



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

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### **Wicklow County Development Plan 2021-2027: Public Consultation, Issues Booklet**

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 13<sup>th</sup> 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 28<sup>th</sup> 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 5<sup>th</sup> 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 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 (QGasSP) 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 welcome 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.

Regards,



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Jim Conway  
Director  
Eastern and Midland Regional Assembly  
20<sup>th</sup> December 2019