

## Section 4 Summary and Assessment of submissions

### Section 4.1 Prescribed Bodies

4.1.1 Office of the Planning Regulator
Item 1 Preamble
<p>The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft Local Areal Plan.</p> <p>As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.</p> <p>The Office has evaluated and assessed the draft Local Areal Plan under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.</p> <p>The Office's evaluation and assessment has had regard to the Wicklow County Development Plan 2022-2028 (the County Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) area, and relevant section 28 guidelines. This submission makes six (6) recommendations and five (5) observations.</p> <p>Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the Wicklow County Council (Planning Authority) is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.</p> <p>Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The Planning Authority is requested by the Office to action an observation.</p> <p>A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The Planning Authority is requested by the Office to give full consideration to the advice contained in a submission.</p>
Chief Executive Response
Noted

## Item 2 Overview

The Office welcomes the preparation of the draft Local Area Plan and the approach taken by the Planning Authority to focus on the protection of the environment, sustainability and consolidation and regeneration of Blessington town to enhance compact growth, public realm and improve connectivity across the plan area and thereby reduce the car based dependency of the settlement.

Blessington is a Self-Sustaining Growth Town as identified in the RSES for the EMRA. As a Self-Sustaining Growth Town, which has experienced strong commuter focused growth in the past, Blessington has the potential to provide housing for people from across the county and region and to strengthen its employment base and develop it as an important centre of employment due to its strategic location, and the availability of a skilled workforce.

The policy framework set out by the draft Local Areal Plan plays an important role in ensuring the sustainable development and expansion of the settlement over the forthcoming years.

The Office welcomes the focused tourism policy objectives including the support of the future expansion of the Blessington greenway and associated infrastructure and the identification of Opportunity Sites for town centre regeneration including the objectives for public realm improvements, which provide a clear policy basis for tourism development and the activation of town centre regeneration sites.

The draft Local Areal Plan includes the relevant statutory reports including Appropriate Assessment Screening, Strategic Environmental Assessment Report and Strategic Flood Risk Assessment (SFRA) as well as a Social Infrastructure Audit, which are welcomed by the Office.

However, the Office notes that additional fundamental supporting documents such as a Settlement Capacity Audit (SCA) for lands zoned for New Residential and Employment uses and a Local Transport Plan (LTP) have not been prepared.

The County Development Plan states:

*Detailed 'Infrastructural Assessments' in accordance with NPO 72 and the methodology for a Tiered Approach to Zoning set out under Appendix 3 of the NPF shall be carried out for all lands proposed to be zoned and de-zoned in future Local Area Plans.*

However, no such assessment has been included to support the land use zoning objectives proposed in the draft Local Area Plan. These documents provide the critical evidence-base upon which the draft Local Area Plan is underpinned, as well as supporting rationale for such decisions.

While the Office acknowledges the publishing of a Local Transport Assessment (LTA), as appendix 4 to the draft Local Area Plan, it is of concern that an Area Based Transport Assessment (ABTA) as per National Transport Authority guidance, has not been carried out to support the preparation of an LTP for the plan area, as required under CPO 12.3 of the County Development Plan.

In addition, the Office also considers that further consideration of the Poulaphouca Reservoir is required to ensure that the reservoir as a drinking water supply is protected and development will not negatively impact this drinking water source.

With the exception of the specific concerns set out below, the draft Local Area Plan otherwise sets out a clear strategy and framework for the future development of the lands concerned. The issues raised below largely focus on supporting the delivery of the vision of the draft Local Area Plan and building on the ambition of the County Development Plan to develop well-serviced, well-connected and sustainable neighbourhoods, and promote sustainable modes of transport.

## Chief Executive Response

### Settlement Capacity Audit / Infrastructure Assessment

There is no statutory obligation for a 'settlement capacity audit' to be carried out for local area plans. It is however accepted that such an exercise can be of assistance in the determination of appropriate location and quantum of

zoning and prioritisation of lands, given the NPF requirements with respect to a 'tiered approach to zoning' which relates to the availability of services.

This exercise has however been carried out, and in some detail, over the last 2 years for Blessington and all towns in the County as part of the RZLT process. This process allowed the Planning Authority to identify lands that are serviced, serviceable, and not serviced. For the Blessington LAP, the information sourced with regard to services across the settlement for the RZLT assessment allowed a draft plan to be crafted wherein only lands that are serviced or serviceable have been proposed for zoning in the draft LAP.

With respect using an SCA to determine potential housing yield data, as clearly expressed in the draft LAP, potential yield has been purposefully not stated in order to allow for flexibility in the application of density, which would only be possible to determine when detailed site specific assessments are completed.

#### **Area Based Transport Assessment / Local Transport Plan**

No ABTA or Local Transport Plan has been prepared as part of this LAP. This is regrettable but technical resources have not been available for this, and it was decided that the lack of such a study should not hold up progress on preparing new LAP. Instead, available internal resources were deployed to carry out a Local Transportation Assessment that did accompany the draft LAP. The CE is satisfied that this assessment did allow for transportation considerations to be fully integrated into the plan development process.

At this stage of plan making, where a period of only 6 weeks is provided for the CE to prepare a report and make recommendations to the members for amendments if necessary, inadequate time would be available to allow for development and production of a Local Transport Plan, of the form and detail as envisaged by the NTA / TII guidance. An LTP can be prepared after the adoption of the LAP and the CE is agreeable to a new objective to this effect.

