



Who are you:	State Body
Name:	HSE - Environmental Health
Reference:	ARKLPF-141725
Submission Made	November 11, 2025 2:21 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Maps:

Proposed Variation No. 5 to the Wicklow County Development Plan 2022-2028 /
Draft Arklow Local Planning Framework 2025

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HSE submission Variation No. 5 to Wicklow CDP 22-28 EHIS 5305.pdf, 0.78MB



Wicklow Local Health Office

Glenside Road, Corporation Lands, Wicklow, A67 HX30

Seirbhís Sláinte Comhshaoil Náisiúnta FSS | National Environmental Health Service HSE

12th November 2025

**Re: Proposed Variation No. 5 to the Wicklow County Development Plan 2022 – 2028
Draft Arklow Local Planning Framework**

Dear Sir/Madam,

Please find enclosed the National Environmental Health Service consultation report in relation to Proposed Variation No. 5 to the Wicklow County Development Plan 2022 – 2028, Draft Arklow Local Planning Framework.

The following HSE departments were notified of the consultation request for this development plan on 2nd October 2025

- Emergency Planning
- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO Dublin & South East

If you have any queries regarding this report please contact Ms. Dervla Browne, Senior Environmental Health Officer, Wicklow at wicklowpeho@hse.ie.

Yours Sincerely,

A handwritten signature in blue ink that reads 'Dervla Browne'.

Dervla Browne
Senior Environmental Health Officer

Background and Introduction

As stated in documents reviewed the purpose of Variation No. 5 is to make a new local land-use plan for the town of Arklow and integrate the draft and final local planning framework into the Wicklow County Development Plan 2022 – 2028.

The National Environmental Health Service (NEHS) has drafted this submission in response to the draft Arklow Local Planning Framework 2025 under Proposed Variation No. 5 to the Wicklow County Development Plan 2022 – 2028.

Much of the following simply restates the submission made during the Pre-Draft Consultation for the Arklow Local Area Plan made on April 1st 2024.

Review of the Written Statement

The written statement is structured into a Part A and Part B with stated strategic goals around Healthy Placemaking, Climate Change and Economic Development. From a public health perspective the strategic goal of Healthy Placemaking is in keeping with the vision of a Healthy Ireland “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 aim of creating a healthy place also fits in with the prevention and promotion elements of universal health coverage and setting such a strategic goal is to be welcomed.

Under Section B3 Housing Development it is recommended to add the word “Resilient” to Sustainable Communities. It is also recommended to specifically integrate the principle of Disaster Risk Reduction and utilise the Sendai Framework for Disaster Risk Reduction 2015 – 2030 as a tool to reduce the risk of disaster. If one seeks to have Sustainable and Resilient Communities it helps to address both side of the climate action coin, namely mitigation and adaptation.

More generally there are some aspects of the framework plan that could be strengthened from a climate action and addressing other environmental determinants of health.

Reference could not be found to the Sustainable Development Goals (SDGs) within the framework. **It is recommended to reference the SDGs in the final plan and demonstrate how the plan contributes towards the meeting of all 17 SDGs and 169 targets by 2030.**

Reference could not be found to ways in which the framework plan will address or support the move towards a circular economy and manage waste in accordance with the waste hierarchy. **It is recommended to integrate actions that move towards a circular economy.**

Another aspect not found in the framework plan is reference to ways in which communities may be supported to grow their own food through the use of allotments for example. **It is**

recommended to consider the inclusion of mechanisms that better enable the residents of Arklow to grow their own food.

In the context of the objective to deliver a healthy place or in this instance Arklow reference could not be found to key determinants of population health namely air quality and noise. Both are important considerations in delivering a healthy place. **It is recommended to plan an Arklow that has the best quality air to protect the community and minimises noise to health protection standards.**

Finally no reference could be found to ways in which the impact of the plan will be assessed. From a public health perspective measuring a “healthy place” will be key to determining if Arklow is in fact a healthy place. **It is recommended that metrics are set to help determine if Arklow is in fact a healthy place following implementation of the plan.**

It is also important to stress that addressing climate change is hugely important to protect public health both locally and more globally. Therefore metrics on how green-house gas emissions are brought to net-zero by 2050 and how the resilience of infrastructure and communities is protective of communities is critically important in terms of assessing performance not only in climate change but that other goal of healthy placemaking. **It is recommended to assess the health impact of the plan in a holistic manner that goes beyond measuring the availability of health care services (GPs, Pharmacies etc.) but assesses those wider environmental determinants of health such as action on climate change, air quality, noise, active travel journeys and other indicators that could be set.**

Below is the pre-draft submission where many of the issues highlighted above were identified in April 2024 at the that pre-draft stage.

