prominent or elevated locations etc;
- Full realisation of the economic potential of increased visitor revenue and increased dwell time with high quality tourism infrastructure including accommodation providers, restaurants, holiday homes, etc.;
- Protection and enhancement of the tourism resource with information and interpretation provided and the actual resources carefully managed and protected.
- Update of the Wicklow Wind Energy Strategy, objectives and policies, whereby Fáilte Ireland recognises the value and necessity of strengthening, improving and expanding energy infrastructure in the county and region, and that this in turn supports the growth of the tourism sector. Whilst Fáilte Ireland is generally supportive of the development of transmission infrastructure and is supportive of the economic benefits associated with its growth and development, potential impacts on landscape and the natural environment (including those on tourism) must be considered and this must be clearly expressed in the emerging County Plan.

Key Issues for the Emerging Plan to Address

The Issues Paper identifies a number of questions or issues for the new plan to address. A number of these influence tourism development. In responding to these areas of interest, Fáilte Ireland would maintain that the appropriate consideration, planning and protection of tourism through forward planning and development management are keys to development of the tourism industry.

The questions relating or effecting tourism detailed in the Issues Paper and Fáilte Ireland’s response are as follows:

How should tourism be developed throughout County Wicklow without compromising our valuable resources including our scenic landscape and rich heritage?

Fáilte Ireland welcomed the inclusion of a growth strategy for the region in the EMRA RSES which is both asset and evidenced based to ensure sustainable growth across the region, having regard to the

parameters as defined by the National Planning Framework. The general theme of sustainable compact growth of both urban and rural areas is welcomed. It is vital that this is implemented and supported through the development plan core strategy.

Tourism services and facilities should be clustered within established settlements as this will serve to protect the quality of the Irish environment; foster strong links to a whole range of other economic and commercial sectors and sustain the host communities; and utilise existing ancillary services and facilities such as water and wastewater infrastructure, power supply etc, rather than creating a requirement for further development in the Irish landscape.

The pathway to sustainable rural development outlined in the 2017 Action Plan for Rural Development and supported through key objectives of the National Planning Framework and EMRA RSES provided guidance on achieving protection of the environment and balancing development. Consolidated growth to support rural towns and villages while protecting natural landscapes will contribute to economic and environmental sustainability while promoting sustainable tourism as a contributor to the rural quality of life.

Is there a need for more tourist facilities within the County? If so, what is needed and where should they be located?

As highlighted in the Wicklow Tourism Strategy there are a number of key priority areas including;

Develop New Accommodation. Wicklow must expand the volume and quality of the visitor accommodation available to visitors. This is the biggest constraint to growth of the visitor economy. With around 3% of all Ireland overnights and spend and just over 2% of available serviced visitor accommodation stock, expanding the supply would create the foundations for success.

Develop Key Towns as Visitor Hubs. Wicklow, Bray, Greystones, Enniskerry, Blessington and Arklow are places which have the potential to function as visitor hubs. Places where international visitors attracted to Wicklow can come and stay for a day or two as part of a wider itinerary. Wicklow Town has been earmarked for Fáilte Ireland Destination Towns funding (Round 2 allocations) in Spring 2020 when further developmental work has concluded with the local authority.

Grow Thematic Experiences. Development of new experiences that capitalise on the thematic strengths of Wicklow and which align to the stories in Irelands Ancient East will strengthen the Wicklow offer dramatically. (This is expanded upon further below – refer to Visitor Experience Development Plans - VEDP’S)

Masterplan for Glendalough. In 2017 Fáilte Ireland announced funding from its Capital Grants budget for Glendalough. The funding is in the context of Fáilte Ireland’s strategic partnership with the OPW to assist in the refurbishment and enhancement of key visitor attractions. The Glendalough-Laragh area serves as a gateway to Glendalough and the Wicklow Mountains National Park, the area is a key tourist attraction, attracting both domestic and international visitors. In 2018 Glendalough attracted 732,824 visitors making it one of the top three free visitor attractions in Ireland. The village of Laragh provides tourism services and facilities for hill walkers, cyclists and tourists such as accommodation, food and drink and craft shops.

Fáilte Ireland, the National Tourism Development Authority and Coillte, Ireland’s largest commercial forestry company have announced plans to re-develop Avondale House and Forest Park into a state-of-the-art visitor attraction.

A total of €8 million will be invested in the re-development of Avondale House and Forest Park with Fáilte Ireland contributing more than €6.1million to the project. The redevelopment of Avondale House and Forest Park is hugely significant from a tourism and economic perspective for Ireland’s Ancient East and for Wicklow. The development of this new world class visitor experience provides a major opportunity for tourism businesses across Wicklow to leverage this significant investment. Fáilte Ireland would welcome policy objectives to support the development of Avondale House and Forest Park in the Draft Plan.

How can County Wicklow capitalise on the potential associated with Ireland’s Ancient East?

The key to unlocking the growth potential of an area is the development of experiences that will motivate potential tourists to firstly visit there and secondly to dwell in the area. These new experiences are less concerned with visitors passively seeing or doing things; they encourage tourists to immerse themselves actively in the locale, interacting with people, engaging the senses, and learning the history and stories of the places.

Fáilte Ireland’s response to this challenge has been the creation of a framework to develop and deliver visitor experience development plans (VEDPs) along with strengthening destination towns. This approach identifies the key assets of an area and provides a framework to present the experiences and stories of that area in a way that tourists can readily and easily understand. It clearly identifies tangible actions and a process for businesses to shape their respective tourist experience(s) in line with the overall experience brand proposition and the key motivating themes for their area.

In Wicklow, Fáilte Ireland has developed the ‘Vikings’ Visitor Experience Development Plan, which sets out to strengthen the county’s offering as a Viking destination. As part of this plan, clusters of Viking experiences in Waterford, Wexford and Wicklow are being researched under the working title ‘Viking Coast’. Initial results from consumer testing show that international consumers find the concepts motivating and interesting. The next phase of research underway involves testing itineraries with tour operators and buyers. A number of Wicklow businesses are now taking part in a bespoke 15-month Great Houses & Gardens Experience Development Programme. This programme is looking at the house and garden experiences available across the county including ways to develop guiding, events, cost and revenue management and sales distribution.

Fáilte Ireland would like to see inclusion of a policy/objective to support the delivery of VEDP’s.

Also, to come to an area, tourists need reassurance that there will be enough attractions to see and activities to do during the day, a sufficient range of accommodation options and a night-time economy to provide evening options. The most effective and efficient way to deliver this for tourists is through destination towns that cater for our tourists. Therefore, it is crucial that improvement and investment across a wide range of touch points – including transport links, accommodation supply, public realm attractions, restaurants, a vibrant night-time economy, tourist management etc are acknowledged and supported in the draft development plan.

Are there any outdoor tourism and recreation facilities that the County lacks?

Wicklow has a breadth and a depth to its tourism offer that means it is well placed to develop a thriving tourism economy. It has world renowned heritage and natural assets, gardens and historic houses, outdoor activities and recreation including the Wicklow Way and a growing network of trails, a National Park, woodlands and uplands, sandy beaches and scenic landscapes, film locations and food culture; it is within reach of huge domestic and international markets; it has some high quality resort properties; and it has some interesting towns and villages.

Greenways are key tourism infrastructure and play an important role in Irish tourism. They boost the appeal of Ireland in the travel market, add value to the existing high tourism offering and support the development of rural communities and job creation in the rural economy, as well as the protection and promotion of natural assets and biodiversity. It is our ambition for Ireland to be recognized internationally as a year-round activity destination. There has been significant growth in cycling tourism in Ireland in recent years. In 2018 it was the 2nd largest activity with 450,000 overseas visitors participating in cycling while on holiday. A projected annual growth of 4% per annual is expected to 2028.

The extension of the Blessington Greenway to a 43km route of walking and cycling trails which will incorporate the villages of Ballyknockan, Vallemount and Lacken has recently been allocated €5m in funding under the Strategy for the Future Development of National and Regional Greenways. The development of the greenway would provide both economic and social benefits to west Wicklow and further enhance the outdoor tourism and recreation facilities of the county. Fáilte Ireland would therefore, welcome the inclusion of a policy/objective to support the delivery of this project.

How can the County Development Plan encourage the reuse of historical buildings that have fallen into disuse?

The relationship between tourism and heritage has potential synergistic benefits. The preservation of heritage to improve tourism can in turn support that preservation. This is not restricted to heritage sites and should also include elements such as urban design (e.g. shop frontage restrictions in heritage towns).

