



Blessington Local Area Plan Submission - Report

Who are you:	State Body
Name:	Office of the Planning Regulator
Email Address:	[REDACTED]
Reference:	BLESSLAP-153734
Submission Made	April 3, 2024 4:03 PM

Topic

Other topics for you to have your say on! - Environmental Assessment - Plan Implementation -Plan Delivery

Submission

A chara,

Please see attached the OPR submission on the Issues Paper for the Blessington Local Area Plan. Please note that this submission applies to the issues paper in its entirety.

Kind regards,
Miriam Conlon

File

2024.04.03 OPR Submission on the Issues Paper for Blessington LAP.pdf, 0.25MB

3rd April 2024

Administrative Officer, Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96.

Re: Issues Paper for the Blessington Local Area Plan

A chara,

Thank you for your authority's work in preparing the Issues Paper (the Issues Paper) for the proposed Blessington Local Area Plan (the LAP).

The planning authority is commended for publishing an Issues Paper, engaging proactively with the public, and notifying the Office of the Planning Regulator (the Office) of the intention to prepare the LAP.

In accordance with the provisions of section 31AO of the *Planning and Development Act 2000*, as amended (the Act), the Office is obliged to evaluate and assess local area plans to ensure alignment with national and regional planning policy and the objectives of your county development plan.

The Office has set out some broad issues relevant to the preparation of local area plans, in addition to some specific issues of particular relevance to the preparation of the LAP, under the following headings:

1. [Strategic policy framework](#)
2. [Development plan core strategy](#)
3. [Zoning, compact growth and infrastructural services](#)
4. [Regeneration](#)
5. [Education, social and community amenities](#)
6. [Economic development, employment and retail](#)
7. [Transport and mobility](#)

8. [Flood risk management](#)
9. [Climate action](#)
10. [Environment, built and natural heritage](#)
11. [Implementation and monitoring](#)

The comments are offered without prejudice to any observations and recommendations by the Office at future stages of the plan-making process. They also do not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

1. Strategic policy framework

Section 20(5) of the Act requires the LAP to be consistent with the objectives of the Regional Spatial and Economic Strategy (RSES), *National Planning Framework* (NPF), the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant development plan.

The LAP should consider the guiding principles of the RSES and ensure consistency with the relevant regional policy objectives (RPO). The objectives of the LAP are also required to be consistent with any strategic development sites for the delivery of residential, employment or other uses.

In this regard, the Office acknowledges that the RSES identifies Blessington as a settlement located in the eastern fringes that has undergone rapid commuter-focused residential expansion over the recent decade, without equivalent increases in jobs with a jobs -resident workers ratio of 0.467¹. This trend is reflective of the low ratio of jobs to resident workforce and services. In this regard, the RSES advises that population growth in Blessington shall be at a rate that seeks to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision.

This is supported by the Wicklow County Development Plan 2022-2028 (the Development Plan) which aims to direct strategic employment development to Blessington which should

¹ Appendix 2 of the National Planning Framework (2018).

be developed in coordination with the sequential delivery of infrastructure and services, as this can mitigate long-distance commuting.

The Office notes that the Development Plan includes an objective (CPO 12.3) to prepare a Local Transport Plan (LTP) for Blessington. It is important that the LTP informs the draft LAP, in particular having regard to the location of employment and residential zoned land, within the LAP settlement boundary.

The Office encourages the planning authority to liaise with the Eastern and Midland Regional Assembly (EMRA) in preparation of the draft LAP, particularly where clarity is required on how the objectives and guiding principles set out in the RSES relate to the LAP.

2. Development plan core strategy

Section 19(2)(b) of the Act requires the LAP to be consistent with the objectives of the development plan and its core strategy. This is also a key message of the section 28 *Local Area Plans, Guidelines for Planning Authorities* (2013) (LAP Guidelines).

In this regard, the Office notes that the core strategy of the Development Plan provided for a population increase of 911 persons over 2016-2028 for Blessington and a requirement for 393 housing units. The development plan also identified a significant surplus of zoned land in the existing LAP relative to the core strategy of the Development Plan, much of which is located outside the existing built up area.