Pre-Draft Submission

The National Environmental Health Service (NEHS) has drafted this initial consultation to support Wicklow County Council deliver a local area plan for Arklow that protects and promotes population health. The Arklow 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 (a noted objective of the Wicklow County Development Plan) 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 2024 (out for public consultation as this submission is written) should form the basis for developing a low carbon, climate-resilient, and environmentally sustainable Arklow 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. The delivery of a low carbon, climate-resilient, and environmentally sustainable Arklow can only be achieved with the full participation of everyone. For example active travel options will only succeed if they are actually used by the community. Supporting behaviour/lifestyle change, such as the uptake of active travel, through “climate literacy” will be crucial to success.
- A plan that meets the National Planning Objective 54 under Project Ireland 2040 and the National Planning Framework which is to “reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate mitigation and adaptation objectives, as well as targets for green-house gas emissions reduction”.
- A plan that supports a just transition that leaves no one behind to a Climate Neutral Ireland and by extension Arklow
- 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. The consultation document on the portal does indicate that the new Local Area Plan will promote healthy placemaking, through quality urban design, public realm and active travel, which in turn helps create a healthy environment for healthy communities to grow.
- In the context of Healthy Placemaking the plan should consider how to measure how a healthier Arklow will be compared to the present Arklow. A number of metrics may need to be developed such as air quality, water quality, availability of recreational space, modes of transport used by those who live, work and play in Arklow etc. to help assess impact in this area.
- 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, linked to some extent to the issue of compact growth and the question posed on what urban design standards should apply in Arklow Town and the statement made under housing about sustainable settlement patterns.

- 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 sustainable transport and infrastructure part of the plan that places sufficient emphasis on empowering or enabling people to transition through a balance on physical infrastructure (segregated cycle lanes, secure bike parking etc.) and “softer” enabling factors. “Soft” enabling factors may include bike libraries, safe cycling training for children, etc.
- 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 (schools, health centres etc.) for the generation of on-site energy via for example solar panels, wind turbines and/or geothermal heat sources. A mix of wind, solar and geothermal energy sources would reduce the potential need for energy storage systems for periods when solar or wind generation are low.
- A plan that adapts to climate change and builds resilience for the residents of Arklow. In practical terms this implies
 - A community that is resilient to severe weather events such as floods, but not just floods and including windstorms, extreme heat, including the contribution of heat/dry spells to the risk of forest fires, and other potential severe weather hazards including cold snaps.
 - Incorporating rain water harvesting/water recycling 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. This includes green and blue spaces within the town.
 - A plan where rain water harvesting, drainage (including sustainable 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.
 - Health specific reference under adaptation can be found in the Dept. of Health’s Health Sector Adaptation Plan 2019 – 2024 which is due for renewal shortly.

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 on the principle of “Leave No One Behind”.

Disaster Risk Management including Disaster Risk Reduction (DRR)

The consultation document on the portal does state that the Local Action Plan has a key role in climate action by including measures to adapt to climate change and transitioning to a low carbon and climate resilient town.

The consultation document on the portal makes specific reference to the management of areas prone to flooding and the coastal zone will also be addressed in the new Local Area Plan. Strategic Flood Risk Assessment is also referred to under other topics. However, the types of hazards that potentially give rise to a disaster are numerous and go beyond floods and coastal erosion. To fully understand the potential risks that may impact on health a Climate Change Risk Assessment is recommended which may fit under priority one of the Sendai Framework referred to below.

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

Other local authorities may refer to A Framework for Major Emergency Management which should be applied for sudden onset disasters (such as severe weather events like floods and windstorms) but this framework should also be applied to slower onset threats/disasters such as declining water availability and infectious disease risks.

Inclusiveness

The plan should aim to be as inclusive as possible taking account of the demographic and lifestyle mix in Arklow, as highlighted on the consultation portal. 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 Arklow. For example supporting cricket players as well as hurlers.
- 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 Authority's 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. Separating different modes of transport from one another may be another factor to bring about the actual use of such infrastructure.

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.

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

- Every Move Counts, National Physical Activity and Sedentary Behaviour Guidelines for Ireland, March 2024

Air Quality

The plan should look to deliver the highest attainable air quality for the people of Arklow 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 and Waste Water

The plan should look to protect existing and future planned water bodies from potential sources of pollution.

In the context of growth the consultation portal refers to the need for an extra 1,221 new homes between now and 2031 and that these homes must be provided in a sustainable manner. In the context of this growth, water supply and waste water treatment capacity must be capable of coping with existing and future growth loads.

The plan should look to enhance water bodies and provide a greater variety of amenity to the people of Arklow and beyond including the tourism opportunities.

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 Arklow to segregate waste in public spaces.
- Supporting food waste reduction in a number of key settings including the local authority itself, commercial premises, schools, health and social care facilities.
- Supporting access to free drinking water refill stations in public spaces
- Supporting “zero waste” businesses and businesses offering repair services.

In drafting the plan reference could also be made to

- A Resource Opportunity – Waste Management Policy in Ireland 2012 and the more recent
- National Waste Management Plan for a Circular Economy 2024 - 2030

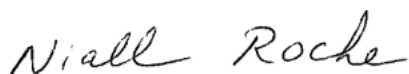
Sustainable/Healthy Diets

The plan should look to support sustainable diets for all the people of Arklow. 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 that are more plant based.
- Enabling the communities of Arklow 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.



Niall Roche
Environmental Health Officer



Dervla Browne
Senior Environmental Health Officer