The adaptive reuse of existing historic buildings is one of the best ways a community can improve the economic, social and environmental sustainability of its village or a town. According to the Heritage Council “The connection between reuse and economic vitality is strong. In the Irish Times’ 2016 list of best shops, 57/100 were located in historic structures. Similarly, of the top 100 restaurants in Ireland as chosen by the McKenna Guides in 2018, 74 were located in historic structures. Finally, many of the higher profile co-working spaces in Ireland are in old structures (e.g. The Digital Hub, Dogpatch, Fumbally Exchange Waterford, Ludgate Hub). Proactive planning policies and objectives which support the reuse and refurbishment of protected structures and older buildings of architectural, cultural, historic and aesthetic merit which, make a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the county should be included in the plan.

Are there any issues in relation to water or wastewater facilities in your area?

The importance high-quality Wastewater Treatment Plants to ensure treated wastewater will not harm or pollute the surrounding environment when it is discharged into it is crucial to protect our coastal areas, rivers and lakes. The quality of bathing waters is also paramount to the tourism sector. In Ireland, we are particularly fortunate to have a varied and beautiful coastline with many pristine beaches that are open to the public to enjoy. To ensure their standard, it is imperative to continue to make strident efforts to protect and improve our waters.

Fáilte Ireland notes that currently untreated wastewater is currently discharging into the Irish Sea at Avoca and Arklow. The delivery and development of the Arklow Wastewater Treatment Plant needs to be prioritised. The continuing discharge of raw sewage is a threat to the development and promotion of on water and in water activities and attractions. It also has the potential to prevent the further development of tourism infrastructure i.e. due to lack of wastewater treatment capacity and facilities.

What transportation improvements are needed throughout the County?

Tourism and transport go hand-in-hand and tourism displays a very high dependency on public transport in particular for its successful operation. It is an objective of Fáilte Ireland to continue to shift our visitors onto sustainable modes of transport which will also result in a significantly improved visitor experience. Transport in existing strong tourism areas needs to be supported and consolidated. A priority should be to provide a wider range of targeted public transport options for tourists who wish to travel from urban areas to rural based tourist attractions and amenities. Possible delivery mechanisms to be explored would include the extension of the Rural Transport Network to include tourism objectives and key tourism sites. Enhanced walking and cycling facilities also have a key role to play in utilising our resources and moreover opening up access to the abundance of natural assets.

A number of state agencies are responsible for the delivery of public transport services in Ireland with the work of Transport for Ireland being of particular significance from a tourism perspective particularly with integrating the various modes of transport and aiming to bring together information and services to help make public transport a little easier for you to use.

The importance of integration of all forms of public transport is highlighted above. Outside of the main urban areas such as Dublin, Galway and Cork, tourism in Ireland for the most part takes place in rural areas. As a result, it is vitally important that public transport connect seamlessly with other modes of transport for the last link of the visitor’s journey (the so called “last mile”) to their accommodation or a visitor attraction etc. At present in many areas the interchange of services at train and bus stations can be haphazard. Greater collaboration between all transport providers including bus, rail, taxi is required to ensure this “last mile” is travelled in a sustainable manner.

From a transport perspective, a priority should be to provide a wider range of targeted public transport options for tourists who wish to travel from urban areas to rural based tourist attractions and amenities particularly in the more rural areas of the western side of the county. Possible delivery mechanisms to be explored would include the extension of the Rural Transport Network to include tourism objectives and key tourism sites. Enhanced walking and cycling facilities also have a key role to play in utilising our resources and moreover opening up access to the abundance of natural assets.

Tourism Strategy for Wicklow

Wicklow forms part of Ireland’s Hidden Heathlands Regional Experience Brand. Although relatively new the brand is tapping into a growing tourism trend for soft activities by encouraging visitors to be ‘active in nature’ and to explore the region by going off the beaten track. The brand’s appeal also very much lies in its offer for visitors to get away from the stresses and pressures of modern life and to experience the tranquillity of rural Ireland. The brand aims to make a significant impact on tourism across the midlands delivering increased visitor numbers and spend, season extension and creating jobs.

Wicklow is well placed to optimise the potential for tourism through proper planning and development. The consideration of natural and heritage resources, strategic planning for accommodation and promotion of inter-agency tourism strategies in the upcoming development plan will build on the previous success of strong tourism consideration in Development Plans.

Wicklow as a largely rural county is important for tourism as tourism in Ireland, for the most part, takes place in rural areas. These areas are home to rich heritage and immense natural beauty that support a varied tourism offering. These assets should be acknowledged and explicitly referenced as a growth enabler for Wicklow.

Towns and villages in Wicklow should be a focus for tourism provision, as key towns act as a base or hub for a whole host of activities and attractions within their immediate environs and hinterlands.

Fáilte Ireland would reinforce that it is vitally important to ensure provision is made for the expansion in accommodation and facilities within towns and along with supporting infrastructural investment including transport links, public realm etc.

Conclusion

Fáilte Ireland welcomes the review of the Wicklow County Development Plan and recommend that the consideration of tourism in the Eastern Midland Region RSES and our comments are addressed in the published Draft Development Plan in order to take due consideration of tourism as one of the most important and indigenous economic sectors in the region and Ireland.

Response of Chief Executive

The content of this submission from Failte Ireland is noted and welcomed. The new County Development Plan, as with previous plans, will aim to support Failte Ireland in the services it provides. In addition, the new plan will, as required, be consistent with the policy objectives and provisions of the National Planning Framework / National Development Plan and the Regional Spatial and Economic Strategy as they apply to tourism development in County Wicklow.

The new plan will, as with previous plans, recognise the importance of tourism as one of the most important and indigenous economic sectors in the county, the region and nationally.

With regard to the policies / objectives requested by Failte Ireland:

- The current County Development Plan acknowledges and recognises tourism as a key economic driver for the county which supports job creation and sustains communities and it is intended that these provisions will be retained and enhanced if necessary in the new plan
- The current County Development Plan already provides a dedicated chapter to tourism and it is intended that these provisions will be retained and enhanced if necessary in the new plan
- The current County Development Plan already plans for tourism as a spatial land use and it is intended that these provisions will be retained and enhanced if necessary in the new plan; it is noted that enhanced mapping / spatial identification of key locations, destinations, attractions, nodes and transport routes to / from same would be of benefit to the new plan and it is intended this will be provided for in the new plan;
- It is intended that new plan will include additional focus on walking / cycling routes, greenways and blueways where possible;
- The current County Development Plan, through its protection for example of sensitive landscapes, waterbodies, areas of archaeological potential etc clearly flags locations that are sensitive to development, including tourism related development, and vulnerable to damage. In addition, the Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood risk assessment processes ensures that all policies and objectives are assessed for impacts on all environmental sensitivities. It is intended that these provisions will be retained and enhanced if necessary in the new plan.
- If possible, having regard to information available and environmental assessment, the new plan will identify areas of unrealised tourism potential; it is likely however that such provisions may not be location specific but rather sector specific.
- With respect to branding, the current County Development Plan provides support for more consistent signage through Objective T25. It is intended that these provisions will be retained and enhanced if necessary in the new plan.
- The current County Development Plan provides for clear objectives with regard to supporting infrastructure such as visitor car parking, toilets, cafés etc and it is intended that these provisions will be retained and enhanced if necessary in the new plan;
- The current County Development Plan promotes and support the enhancement of public transport throughout the County, for both residents and visitors and it is intended that these provisions will be retained and enhanced if necessary in the new plan; the delivery however of services is outside the remit of the plan;
- The current County Development Plan provides location and design standards for all development types, including tourism developments, and it is intended that these provisions will be retained and enhanced if necessary in the new plan;
- The current County Development Plan explicitly supports and promotes the development of infrastructure and facilities that would increase dwell time in the County such as enhanced overnight accommodation, eating establishments and activities. With respect to holiday homes specifically, County Wicklow already has a high proportion of such accommodation and it appears given Wicklow’s proximity to Dublin that this format provides limited overspill spending and as result for a number of development plans, this format of accommodation has been more carefully managed and in particular is generally limited to new holiday homes in existing settlements, or as part of a larger integrated tourism facility, or on farms. It is intended that these provisions will be retained and enhanced if necessary in the new plan;
- A key aim of the current County Development Plan, with respect to all forms of development including tourism and recreation related development, is to ensure that natural resources are appropriately managed to ensure no damage occurs, while at the same time allowing for use and appreciation of same by visitors. The provision however of information and interpretation

signage for example would not be a matter for the plan per se, but rather for the various tourism agencies.

- The Wicklow Wind Energy Strategy will be reviewed and updated if required in light of forthcoming Ministerial Wind Energy guidelines.