#### **Poulaphouca Reservoir**

The CE is happy to recommend additional text and objectives to address the issue raised (please Item 9 to follow)

#### **CE Recommendation**

##### **Amend the plan as follows:**

Include new objective in Section B.7:

**BLESS - XX** *In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Blessington.*

<b>Item 3 Consistency with the Regional, Spatial and Economic Strategy</b>
<p>Blessington is located within the Eastern and Midlands Region and is identified as a Self- Sustaining Growth Town in the RSES. The RSES recognises that Blessington is one of the towns which has recorded the highest growth rates in the country in the last ten years with lower levels of employment provision, which is nevertheless an important employment and service centre.</p> <p>As a Self-Sustaining Growth Town, the RSES prioritises contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.</p> <p>Overall, the Office is satisfied that the provisions of the draft Local Area Plan are broadly consistent with the RSES.</p>
<b>Chief Executive Response</b>
Noted

<b>Item 4 Consistency with development plan and core strategy</b>
<p>Section 19(2) of the Act requires a local area plan to be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.</p> <p>Section A.2 of the draft Local Area Plan sets out the vision and strategy of the draft Local Area Plan and how it complies with the core strategy of the County Development Plan.</p> <p>The core strategy allocates a projected population increase of 1,079 with a corresponding housing supply target of 514 units to 2031.</p> <p>The Office considers that the strategy set out in the draft Local Area Plan in respect of the delivery of these targets is generally consistent with the County Development Plan, except where otherwise specified below.</p> <p>The Office is also satisfied that the overall approach in the draft Local Area Plan promotes compact growth and sequential development, and regeneration within the town centre is generally consistent with the strategic objectives and Settlement Strategy Objective CPO 4.1 of the County Development Plan.</p> <p>The Office recognises that the draft Local Area Plan relates to the lands within the Planning Authority's jurisdiction and that it is a priority of the County Development Plan and draft Local Area Plan to ensure that any plans prepared for the town are undertaken in consultation with Kildare County Council to provide a strategy for the sustainable development of the town and its hinterland as a whole, irrespective of county borders.</p> <p>As such, the Planning Authority should consider illustrating the Blessington Environs lands on the maps accompanying the draft Local Area Plan to ensure that the strategy for the sustainable development of the town and its hinterland as a whole, irrespective of county borders, is understood and to ensure that supporting infrastructure delivery for the town and the immediate surrounding area is coordinated in a sustainable and comprehensive manner.</p>
<b>Observation 1 – Blessington Environs</b>
<p>Having regard to section 4.2 of the Wicklow County Development Plan 2022-2028 and section A2.2 of the draft Blessington Local Area Plan 2025 (the draft Local Area Plan), the Planning Authority is requested to consider illustrating the Blessington Environs lands on the maps accompanying the draft Local Area Plan to ensure that the strategy for the sustainable development of the town and its hinterland as a whole, irrespective of county borders, is understood and to ensure that supporting infrastructure delivery for the town and the immediate surrounding area is coordinated in a sustainable and comprehensive manner.</p>
<b>Chief Executive Response</b>
The zoning provisions of the Kildare County Development plan, as they relate to Blessington can be shown on the plan maps.
<b>CE Recommendation</b>
Amend Map 1 to include zoning objectives for Blessington from Kildare County Development Plan.

### **Item 5 Residential Development Strategy**

Chapter 4 of the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines) outlines the approach for zoning that should be followed by planning authorities.

The Planning Authority proposes to zone 49ha for new residential development. In determining the land area required to accommodate projected growth, the Office notes that Residential Use is also considered an appropriate use on lands identified as Town Centre and Mixed Use zonings.

The Office welcomes the zoning objectives for New Residential Priority 1 lands which will facilitate the compact and sustainable growth of the town in a sequential manner, and the clear policy approach in respect of phasing the development of zoned land in accordance with the sequential approach.

However, it is not clear whether infrastructure capacity exists or will be delivered over the plan period as no Infrastructure Assessment / SCA has been included in the draft Local Area Plan. It is critical that lands zoned as New Residential Priority 1 and / or Priority 2 are evaluated on this basis and to demonstrate either Tier 1 or Tier 2 status for these undeveloped lands consistent with RPO 4.2 of the RSES and CPO 4.1 of the County Development Plan to align the settlement / core strategy to infrastructure delivery.

#### **Recommendation 1 – Co-ordination of housing delivery and infrastructure**

**Having regard to the provision of new homes at locations that can support compact growth and sustainable development and the co-ordination of housing delivery and infrastructure, and in particular to:**

- **RPO 4.2 of the RSES to align the settlement strategy to infrastructure investment;**
- **Policy Objective CPO 4.1 of the County Development Plan to implement the core strategy having regard to the availability of services and infrastructure; and**
- **the policy and objective for zoned land to be informed by a Settlement Capacity Audit (SCA) under section 6.2.1 of the Development Plans, Guidelines for Planning Authorities (2022),**

**the Planning Authority is required to:**

- (i) prepare an SCA and engage with the relevant statutory bodies to identify that the lands zoned for New Residential are serviceable within the plan period; and**
- (ii) review the zoning objectives to ensure that lands that cannot be reasonably or cost effectively delivered within the plan period are not zoned for development.**

#### **Chief Executive Response**

The CE is satisfied that:

- all lands zoned for town centre and infill development in existing developed areas are serviced
- all lands zoned for Priority 1 New Residential are serviced
- All lands zoned for Priority 2 New Residential are either serviced or serviceable.

