



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

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HSE Submission Report Greystones Delgany Kilcoole Local Area Plan.pdf, 0.82MB



Environmental Health Service

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Greystones – Delgany & Kilcoole LAP
Administrative Officer
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26th January 2024

Re: Greystones – Delgany & Kilcoole Local Area Plan

Dear Sir/Madam,

Please find enclosed the Environmental Health Service consultation report in relation to the Greystones – Delgany & Kilcoole Local Area Plan.

The following HSE departments were notified of the consultation request for this development plan on 5 December 2023.

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

If you have any queries regarding this report please contact Eugene Monahan Principal Environmental Health Officer, HSE Glenside Rd Wicklow Town A67 HX30
Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'E. Monahan', written over a light blue rectangular background.

Principal Environmental Health Officer



26th January 2024

HSE Submission Report

Re: Stage 1 Pre-draft Local Area Plan Greystones – Delgany & Kilcoole

The Environmental Health Service (EHS) is making this submission under the remit of Healthy Ireland and relevant health supporting strategies. The purpose of this submission is to incorporate relevant environment and health actions into the strategic planning of the spatial and built environment of the Pre-Draft Consultation for Greystones – Delgany & Kilcoole Local Area Plan with an overall objective of improving health and wellbeing of the population.

The local area plan should deliver healthier housing, healthier workplaces and healthier communities through effective urban planning, design and construction.

The Draft local area plan should reference the following policies and initiatives:

- 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

Healthy Ireland in the Health Services – National Implementation Plan

The HSE has an implementation plan for Healthy Ireland in the Health Service. One Key Action outlined in the plan is:

“Ensure that each programme is supported by a network of partner organisations including community and voluntary sector, academia and professional bodies”

The Pre-Draft Consultation for Greystones – Delgany & Kilcoole Local Area Plan should strategically aim to support community involvement in the development of health services and Healthy Ireland initiatives. The identification of sites for the provision of additional primary care facilities should be prioritised to ensure there is adequate services to cater for the growing population in the area.

Healthy Ireland: Get Ireland Active – National Physical Activity Plan for Ireland

<http://health.gov.ie/wp-content/uploads/2016/01/Get-Ireland-Active-the-National-Physical-Activity-Plan.pdf>

Physical activity for all age groups within the population should be considered and included in local plans. The plan should enable/support 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.

A strategic aim for Wicklow County Council should be to establish processes that enable consultation with children and young people in the development and implementation of programmes in which they are involved e.g. playgrounds, activity centres and public spaces. Suitable facilities that cater for all age ranges, including teenagers, should be provided. A strategic aim of the local plan should be that all Nursing Home or Residential Care facilities



include proposals for gardens and recreational activities. Physical activity should be integrated into long term care planning and practice.

A key aim of the National Physical Activity Plan for Ireland is compiling a directory of publicly accessible sports/recreational facilities and amenities. The draft Local Area Plan should include a strategy for meeting this aim for Greystones – Delgany & Kilcoole.

The National Positive Ageing Strategy

<https://health.gov.ie/healthy-ireland/national-positive-ageing-strategy/>

A key aim for older people is to ensure they live in well-maintained, affordable, safe and secure homes, which are suitable for their physical and social needs. The Draft Local Area Plan for Greystones should take note of the National Positive Ageing Strategy and ensure that there is

- Provision of age-friendly public transport.
- Provision of public transport linkages to major health facilities and personal social services.
- Supporting the design and development of age friendly public spaces, transport and buildings.
- Designing age friendly urban environments (street lighting, footpaths, roads, public seating).
- Carry out an assessment of housing need and provision and consider all housing options in development (i.e. social housing, sheltered housing; retirement villages). Housing for the elderly should not focus solely on the provision of nursing homes.
- Implement Older People Remaining at Home (OPRAH) strategy.
- Promote lifetime adaptable housing and design and the use of assistive technologies.
- Promote access (in terms of affordability, transport availability, accessibility of venue) to a wide range of opportunities for continued learning and education for older people.
- Promote the concept of active citizenship and the value of volunteering, and encourage people of all ages to become more involved in and to contribute to their own communities.