Key Issues for the Emerging Plan to Address:

- As suggested in this submission, it is agreed that tourism services and facilities should be clustered within established settlements as this will serve to protect the quality of the environment and best utilise existing infrastructure;
- As suggested it is agreed that key priority areas should be: Develop New Accommodation; Develop Key Towns as Visitor Hubs; Grow Thematic Experiences; Masterplan for Glendalough and re-development Avondale House and Forest Park, as well as supporting the improvements to transport links, the public realm, restaurants, a vibrant night-time economy etc;
- The development by Failte Ireland of visitor experience development plans (VEDPs) is noted and it is recommended that the new plan support Failte Ireland in the development and delivery of these plans where possible;
- It is agreed that greenways and cycling infrastructure are key tourism infrastructure and play an important role in Irish tourism as supported in Objective T29 of the current plan. It is intended that the new plan will enhance this existing provisions where possible.
- It is agreed that the preservation of heritage to improve tourism can in turn support that preservation and that the adaptive reuse of existing historic buildings is one of the best ways a community can improve the economic, social and environmental sustainability of its village or a town. The current plan promotes such development through Objective BH10. It is intended that this provision will be retained and enhanced if necessary in the new plan.
- It is agreed that high quality water infrastructure is essential to support development without damaging the environment; the provisions of the current and new plan do and shall continue to address this requirements. The concern noted with respect to bathing waters is also noted – the current County Development Plan includes Objective NH4 in this regards and it is intended to retain and enhance this objective if necessary in the new plan.
- With respect to the concern expressed regarding wastewater entering the river / sea at Arklow, Irish Water following recent consent from An Bord Pleanala intends to move quickly ahead with the construction of a new wastewater treatment plant at Arklow.
- It is agreed that transport in existing strong tourism areas, including rural areas, needs to be supported and consolidated and the provisions of the current County Development Plan aim to support transport agencies in this regard (Objectives TR1-TR8 specifically refer). It is intended that these provisions will be retained and enhanced if necessary in the new plan.
- The new brand ‘Ireland’s Hidden Heathlands’ is noted and will be referenced in the new plan.
- It is agreed that Wicklow’s rich heritage and natural beauty can support a varied tourism offering and these assets should be acknowledged and explicitly referenced as a growth enabler for Wicklow.
- It is agreed that towns and villages in Wicklow should be a focus for tourism provision, as key towns act as a base or hub for a whole host of activities and attractions within their immediate environs and hinterlands.

Recommendations of Chief Executive

1. To review and update / strengthen where necessary the current tourism and recreation provisions of the County Development Plan in light of the current tourism strategies objectives of:
 - National Planning Framework / National Development Plan
 - Regional Spatial and Economic Strategy
 - Failte Ireland
 - Wicklow County Tourism

Name: Gas Networks Ireland

A1

Issues raised

Acknowledge receipt of invitation to make submission, but have no comment to submit.

Response of Chief Executive

N/A

Recommendations of Chief Executive

N/A

Issues raised

The Health & Safety Authority (the Authority) is an Authority prescribed under Article 13 of the Planning & Development Regulations 2001-2015 and as such is required to be consulted in relation to Development Plans under sections 11-13 & 24 of the Act.

The approach of the Authority to Land-use Planning is set out in the document 'Policy & Approach of the Health and Safety Authority to COMAH Risk-based Land-use Planning'. It is available from our website at:

[https://www.hsa.ie/eng/YourIndustry/Chemicals/Legislation Enforcement/COMAH/LandUsePlanning/](https://www.hsa.ie/eng/YourIndustry/Chemicals/Legislation%20Enforcement/COMAH/LandUsePlanning/).

The document should be consulted to fully understand the advice given in this letter.

The Authority would expect the planning guidelines to contain:

- An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU.
- The consultation distances and generic advice, where applicable, supplied by the Authority to Fingal County Council in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority .
- A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments ,including developments in the vicinity of such establishments;
- There is currently one COMAR establishments in the area of Wicklow County Council which is as follows: Sigma Aldrich, Vale Road, Arklow, Co. Wicklow.

Response of Chief Executive

The current County Development Plan provides for the following objective in light previous submission made by the HSA:

WEB *To have regard to the "Major Accidents Directive" (Seveso-III (Directive 2012/18/EU). This Directive relates to the control of major accidents involving dangerous substances with an objective to prevent major accidents and limit the consequences of such accidents. This policy will be implemented through Development Management, through specific control on the siting of new establishments and whether such a siting is likely to increase the risk or consequence of a major accident.*

In addition, having regard to the fact that only one such site is located in Co. Wicklow, the Arklow & Environs Local Area Plan 2018 includes a separate Objective ED7 in relation to the prevention of a major accident at this location with an associated map showing 1000m buffer zone

It is recommended that the more detailed objective of the Arklow & Environs Local Area Plan be utilised in the new County Development Plan

Recommendations of Chief Executive

Replace current objective WE8 with the following text:

In relation to the Prevention of Major Accidents (Control of Major Accident Hazards Involving Dangerous Substances) legislation, it is an objective to:

- *comply with the Seveso III Directive in reducing the risk and limiting the potential consequences of major industrial accidents;*
- *where proposals are being considered for the following: (i) new establishments at risk of causing major accidents, (ii) the expansion of existing establishments designated under the Directive, and (iii) other developments proposed near to existing establishments; the Council will require that applicants must demonstrate that the following considerations are taken into account: (i) prevention of major accidents involving dangerous substances, (ii) public health and safeguarding of public health, and (iii) protection of the environment;*
- *ensure that land use objectives must take account of the need to maintain appropriate distances between future major accident hazard establishments and residential areas, areas of substantial public use and areas of particular natural sensitivity or interest; and*
- *have regard to the advice of the Health and Safety Authority when dealing with proposals relating to Seveso sites and land use plans in the vicinity of such sites.*

Issues raised

The Environmental Health Service is making this submission under the remit of Healthy Ireland and relevant health supporting strategies. Healthy Ireland is a framework for improved health and wellbeing. Its vision statement is *‘A Healthy Ireland, where everyone can enjoy physical and mental health and wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone’s responsibility’*.

We have reviewed key health strategies and make recommendations to Wicklow County Council to take this opportunity to incorporate these relevant health actions into the strategic planning of the spatial and built environment of the county, with the overall aim being to improve the health and wellbeing of the population of Wicklow.

Development Plans: Guidelines for Planning Authorities, June 2007

<http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload%2C14468%2Cen.pdf>

Government guidelines issued to planning authorities state that Development Plans should:

- a) be a catalyst for positive change and progress,
- b) anticipate future needs on an objective basis,
- c) have a role in protecting the environment,
- d) create a framework within which sustainable development can be achieved,
- e) be consistent between plans and strategies at national, regional and local level,
- f) address diverse community needs.

Development plans provide a clear opportunity to incorporate health and its wider determinates into the planning process. Wicklow County Council should consider ways strategic planning can protect population health and the built environment should be explored for opportunities that can maximise health gain.

Key Changes to Development Plan

Due to the requirements of the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES), Bray and Wicklow-Rathnew will now be defined as the key towns for the County. The County Development Plan will need to categorise the remaining towns into either ‘Self-Sustaining Growth Towns’ or ‘Self Sustaining Towns’ based on assessment criteria set out in the RSES.

The current population growth target for the county as set out in the 2016 County Development Plan is 176,000 in 2028. The NPF has set a revised target of 164,000 in 2031, which is slightly lower than previously projected.

County Wicklow Health Status

The creation of County Health Profiles is one of the key actions from the Healthy Ireland strategy which is our national framework for action to improve the health and wellbeing of the people of Ireland. Understanding health needs at a local level enables local action and creates an environment where every individual and sector of society can play their part in achieving a healthy Ireland.

County profiles help identify health priorities in areas and highlight health inequalities which may exist. County Wicklow Health Profiles can be accessed at: <http://hdl.handle.net/10147/584031>

Key Facts for Wicklow:

- Is the seventh most affluent local authority area nationally

- Has a high percentage of lone parent households of 11.9% (national 10.9%)
- Cancer incidence is higher than the national rate for female malignant melanoma and female lung cancer
- Death rates for all ages and the main causes of death are average or below the national rate
- Suicide rate of 9.4 is less than the national rate of 11.3

The statistics also show that Wicklow has a higher proportion of younger people 0-19 years than the national average and a higher rate of 35-50 year olds than the national average. Lone parent households and households that are LA rented are also higher than the national average. It is essential that services and facilities that cater for the needs of younger members of the population are developed in the Wicklow area.