In this regard, there are no deficiencies in the capacity of water supply or wastewater treatment infrastructure for any of the lands zoned for new development in the plan area during the plan period. With respect to transportation services, all zoned lands are serviced or can be serviced by roads, footpaths, cycleways and public lighting. In addition, all lands proposed to be zoned are within a 15 minutes' walk of a bus service, as detailed in the Local Transport Assessment appendix.

Therefore it is not considered necessary for an SCA to be prepared at this stage of plan making.

#### **CE Recommendation**

No change.

## Item 5 Transport and Accessibility

The Office recognises that the LTA, as prepared, sets out useful information and objectives regarding transport infrastructure and can form the basis for the main elements of an LTP to support the draft Local Areal Plan.

However, as outlined in CPO 12.3 of the County Development Plan, LTPs are to be prepared for towns, including Self-Sustaining Growth Towns, and should be prepared incorporating ABTA methodologies, to inform land use and investment decisions, including the preparation of local area plans.

Given Blessington's role as a Self-Sustaining Growth Town, having the main elements of an LTP integrated into the draft Local Area Plan will be critical to support the sustainable development of the plan area and the achievement of national climate action targets.

The Office therefore recommends that the LTA and the draft Local Areal Plan are revised to reflect the main LTP requirements of the RSES with respect to the items outlined below.

The tables presented in section 1 of the LTA highlight that active travel and public transport mode shares for travelling to work, have not shown any significant increase from 2011 to 2022, with the overall number of people using active modes declining. For example, there is particularly low cycle usage among secondary school students in Blessington. The LTA notes this is concerning given the increase in investment in these modes over the last decade. It is recognised that a greater uptake of active and sustainable modes is needed to enable the achievement of mandatory climate action targets to reduce emissions by 51% by 2030, as required under national climate action targets and as set out in section 4.3 of the Wicklow Climate Action Plan 2024-2029 (Wicklow CAP).

Having clear modal shift ambitions will be important to achieving these targets. The Office notes however that mode share targets have not been included in the LTA nor the draft Local Areal Plan and it is recommended that ambitious but realistic mode share targets are proposed together with an effective monitoring programme.

A key function of LTPs, as set out under the RPO 8.1 of the RSES, is to ensure the integration of land use and transport planning at local level. The Office is concerned that the LTA does not include an adequate focus on the connectivity needs of the emerging development areas listed as Specific Local Objectives (SLO). While the SLO Concept Plans do give indicative connectivity details at site level, there is no detail on connectivity to the wider network and any deficiencies that may exist. The LTA should include an assessment in this regard with recommendations for improvements highlighted and incorporated into the objectives of the draft Local Area Plan.

The Office welcomes the inclusion of the Active Travel Strategy Map No. 6 in the draft Local Area Plan, and recommends that the inclusion of key development areas on this map will assist in understanding the delivery of the emerging active travel network for the plan area.

The Office notes that the Transport Strategy Map No. 5 and SLO3 and SLO4 indicate that these lands would be accessed from the N81 / Blessington Main Street within the 80km/hour speed limit zone. It is important therefore to highlight that access associated with the development of these lands is required to comply with Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and all relevant Transport Infrastructure Ireland Publications.

### Recommendation 2 - Integrated Land Use and Transport Planning

**Having regard to the provision of a sustainable Transport Strategy and the transition to a low carbon and climate resilient society including the reduction of greenhouse gas emissions, and in particular to:**

- **The Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021);**
- **RPO 8.1 and RPO 8.4 of the RSES for the integration of land use and transport planning;**
- **RPO 8.6 of the RSES to prepare a Local Transport Plan (LTP) for selected settlements in the region;**

- sustainable mobility objectives CPO 12.1, CPO 12.2 and CPO 12.3 of the County Development Plan;
- cycling and walking objectives CPO 12.13, CPO 12.14, CPO 12.15, CPO 12.16 and CPO 12.17 of the County Development Plan;
- public transport objectives CPO 12.20 and CPO 12.21 of the County Development Plan; and
- national road objectives CPO 12.40 of the County Development Plan,

the Planning Authority is required to:

- (i) review the current Local Transport Assessment (LTA) in consultation with the National Transport Authority, to provide an LTP, closely aligned with the updated Area Based Transport Assessment guidance;
- (ii) revise the draft Blessington Local Area Plan 2025 (the draft Local Area Plan) to incorporate the measures and proposed modal networks of the LTA / LTP and include policy support for the proposed interventions together with clear mapping of all measures on the Transport Strategy Map No. 5 and Active Travel Strategy Map No. 6;
- (iii) include key development areas on the Active Travel Strategy Map No. 6 assist in understanding the delivery of the emerging active travel network for the plan area;
- (iv) amend the draft Local Area Plan to include mode share targets and an effective monitoring programme; and
- (v) ensure that all future access proposals to serve zoned lands at SLO3 and SLO4 comply with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and are in compliance with all relevant Transport Infrastructure Ireland Publications.

#### Chief Executive Response

##### Local Transport Plan

At this stage of plan making, where a period of only 6 weeks is provided for the CE to prepare a report and make recommendations to the members for amendments if necessary, inadequate time would be available to allow for development and production of a Local Transport Plan, of the form and detail as envisaged by the RSES or NTA / TII guidance. As set out in the response to the suggestion from the NTA in its submission, a LTP can be prepared after the adoption of the LAP and the CE is agreeable to a new objective to this effect.

##### Policy support / mapping of transport measures

The CE is generally satisfied that the LAP objectives and the transport strategy maps identify the transport improvements detailed in the LTA text; however, further enhancement can be made to give more detail of active travel measures and projects – both those already in train and desired future projects, where known. At this stage of plan making, given the time limits involved, it would not be possible to carry out fresh survey, evaluation and determination of significant or nascent additional transportation measures that might be necessary in the settlement. The CE is committed to such assessment being undertaken as part of the development of a LTP for the plan area. With respect to significant development areas (SLO areas) these will be added to the 2 transport objectives maps to show connectivity.

##### Modal Share Targets

This is a matter that has also been raised by the NTA but no advice has been offered by the OPR or NTA as to how these targets may be calculated, and it is not considered rational or reasonable to come up with arbitrary modal share targets as part of this plan making process. This is a matter that can be considered in the future LTP.

##### SLO3/SLO4 and Spatial Planning and National Roads Guidelines for Planning Authorities

It is intended that on the completion of the BIRR, that the speed limit from the new roundabout at the northern end of the BIRR on the N81 and the existing southern roundabout at Blessington Industrial Estate, will be reduced as traffic not bound for Blessington is diverted onto the BIRR. This will allow for significant town centre / public realm / public transport improvements to be carried out in Blessington.

With respect to SLO3, these lands which are currently in quarry use, already access directly onto the N81. It is the objective of this plan that these lands, following rehabilitation, may be suitable for additional forms of development including general employment / enterprise and a public amenity park. It is intended that general vehicular traffic associated with such uses would access the public road network via the BIRR but that HGVs should continue to access



the road network onto the N81, as they do currently.

As indicated in the draft Plan, it is intended that SLO4 will be serviced by a new link road from the new N81 roundabout (to be developed as part of the BIRR) to the Kilbride Road. Only cyclist / pedestrian traffic is indicated as desired from SLO3 onto the current N81.

Any concerns that arise with respect to interactions of these SLOs with the N81 can be addressed in appropriate detail in the future LTP and indeed in any future planning applications that may be made for these lands. In addition, additional text may be added to the plan to address the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

## **CE Recommendation**

### **Section B.7 Infrastructure**

Include new objective in LAP

**BLESS - XX** *In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Blessington.*

Amend objectives as follows:

**BLESS - 50** *To protect the strategic function of the N81 ~~(and any upgrade/bypassed route thereof) as it relates to the plan area.~~ in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.*

### **Section B.8 Zoning**

#### **Specific Local Objectives (SLO)**

*The purpose of an SLO is to guide developers as to the aspirations of the plan regarding the development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where the lands are zoned for 'mixed use' to give more detail on the development objective of these lands. A masterplan for the entire SLO area may be required to be submitted as part of the first application within the SLO. All masterplans / development applications shall have regard to the requirements of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.*

#### **Amend Transport Objectives Maps as follows:**

- Add additional information on active travel projects
- Add SLO areas
- Add OP sites



## **Item 6 Flood Risk Management**

The Office welcomes the preparation of the SFRA and approach taken to the Plan Making Justification Tests (Justification Tests) to inform the policies and objectives of the draft Local Areal Plan which is of a very high standard. The Office welcomes the discussion on flood risk and climate change in section 5 of the SFRA, and the inclusion of future scenario extents on the flood zone mapping, and also acknowledges and supports the identification of flood risk zones on map no 4. However, these have not been overlaid on the land use zoning maps. It is difficult therefore to fully understand the implications of flood risk across the plan area, and the Planning Authority is advised to overlay the future scenario mapping on the land use zoning maps in order to provide clarity on areas at risk from climate change.

In line with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) the Office considers that the Planning Authority needs to give further consideration to three specific sites, as set out below.

Firstly, in consideration of future flood risks in the preparation of the draft Local Area Plan the Office notes that an area zoned for highly vulnerable New Residential – Priority 1 use at Oak Drive, Blessington Demesne East, is shown as at risk in both the mid-range and high-end future flood risk scenarios. The Office considers that specific local objectives are necessary to be included in the draft Local Area Plan to provide detail on how risk to this area will be mitigated, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.

Secondly, in respect of the portion of the site zoned as Tourism on the land use zoning objective map no. 1 and identified as site i(b) in the Justification Tests, the Office notes that the zoning objective provides for vulnerable and highly vulnerable uses such as tourism accommodation. Given that the site fails the Justification Tests, the Office considers that a specific local objective is necessary to limit appropriate uses to those compatible with the specific flood risk and Tourism zoning objective.

Finally, in applying the sequential approach to flood risk, undeveloped lands are zoned for Community and Education use within Flood Zone B at Oak Drive. This zoning objective allows for highly vulnerable development such as schools and nursing homes. As it is not clear if the sequential approach to flood risk has been applied i.e. the consideration of avoidance and substitution in the first instance, nor whether a plan-making Justification Tests has been prepared and passed. As such, the Office considers that the Planning Authority should provide an analysis of these lands within the SFRA.

### **Recommendation 3 – Flood Risk Management**

**Having regard to flood risk management, and in particular,**

- **RPO 7.12 of the RSES to avoid inappropriate land use zonings and development in areas of risk of flooding in accordance with the Flood Risk Management Guidelines;**
- **Strategic County Outcome SCO 7 to restrict development in areas that are at risk of flooding, and Policy Objectives CPO 14.06 of the County Development Plan to implement the guidelines of Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines), of the Wicklow County Development Plan 2022-2028; and**
- **the Flood Guidelines,**

**the Planning Authority is required to:**

- (i) **overlay the flood zones maps and future scenario maps with the land use zoning maps in the draft Blessington Local Area Plan 2025; and**
- (ii) **amend the draft Local Area Plan and / or Strategic Flood Risk Assessment to:**
  - (a) **include specific local objectives to provide detail on how risk to the area zoned for highly vulnerable New Residential – Priority 1 use at Oak Drive, Blessington Demesne East will be mitigated;**
  - (b) **include a specific local objective for lands zoned Tourism at the lakeshore to limit existing development to minor development only as outlined in section 5.28 of the Flood Guidelines and new development to water compatible uses in Flood Zone A and less vulnerable uses in Flood Zone B; and**
  - (c) **apply the sequential approach to lands zoned for Community and Education use at Oak Drive,**

and if appropriate include a Plan Making Justification Test for lands which overlap with Flood Zone B. Where the Justification Test is not passed the lands should be rezoned for water compatible use or substitute for a land use appropriate to the level of flood risk.

**The Planning Authority should consult with the Office of Public Works regarding this recommendation.**

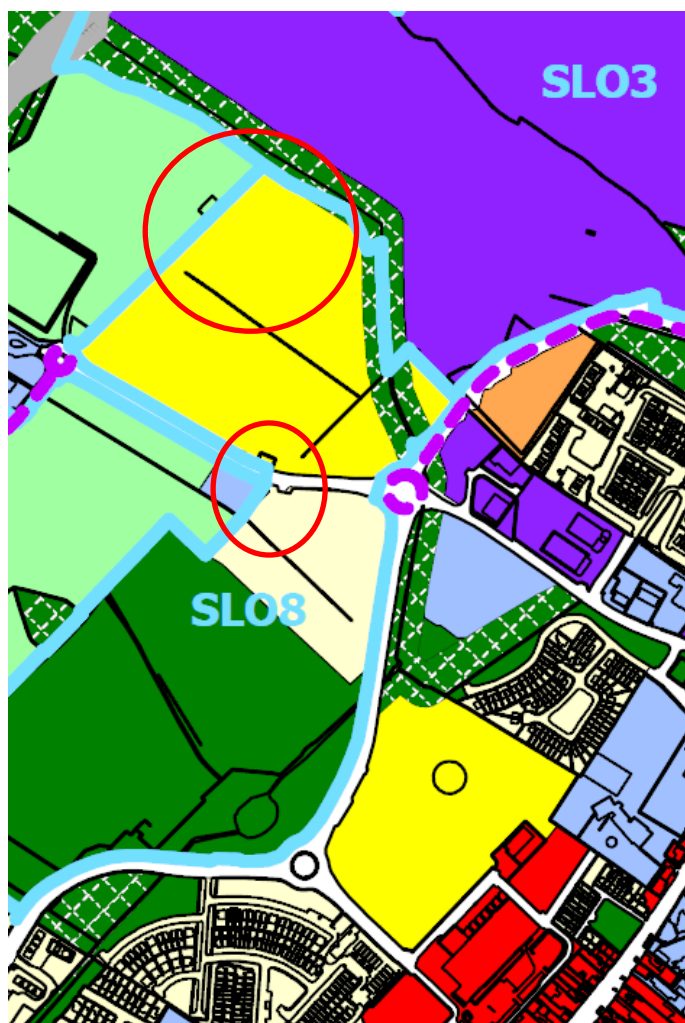
#### **Chief Executive Response**

- (i) The SFRA prepared overlays the flood risk maps and the zoning maps throughout the assessment. However if this is not sufficiently clear, additional maps can be provided.
- (ii) In accordance with advice from the OPW, future flood risk scenario mapping should not be used as a determinant of zoning in the SFRA – only the 'present day' Flood Zones are used in this assessment. However, where flood risk is identified in future scenario mapping, the OPW advises that consideration should be given in the preparation of plans to avoiding development in such areas, providing space for future defences, specifying minimum floor levels and setting specific development management objectives.

(a) Oak Drive – RN1

There are two sites zoned RN1 at Oak Drive.

With respect to the more northerly site, no lands that are identified as at risk in a future scenario are zoned for residential development – they are zoned 'open space'. With respect to the more southerly site, a small area is identified as being at 'present day' risk and these lands are zoned open space'. However, there are lands proposed to be zoned for residential development located in the 'worst case' future flood risk scenario.



The draft LAP objectives already provide that where land is zoned for development, but future scenario flood

mapping indicates a risk of flooding, a site specific flood risk assessment will be required. This objective can however be strengthened to address the concerns raised.

(b) Lakeshore – Tourism

The area zoned 'T-Tourism' at the lakeshore that is in an area identified at risk of flooding comprises only a narrow path and a jetty. These lands are already developed for these uses, which are water compatible, and could not be developed for vulnerable development like tourism accommodation given their size and configuration. Therefore no change is considered warranted.