A key part of the Office's assessment of the draft LAP is to consider whether the objectives and zoning provisions of the LAP are consistent with the level of growth set out in the core strategy for the proposed area of the LAP.

The *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines) provide clear guidance in terms of ensuring that sufficient housing lands/sites are provided based on the housing unit yield of land zoned for residential and a mix of residential and other uses. This is critical in terms of the ability to plan for the timely delivery of physical and social infrastructure in the right location to serve new housing development and to support compact and sequential growth.

It will be necessary, therefore, to ensure that the LAP is consistent with the Development Plan in order to comply with section 19(2B) of the Act.

3. Zoning, compact growth and infrastructural services

Where proposed, our assessment will carefully consider whether proposed zoning objectives are consistent with the core strategy and objectives of the Development Plan and whether they can demonstrate consistency with the objectives for compact growth and densification² under the NPF (NPO 3 and NPO 35) and the RSES (RPO 3.2). The implementation of effective compact growth to avoid urban sprawl also plays a key role in climate change mitigation.

Zoning objectives should also be consistent with any strategic development sites for the delivery of residential, employment or other uses identified in the RSES.

In relation to residential development, any provisions or standards for density or building height in the LAP should have regard to relevant section 28 guidelines and any SPPRs therein, including, in particular:

- *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)*;
- *Urban Development and Building Heights, Guidelines for Planning Authorities (2018)*; and
- *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023)*.

Land use zoning should follow a sequential approach so that the development of lands closest to the town centre are prioritised over lands on the outskirts of the town, as set out under section 6.2.3 of the Development Plans Guidelines.

The planning authority also needs to ensure that lands that cannot be serviced within the lifetime of the LAP are not zoned for development, consistent with the tiered approach to zoning under NPO 72 a-c of the NPF. In this regard, an infrastructure assessment should be prepared in accordance with Appendix 3 of the NPF and having regard to section 4.5.2 (Settlement Capacity Audit) of the Development Plans Guidelines.

² Including through reductions in vacancy, re-use of existing buildings, infill development, area or site-based regeneration and increase building heights.

The Office notes that Uisce Éireann has indicated that there is sufficient water supply and wastewater capacity to accommodate the projected growth as set out in the core strategy within the lifetime of the LAP. The Office, however, advises the planning authority to liaise closely with the relevant prescribed authorities concerning the delivery of essential services and infrastructure.

4. Regeneration

Both the NPF (NPO 4 urban places; NPO 6 urban regeneration; NPO 18a proportionate growth; NPO 18b new homes and NPO 35 increasing residential use) and the policy objectives of the RSES emphasise the importance of opportunities for urban and village regeneration to create attractive, liveable, and high quality urban places. The reuse of brownfield sites and vacant buildings will also contribute to climate change mitigation.

The Office acknowledges and welcomes the approach in the Development Plan which recognises that Blessington has the potential to reclaim the Market Square as an amenity space and focal point for the town. This has the potential to include public realm improvements to significantly improve permeability and sustainable mobility consistent with the Development Plan objectives CPO 5.15 (Placemaking) and CPO 5.16 (Placemaking) respectively. The plan to improve public realm should inform placemaking in the draft LAP and will provide opportunities to improve permeability and public safety.

Further, the Development Plan policy objectives CPO 4.9 and CPO 5.6 place a firm focus on regeneration in Blessington.

The Office also notes the Development Plan proposals to identify options to provide remote working/enterprise hubs, including repurposing the former Health Service Executive building to create a visitor centre. It is anticipated that the regeneration proposals will include measures to increase economic opportunities within the town.

The Office acknowledges that the Issues Paper refers to the regeneration of vacant sites and their potential to improve the vitality and viability of the town centre and includes the revitalisation and regeneration of Blessington Main Street, Blessington Town Centre and Quarry Lands.

It is important that the draft LAP sets out clear policy framework to ensure the delivery of these key Development Plan regeneration objectives.