Get Ireland Active – National Physical Activity Plan for Ireland <http://health.gov.ie/wp-content/uploads/2016/01/Get-Ireland-Active-the-National-Physical-Activity-Plan.pdf>

A key aim of the National Physical Activity Plan for Ireland is compiling a directory of publicly accessible sports/recreational and amenities facilities. The Strategic Development Plan should include a strategy for meeting this aim for County Wicklow. All new facilities should be added to this directory and an audit should be carried out to ensure that all existing sites/facilities are entered.

A strategic aim for County Wicklow should be to increase the active school flag programme to at least another 20 schools in the county.

A strategic aim for Wicklow County Council should be to develop and establish processes that enable consultation with children and young people in the development and implementation of programmes in which they are involved, i.e. playgrounds, activity centres and public spaces. This is particularly important given the age profile of the County. Suitable facilities that cater for all age ranges, including teenagers, should be provided.

A strategic aim for development in Wicklow should be that all plans and development for Nursing Homes or Residential Care Facilities should include proposals for gardens and recreational activities. Physical activity should be integrated into long term care planning and practice.

Strategic development of Wicklow County should include:

- a) Opportunities for physical activity in the development of the built environment
- b) All development should promote cycling and walking. A network of cycle routes and footpaths should be planned and developed which aim to promote connectivity of housing/employment to town centres, park and recreational amenities
- c) Develop local and regional parks and recreational spaces that encourage physical activity.
- d) Prioritise the planning and development of walking and cycling and general recreational/physical activity infrastructure.
- e) Explore opportunities to maximise physical activity and recreation amenities in the natural environment.
- f) A framework for workplace health and wellbeing, including physical activity should be developed. Any possible health gain for employees should be explored and developed.
- g) The smarter travel workplaces initiative should be promoted. Sustainable or active modes of travel should be facilitated.
- h) Ensure planning makes provision for recreational facilities for staff in industrial estates and ensures connectivity of work to park and recreational activities.

- i) Support and develop 20 new walking groups in the County through funding of signage, upgrade of paths and lighting and resolving safety issues.
- j) Developing a standardised framework for publicly funded programmes designed to increase physical activity levels. Use public money to leverage private funding to promote and develop physical activity and sport programmes.

Tobacco Free Ireland <http://static.rasset.ie/documents/news/tobacco-free-ireland.pdf>

Wicklow County Council should have cognisance of the high rates of female lung cancer identified in the Wicklow Health Statics and should take action to assist in decreasing smoking rates among the population of the county. A strategic aim of the Wicklow County Development Plan should be to:

- a) Implement the tobacco free playgrounds initiative.
- b) Promote tobacco free environments, parks, beaches, and public campuses and grounds

With regard to the protection of people from second hand tobacco smoke all plans for development that include a designated smoking area should be forwarded to the Environmental Health Service prior to the planning decision.

Healthy Ireland- A Healthy Weight For Ireland

<http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf>

Rising levels of overweight and obesity are placing an increasing burden on individuals and society. Currently, in Ireland, six in ten adults and one in four children are overweight or obese (Department of Health, 2013; Layte and McCrory, 2009; 2011). According to World Health Organization forecasts, Ireland could top the European league tables in the coming years (WHO, 2015).

There are 10 action steps outlined in this document to tackle obesity, Step 2 is to regulate for a healthier environment. Wicklow County Council can influence the built environment to improve health and reduce the extent to which it promotes obesity. An assessment of food outlets in every town and village in Wicklow should be carried out to ensure that choices of healthy food options are equally available and to prevent a proliferation of fast food outlets. Providing easy access and choice to healthier food options should be promoted as outlined in government policy.

The environment in which we live impacts on the choices that we make and Wicklow County Council should create environments that make the healthy choice the easy choice:

- a) Support community based initiatives that develop programmes that support healthy lifestyles and prevention of obesity in children and adults.
- b) Promote through planning and the built environment the benefits of healthy eating, physical activity and non-sedentary behaviour
- c) Improve availability of and access to healthier food choices. Support developments that aim to improve the health of the population.
- d) Support opportunities for increasing physical activity levels generally/ in the community through Local Sports Partnerships and supporting initiatives e.g. Parkrun.
- e) Facilitate community gardens through identifying and releasing suitable publicly owned land

Steering group report on a national substance misuse strategy

http://health.gov.ie/wp-content/uploads/2014/03/Steering_Group_Report_NSMS.pdf

The Strategic Development Plan for Wicklow should include:

- a) A strategy to reduce and eliminate the reliance on alcohol sponsorship. Any public event or events on publicly owned lands or buildings should use alternatives to alcohol sponsorship
- b) Develop the provision of alcohol-free venues for young people, (e.g. Youth cafés, alcohol-free music and dance venues and sports venues) with:
 - a. the young people being centrally involved in the development and management of the programmes and venues;
 - b. late night and weekend opening; and increased access to school facilities in out of-school hours.

The National Positive Ageing Strategy

http://health.gov.ie/wpcontent/uploads/2014/03/National_Positive_Ageing_Strategy_English.pdf

A strategic aim for the development of County Wicklow should be to enable people as they age ‘to get out and about’ through the provision of accessible, affordable, and flexible transport systems in both rural and urban areas. This should include:

- a) Provision of age-friendly public transport,
- b) Promotion of the integration of the Rural Transport Programme with other local transport services,
- c) Provision of public transport linkages to major health facilities and personal social services.
- d) Supporting the design and development of age friendly public spaces, transport and buildings.
- e) Designing age friendly urban environments (street lighting, footpaths, roads, public seating)
- f) Promote access (in terms of affordability, transport availability, accessibility of venue) to a wide range of opportunities for continued learning and education for older people.
- g) Promote the concept of active citizenship and the value of volunteering, and encourage people of all ages to become more involved in and to contribute to their own communities.
- h) Promote the development of opportunities for engagement and participation of people of all ages in a range of arts, cultural, spiritual, leisure, learning and physical activities in their local communities.

Suitable housing is a key aim in the National Positive Ageing Strategy and a key strategic aim for County Wicklow should be to:

- a) Carry out an assessment of housing need and provision and consider all housing options in development (i.e. social housing, sheltered housing; retirement villages).
- b) All residential development should incorporate the ‘Universal Design’ Principal to ensure housing can meet the needs of the occupants regardless of their age, size, ability or disability. This will also ensure that the houses provided will meet their changing needs over time so that people can continue living in their own homes and communities as they get older or become disabled.

Universal Design Guidelines For Homes In Ireland

<http://universaldesign.ie/Built-Environment/Building-for-Everyone/>

This will also assist in implementing the Older People Remaining at Home (OPRAH) strategy.

- c) Implement a strategy that facilitates older people to live in well-maintained, affordable, safe and secure homes, which are suitable to their physical and social needs. Development should

incorporate the principals outlined in the ‘Design Out Crime’ Document.
http://www.designcouncil.org.uk/sites/default/files/asset/document/designersGuide_digital_0_0.pdf

Time to move on from congregated settings – A strategy for community inclusion

<http://www.hse.ie/eng/services/list/4/disability/congregatedsettings/congregatedsettingsreportfinal.pdf>

The Strategic Development Plan for County Wicklow should:

- a) Improve community inclusion of people with disabilities in their local community and community based services.
- b) Improve greater connectivity between generic community based services and disability specific organisations. Facilitate their engagement as stakeholders.
- c) Focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, new-build housing, leased housing or rented housing. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. The plan should be based on best practice in including people with disabilities in local communities and should facilitate dispersed housing with personal supports.
- d) All residents in congregated settings should be assessed by the local authority to establish their eligibility and need for social housing support.
- e) Consideration should be given to reserving a certain proportion of dwellings for people with disabilities.
- f) Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants.
- g) Support people with disabilities to access employment and education opportunities.
- h) Support people with disabilities to access mainstream community services.

The Urban Design Manual – A Best Practice Guide

<https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload,19216,en.pdf>

It should be the objective of Wicklow County Council to provide attractive, interesting and well used public realm and open spaces and to create a pedestrian centred environment with active, inviting public spaces and parks. Best practice should be implemented in the design of sustainable neighbourhoods. The 12 criteria outlined in the Urban Design Manual should be incorporated into the planning for urban areas Wicklow Development Plan.

The Environmental Health Service recommends that any proposed housing/residential development is made up of a variety of household types, tenures and typologies, thereby creating a range of lifestyle, affordability and lifespan choices. This should ensure sustainable development with a diversity and mix of uses. The EHS also recommends that development proposals for large housing or urban areas should be accompanied by a Design Statement. It is hoped this will provide coherency and quality in design and also ensure compliance with all the objectives of the Wicklow Development Plan.

