



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

Who are you:	State Body
Name:	Office of The Planning Regulator
Email Address:	[REDACTED]
Reference:	GDKLAP-151912
Submission Made	January 31, 2024 4:18 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 Greystones-Delgany Kilcoole Local Area Plan. Please note that the attached submission applies to the plan in its entirety.

Kind regards,
Eoin Daly

File

2024.01.31 OPR Submission Greystones-Delgany Kilcoole LAP_IP-037-23_.pdf, 0.25MB

31st January 2024

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

Re: Issues Paper for the Greystones-Delgany and Kilcoole Local Area Plan
2024-2030

A chara,

Thank you for your authority's work in preparing the Issues Paper (the Issues Paper) for the proposed Greystones-Delgany and Kilcoole Local Area Plan 2024-2030 (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 and 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 (RPOs). 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 Office notes that the Metropolitan Area Strategic Plan (MASP) identifies a number of large-scale employment and mixed-use development areas within the metropolitan area, which should be developed in coordination with the sequential delivery of infrastructure and services.

Having regard to the above, and of particular relevance to the LAP is the redevelopment of the IDA strategic employment site at Greystones which will strengthen the employment base in North Wicklow. The draft LAP should clearly demonstrate the role of Greystones-Delgany and Kilcoole as recognised in RSES, as a strategic location, for both MASP and North Wicklow, with the potential to strengthen and promote economic development.

In relation to residential land use zoning, and as referenced further in section 2 below, the draft LAP should have particular regard to the extent of residential land use zoning in the LAP area to ensure consistency with the Wicklow County Development Plan 2022 - 2028 (the Development Plan), core strategy and settlement targets.

Furthermore, a strategic objective for the LAP is the delivery of an enhanced Park and Ride facility in Greystones. In this regard the Office notes policy objective RPO 8.14 which supports the delivery of the strategic Park and Ride facilities, including a facility in Greystones. It is important the Local Transport Plan (LTP) informs the draft LAP, in particular having regard to the location of the proposed enhanced Park and Ride facility, within the LAP area.

The Office encourages the planning authority to liaise with the Eastern Midlands 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 27,233 persons over 2016 – 2028 and a requirement for 8,467 housing units and 223 hectares of residential land over the plan period (2022 – 2028).

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 Office notes that the core strategy of the Development Plan indicates that there is an estimated requirement of 17 hectares of residential zoned land in Greystones, and 4.6 ha in Kilcoole, with a significant excess quantum of lands zoned for both settlements. In its submissions on the review of the Development Plan, this Office raised concern generally to the extent of residential zoning in a number of settlements, relative to that required to deliver the housing supply targets for the settlements.

The LAP plan period will, however, extend beyond that of the development plan. In these circumstances, the housing supply targets for Greystones-Delgany and Kilcoole should be consistent with the Development Plan, making allowance for the variation in the plan period.

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 densification¹ under the NPF (NPO 3 and NPO 35) and the RSES (RPO 3.2). The

¹ Including through reductions in vacancy, re-use of existing buildings, infill development, area or site-based regeneration and increase building heights.

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:

- *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/village 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 section 4.5.2 (Settlement Capacity Audit) of the Development Plans Guidelines.

In this regard, 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.

Further, the Development Plan policy objectives CPO 4.9 and CPO 5.6 place a firm focus on regeneration in Greystones-Delgany and Kilcoole. In addition, CPO 5.1 and CPO 5.2 also promote town centre regeneration in settlements in Co. Wicklow.

The Office acknowledges and welcomes that the Issues Paper refers to vacant sites on the Main Street in Kilcoole and in town/village/small local centres in Greystones-Delgany, which have the potential to revitalise these urban centres.

Moreover, the Office acknowledges and welcomes the approach in the Development Plan which recognises that Greystones has the potential to deliver compact growth, having regard to underutilised sites and brownfield sites. The delivery of this compact growth will form economic opportunities and will strengthen the Greystones urban structure. The planning authority is advised to ensure that the draft LAP includes targeted objectives to facilitate the delivery of compact growth on these underutilised sites and brownfield sites.

Further, and having regard to Development Plan policy objectives CPO 5.15 (Placemaking) and CPO 5.16 (Placemaking) respectively, the Greystones Public Realm Plan should inform the placemaking strategy in the draft LAP, which will provide opportunities to improve the public realm, improve permeability and public safety.

In addition, the draft LAP offers the opportunity to enhance and revitalise the urban structure of Delgany, utilising its unique heritage and addressing dereliction and underutilised sites.

The Office also notes that it is an objective of the Development Plan (CPO 5.6) to strengthen and revitalise Kilcoole's town centre and include the creation of a formal town square and new civic building to create a new focal point for the town with amenity and cultural focus and to improve permeability. It is important that the draft LAP sets out clear policy framework to ensure the delivery of these key Development Plan regeneration objectives.