The Office advises where such sites are identified for regeneration, the planning authority should prepare a development framework for future development with appropriate guidance regarding layout, massing, permeability, green infrastructure and Sustainable urban Drainage Systems (SuDS) etc., as set out in section 5.7 of the LAP Guidelines.

Further, the delivery of town centre regeneration will deliver compact growth and create economic opportunities and will strengthen the Blessington urban structure. The planning authority is advised to ensure that draft LAP includes targeted objectives to facilitate the delivery of compact growth on these underutilised sites and brownfield sites.

Finally, the Office acknowledges the strong policy content in the Development Plan in relation to regeneration, including CPO 6.35, and recommends that the LAP includes a strong policy framework to support the utilisation of existing buildings, brownfield/infill sites, and derelict and underutilised sites. In this regard, the planning authority should consider proactive land activation measures including the planning authority's powers for land acquisition / compulsory purchase and derelict sites and vacant land.

The Office also acknowledges policy objective CPO 5.6 which aims to seek funding and focus new investment in towns and villages, reverse decline and encourage new roles and functions for streets and buildings within towns and villages. The LAP should therefore align with sources of funding to facilitate key regeneration projects such as the recently announced *Croí Cónaithe (Towns) Fund Scheme*, and TCF-aligned funding streams under the Government's *Town Centre First: A Policy Approach for Irish Towns (2022)*.

5. Education, social and community amenities

Access to quality childcare, education and health services is a National Strategic Outcome of the NPF. The LAP should therefore seek to align population growth with investment in childcare and education facilities on well-located sites within or close to the existing built-up areas, to meet the diverse needs of local populations.

As such, the LAP should be informed by a social or civic infrastructure audit to establish the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents, and identify the need for any additional facilities.

It is also important that access to existing and proposed facilities by walking or cycling is prioritised consistent with the sustainable approach to settlement and mobility discussed below.

Specifically, in relation to schools, the planning authority should consult with the Forward Planning Section and Site Acquisition and Property Management Section of the Department of Education.

The planning authority's *Local Economic and Community Plan 2016-2022* should inform the LAP to provide for the co-ordinated spatial planning of community services for the area. In addition, the planning authority's *Traveller Accommodation Programme 2019-2024* should also inform the LAP.

6. Economic development, employment and retail

The NPF, RSES and section 28 guidelines emphasise the need to take an evidence-based approach to the inclusion of objectives for employment and other commercial uses.

In particular, the LAP should be aligned with the detailed economic strategy and all relevant guiding principles of the RSES, in addition to any objectives concerning strategic enterprise/employment sites.

This will be particularly important for Blessington given the Development Plan policy objective CPO 9.1, which directs strategic employment development to the town to achieve a more sustainable settlement, tackling climate change by mitigating carbon emissions associated with long-distance commuting. The draft LAP is advised to provide a robust policy framework to ensure implementable objectives in relation to this strategic objective.

Moreover, the RSES supports Development Plan policy CPO 9.1 by acknowledging that Blessington has undergone rapid commuter-focused residential expansion over the recent decade and needs to address its low ratio of jobs to resident workforce and services, and needs to include a balancing effect and inclusion of policies in relation to employment provision.

In terms of identifying the optimal locations for employment zonings, the key criteria should be compact growth, the sequential approach to development and the options for

sustainable transport having regard to the need to mitigate climate change. The reuse of appropriate brownfield sites and vacant premises should also be prioritised.

The LAP Guidelines state that local area plans should include objectives to promote local economic development and employment growth by focusing on issues such as the creation of vibrant and dynamic city and town centres where local businesses thrive, and the provision of low cost accommodation for start-up businesses.

The facilitation of retail facilities also need to be considered to provide for the anticipated population growth. Particular regard should be given to the sequential approach to the location of retail development and other provisions of the *Retail Planning, Guidelines for Planning Authorities* (2012), and the position of the town in the retail hierarchy of the Development Plan and Blessington's designation as a Level 3 Town and/or District Centre and Sub-County Town Centre in the EMRA and County Wicklow retail hierarchy in the Development Plan.