It is stated an efficient use of land is essential for sustainable development and an emphasis has been placed on compact growth, with increased housing densities. The NPF requires that 30% of all new homes will be delivered within the existing built up footprint of settlements making better use of underutilised land including infill and brownfield sites. It is essential that houses and apartments are designed to specifically to suit the spaces they are in. Wicklow County Council should request a shift

away from generic housing layouts and a move towards quality design, specific to the requirements or impediments of the site.

The proposal for a new Housing Strategy which will be informed by a Housing Need Demand Assessment with 10% for social housing is welcomed; however as the health statics show Wicklow has a higher % than the national average in LA rented accommodation. The provision of social housing should be based on the needs assessment and may need to be greater than 10%.

It is also recommended that Wicklow County Council outlines an ‘implementation and sequencing strategy’ for the county or other similar initiatives which would identify and outline the key infrastructural requirements for an area and which would aim to ensure that the necessary infrastructure, facilities and amenities are provided in conjunction with residential development. This should ensure that development throughout the Wicklow County takes place in a planned, proportionate and sustainable manner.

Transport

Two specific transport projects have been mentioned in the Development Plan however both relate to road improvement works. There are no proposals for public transport initiatives to serve County Wicklow, despite it being acknowledged that public transport is badly in need of investment and more sustainable transport options are a key requirement in Irelands bid to reduce our greenhouse gas emissions.

It is recommended that Wicklow County Council dedicates more of its budget for active transport schemes and infrastructure.

Smarter Travel Policy

http://www.smartertravel.ie/sites/default/files/uploads/2012_12_27_Smarter_Travel_english_PN_WEB%5B1%5D_0.pdf

The Strategic Development Plan should:

- a) Set targets requiring a minimum percentage of new residential and mixed-use development to take place on brownfield/existing sites to consolidate urban growth and enable organic development of urban areas from the centre out.
- b) Specify a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance to amenities.
- c) Set a general restriction of the future development of out-of-town retail centres except in exceptional circumstances and consideration of a similar requirement that parking charges be introduced for most existing centres.
- d) Require developments above a certain scale to implement viable travel plans which promote public transport and modes of active travel and which reduce reliance on the car. All development should be required to show a route map showing safe cycling and walking routes to schools, shops and public transport.
- e) Establish e-working centres to provide opportunities for people in rural areas and satellite towns to work from a location closer to home.
- f) Set a target that every school in Wicklow has a school travel plan to encourage students to take alternatives to the car. This should be supported with a strategic aim to develop safe walking and cycling routes to and from schools and other educational institutions as well as providing disability access.
- g) Provide facilities such as secure bike parking and changing/showering facilities at places of employment in public authorities to encourage staff to cycle.

To support smarter travel there should be a strategic aim to:

- h) Reprioritise traffic signals to favour pedestrians instead of vehicles, reducing waiting times and crossing distances at junctions.
- i) Create level grade crossings for pedestrians across junctions. Create larger traffic-free areas in urban centre. Ensure that 30 km/h zones are designated in central urban areas which accommodate motorised traffic.
- j) Widen footpaths where there are high pedestrian flows, particularly close to public transport nodes. Improve the surface quality of footpaths Provide appropriately designed safe, well-lit, direct, continuous facilities for pedestrians.
- k) Ensure State-owned lands such as canal towpaths, former rail lines, Coillte estates, etc. are made available for the development of walking and cycling trails.
- l) Support private and public sector initiatives to establish car club schemes in Ireland. Provide on-road parking spaces to be designated for car clubs through appropriate signage.
- m) Establish park and ride facilities along major public transport nodes, at the periphery of major urban areas and at key public transport locations and nodes.

National Cycle Policy Framework

[http://www.smartertravel.ie/sites/default/files/uploads/2013_01_03_0902%2002%20EnglishNS1274%20Dept.%20of%20Transport National Cycle Policy v4%5B1%5D%5B1%5D.pdf](http://www.smartertravel.ie/sites/default/files/uploads/2013_01_03_0902%2002%20EnglishNS1274%20Dept.%20of%20Transport%20National%20Cycle%20Policy%20v4%5B1%5D%5B1%5D.pdf)

There is a need to improve the safety of cycling in County Wicklow and make it more attractive for users. The Strategic Development Plan should include the needs of cyclists, and in particular:

- a) Implement measures to reduce the volumes of through-traffic, especially HGVs, in town centres and especially in the vicinity of schools and colleges.
- b) Introduce traffic calming measures / enforce low traffic speeds in urban areas, make junctions safe for cyclists.
- c) Support the provision of dedicated signed rural cycling networks building on Fáilte Ireland’s Strategy to Develop Irish Cycling Tourism.
- d) Segregate cycle paths if possible. Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit and signposted.
- e) Provide secure cycling parking at all destinations of importance to the cyclist and aim to integrate cycling and public transport and the provision of cycling parking at all appropriate public transport interchanges.
- f) Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly. Link up all existing cycle lanes.

It is recommended that a ‘quality audit’ is carried out of pedestrian routes in towns and villages in the county, to ensure they are safe, well lit and enticing for users. It is essential that attractive, safe and secure pedestrian walkways/cycleways are provided in order to influence behavioural change in the population and promote greater take up of active travel.

Waste A Resource Opportunity – Waste Management Policy in Ireland
https://www.epa.ie/pubs/reports/waste/plans/Resource_Opportunity2012.pdf

The Wicklow Development Plan should implement the Waste Hierarchy set out in the Waste Framework Directive and place prevention and minimisation at the forefront of any waste policy.

- a) Disposal of municipal waste to landfill should be a last resort.
- b) Implement waste prevention measures with local business and community groups.
- c) Include community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities.
- d) The use of easily accessible public recycling bins should be considered for public areas, paths and green spaces that will allow for adequate waste segregation and will encourage the use of the waste management hierarchy.
- e) Food waste reduction initiatives and incentives should be implemented in homes and in business.
- f) A Reuse Policy should be developed in consultation with the national Procurement service and other relevant bodies, and implemented within public bodies in Wicklow to ensure that full consideration is given to feasible reuse options before embarking on the purchase of new goods.

Water

The strategic aim of Wicklow County Council should be to ensure the provision of safe secure drinking water and promote the reduction in waste and over use of water.

Water usage audits of public buildings should be carried and water conservation measures implemented.

To protect the ground water quality in the County there should be a strategic aim of ensuring all waste water treatment plants can operate effectively with their current demand and future demand, and that private effluent treatment and domestic septic tanks are fit for their purpose

Food

It should be a strategic aim from the Wicklow Development Plan to facilitate the production of more locally produced, healthy, high quality food.

Research 195: Health Benefits from Biodiversity and Green Infrastructure

<http://www.epa.ie/pubs/reports/research/health/research195.html>

Recreational, green spaces are a fundamental part of any development as they promote the health and wellbeing of residences who will occupy the accommodation and indeed the wider community. It is well established that there is a need to reconnect urban society with nature in order to promote health.

It is recommended that all future developments in County Wicklow are examined for the opportunity to integrate green infrastructure into the design at planning stage. Any potential for health gain should be explored and incorporated into all development and the built environment.

“For amenity purposes at least 9m² /person of accessible open green space are recommended by the World Health Organization, however it is recognised that this may vary depending on the size of the city, the number of inhabitants and where boundaries are drawn” (Dzhambov et al., 2014).

It is recommended that the following proposals are considered when planning for parks and recreational areas:

- a) Green biodiverse spaces should be designed so that there is at least one within walkable distance from people’s homes.
- b) Green spaces should be co-designed with communities and reflect local needs.
- c) Areas should be as large as possible with connections through flowery verges or linear habitats alongside paths and roads.
- d) Areas should be relatively open, but grass does not all have to be the same length. This design could suggest careful, rather than a lack of, management. Interpretative signage can explain the practice and highlight signs of nature to look out for.
- e) A few scattered trees or clumps of trees are preferable to dense planting of trees.
- f) Paths, recreational areas and places to relax and engage with nature should be incorporated from the start, to promote use and maintain a feeling of safety. It is recommended all proposed green areas are provided with paths for walking.
- g) Exercise areas, trails and paths need to provide maximum contact with green space, as this made exercise accessible and nature contact motivated people to walk more.
- h) Not all areas should be managed to the same intensity. Some parts near paths could be managed more to look tidy, whereas stakeholders recognised the value of incorporating wild areas, which could be further away from paths.
- i) Biodiversity areas can be designed to accommodate playgrounds and other amenity areas.

