



## Wicklow Town - Rathnew LAP Submission - Report

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DRAFT pre consultation submission for Wicklow Town and Rathnew LAP HSE submission EHIS 3310.pdf, 0.96MB



Seirbhís Sláinte Comhshaoil  
Cill Mhantáin

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19<sup>th</sup> September 2023

**Re: Pre-Draft Consultation for Wicklow Town and Rathnew Local Area Plan**

Dear Sir/Madam,

Please find enclosed the Environmental Health Service consultation report in relation to the Pre-Draft Consultation Phase for the Wicklow Town and Rathnew Local Area Plan

The following HSE departments were notified of the consultation request for this development plan on 20<sup>th</sup> July 2023.

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O’ Moore
- CHO – Martina Queally

If you have any queries regarding this report please contact Eugene Monahan, Principal Environmental Health Officer, Wicklow at [eugene.monahan@hse.ie](mailto:eugene.monahan@hse.ie) if you wish to make a submission

Yours Sincerely,

Eugene Monahan  
Principal Environmental Health Officer

The Environmental Health Service (EHS) has drafted this initial consultation to support Wicklow County Council deliver a local area plan for Wicklow Town and Rathnew that protects and promotes population health. The Wicklow Town and Rathnew Local Area Plan (hereafter referred to as the Plan) should fit the vision of the Healthy Ireland Framework “where everyone can enjoy physical and mental health wellbeing to the their full potential, where wellbeing is valued and supported at every level of society and is everyone’s responsibility”

The following observations are made under the remit of Healthy Ireland and relevant health supporting policies, strategies and plans. It takes account of the pre-draft issues booklet accessed to inform this submission.

The observations are made under the following headings

### **Climate Change**

Climate Change is the greatest threat to global health this century and climate action is the greatest opportunity for delivering health gain. Climate action should be central to the plan to both Mitigate/reduce/eliminate Green House Gas emissions and Adapt to climate change in order to protect present and future generations.

The plan should support actions that move Ireland to “a low carbon, climate-resilient, and environmentally sustainable economy by 2050” as set out in the Climate Action and Low Carbon Development Act 2015 – 2021. The latest Climate Action Plan 2023 should form the basis for developing a low carbon, climate-resilient, and environmentally sustainable Wicklow Town and Rathnew by 2050 with interim targets for 2030. Examples of actions include

- Citizen engagement – a plan that contributes to delivering “climate literacy” and enables citizens to take action to improve the quality of life for themselves and fellow citizens.
- A plan that supports a just transition that leave no one behind to a Climate Neutral Ireland and by extension Wicklow Town and Rathnew.
- A plan that builds better, to Zero Emission Building (ZEB) standard in all new construction and supports retro-fitting of all other building stock.
- A plan that delivers healthier housing, healthier workplaces and healthier communities through effective urban planning, design and construction. As the booklet indicates a local area plan that “will promote healthy place making through quality urban design, public realm and active travel...”

- Development of a transport system that delivers on the principles of Shift – Avoid – Improve.
  - A plan that through land use planning assists people to Reduce or Avoid the need for travel
  - A plan that enables people Shift to more environmentally friendly modes of transport such as walking, cycling or public transport.
  - A plan that improves the energy efficiency of vehicle technology – for example perhaps only allowing car share that utilises hybrid or fully electric vehicles or only allows the use of zero or near zero emission vehicles in the delivery of public transport.
  
- A plan that facilitates the large scale deployment of renewable energy technologies to help deliver Ireland’s emission reduction targets. This should include the utilisation of public buildings for the generation of solar power.
  
- A plan that adapts to climate change and builds resilience for the residents of Wicklow Town and Rathnew. In practical terms this implies
  - A community that is resilient to severe weather events such as floods, windstorms, extreme heat and other potential severe weather hazards including protection from coastal erosion and sea level rise.
  - Incorporating rain water harvesting to build resilience to dry spells/drought conditions.
  - Particular attention is drawn to protecting vulnerable people such as older persons and young children from extreme heat events and planning a landscape that limits the urban heat island effect, provides green and blues spaces, provides shade and other measures to cool the local environment in advance of and during heatwave events.
  - A plan where rain water harvesting, drainage and waste management infrastructure limit the opportunities for vectors of disease, such as mosquitos and flies to breed.
  - Land use management that reduces exposure to aero-allergens that may contribute to the burden of asthma and other allergic impacts on people.
  - A plan that anticipates and prepares for climate related displacement of people locally and a potential influx of migrants from other places (locally and globally). Connected to DRR below.
  - Reference under adaptation can be made to the Dept. of Health Health Sector Adaptation Plan 2019 – 2024.