7. Transport and mobility

The *Climate Action Plan 2024* identifies the need to significantly reduce car kilometres and increase sustainable journeys, guided by the *National Sustainable Mobility Policy* (2022) and the proposed *National Demand Management Strategy*. This is particularly relevant for Blessington, as 84% of commuters into Dublin City and suburbs travelled by car³.

The integration of land use and transportation is centrally important to this objective and to the objectives and provisions of the NPF (NPO 27 alternatives to the car; NPO 33 location of new homes and NPO 64 air quality, among others) and the RSES.

The RSES identifies the requirement for an LTP for selected settlements (although not limited to these settlements). The Development Plan (policy CPO 12.3) commits to the preparation of an LTP to inform land use and the preparation of the LAP in collaboration and with the support of the relevant transport agencies, including updating existing Area Based Transport Assessments and LTPs, for Blessington.

The National Transport Authority's (NTA) *Area Based Transport Assessment Advice Note* (2018) (ABTA) and *ABTA How to Guide Guidance, Document Pilot Methodology* (2021) as

³ Census 2016

well as Transport Infrastructure Ireland's (TII) *Area Based Transport Assessment (ABTA) Guidance Notes* (2018) should be considered by the planning authority in preparing the LTP. The LTP should inform the preparation of the LAP and, in particular, the zoning provisions.

The planning authority is strongly advised to liaise with the NTA and TII in the preparation of the LTP.

In addition, the LAP should set out an ambitious (but realistic) modal shift target for the area of the LAP.

In order to increase the potential for trips to be made on foot, bicycle or public transport, the LAP should demonstrate consistency with 'Avoid-Shift-Improve' principle and the '10-minute town concept', as well as providing for the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) and the NTA's *Permeability Best Practice Guide*.

Consistency with the NTA's *Transport Strategy for the Greater Dublin Area 2022-2042* is required for LAPs within the Greater Dublin Area planning authorities.

8. Flood risk management

Flood risk management will be the most critical climate change adaptation measure to be addressed in the LAP, informed by a Strategic Flood Risk Assessment (SFRA).

The planning authority should ensure that the LAP is consistent with NPO 57 by avoiding inappropriate development in areas at risk of flooding, in accordance with the detailed requirements and provisions of section 28 *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009). These guidelines require a staged approach to flood risk assessment and, in particular, the application of the sequential approach and the requirement to carry out the plan-making justification test where appropriate.

Flood risk zones should also be clearly overlaid on any proposed land use zoning maps to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied. The planning authority is also requested to make a copy of digital mapping data available to the Office and to the Office of Public Works (OPW) to facilitate assessment.

The planning authority is strongly advised to liaise with the OPW in the early stages of preparing the SFRA to avoid issues arising at draft LAP stage. In particular, you should be aware that the Preliminary Flood Risk Area maps are preliminary assessments and should not be relied upon to inform zoning decisions.

In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, such as SuDS. In this regard, the Office draws the planning authority's attention to *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document (2022)*.

9. Climate action

It is a National Strategic Outcome of the NPF to transition to a low carbon climate resilient society. The effective implementation of climate mitigation objectives through the LAP are critical to the achievement of the Government's greenhouse gas emissions reduction target to mitigate climate change under the *Climate Action and Low Carbon Development Act 2015*, as amended (the Climate Act).

The efficient use of land, including through infill development and brownfield development consistent with compact growth, will ensure consistency with NPO 53 (land use). An integrated approach to land use and transport planning will help ensure that climate action is integral to the LAP in support of national mitigation targets (NPO 54) under the Climate Act. The LAP should also consider how development in the area might best contribute to the delivery of renewable energy consistent with NPO 55. These NPOs, together with the relevant objectives of the RSES and the Development Plan, will be of particular importance in this respect.

The effective implementation of climate adaption objectives through the LAP will be essential to ensure Blessington is climate resilient into the future. As noted above, flood risk management will be the most critical climate change adaptation measure to be addressed in the LAP. The National Adaptation Framework (2018)⁴ (NAF) specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the

⁴ A new NAF is under development and will be submitted to Government for approval in early 2024.