Biodiversity & Green Areas

It should be a strategic aim of the Wicklow Development Plan to bring biodiversity into the planning decision making process. A Biodiversity Action Plan should be developed which aims to conserve and restore biodiversity and ecosystem services in the wider countryside. Guidance on managing Biodiversity in strategic planning and urban areas is found in:

http://www.uep.ie/pdfs/guidelines_complete.pdf

All opportunities for green infrastructure should be explored and integrated into the design of public areas. Existing green areas should be preserved and utilised to their full capacity. New green areas should be provided. The provision of pedestrian and cycle routes through green areas should be a key provision of the design. The landscaping or ‘greening’ of these pedestrian/cycle routes should be considered at design stage, not only in the interest of making them more attractive for use but also to facilitate the movement of fauna, creating ecological corridors and thus having a positive effect on biodiversity. Towns and villages in Wicklow should be explored to identify areas where biodiversity can be integrated into the urban fabric. All towns and villages in the county should commit to a pollinator plan.

It should be noted that the quality of green areas is key and the on-going need for maintenance should always be factored into any decisions at the design stage.

Sustainable Development

Our sustainable future – A Framework for Sustainable Development

<http://www.housing.gov.ie/sites/default/files/migrated->

[files/en/Publications/Environment/Miscellaneous/FileDownload%2C30452%2Cen.pdf](http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/Environment/Miscellaneous/FileDownload%2C30452%2Cen.pdf)

<http://www.epa.ie/pubs/advice/ea/integratingclimaticfactorsintoseainireland.html>

Wicklow County Council has adopted a Climate Adaptation Strategy for County. The most immediate risks to Wicklow have been identified as floods, precipitation, storms and higher sea levels.

In terms of climate change and land use planning the County Development Plan should play an important role in influencing a reduction in GHG emissions by guiding the sustainable growth of the County, encouraging more compact mixed-use development and greater use of sustainable transport options such as cycling, walking and public transport, restricting development in areas that are at risk of flooding and protecting the natural landscape and biodiversity. Specific actions that seek to combat reduce or eliminate the emissions of greenhouse gases must be incorporated into the Development Plan.

Wicklow County Council should ensure that climate considerations are fully integrated into the planning of new projects and their design. All future development within Wicklow should have a green procurement approach, which incorporates carbon pricing and climate criteria into decision making. Environmentally friendly proposals such as the integration of public transport infrastructure, building typologies that minimise the use of energy, the use of low carbon materials, increased SuDS management initiatives, water recycling and conservation; green roofs, use of photovoltaic or rainwater harvesting and the integration and utilisation of open space should all be incorporated into the design stage of any development in the Wicklow area. It is recommended that all large development should document their energy efficiency proposals via a design statement at the planning stage.

The high volume of local authority housing which is provided by Wicklow County Council affords them the opportunity to be a leader in the promotion of innovative, low carbon, renewable energy design and technology. It is also recommended that Wicklow County Council carries out a carbon audit of its existing building stock and retrofit with more insulated building fabric and sustainable technologies.

Energy

Ireland's Second National Energy Efficiency Action Plan to 2020

http://www.seai.ie/Publications/Energy_Policy_Publications/Energy_Service_Companies/Ireland%E2%80%99s_second_National_Energy_Efficiency_Action_Plan_to_2020.pdf

The Strategic Development Plan for County Wicklow should include spatial planning policies to reduce the need for commuting to and from work.

The Strategy should:

- a) Promote and facilitate the incorporation of energy efficient design into projects.
- b) Develop and implement an energy management programme for all public buildings.
- c) Develop new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management.
- d) Support and promote the Better Energy Communities Scheme to enable communities around the country develop new and innovative, locally-based solutions to energy poverty.

Environmental Noise

The World Health Organisation (WHO) has identified Environmental Noise as an increasing cause of ill health and detrimental effect on health and wellbeing.

http://www.euro.who.int/data/assets/pdf_file/0008/136466/e94888.pdf

It is recommended that a Noise Impact Assessment is carried out for any development proposals with the potential to give rise to significant noise impacts. Also new developments must consider the

impact of noise from existing noise sources. We recommend that environmental noise should be considered in the context of:

- a) New roads, railways, airports, industry or recreational activities adjacent to residential properties or noise sensitive premises such as schools or hospitals, or recreational spaces,
- b) New residential properties or noise sensitive premises such as schools or hospitals, adjacent to existing roads, railways, airports, industry or recreational activities;
- c) The development of mixed residential/commercial use buildings, and multipart Residential buildings;
- d) Public house, night clubs, restaurants or other recreational activities; and
- e) Industrial operations, workshops and factories.

It should be a Strategic aim of the Wicklow Development Plan to map noise and implement Noise Action Plans as per EPA Guidance:

<http://www.epa.ie/pubs/advice/noisemapping/epaguidancenotefornoiseactionplanning.html>

Air Quality

The health statics outlined in the county health profiles identified that mortality rates from respiratory illness in Wicklow far exceed the national average. The Strategic Development Plan should have cognisance of this and should aim to reduce polluting emissions into air and increase the quality of air in County Wicklow by:

- a) Participating in, and facilitating national programmes of air quality monitoring,
- b) Working to develop and promote the Air Quality Index for Health,
- c) Develop Local Air Quality Management Plans that identify pollution ‘hot spots’ and aim to reduce pollution through local action on emissions.

It is recommended that an Air Quality Impact Assessment is carried out for any development proposals with the potential to give rise to significant Air Quality impacts. Also new developments must consider the impact of air pollution from existing sources.

Response of Chief Executive

This very detailed submission from the HSE is very welcomed by the Chief Executive as it aligns well with the already stated intention to include a new focus on ‘health and well-being’ in the new plan and in particular to carry out a health and well being audit of the plan, to ensure all provisions contribute towards improving the quality of the life in the County and allowing any potentially adverse impacts arising out of existing plan provisions to be identified and removed / ameliorated.

The following Government strategies, policies and studies will be considered in the drafting of the new plan:

- National Planning Framework / National Development Plan
- Regional Spatial and Economic Strategy
- Development Plans: Guidelines for Planning Authorities, June 2007 and any successor thereof
- Health Ireland Framework 2013
- The County Wicklow Health Profile
- Get Ireland Active – National Physical Activity Plan for Ireland
- Healthy Ireland- A Healthy Weight For Ireland
- The National Positive Ageing Strategy
- The Urban Design Manual – A Best Practice Guide

- Smarter Travel
- National Cycle Policy
- A Resource Opportunity – Waste Management Policy in Ireland
- Research 195: Health Benefits from Biodiversity and Green Infrastructure
- National Biodiversity Plan
- Our sustainable future – A Framework for Sustainable Development
- National Energy Efficiency Action Plan to 2020
- Climate Action Plan and the Climate Action Charter signed by WCC in December 2019

In addition, the new County Development Plan new Housing Strategy in accordance with guidance from the Department of Housing, Planning and Local Government including the Housing Demand Needs Assessment (in development).

The ‘**health and well-being**’ audit shall generally address the following topics:

- Housing including universal design and layout / design of new developments
- Sustainable and accessible transport
- Physical activity
- Public realm, open spaces, sports grounds, parks, allotments
- Community infrastructure
- Healthy environment – managing waste, protecting water bodies and biodiversity, clean air, noise control, renewable energy, access to nature,
- Managing and preventing hazards
- Service infrastructure – water supply, wastewater disposal, energy
- The needs of the older generation
- The needs of Wicklow’s youth population
- Workplace health and wellbeing
- Climate Action and sustainable living

With regard to the specific points raised:

Open Space and recreation

The open space and recreation provisions of the current County Development Plan are based on Wicklow’s ‘Play Policy’; this provides analysis and guidance as to the quantum and type of open spaces needed by the resident population, and these provisions are integrated into the land use objectives and zoning provisions of all Wicklow county and local plans. While this play policy is not under review as part of this process, through the ‘health and well-being audit’, the current provisions will be evaluated in order to ensure they still form a robust basis for zoning and land use decisions. In addition, the provision of any newer or higher order national or regional policies with respect to open space, sport and recreation will be considered in the audit and in the crafting of the new plan.

Wicklow County Council is committed to ensuring the views of the public are integrated into decision making regarding open space and recreation at all levels, whether that be through a process such as this development plan or the design of a new playground.

With respect to open space at nursing homes, while the current County Development Plan requires that the facilities provided in such establishments comply with national regulations (being the Nursing Homes (Care and Welfare) Regulations) which address recreational needs of users, the County Development Plan does not specify a minimum standard of open space for such facilities. This will be examined in the context of the health and well-being audit.