## **Sustainable Development Goals**

The plan should support action towards the achievement of the Sustainable Development Goals as set out in Agenda 2030. Specifically it should deliver towards SDG 3, which is to “ensure healthy lives and promote well-being for all at all ages”. The achievement of SDG 3 is dependent on achieving so many other SDGs and the plan should map out the SDGs that will make the greatest contribution to SDG 3. One of the most relevant in the context of this Local Area Plan is SDG 11 “sustainable cities and communities”

The plan should align with the Government’s National Implementation Plan for the Sustainable Development Goals 2022 – 2024. A key principle to deliver is the principle of Leave No One Behind.

## **Disaster Risk Management including Disaster Risk Reduction (DRR)**

The plan should apply the Sendai Framework for Disaster Risk Reduction 2015 – 2030 and adopt the four priorities of

- Understanding disaster risk
- Strengthening disaster risk governance to manage disaster risk
- Invest in disaster risk reduction for resilience
- Enhancing disaster preparedness for effective response, and to “Build Back Better” in recovery, rehabilitation and reconstruction

## **Inclusiveness**

The plan should aim to be as inclusive as possible taking account of the demographic mix in Wicklow Town and Rathnew. The following outlines some of the issues to consider in the plan:-

- A plan that is Age Friendly for the likes of older and younger persons. Takes account of the National Positive Aging Strategy and literature around to support Older People Remaining at Home (OPRAH).
- A plan that delivers for Persons with a Disability ensuring people are not impaired or excluded from active participation in their community – may include issues around street lighting, footpaths, roads, public seating etc.)
- A plan that delivers for Youth/Adolescents supporting safe spaces to socialise and play

- A plan that delivers for disadvantaged and marginalised groups, such as the homeless, travellers and others.
- A plan that delivers for the present and future ethnic and cultural mix in Wicklow Town and Rathnew
- A plan that delivers for all genders and empowers women and girls in particular. For example a plan that supports girls to remain physically active and protects boys from engaging in dangerous activities.

### **Physical Activity/Sustainable Movement**

The plan should enable/support all of all ages to engage in active play/sport (in formal and informal spaces) and active travel that results in a more active and healthy community with the co-benefits of safer streets, less congestion, reduced carbon emissions, better air quality and a positive climate impact. Transport options should be prioritised in line with the transport hierarchy putting pedestrians first followed by cyclists, public transport and private vehicles at the bottom and deliver on the Road Safety Authorities strategy 2021 – 2030 priority seven regarding safe and healthy modes of travel. Wicklow County Council (WCC) should give consideration to the physical separation of pedestrian and cycling paths to ensure safe and healthy travel for all.

Rights of way should be prioritised in line with the transport hierarchy and cyclists should be supported with ample and secure bike parking (including those with electric bikes) in the right locations.

The issue of scooters will need to be considered in the context of active travel and road safety.

A specific opportunity exists in the Murrough Area of Wicklow Town to maximise the opportunity for recreational and active travel use.

In the drafting of the plan reference should be made to the following

- National Sustainable Mobility Policy 2022
- Smarter Travel Policy 2009 – 2020 and/or recent updates
- National Cycle Policy Framework 2009 – 2020 and/or recent updates
- Government Road Safety Strategy 2021 – 2030
- Get Ireland Active – National Physical Activity Plan for Ireland
- Healthy Ireland - A Healthy Weight For Ireland Obesity Policy and Action Plan 2016 - 2025

## **Air Quality**

The plan should look to deliver the highest attainable air quality for the people of Wicklow Town, Rathnew and beyond. Hotspots of poor air quality should be identified, in areas with high traffic volumes for example, and mitigation measures put in place to improve air quality to the latest health protection standards of the WHO Air Quality Guidelines 2021.