(c) Oak Drive – CE

The zoning of CE lands at this location, on the south side of Oak Drive has been amended significantly from the previous plan; in the previous plan these lands were fully zoned 'E – Employment' whereas the new draft plan shows the lands zoned for the mixture of open space and CE – Community & Education. The OS zones cover the area at 'present day' flood risk. No part of the CE zone is within the 'present day' flood risk but is in the 'worst case' future scenario risk area. The draft LAP objectives already provide that where land is zoned for development, but future scenario flood mapping indicates a risk of flooding, a site specific flood risk assessment will be required. This objective can however be strengthened to address the concerns raised.



## CE Recommendation

### 1. Insert at end of SFRA –

Map 1 Flood Risk Zones (Present day)

Map 2 Flood Risk Zones (Future Climate Change Scenario)

Map 3 Overlay of Flood Maps with Zoning Map

### 2. Amend the following objective:

#### **Bless 51**

~~Applications for new developments or significant alterations/extension to existing developments in an area at risk of flooding shall comply with the following:~~

- ~~• Follow the 'sequential approach' as set out in the Flood Risk Management' Guidelines~~

- ~~An appropriately detailed flood risk / drainage impact assessment will be required with all planning applications, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site), taking into account all sources of flooding;~~
- ~~Restrict the types of development permitted in Flood Zone A and Flood Zone B to that which are 'appropriate' to each flood zone, as set out in Tables 3.1 and 3.2 of the Flood Risk Management Guidelines unless the 'plan making justification test' has been applied and passed;~~
- ~~Where an development application site located in Flood Zone A or B a site has been subject to and satisfied the 'Plan Making Justification Test' development will only be permitted where a proposal complies with the 'Justification Test for Development Management', as set out in Box 5.1 of the Flood Risk Guidelines.~~
- ~~Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Guidelines and the SFRA.~~

~~Where flood zone mapping does not indicate a risk of flooding but the Planning Authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, including the latest future scenario flood mapping, an appropriate flood risk assessment will be required to be submitted by an applicant for planning permission and the sequential approach shall be applied as the 'Plan Making Justification Test' will not be satisfied.~~

Applications for new developments or significant alterations/extension to existing developments in an area identified as at risk of flooding (Flood Zones A and B) as set out in the SFRA and flood maps appended to this plan **OR** in Flood Zone C but within an area

- that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to new information with respect to flood risk in the area that has come to light; or
- that is identified as at possible future risk of flooding having regard to climate change scenarios either on Map X attached to this plan or on any future maps prepared by the OPW during the lifetime of the plan;

shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'the Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this plan) and shall be accompanied by a site specific Flood Risk Assessment. Site specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the plan SFRA.

## **Item 7 Economy and Employment**

The Office welcomes the economic development strategy set out in section B.3 of the draft Local Area Plan, which aligns with the role of the town as a Self-Sustaining Growth Town consistent with the RSES and County Development Plan policy objectives.

The County Wicklow Economic Development Hierarchy identifies that Blessington's economic function is to attract inward investment through foreign direct and local investment and people and product intensive industries. To support and grow the economic activity in the settlement, 44.2ha of undeveloped land has been zoned for Employment uses in the draft Local Area Plan, of which the majority is identified as SLO3 lands to the north of the settlement.

In terms of consistency with regional planning policy, the Office considers it critical that the draft Local Area Plan does not zone lands for employment uses which are not serviced and are poorly served by public transport consistent with RPO 4.2 of the RSES and SCO 5 of the County Development Plan.

In this regard, the Office is concerned that there is no robust rationale underpinning the location and extent of each zoned site in the draft Local Area Plan for employment purposes. As set out at section 6.2.5 of the Development Plans Guidelines, an evidence-based approach to zoning for employment development is a critical part of the County Development Plan preparation process.

It is also unclear that all of the lands zoned for Employment are serviceable within the plan period and/or that their development is integrated with the timely delivery of sustainable transport infrastructure connections to support the modal shift to active modes contrary to RPO 8.1 of the RSES and CPO 9.6 of the County Development Plan.

Finally, the draft Local Area Plan does not outline how it has applied the guiding principles to identify locations for strategic employment development as required by RPO 6.1 of the RSES and the guiding principles for the integration of land use and transport planning as required by RPO 8.1 of the RSES.

### **Recommendation 4 - Economy and Employment**

**Having regard to the provision of an evidence-based employment strategy, and the location of employment in areas that can support more sustainable transport options, and in particular to:**

- **RPO 4.2 of the RSES to require employment development to be planned in collaboration with infrastructure providers to ensure adequate capacity for services is available;**
- **RPO 6.1 of the RSES to apply the Guiding Principles to Identify Locations for Strategic Employment;**
- **RPO 8.1 of the RSES for the integration of transport and land use planning consistent with the guiding principles of the RSES transport strategy;**
- **SCO 5 of the County Development Plan to support the integration of land use and transportation to encourage a sustainable mobility;**
- **Objective CPO 9.6 of the County Development Plan to promote the development of employment generating uses at locations which comply with sustainable transportation objectives of the County Development Plan; and**
- **the policy and objective of the Development Plans, Guidelines for Planning Authorities (2022) under section 6.2.1 for zoning to be informed by a Settlement Capacity Audit (SCA), and section 6.2.5 for the provision of an evidence and rationale underpinning the zoning of land for employment purposes,**

**the Planning Authority is required to:**

- (i) provide robust justification and appropriate phasing for the extent and location of Employment zoned land and demonstrate that the criteria of the aforementioned national and regional policies have been satisfied specifically in respect of the following undeveloped Employment lands:**
  - (a) SLO 3 (current/former quarry lands)**
  - (b) N81 South (adjacent to the waste water treatment plant); and**
- (ii) demonstrate by way of an Infrastructure Assessment / SCA that lands zoned for employment are realistically serviceable within the plan period.**

**Where an evidence-based rationale consistent with the above cannot be provided for these, or any other Employment zonings, the subject zoning objective should be removed from the draft Blessington Local Area Plan 2025.**

#### **Chief Executive Response**

The CE is satisfied that the draft LAP provides for an appropriate amount of employment zoned land. Attention is drawn to the fact that no increase in employment zoning is proposed compared to the previous plan and no new areas previously not zoned for such use are proposed in the draft plan. The amount of zoned employment land has in fact been reduced overall by changes in zoning at some locations to more appropriate uses, including identifying additional lands active open space and for the protection of watercourses and biodiversity.

In light of the concerns raised by the OPR, the CE has undertaken a review of all proposed employment lands with respect to services / serviceability. For all zones lands are either partially developed or serviced / serviceable within the lifetime of the plan and therefore would be illogical to 'de-zone'. A wide range of site options are essential in order to attract new employers to the area, and achieving the sustainability and employment growth goals for Blessington as envisaged by the RSES and County Development Plan would not benefit from the de-zoning of already zoned and serviced / serviceable employment land. In particular:

<b>Undeveloped Employment Lands</b>	<b>Assessment of suitability</b>
SLO3	<p>These lands are in use for quarrying activities and are currently zoned for new employment use. It is envisaged that these lands would become suitable for alternative employment use when they have been rehabilitated to a condition that supports new development, which is likely to be a more medium to long term programme. The extent of the employment zoning within the quarrying site has been reduced compared to the previous plan however with the more easterly portion changed to more appropriate OS use. In addition, lands along a watercourse on the southern boundary of this zone have also been changed to OS use.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p> <p>Employment use comprises the most appropriate use for these lands in the future given the current use, current condition, surrounding land uses and proximity to the N81. Given that the lands are already in active commercial use and are serviced, de-zoning is not considered reasonable.</p>
Mart	<p>These lands are already developed and are in use as a Mart. The lands are currently zoned for new employment use. The extent of the zoning has been significantly reduced however with the northern and eastern portions changed to more appropriate OS uses.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>
Oak Drive	<p>The majority of these lands are already developed and are located centrally in the settlement. Opportunities would be available for additional infill employment development.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>
Blessington Industrial Estate	<p>The majority of these lands are already developed and are located centrally in the settlement. Opportunities would be available for additional infill employment development.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>
N81 (north of WWTP)	<p>The lands are currently zoned for new employment use. The extent of the zoning has been slightly expanded from the previous plan in that a previous objective to reserve a portion of the lands for a 'park-and-ride' has been removed. These lands are surrounded by existing development on all sides, are across the road from the main employment area in the town (Blessington Industrial Estate) and are within the 60kph speed limit area.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p> <p>Having regard to the fact that other than SLO3, most employment land in the settlement is already or partially developed, it is considered essential to provide for some greenfield lands for future new employment development. These lands are considered optimal for this use given the surrounding land uses, servicing status and proximity to the N81 / town centre. De-zoning is therefore not considered justified.</p>

#### **CE Recommendation**

No change



## Item 8 Town Centre Regeneration

The Office welcomes the inclusion of Section B.1 on Town Centre Regeneration in the draft Local Area Plan for Blessington. The Opportunity Sites identified have the potential to act as a regenerative catalyst to increasing the residential, economic and leisure potential of the town centre, while also addressing vacancy, derelict buildings and enhancing the vibrancy of the town centre.

It is important that the draft Local Area Plan facilitates and prioritises the regeneration of the town centre through appropriate active land management objectives and policies, in accordance with the government's Town Centre First, A Policy Approach for Irish Towns (2022) (Town Centre First). It should also identify the critical measures and/or actions the Planning Authority will implement, having regard to public funding available under, among others, the Urban Regeneration and Development Fund and Town Centre First funds (e.g. Croí Cónaithe).

### Recommendation 5 - Town Centre Regeneration

**Having regard to the vitality, viability and regeneration of Blessington, and in particular to:**

- **RSO2 of the RSES to promote regeneration by making better use of under- utilised land and buildings within the existing built up urban footprint;**
- **RPO 4.26 of the RSES to achieve compact growth;**
- **RPO 8.1 of the RSES to ensure the integration of land use and transport planning; and**
- **Policy Objectives CPO 4.9 and CPO 5.1 of the County Development Plan to target the reversal of town and village centre decline through sustainable compact growth to deliver sustainable regeneration outcomes and to protect and maintain the viability of town and village centres,**