With respect to workplaces, the current County Development Plan suggest a minimum open area of 5% of the building floor area, but acknowledged that this may not always be possible in built up areas. Again the standards in this regard, particularly for new build development, will be reviewed as part of the plan review process.

Sustainable Transport

It is agreed that investment in public transport is essential and as set out in the recommended new Core Strategy, the growth framework for the County will be framed around ensuring housing growth is commensurate with services already available or that will be provided within the lifetime of the plan. The Council will continue to work with and support the public transport providers to improve services in Wicklow. The County Development Plan already contained objectives to that effect and it is recommended that same be retained and enhanced where necessary in the new County Development Plan.

The Council is committed in its annual roads delivery programme to improve footpaths and cycling paths / lanes. The delivery of footpaths and cycling paths / lanes is an operational matter and is dependent on the allocation of funding through the annual budgetary process or allocations from other agencies, such as the NTA.

Significant work is ongoing on the provision of walking and cycling facilities. The recent IPB dividend funding was spent improving footpaths throughout the county. This is in addition to NTA funding for footpaths and cycleways. In relation to schools, the NTA have a designated ‘permeability’ fund. This is aimed at creating safe routes to schools and removing barriers such as walls and gates blocking direct access to schools. Several projects have been completed under this programme and others are currently being progressed.

Accessibility and social inclusion

The Council is committed to improving accessibility and inclusivity for all in society, regardless of age, means or abilities, with the Wicklow **Local Economic and Community Plan** (LECP) driving Council activities and actions in this regard.

A wide range of actors and agencies will be required to deliver the LECP goals. It will be the role of the LCDC to coordinate the various organisations and actions required to fulfil the goals of the LECP. The County Development Plan plays the following roles in delivering these goals:

1. Facilitating the delivery of community infrastructure through:
 - the reservation of land for the development of new or enhanced social and community infrastructure in County and local development plans;
 - managing the expansion of residential development commensurate with the community infrastructure available;
 - requiring the delivery of new community infrastructure as part of development proposals; and
 - cooperating with other services providers in the delivery of new infrastructure.
2. Facilitating improved physical access to community infrastructure and services through:
 - coordinating easily accessible by public transport, cycle or foot;
 - requiring all new facilities to be accessible and useable by those with special needs, including mobility or other impairments; and
 - facilitating enhancement of communications infrastructure.

3. Facilitating the maintenance, restoration and upgrading of cultural and natural heritage of communities, environmental upgrading and general actions to enhance the environmental, amenity and physical attributes of communities.

This approach to social inclusion and accessibility will be examined and reviewed as part of the ‘health and well-being’ audit. It is however already evident through the submissions made to this process that ‘Universal Design’ concepts will need to be considered in the crafting of the provisions of the new plan.

Housing

The submission raises the housing needs of older persons, persons with disabilities and the Housing Needs Demand Assessment. As per the requirements of Section 94 of the Planning and Development Act, 2000 (as amended), the development plan shall include a Housing Strategy. The purpose of the strategy is to ensure that provision is made for the housing needs of the existing and future population of the plan area. The Act stipulates that the housing strategy shall take into account:

- a. *‘the existing need and likely future need for housing to which subsection (4)(a) applies,*
- b. *the need to ensure that housing is available for persons who have different levels of income,*
- c. *the need to ensure that a mixture of house types and sizes is developed to reasonably match the requirements, of the different categories of households , as may be determined by the planning authority, including the special requirements of elderly persons and persons with disabilities, and*
- d. *the need to counteract undue segregation in housing between persons of different social backgrounds’.*

The Strategy shall include an estimate of the amount of social and affordable housing required during the plan period and shall provide that as a general policy a specified percentage (not exceeding 10%) of the land zoned in the development plan for residential use, or for a mixture of residential and other uses, shall be reserved for those in need of social housing in the area.

While the County Development Plan is not directly responsible for the delivery of affordable homes or houses for certain sectors in society with special needs, there are a number of things it can do to create the right environment for the delivery of affordable homes, removing development bottlenecks and enabling a continuous supply of housing. These include:

- Providing a robust development framework and core strategy;
- Zoning land for development that is serviced and in appropriate locations which gives a greater degree of certainty to developers and infrastructure providers;
- Providing a clear and articulate longer term development strategy that facilitates the coordinated and efficient provision of enabling infrastructure;
- Including policy to support active land management;
- Providing for higher densities that ensures more efficient use of land and enabling more units coming to the market;
- Providing flexibility in terms of design particularly in urban cores to enable more cost-efficient construction and variety of homes;
- Including policy which encourages infill development and the densification of existing built up areas.

The delivery of sustainable communities will be a core aim of the new County Development Plan. In order to enable the development of sustainable communities, it is considered that the new Plan should include a policy to encourage a wide variety of housing types, sizes and tenure that reflect the County’s household composition. As part of the housing strategy, an analysis of existing demographics will be undertaken to inform future housing mix requirements and policy. By providing

a good mix of house types it will be possible to create sustainable neighbourhoods that cater for a variety of people and allow people the choice and opportunity to remain in their community while availing of accommodation that caters to their changing needs at particular stages of their life. It is noted that a number of Specific Planning Policy Requirements (SPPRs) in relation to housing mix are included in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018) - SPPRs were introduced in 2015. In accordance with **Section 28** (1C) of the Planning and Development Act 2000 (as amended) SPPRs are required to be applied by planning Authorities.

In accordance with the National Planning Framework the Council is required to carry out a comprehensive Housing Need Demand Assessment (HNDA) that will support the preparation of the housing strategy and all related housing outputs. NPO 37 states '*A Housing Need Demand Assessment (HNDA) is to be undertaken for each Local Authority Area in order to correlate and accurately align future housing requirements. The HNDA is:*

- *to be undertaken by Local Authorities with coordination assistance to be provided by the Regional Assemblies, and also at a Metropolitan scale, particularly where inter-county and inter-regional settlement interactions are to be planned for and managed;*
- *to primarily inform housing policies, housing strategies and associated land use zoning policies as well as assisting in determining where new policy areas or investment programmes are to be developed; and*
- *to be supported, through the establishment of a coordination and monitoring unit to assist Local Authorities and Regional Assemblies in the development of the HNDA (DHPLG, Regional Assemblies and the Local Authorities). This will involve developing and coordinating a centralised spatial database for Local Authority Housing data that supports the HNDA being undertaken by Local Authorities'.*

According to the NPF the purpose of the HNDA is

- *'Assist local authorities to develop long-term strategic views of housing need across all tenures.*
- *Provide a robust evidence base to support decisions about new housing supply, wider investment and housing related services that inform an overall national housing profile.*
- *Inform policies about the proportion of social and affordable housing required, including the need for different types and sizes of provision.*
- *Provide evidence to inform policies related to the provision of specialist housing and housing related services' (NPF, 2018:96).*

The guidance on how to prepare HNDAs has not been published to date. Until such guidance is produced, the Planning Authority will continue to prepare a Housing Strategy in accordance with current guidelines that will inform County Development Plan housing policy.

With regard to housing for persons with disabilities it is noted that all new housing must comply with the requirements of the Buildings Regulations Part M. *Part M aims to foster an inclusive approach to the design and construction of the built environment. The requirements of Part M (M1 - M4) aim to ensure that regardless of age, size or disability:*

- (a) new buildings other than dwellings are accessible and usable;*
- (b) extensions to existing buildings other than dwellings are where practicable, accessible and useable;*
- (c) material alterations to existing buildings other than dwellings increase the accessibility and usability of existing buildings where practicable;*
- (d) certain changes of use to existing buildings other than dwellings increase the accessibility and usability of existing buildings where practicable; and*
- (e) new dwellings are visitable.*

While acknowledging that it sets out the minimum level of provision for compliance with Part M of the Building Regulations, the Technical Guidance Document for Part M also states that: *‘those involved in the design and construction of buildings should also have regard to the design philosophy of universal design and consider making additional provisions where practicable and appropriate’.*

Universal design is defined in the Disability Act 2005 as *‘the design and composition of an environment so that it may be accessed, understood and used to the greatest practicable extent, in the most independent and natural manner possible, in the widest possible range of situations and without the need for adaptation, modification, assistive devices or specialised solutions, by persons of any age or size or having any particular physical, sensory, mental health or intellectual ability or disability’.*

The *National Disability Authority Centre for Excellence in Design* has produced *Universal Design Guidelines for Homes in Ireland (2015)*. These Guidelines are a first step in the process of raising awareness and inspiring people to think differently about the benefits of Universally Designed homes and the potential opportunity to address some of the challenges society faces by future-proofing our homes through embracing Universal Design thinking. The County Development Plan will include a policy to require, where practicable, new development to incorporate the principles of universal design as set out in the guidelines.