Time to move on from congregated settings – A strategy for community inclusion

<http://www.hse.ie/eng/services/list/4/disability/congregatedsettings/congregatedsettingsreportfinal.pdf>

A strategic aim of the Draft Local Area Plan should be to promote and improve community inclusion of people with disabilities in their local community and community based services.

Promote and improve greater connectivity between generic communities based services and disability specific organisations. Facilitate their engagement as stakeholders.

Focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, new-build housing and leased housing or rented housing. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. The plan should be based on best practice in including people with disabilities in local communities and should facilitate dispersed housing with personal supports.

The Local Authority should give consideration to reserving a certain proportion of dwellings for people with disabilities.

- Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants.



- Support people with disabilities to access employment and education opportunities.
- Support people with disabilities to access mainstream community services.

Healthy Ireland - A Healthy Weight for Ireland

<http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf>

A strategic aim of the Local Area Plan should be to develop guidelines and support materials for those working in developing the built environment and planning in relation to reducing the obesogenic environment. These guidelines should help create environments that make the healthy choice the easy choice and should include the following:

- Support community based initiatives that target high risk groups and develop programmes that support healthy lifestyles and prevention of obesity in children and adults.
- Promote the benefits of healthy eating, physical activity and non-sedentary behaviour.
- Improve availability of and access to healthier food choices, particularly amongst low income groups.
- Create environments to promote/encourage active living including active travel (walking, biking, public transport) and access to recreational spaces.
- Support opportunities for increasing physical activity levels generally/in the community through Local Sports Partnerships and supporting initiatives e.g. Park run.
- Facilitate community gardens through identifying and releasing suitable publicly owned land.
- 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.

Steering group report on a national substance misuse strategy

http://health.gov.ie/wp-content/uploads/2014/03/Steering_Group_Report_NSMS.pdf

The Draft Local Area Plan for Greystones – Delgany & Kilcoole should consider this report and consider developing the provision of alcohol-free venues for young people e.g. youth cafes, alcohol free music/dance/sports venues. Young people should be centrally involved in the development and management of the programmes and venues. Consideration should be given to late night and weekend opening of these venues with increased access to school facilities out of school hours. All community facilities should have shared services making them more sustainable.

Tobacco Free Ireland

<https://assets.gov.ie/19465/0c99a96e05c54b249c7d53b93b17437c.pdf>

A strategic aim of the Pre-Draft Consultation for Greystones – Delgany & Kilcoole Local Area Plan should be the promotion of tobacco free environments, parks and beaches. All public campus and grounds should be promoted as tobacco free. The plan should aim to implement the tobacco free playgrounds initiative. 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.



Sustainable Development

<http://una-gp.org/the-sustainable-development-goals-2015-2030/>

<http://greenbusiness.ie/wp-content/uploads/2016/02/Our-Sustainable-Future.pdf>

Sustainable development is about Society, Environment and Economics and the Draft Local Area Plan for Greystones – Delgany & Kilcoole should aim to support and fulfil the United Nations 17 Sustainable Development Goals for the period 2015-2030. These goals form the blueprint for achieving a better and more sustainable future for all. The goals relevant to this draft Local area plan include:

- Goal 3 “Good Health and Wellbeing”; ensure healthy lives and promote well-being for all at all ages.
- Goal 4 “Quality Education”; ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.
- Goal 6 “Clean water and Sanitation”; Ensure sustainable management of water to include avoiding water waste.
- Goal 7 “Affordable and clean energy”; Ensure access to affordable, reliable sustainable and modern energy for all to include doubling the rate of improvement in energy efficiency.
- Goal 9 “Industry Innovation and Infrastructure”; Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.
- Goal 11 “Sustainable Cities and Communities”; Ensure access for all to adequate, safe and affordable housing and basic services, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport with special attention to the needs of those in vulnerable situations such as persons with disabilities, children and older persons. Provide universal access to safe, inclusive and accessible green and public spaces. Reduce the adverse per capita environmental impact of communities by paying special attention to air quality and municipal and other waste management.
- Goal 12 “Responsible Production and Consumption”; Ensure sustainable consumption and production patterns; to include substantially reducing waste generation through prevention, reduction, recycling and reuse. Ensure the promotion of public procurement practices that are sustainable and that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature.
- Goal 13 “Climate Change”; Take urgent action to combat climate change and its impacts.
- Goal 15 “Life on land”; Protect restore and promote sustainable use of terrestrial ecosystems and halt and reverse land degradation and halt biodiversity loss.

From a National perspective this plan should take account of the Framework published “Our sustainable future – A Framework for Sustainable Development”. This provides a platform for a joined-up approach to policy-making across all sectors to ensure cohesive, rigorous and soundly-based decision making. Sustainable development Actions for the Draft Local Area Plan should take into account the following:

Energy

Ireland's Second National Energy Efficiency Action Plan to 2020

http://www.seai.ie/Publications/Energy_Policy_Publications/Energy_Service_Companies/Ireland%E2%80%99s_second_National_Energy_Efficiency_Action_Plan_to_2020.pdf

The Draft Local Area Plan Greystones – Delgany & Kilcoole Local Area plan should:

- Promote and facilitate the incorporation of energy efficient design into projects.
- Develop and implement an energy management programme for all public buildings.



- The Local Authority should aim to deliver new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management.
- The Local Authority shall support the Better Energy Communities Scheme to enable communities around the country develop new and innovative, locally-based solutions to energy poverty.

Transport
Smarter Travel Policy

http://www.smartertravel.ie/sites/default/files/uploads/2012_12_27_Smarter_Travel_english_PN_WEB%5B1%5D_0.pdf

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.

The Draft Local Area Plan for Greystones – Delgany & Kilcoole should aim to:

- Specify a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance to amenities.
- The Local Authority should require that developments above a certain scale have viable travel plans in place.
- Reduce the necessity to travel to work through the adoption of flexible working policies. The Local Authority should set targets to encourage e-working where appropriate.
- Ensure that schools in the Greystones area and its environs have school travel plans to encourage students to take alternatives to the car. The local authority shall identify and implement safe walking and cycling routes to and from schools and other educational institutions as well as providing better access for people with disabilities.
- Implement more radical traffic management measures to improve the punctuality and reliability of bus services.
- Improve bus shelters to make this mode of transport more attractive by providing seating, overhead shelter and digital timetables.
- Review the school transport service, the current distance eligibility criteria, where it is not feasible to provide safe walkways and/or cycle paths
- Provide facilities such as secure bike parking and changing/showering facilities at places of employment in public authorities to encourage staff to cycle
- Reprioritise traffic signals to favour pedestrians instead of vehicles, reducing waiting times and crossing distances at junctions. Create level grade crossings for pedestrians across junctions.
- Widen footpaths where there are high pedestrian flows, particularly close to public transport nodes. Clear footpaths of unnecessary street furniture, e.g. rationalisation of signage poles etc. Improve the surface quality of footpaths Provide appropriately designed safe, well-lit, direct, continuous facilities for pedestrians. Signpost pedestrian routes to important urban destinations such as public buildings and public transport nodes.
- Provide green, safe and enticing pedestrian routes to help ensure coherence of the different neighbourhoods and quarters. This will have the added advantage of improving biodiversity and visually improve the streetscape with a “greening” of the areas whilst providing an additional benefit of possible health gain.
- Support private and public sector initiatives to establish car club schemes in Ireland. Provide on-road parking spaces to be designated for car clubs through appropriate signage.