The development of the plan may also refer to the Clean Air Strategy published in April 2023

## **Energy**

Energy systems chosen should aim to reduce or eliminate air pollution and support renewables including energy storage systems towards the goal of being carbon neutral by 2050

## **Noise**

Noise is widely recognised as the second biggest environmental determinant in Europe after air pollution. The plan should have a noise map of the area and look to ensure existing noise levels that are potentially detrimental to health are minimised. The plan should also look to ensure future developments do not breach noise thresholds at day, evening and night times that are potentially harmful to health and/or are a nuisance to people and their pets/animals.

## **Water Quality**

The plan should look to protect existing and future planned water bodies from potential sources of pollution. The plan should look to enhance water bodies and provide a greater variety of amenity to the people of Wicklow Town and Rathnew.

## **Circular Economy/Waste**

The plan should look to be aligned with the Circular Economy and Miscellaneous Provisions Act of July 2022. The plan should follow the principles of the waste hierarchy to first of all eliminate the generation of waste in the first place, including single use items, thereafter reduce, reuse and recycle waste including supporting “the right to repair” and work towards a Circular Economy. Some key areas to highlight include

- Supporting the people of Wicklow Town and Rathnew to segregate waste in public spaces
- Supporting food waste reduction in a number of key settings including commercial premises, schools, health and social care facilities
- Supporting access to free drinking water refill stations in public spaces
- Supporting “zero waste” businesses

In drafting the plan reference could also be made to

- A Resource Opportunity – Waste Management Policy in Ireland 2012

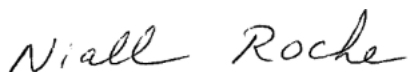
### **Sustainable/Healthy Diets**

The plan should look to support sustainable diets for all the people of Wicklow Town and Rathnew. This may include some or all of the following:-

- Leading by example in Wicklow County Council to source food locally and to promote sustainable diets
- Enabling the communities of Wicklow Town and Rathnew to Grow their Own Food
- Balancing the mix of food businesses and “fast food” businesses in the area to give people the option to “make the healthy choice the easy choice”

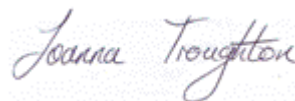
### **Tobacco and Disposable Vapes Free Ireland**

The plan should look to assist in the delivery of a Tobacco Free Ireland as outlined in the Tobacco Free Ireland Report 2013 and respond to anticipated changes regarding the accessibility of Disposable Vapes in Ireland.



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Niall Roche  
Environmental Health Officer



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Joanna Troughton  
Senior Environmental Health Officer



**Date: 18/09/2023**

**RE: Pre-Draft Consultation for the new Wicklow Town & Rathnew Local Area Plan 2024**

**FAO: Eugene Monahan, Principal Environmental Health Officer, Wicklow**

Dear Eugene,

Please see below a number of Public Health considerations for the pre-draft consultation for the new Wicklow Town & Rathnew Local Area Plan 2024.

### Overview

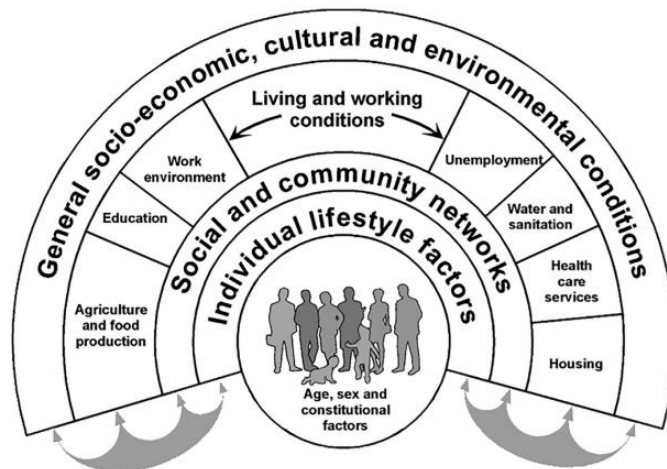
The effect of 'place' on health is an important consideration in local area planning, with the environment long recognised as a key determinant of health. (1) Promoting health solely through changing the behaviour of individuals or small groups has not been demonstrated to be very effective, reaching only a small proportion of the population and seldom maintained in the long term. (1) Therefore, there is a need for assessment of the social, economic and environmental impacts on health, and within this, an acknowledgement of the role of planning and design of human habitation plays in promoting health. (1)

Many of the previous trends in urban development have promoted unhealthy, car-dependant lifestyles and health has been a casualty in this. This type of development has led to a decline in regular daily walking and cycling, resulting in increased obesity and risk of disease including diabetes and cardiovascular disease. Health inequalities are exacerbated as people tied to the locality (e.g. elderly people, unemployed and immobile people) are especially vulnerable to these trends. (1) Therefore, it is important to consider aspects that can promote the health and well-being of the community in local area planning.

Public health considerations in developing the new Wicklow Town & Rathnew Local Area Plan are outlined below.

### Social determinants of health

Dahlgren and Whitehead proposed a model for determinants of health that recognises there are complex, multi-layered influences and factors that have an impact on the health of individuals (see Figure 1). (2) These include constitutional factors such as age and sex, lifestyle factors such as smoking, social and community factors such as socio-economic status, work environment, living conditions, education and transport and the wider economic, political, cultural and environmental factors. All of these spheres outlined in the Dahlgren and Whitehead model are themselves affected by the changes in the built environment, in complex and interacting ways. (1)



Source: adapted from Dahlgren and Whitehead, 1991

**Figure 1. The main determinants of health**

Source: Dahlgren and Whitehead 2021 (2)

Therefore, planning authorities play a key role in addressing these determinants of health, and the planning and design of urban environments has a major effect on health equity. The World Health Organisation (WHO) estimates that lack of physical activity, alcohol consumption, tobacco use and unhealthy diets are the main cause of the four non-communicable diseases (NCDs) responsible for over 80% of premature deaths from NCDs worldwide - that is diabetes, cancer, heart disease and respiratory disease. (3) Local area planning presents an opportunity to address these issues through determining the quantity and quality of green space, the type and frequency of transport, the quality and quantity of housing, and the frequency and location of fast-food and off-licences. (4) Through this, planning has a knock on effect on the causes of NCDs by, for example, facilitating physical activity and active transport, reducing car use, and improving air quality and improving sanitation. In addition, planners play a role in ensuring equitable access to health services by facilitating the development of healthcare infrastructure at suitable locations that are readily accessible by those who are in need of the services.

#### Accessibility to green and blue spaces

Green spaces are a fundamental component of urban ecosystems, facilitating physical activity and relaxation and also providing a refuge from noise. (5) Public green and blue spaces are important for sustainable development and include areas such as parks, sporting fields, streams and riverbanks, greenways, community gardens, street trees, nature conservations and less conventional green spaces such as green alleyways and cemeteries. (6) Greater access to green space has been associated with decreased depression and increased physical activity which promotes health and well-being. However, access to green space is not distributed equitably, and is often stratified based on certain characteristics such as income and age. (6)

There is also evidence that urban green infrastructure regulates local environmental hazards, including an associated reduction in pollution and noise. (7) Both air pollution (8) and noise pollution (9) can have detrimental impact on the health of individuals, therefore helping to

address these issues with equitably distributed increased access to green space may have beneficial public health consequences for the health of the local population.

#### Active transport and physical activity

There is a mounting body of evidence to suggest a causal relationship between the built environment and physical activity behaviours, in particular, active transport. (10) Improving walkability, providing quality parks and playgrounds and providing active transport infrastructure is likely to generate positive impacts on activity levels in children and adults. (10)

There are a number of initiatives that can encourage an increase in active transport, for example (11) :

- 1) Pedestrian and bicycle infrastructure - pedestrian infrastructure includes pedestrian access routes, pavements, pedestrian crossings, benches, lighting and traffic control. Bicycle infrastructure includes road spaces for bicycles, parking facilities for bicycles, and bicycle sharing schemes. Ensuring appropriate infrastructure is in place can create or enhance the convenience and acceptability of these modes of transport and improve safety.
- 2) Safe routes to school - facilitating active transport to and from school that is safe for children by improving infrastructure. Prioritisation of schools for active transport infrastructure improvements and ensuring new housing is planned to be within walking distance of schools where possible can have considerable benefit for the health of the community.
- 3) Public transport use - encouraging public transport use through provision of suitable public transport infrastructure may lead to more physical activity given that active travel is often required to get to transit stops and final destinations. This can be achieved through:
  - Service improvements (e.g. increased peak hour frequency)
  - Infrastructure such as dedicated bus lanes
  - Accurate real-time service and wait-time information
  - Signal priority at intersections for public transport
- 4) Traffic safety - this includes initiatives such as reducing speed limits, enforcing bicycle helmet use, promoting stronger regulation for drivers, improving active transport infrastructure, and ensuring greater enforcement of traffic laws.
- 5) Community design (often called walkability), includes strategies such as street-scale design and place making that can affect the quality of the experience of pedestrians, cyclists and transits users. Street design is important to consider as features such as footpaths, pedestrian crossings, bicycle facilities, traffic calming and landscaping are an easier and less costly method of encouraging active transport than altering the road network, for example. Place making involves making public places distinctive, appealing, and comfortable and safe, thus improving the experience for people using active transport.

Regular physical activity is an essential health behaviour that promotes mental and physical health and wellbeing and environments that support active transport promote mobility, health lifestyles, reduced traffic congestion, positive environmental impacts and generate economic benefit. (11)

### Healthy eating

Obesity is a complex, multifactorial disease defined as abnormal or excess fat accumulation that presents a risk to health. (12) It is a serious public health challenge and a major determinant of non-communicable disease and disability. 'Obesogenic' food environments are thought to contribute to rising levels of overweight and obesity through promoting access to unhealthy food choices such as takeaway and fast food shops and other retail outlets that are less likely to sell healthy foods. (13) The Healthy Ireland Strategic Action Plan 2021-2025 commits to continue to use planning to address the obesogenic environment. (14)

In addressing the obesogenic environment, consideration should be given to (13):

- 1) Accessibility and availability - this include physical and financial accessibility of products and shops need for a healthy (or unhealthy) diet. Planning that ensures access to healthy food and limits access to unhealthy food such as fast food and take-away is important for the health of the local community.
- 2) Social conditions - this includes social interactions such as marketing and social support.
- 3) Material conditions - this includes unfavourable working, housing and neighbourhood conditions. Living or working in an unfavourable environment may induce stress and indifference concerning a healthy diet. Thus, planners have a role to play in maximising housing and community conditions.

### Climate and sustainability

Climate change and air pollution threaten health and create inequality. Climate change affects both the social and environmental determinants of health - clean air, safe drinking water, sufficient food and secure shelter. (15) Climate change impacts on health in a myriad of ways, including increasingly frequent extreme weather events, disruption of food systems, increases in zoonosis and food and water borne diseases, and mental health issues. (15) Increased river and coastal flooding is a particular risk for Ireland - we have seen an increase in average annual national rainfall of 5% in the period from 1981-2010 compared to 1961-1990. Other risks include changes in wind speeds and storm tracks, changes in distribution of plant and animal species, and water stress for crops and pressure on water supply during warmer months, all of which may have negative impacts on human health and wellbeing. (16) Local authorities have the opportunity to embed climate mitigation in local authority and spatial planning. The 2021 Climate Action Act significantly expands the role of the local authority in relation to climate action (17), and local authorities in their planning function can influence patterns of development that drive demand for transport, energy related emissions and residential emissions.

Climate mitigation actions have additional benefits in improving transport, housing and energy systems that can help improve air quality and reduce the risk of respiratory illness associated with poor air quality, and the Healthy Ireland implementation plan highlights that air pollution should be prioritised in climate mitigation plans. (14) In addition, as outlined above, shifting to

active modes of transport can increase physical activity levels and reduce traffic related injuries and deaths.

### Conclusion

The design of the built environment can support improvements in health and reduce the risk of developing disease, thus improving the physical and mental health of the population. In addition, climate mitigation actions and ensuring sustainable development also have the potential to improve the health of the population.

Kind regards,

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Dr Triona McNicholas  
Specialist Registrar in Public Health Medicine, Department of Public Health, Area C

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