Waste

The need to deliver sustainable management of the waste that is generated in society is noted. The Eastern–Midlands Region Waste Management Plan (WMP) 2015-2021 provides the framework for solid waste management in the region and sets out a range of policies and actions to meet specified mandatory and performance based targets. With regard to waste and emissions it is the strategy of the plan *“To promote and facilitate best practice in prevention, re-use, recovery, recycling and disposal of all waste and environmental emissions produced in the County”.* This strategy along with the objectives will be reviewed and updated where necessary in the new plan making process.

Water & Wastewater

The provision of an adequate supply of water and wastewater treatment facilities is critical to facilitate and sustain the quality of life and well-being in the County. As of January 2014 Wicklow County Council no longer has any direct control in relation to the provision of such services. The delivery, integration and implementation of water and wastewater projects and infrastructural improvements are now the responsibility of the State body ‘Irish Water’.

The management of the majority of wastewater plants is now in the hands of Irish Water, which is activity pursuing a policy and programme of bringing all plants up to required standards in terms of quality of discharges. This programme is supported by the County Development Plan. Responsibility for permitting and monitoring smaller plants / private effluent disposal systems falls with the Council; new plants are strictly controlled through the application of the Council’s policies and objectives with regard to such developments, by ensuring compliance with planning condition and EPA standards, and by the septic tank monitoring programme.

Wicklow County Council is committed to working with Irish water to protect existing and potential water resources of the County, in accordance with the EU Water Framework Directive, the River Basin Management Plans, the Groundwater Protection Scheme and source protection plans for public water supplies. In this regard however the County Development Plan only has a certain remit which is generally the control of new development and providing planning policy support for the activities / plans / strategies of other bodies / agencies. The active ongoing management of water bodies, including pollution control, management of land uses near water courses, in-stream works to improve flow / passage of fish etc in Wicklow occurs via the implementation of the Water Framework Directive and River Basin Management Plan, which is actively delivered by the EPA, Department of Communications, Climate Action and Environment, and the Council’s water protection team.

Existing objectives with regard to water conservation within buildings will be examined and reviewed where necessary in the new plan.

Biodiversity & Green Areas

The Council is committed to protecting biodiversity and natural habitats. The current County Development Plan provides planning policy support for the National Biodiversity Action Plan (2017-2021) and the Wicklow Biodiversity Plan (which is part of the Wicklow Heritage Plan) as well as a suite of planning policies and objectives regarding protection of the environment, habitats and protected areas / species that are implemented on an ongoing basis. It is intended that these provisions will be retained and enhanced where necessary in the new plan.

A new Strategic Policy Committee for Climate Change & Biodiversity has recently been established in Wicklow, and the submissions made in relation to these areas will be brought to its attention for consideration in their action / work programme for the coming years.

With respect walking trails, cycling paths and greenways, it is acknowledged that such infrastructure will not only improve the County’s recreational and heritage resources but will contribute to the creation of healthier communities and attractive places to live. The NPF acknowledges that *‘the maintenance of access to our landscapes and the creation of new accesses are dependent on maintaining good links with the agricultural sector’*. The NPF also notes that *‘the development of greenways, blueways and peatways offer a unique alternative means for tourists and visitors to access and enjoy rural Ireland’* and the *‘development of a strategic national network of these trails is a priority’*.

Wicklow County Council’s Municipal Districts, Community Cultural and Social Development Department and the Transportation, Water and Emergency Services Department are involved in the development of a number of greenways throughout the county, including the Blessington Greenway (estimated start date of construction is September 2020), Arklow-Shillelagh Greenway (currently at design land acquisition phase) and Kilmacanogue to Bray Cycleway (consultants recently appointed to progress).

Wicklow County Council’s Transportation, Water and Emergency Services Department are examining further schemes that are listed in the GDA Cycle Network Plan and will submit for NTA funding. These include;

- North Wicklow: Bray, Greystones, Kilcoole, Newtownmountkennedy;
- South Wicklow: Wicklow Town & Arklow;
- West Wicklow: Blessington & Baltinglass; and
- Rural Cycle Routes in Wicklow including the East Coast Trail Greenway in Wicklow and 18 other routes throughout the county.

Wicklow County Council is also working on a “Blueway” in conjunction with 2 other counties, Wexford and Waterford. This is an initiative of the Celtic Routes INTERREG project. A feasibility study has been carried out and currently funding options are being explored.

Energy

The current County Development Plan, in light of national policy, includes a range of policies, objectives and building standards aimed at reducing energy use, in terms of reducing use of electricity in buildings, reducing heating demand and reducing energy consumed by transport. These provisions will be review and enhanced where necessary in the new plan.

Environmental Noise

Since the adoption of the current County Development Plan, new regulations have come into effect with regard to environmental noise (SI 549/2018), which provide for the designation of ‘quiet areas’ following study, consultation and approval by the Minister. These regulations will be considered in the crafting of the new plan to determine what role the County Development Plan may have in relation to same. The current County Development Plan includes a number of objectives with respect to noise, (WE12 through to WE 15 refer) and it is intended that these shall be reviewed and enhanced if necessary in the new plan:

Air Quality

The Environmental Protection Agency holds overall responsibility for the co-ordination and monitoring of air quality in accordance with EU air quality directives. Damaging emissions to air can take the form of pollutant gases (for example from car exhausts) and air borne particulars (such as dust). Wicklow County Council is committed to regulating and controlling activities likely to give rise to emissions to air (other than those activities which are regulated by the EPA) and requiring activities likely to give rise to air emissions to implement measures to control such emissions, to undertake air quality monitoring and to provide an annual air quality audit (objectives of the current County Development Plan). The current provisions relating to air quality will be reviewed and updated if necessary in the new plan.

There are a number of suggestions in this submission that do not have a land use or spatial aspect and as such cannot be addressed via the County Development Plan. However these would be more relevant for other Council strategies or operations, such as

- Suggestions regarding tobacco use, non-smoking zones etc
- Suggestions regarding the promotion of healthier food options
- Suggestions regarding substance misuse
- Suggestions regarding delivery public transport services, traffic management

This submission will be circulated and brought to the attention of various Council departments working on strategic and / or operational plans.

Recommendations of Chief Executive

1. To ensure health and well-being are addressed throughout the new plan as a plan dynamic through the preparation of a health and well- being ‘audit’ of the new plan.
2. To determine if there are opportunities to integrate more ‘Universal Design’ criteria and requirements into the plan objectives and development standards.
3. The new County Development Plan shall be drafted to be consistent with the provisions of the National Planning Framework and the Regional Spatial and Economic Strategy.
4. In the development of the new plan, particular regard will be taken of the need for adequate and appropriate critical service infrastructure to service any development proposed and authorised during the lifetime of the plan. To target housing and employment growth into settlements which can demonstrate capacity to absorb such growth in a sustainable manner.
5. The new plan will support the need for compact growth and better integration of transport and land-use planning, including walking and cycling infrastructure, public transport, park-and-ride facilities, etc. The policies, objectives and zonings that will be set out in the new plan will have at their core the need to direct development into those locations which facilitate the prioritisation of public transport, walking and cycling. The new plan shall be consistent with and have regard

to higher order plans and strategies and the plan / strategies of other agencies including ‘Smarter Travel’, ‘The National Cycle Policy Framework’, ‘A Healthy Weight for Ireland, Obesity Policy and Action Plan’, ‘A Framework for Improve Health and Wellbeing 2013-2025’ and ‘Get Ireland Active! National Physical Activity Action Plan for Ireland’. The new plan will be aligned, as is required, with regional transport strategies of the National Transport Authority (NTA).

6. In the development of the new plan, particular regard will be taken of the need to align with national commitments on climate change mitigation and adaptation; to address climate change directly in the new plan with a specific climate change chapter and indirectly throughout the entire plan by integrating climate change mitigation and adaptation into the plan objectives.
7. The new plan shall promote the need to protect non-designated aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity.
8. As per the requirements of Section 94 of the Planning and Development Act, 2000 (as amended), to include a Housing Strategy to ensure that provision is made for the housing needs of the existing and future population of the plan area. When guidance for same as been published, to carry out a comprehensive Housing Need Demand Assessment (HNDA) that will support the preparation of the housing strategy and all related housing outputs.