State to the negative effects of climate change and to avail of any positive effects that may occur.

10. Environment, built and natural heritage

The planning authority is the competent authority for Strategic Environmental Assessment and Appropriate Assessment, and will be aware of the *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities (2022)* issued under section 28 of the Act and the *Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities (2009)*, as revised.

The planning authorities should also ensure the LAP is consistent with objectives of the NPF and RSES concerning environmental protection. In this regard, the Office highlights the importance of integrating green and blue infrastructure into the LAP consistent with NPO 58 and planning for greenbelts (NPO 62). Planning for green and blue infrastructure can contribute to climate change adaptation, in particular flood risk management through nature-based solutions (NPO 57 and NPO 63). It can also make a positive contribution to climate mitigation and have positive impacts on biodiversity and clean air (NPO 64).

The Office also highlights the importance of integrating green and blue infrastructure into the LAP consistent with NPO 58. Planning for green and blue infrastructure can contribute to climate change adaptation, in particular flood risk management through nature-based solutions. It can also make a positive contribution to climate mitigation and have positive impacts on biodiversity.

The Office notes that the RSES acknowledges the importance of the proposed Blessington Greenway, and extension, for offering the potential to attract people to work and visit the area and surrounding villages. Further, there are positive policy objectives in the Development Plan, that relate specifically to Blessington, including CPO 11.36, which supports and facilitates the delivery of the Blessington Greenway and the development of linkages between these trails and other local routes. The draft LAP is advised to set out a policy framework to ensure delivery of this green infrastructure objective.

Regarding built-heritage, the planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP. Accordingly, the planning authority should have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities (2011)*.

11. Implementation and monitoring

The NPF and the RSES place increased emphasis on the importance of monitoring the implementation of statutory strategies and plans to measure plan effectiveness and to continually update a relevant evidence base to inform future planning strategies.

The planning authority is therefore encouraged to set out specific provisions for monitoring the implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines.

Summary

In summary, the Office commends the planning authority for the preparation of this Issues Paper. The Office advises the planning authority to pay particular attention to the following issues in the preparation of the LAP:

- the housing supply targets for Blessington should be consistent with the Development Plan, making allowance for the variation in the plan period;
- the approach to zoning land for residential development should prioritise housing delivery in areas close to the facilities and services of the town centre, where land is already served by appropriate infrastructure or is capable of being serviced within the plan period, and is accessible by walking, cycling and public transport;
- an Infrastructure Assessment/Settlement Capacity Audit should be prepared in respect of all land use zoning;
- a sustainable policy framework should be provided to strengthen the employment base for the draft LAP area, providing an alternative for the need for long distance commuting for residents and ensuring that locations to be zoned for employment are consistent with compact growth, sustainable mobility, and have regard to the sequential approach;
- an LTP should be prepared to set out how the modal share targets in the Development Plan will be achieved, and to inform:
 - land use zoning objectives based on accessibility by walking, cycling and public transport;
 - transport initiatives and measures to provide sustainable mobility options for residents and visitors, and in particular providing connectivity from residential



areas to services and amenities and reduce dependence on the private car;
and

- public realm enhancements to improve the quality of the public environment within the town by prioritising pedestrians, the heritage of the town, social and commercial activities.

The planning authority is advised to consult with the NTA and TII in this regard.

- site specific land activation measures and targeted objectives to ensure that sites identified for regeneration, including the utilisation of existing buildings, brownfield/infill sites, and derelict and underutilised sites are advanced during the plan period; and
- prepare an updated SFRA and include policies and objectives in relation to the implementation of SuDS and nature-based solutions as a means for managing surface water run-off at key development sites. The planning authority is advised to consult with the OPW in this regard.

The Office looks forward to reviewing the future draft LAP and to continued positive engagement with your authority in the implementation of national and regional policies at the county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Is mise le meas,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations