



# Pre Draft Bray LAP Submission - Report

Who are you:	State Body
Name:	National Environmental Health Service HSE
Reference:	BRAYLAP-151820
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## File

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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

17<sup>th</sup> December 2024

**Re: Pre-Draft Consultation for Bray Municipal District (MD) Local Area Plan**

Dear Sir/Madam,

Please find enclosed the National Environmental Health Service consultation report in relation to the Pre-Draft Consultation Phase for the Bray Local Area Plan.

The following HSE departments were notified of the consultation request for this development plan on 20<sup>th</sup> November 2024

- Emergency Planning – Brendan Lawlor
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O'Moore / Ina Kelly
- REO Dublin and South East – Martina Queally

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

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'E. Monahan'.

Eugene Monahan  
Principal Environmental Health Officer



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

The National Environmental Health Service (NEHS) has drafted this initial consultation to support Wicklow County Council deliver a local area plan for Bray MD that protects and promotes population health. The Bray MD 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 do not follow the topics in the order they are listed under the consultation portal. It is noted that the topics covered in the consultation portal are as follows:-

- Housing – Population – Compact Growth
- Regeneration of Communities and Places – Healthy Placemaking – Urban Design
- Economic Opportunity – Tourism – Shops and Services – Community Facilities
- Heritage – Biodiversity – Green Infrastructure – Climate Action - Energy
- Infrastructure – Sustainable Movement – Transportation
- Any other issues – Environmental Assessment – Implementation/Delivery

The following observations do touch upon many of the topics listed above, most notably Compact Growth, Healthy Placemaking, Urban Design, Community Facilities, Green Infrastructure, Climate Action, Sustainable Movement, Transportation and Environmental Assessment.

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 should form the basis for developing a low carbon, climate-resilient, and

environmentally sustainable Bray MD 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 Bray MD can only be achieved with the full participation of everyone. For example active travel/sustainable movement 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 in a Climate Neutral Ireland and by extension Bray MD
- 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 topics outlined in the submission portal does indicate that the LAP will promote healthy placemaking through (a) Quality Urban Design, (b) Public Realm and (c) Active Travel.
- In the context of Healthy Placemaking the plan should consider how to measure how a healthier Bray MD will be compared to the present Bray MD. 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 Bray etc. to help assess impact in this area.
- In response to the question posed in the submission portal “are there any other issues you would like see addressed in the LAP” the issue of monitoring progress and evaluating performance in the context of health metrics is one such issue the NEHS would like to see addressed in the LAP.
- 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 to Bray MD.

- 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 question in the submissions portal is “what are the key transport and movement issues affecting residents, workers and visitors?” In response to the this question and moving from the private care to public transport or walking and cycling the answer has to lie in a holistic and comprehensive addressing of behavioural challenges. Understanding existing knowledge, attitudes and behaviours in the area of transport is critical to delivering a package of measures that enables the modal shift sought. As referred to above this combines hard engineering with softer “literacy” and a wider enabling environment from Wicklow County Council and Central Government.
  - 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 Bray MD. This is stated as a key role for the plan by including measures to adapt to climate change under the Climate Action topic of the submission portal. 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.
- 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 with new plan due in Sept. 2025.

### **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 submission portal as stated already indicates that the plan will play a key role in climate action by including measures to adapt to climate change and transitioning to a low carbon and climate resilient town.

Specific reference is made in the submissions portal to areas that are prone to flooding and the coastal zone. Strategic Flood Risk Assessment is also referred to elsewhere in the submissions portal. Flooding risk and coastal erosion undoubtedly are some of the main challenges the Bray MD will face in the context of climate change. 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 Bray MD. This links to the statement in the submission portal that “there is a need to ensure that there is enough land zoned within the settlement to meet the projected educational, community, sport and recreational facilities”.

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 Bray MD. 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 Authorities strategy 2021 – 2030 priority seven regarding safe and healthy modes of travel. Wicklow County Council (CCC) 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 Sedantary Behaviour Guidelines for Ireland, March 2024

## **Air Quality**

The plan should look to deliver the highest attainable air quality for the people of Bray MD 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 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 submission portal refers to an undefined number of new homes to be built between now and 2031. 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 Bray MD 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 Bray MD 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

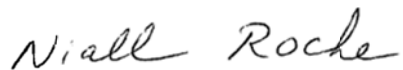
### **Sustainable/Healthy Diets**

The plan should look to support sustainable diets for all the people of Blessington. 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 Bray 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