Where such sites are identified for regeneration, the draft LAP 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.

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. In this respect the Office acknowledges policy objective CPO 5.6 which aims to seek funding and focus new investment in towns and villages and reverse decline and encourage new roles and functions for streets, and buildings within towns and villages. The LAP should also 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 and 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 Acquisitions and Property Management Section of the Department of Education.

The planning authority's *Local Economic and Community Plan 2016-2022* (LECP) 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. In this regard, the Office acknowledges the Material Alterations to the Housing Strategy² in the Development Plan (included in Table 8.4), in relation to assessment of demands for Traveller accommodation up to 2024 of 80 homes (59 standard housing type and 21 Traveller-specific accommodation) and this includes provision for 8 standard housing units in the Greystones Municipal District within the lifetime of the Traveller Accommodation Programme. It is important that the draft LAP provides implementable objectives for the provision of accommodation for Travellers consistent with the estimated need for the Greystones Municipal District.

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 Greystones-Delgany and Kilcoole LAP given that the Dublin Metropolitan Area Strategic Plan (MASP) vision for Greystones includes a planned strategic development area. The Office acknowledges Table 5.1 'Strategic Development Area Corridors' of MASP identifies the strategic employment site as the IDA site in Greystones to strengthen the economic base in North Wicklow. Further the Office acknowledges that a key MASP objective for this IDA site, in addition to the strengthening local employment generation, is to reduce pressure on the metropolitan transport network. This key strategic objective is supported by Development Plan policy CPO 9.1, where there is an objective to direct strategic employment development to Greystones, especially where this can mitigate long distance commuting. The draft LAP is advised to provide a robust policy framework to ensure implementable objectives in relation to this strategic regional policy objective.

² Amendment V3 – 129

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 LAPs 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.

Furthermore, the Office notes Table 5.2 Potential for Strategic Employment Development Areas in the Dublin Metropolitan Area of MASP is relevant to the draft LAP and recognises the employment potential from the re-intensification of commercial town centre functions in Greystones.

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)* (Retail Guidelines), and the position of the town in the retail hierarchy of the Development Plan and Greystones designation as a Level 3 Town and /or District Centres and sub county town centres in the EMRA and County Wicklow Retail Hierarchy in the Development Plan.

7. Transport and mobility

The *Climate Action Plan 2023* identifies the need to significantly reduce car kilometres and increase sustainable journeys, guided by the *National Sustainable Mobility Policy (2022)* (NSMP) and the proposed *National Demand Management Strategy*. This is particularly relevant for Greystones, as nearly half of Greystones workers commuted to Dublin city and suburbs, and 66% of them 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.

³ Census 2016

The RSES identifies the requirement for a LTP for selected settlements (although not limited to these settlements), and certain large settlements for development area within the Dublin Metropolitan Area. The Development Plan (policy CPO 12.3) commits to the preparation of a 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 Local Transport Plans, for Greystones–Delgany and Kilcoole.

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 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.

A key component of the LTP is the inclusion a Park and Ride facility in Greystones. RPO 8.14 supports the delivery of the strategic Park and Ride facilities, including Greystones. This regional objective is further supported by Development Plan policy CPO 12.21 which supports the facilitation and enhancement of the strategic park and ride at Greystones as identified in the RSES.

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* (Transport Strategy) is required for LAPs within the GDA 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 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 Greystones-Delgany and Kilcoole 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) (NAF)* specifies the national strategy for the application of adaptation measures in different sectors and by planning authorities in their administrative areas in order to reduce the vulnerability of the 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 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).

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)*, as amended.

The Office notes that RSES (Table 7.1) acknowledges Greystones is identified as having green infrastructure assets including maritime and beaches, and greenways. Further the Office notes the positive policy objectives in the Development Plan, that relate specifically to Greystones, including CPO 19.20 which refers to Coastal Cell Objectives in relation to Greystones to Kilcoole (Ballynerrin). The draft LAP is advised to set out a policy framework to ensure delivery of this green infrastructure objective.

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

- the housing supply targets for Greystones-Delgany and Kilcoole should be consistent with the Wicklow County Development Plan 2022–2028, 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/village centres, 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;
- the role of Greystones-Delgany and Kilcoole, as recognised in RSES,

- as a strategic employment location for both the MASP and North Wicklow;
 - strengthening the employment base for the Local Area Plan area; and
 - ensuring that locations to be zoned for employment are consistent with compact growth, having regard to the sequential approach and support modal shift to active and sustainable transport
- a Local Transport Plan 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;
 - the delivery of an enhanced Park and Ride facility in Greystones, consistent with the RSES objective RPO 8.14 which supports the delivery of the strategic Park and Ride facility in Greystones; 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;

- include 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;
- include objectives for the delivery of Traveller accommodation consistent with the objectives of the Development Plan and the Housing Strategy; 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 is committed to continued positive engagement with your authority in 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