The draft local area plan should consider the expansion of the Dart service to Kilcoole to enhance public transport services for commuters in the area.



National Cycle Policy Framework

http://www.smartertravel.ie/sites/default/files/uploads/2013_01_03_0902%2002%20EnglishNS1274%20Dept.%20of%20Transport_National_Cycle_Policy_v4%5B1%5D%5B1%5D.pdf

The draft Local Area Plan should include:

- Measures to reduce the volumes of through-traffic, especially HGVs, in town centres and in the vicinity of schools and colleges.
- Traffic calming measures/enforce low traffic speeds in urban areas, make junctions safe for cyclists.
- Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit and signposted.
- Provide secure cycling parking at all destinations of importance to the cyclist.
- Aim to integrate cycling and public transport.
- Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly. Link up all existing cycle lanes.

Waste

A Resource Opportunity – Waste Management Policy in Ireland

https://www.epa.ie/pubs/reports/waste/plans/Resource_Opportunity2012.pdf

National Strategy on Biodegradable Waste

http://www.epa.ie/pubs/advice/waste/municipalwaste/IRL_National_Strategy_on_Biodegradable_Waste_Final_2006.pdf

The Draft Local Area Plan should implement the waste hierarchy set out in the waste framework directive and place prevention and minimisation at the forefront of any waste policy.

Disposal of municipal waste to landfill should be a last resort. The Development strategy should continue to expand and implement waste prevention measures with local business and community groups. Waste prevention strategy should include community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities.

A reuse policy should be developed in consultation with the national procurement service and other relevant bodies, and implemented within public bodies to ensure that full consideration is given to feasible reuse options before embarking on the purchase of new goods.

The use of easily accessible public recycling bins should be considered for public areas, paths and green spaces that will allow for adequate waste segregation and will encourage the use of the waste management hierarchy.

Circular Economy/Waste

The draft local area plan should 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, including single use items and thereafter reduce, reuse and recycle waste including supporting “the right to repair”. Some key areas to highlight include:

- Supporting the people of Greystones – Delgany & Kilcoole 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

Water

The Draft Local Area Plan should strategically aim to ensure the provision of safe, secure drinking water and reduce water waste and overuse.

The design and installation of drinking water supply for the area must provide for a potable water supply and must be in compliance with the European Communities (Drinking Water) Regulations 2014.

Biodiversity

Research 195: Health Benefits from Biodiversity and Green Infrastructure

<http://www.epa.ie/pubs/reports/research/health/research195.html>

Recreational, green and blue spaces are a fundamental part of any development as they promote the health and wellbeing of residences who will occupy the accommodation and indeed the wider community. A strategic aim of the local area plan should be to ensure the provision of quality, recreational green space in urban environments.

It is recommended that all future developments in the local area are examined for the opportunity to integrate green infrastructure into the design at planning stage. Any potential for health gain should be explored and incorporated into all development and the built environment.

It is recommended that the following proposals are considered when planning for parks and recreational areas:

- Green biodiverse spaces should be designed so that there is at least one within walkable distance from people's homes.
- Green spaces should be co-designed with communities and reflect local needs.
- Areas should be as large as possible with connections through flowery verges or linear habitats alongside paths and roads.
- Areas should be relatively open, but grass does not all have to be the same length. This design could suggest careful, rather than a lack of, management. Interpretative signage can explain the practice and highlight signs of nature to look out for.
- A few scattered trees or clumps of trees are preferable to dense planting of trees.
- Paths, recreational areas and places to relax and engage with nature should be incorporated from the start, to promote use and maintain a feeling of safety. It is recommended all proposed green areas are provided with paths for walking.
- Exercise areas, trails and paths need to provide maximum contact with green space, as this made exercise accessible and nature contact motivated people to walk more.
- Not all areas should be managed to the same intensity. Some parts near paths could be managed more to look tidy, whereas stakeholders recognised the value of incorporating wild areas, which could be further away from paths.
- Biodiversity areas can be designed to accommodate playgrounds and other amenity areas.

Biodiversity & Green Areas

It should be a strategic aim of the Local Development Plan to bring biodiversity into the planning



decision making process. A Biodiversity Action Plan should be developed which aims to conserve and restore biodiversity and ecosystem services in the area.

Nature based solutions for the better management of urban problems such as flooding, biodiversity loss etc should be explored and integrated into the design of public areas. Existing green areas should be preserved and utilised to their full capacity. New green areas should be provided. The provision of pedestrian and cycle routes through green areas should be a key provision of the design. The landscaping or 'greening' of these pedestrian/cycle routes should be considered at design stage, not only in the interest of making them more attractive for use but also to facilitate the movement of fauna, creating ecological corridors and thus having a positive effect on biodiversity. The local authority should identify areas where biodiversity can be integrated into the urban fabric.

It should be noted that the quality of green areas is key and the on-going need for maintenance should always be factored into any decisions at the design stage.

The natural and built assets of the local area, which attract tourists to the area, are also the foundations upon which infrastructure and facilities for recreation and amenity are based. The availability of such infrastructure and facilities makes a significant contribution to the physical health and overall well-being of communities. Established and key natural assets such as the Irish sea are supplemented by the provision of built facilities such as walking and cycling paths, open spaces, playgrounds, and playing fields. Open spaces have a particularly important role in built up urban areas, for biodiversity, the enhancement of neighbourhoods and for recreation and amenity.

The NEHS supports the provision of allotments. The availability of allotments to the public contributes to the government's policy of "healthy Ireland". It promotes healthy eating by being able to grow your own produce, physical activity and the element of "minding your mood" where people are outdoors and a sense of achievement from growing their own produce.

Environmental Noise

The World Health Organisation (WHO) has identified Environmental Noise as an increasing cause of ill health and detrimental effect on health and wellbeing.

http://www.euro.who.int/_data/assets/pdf_file/0008/136466/e94888.pdf

The Draft Local Area Plan should consider environmental noise in the context of:

New roads, industry, recreational activities, adjacent to residential properties or noise sensitive premises such as schools or hospitals.

Flood Risk

The EU Floods Directive and the "Planning System and Flood Risk Management Guidelines for Planning Authorities" set out the requirement for a plan to be accompanied by a Strategic Flood Risk Assessment. These guidelines state that inappropriate development that cannot meet the "Justification Test" should not be considered at the plan making stage. The Council should carry out a Strategic Flood Risk Assessment of the policies and objectives of the Draft LAP as outlined. This assessment will provide a broad assessment of flood risk within the Greater Urban Area and inform strategic land use decisions.

Air Quality

The draft Local Area Plan should have an aim to reduce polluting emissions into air and increase the quality of air in Greystones – Delgany & Kilcoole by participating in, and facilitating national programmes of air quality monitoring where possible, working to develop and promote the Air Quality Index for Health and Local Air Quality Management Plans that identify pollution 'hot spots' and aim to reduce pollution through local action on emissions.



Food strategy

Consideration should be given to the development of a Food Strategy to help develop the food economy, examine food resilience, food waste, food security and food poverty. Improvement in these areas would contribute to the health and wellbeing of residents, create employment and enhance Greystones – Delgany & Kilcoole food tourism potential.

A food strategy could link in with Food Wise, the Government's 10 year plan for the agri food industry which endeavours to enable it to act more strategically and achieve recognition in the internal marketplace. Food Wise 2025 also recommends creation of civic and festival markets in our major cities and towns. The development of the strategy above could also link in with Failte Ireland's Food Strategy which endeavours to increase the perception of Ireland as a food destination.

Climate Change

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

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

A handwritten signature in blue ink that reads 'Carmel Lynch'.

Carmel Lynch
Environmental Health Officer
Environment and Climate Change Network Support Unit

Joanna Troughton
Senior Environmental Health Officer
Wicklow