**the Planning Authority is required to:**

- (i) **provide a framework for prioritising and phasing of the town centre Opportunity Sites with an emphasis on delivery during the lifetime of the plan and potential funding streams;**
- (ii) **provide additional guidance in relation to density and building heights via the Opportunity Site Objectives BLESS OP1- BLESS OP8 and / or on the Concept Parameters and Access Plans / Sketches Figures B.1.3.- B.1.11;**
- (iii) **include measurable targets for the reduction of vacancy for the plan period and a strategy for the monitoring of same; and**
- (iv) **include permeability measures on the Transport Strategy Map No.5 and Active Travel Strategy Map No.6 to ensure that the Opportunity Sites are connected to planned active travel infrastructure.**

### Chief Executive Response

- (i) While it would be possible to attach a phasing / priority to each Opportunity Site in the plan area, it would be difficult to link that to delivery or potential funding streams when (a) delivery will be highly dependent on the private sector given that all sites are either fully or partially in private ownership and (b) as future funding streams under national / local programmes e.g. under URDF / RRDF are not known at this time. It should also be noted that the TCF plan, from which the majority of the OP sites are derived, does not assign a property / phasing on these sites. Please see recommended amendment below.
- (ii) It is not considered necessary or appropriate to provide guidance on density and building height for any sites in the plan as these are matters that would fall to be determined at development management stage, in accordance with the objectives of the Wicklow CDP and the various SPPRs and Ministerial guidelines addressing these matters. The OP sites are located in the town centre, surrounded by an existing wide variety of styles, height and uses, and it is not considered appropriate at this stage of plan making, without detailed consideration of these surroundings, to predetermine what design might be suitable. In addition, the draft plan also states:

#### **Development Potential & Density**

*In addition to the objectives of the County Development Plan and this Local Area Plan, the development potential of any site will be subject to determination of appropriate density at the development management stage. The application of density ranges will be considered in line with the objectives of the County Development Plan, this Local Area Plan and relevant Planning Guidelines. Density ranges should be based on consideration of centrality*



and accessibly to services and public transport; and considerations of character, amenity and the natural environment. As the density that may be possible to achieve on any given site cannot be pre-determined, this plan will not include an estimate of housing yield for any particular area / site.

and

### **Zoning Objectives**

Whilst the land-use zoning will give an indication of the acceptability or otherwise of particular uses in particular areas, proposed development will also be assessed in terms of compatibility with the development control guidelines and standards outlined in the Wicklow County Development Plan and this plan. Factors such as density, height, massing, traffic generation, public health regulations, design criteria, visual amenity, availability of services and potential nuisance by way of noise, odour and air pollution are also of importance in establishing whether or not a development proposal conforms to the proper planning and sustainable development of an area.

- (iii) As part of the preparation of the LAP, the TCF and the RZLT maps, town centre surveys have been undertaken and record vacancy and building uses at a given point in time. It will be possible to measure changes periodically against the 2023 – 2024 surveys, in particular through the addition or deletion of sites to the RZLT maps which is an annual programme. However it is not considered appropriate to include a specific target for vacancy reduction, particularly when the majority of sites are in the private ownership and the Local Authority would have limited tools available to bring such properties back into use. The Local Authority will however continue to utilise routes available e.g. under the Derelict Sites Act, to address dereliction and vacancy.
- (iv) All of the OP sites are located within the town centre and are therefore already serviced by footpaths and are within 5 minutes' walk of public transport services. However there is no issue with them being identified on the transport strategy maps.

### **CE Recommendation**

**Amend the plan as follows:**

#### **Section B.1 Town Centre Regeneration**

##### **Blessington Opportunity Sites (OP)**

*'Opportunity sites' (OP) are identified in this Local Area Plan, which would, if developed, contribute to the enhancement of the public realm, streetscape, vibrancy, vitality, and the retail/services offer in the town centre. There are numerous underutilised and unoccupied properties within Blessington Town Centre that could be redeveloped to contribute to the enhancement of the area and any development proposal for these sites should have regard to the objectives of the County Development Plan, this Local Area Plan, and the Blessington Town Centre First Plan as relevant. Note that this Local Area Plan has included all opportunity sites identified in the Blessington Town Centre First Plan, but has also identified further opportunity sites as relevant.*

*In terms of phasing or priority, while the Local Authority will support where possible the development of all OP sites during the lifetime of the plan, the focus for the Local Authority's own efforts, including developing projects and seeking funding will be OP1, 2 and 3 located in the very core of the town centre, around Market Square.*

##### **Transport Strategy Maps**

Add OP sites

<b>Item 9 Climate Action</b>
<p>The Office welcomes the strategic goals of the draft Local Area Plan with healthy place-making, climate change and economic opportunity at the core. Key features of a low carbon town include: land use, movement and transport, energy and natural heritage, and inclusive communities.</p> <p>There is, however, an opportunity for the draft Local Area Plan to include more specific policy measures and actions to give effect to and complement the objectives and actions of the Wicklow CAP which are specific to Blessington and have a strong relationship to planning, such as transport and the built environment. For example, the inclusion of mode share targets and flood relief schemes.</p> <p><b>Observation 2 – Integrating Climate Action</b></p> <p><b>Having regard to:</b></p> <ul style="list-style-type: none"> <li>▪ <b>RPO 3.7 of the RSES;</b></li> <li>▪ <b>the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%; and</b></li> <li>▪ <b>the Wicklow Climate Action Plan 2024-2029 (Wicklow CAP),</b></li> </ul> <p><b>the Planning Authority is advised to review and revise the draft Blessington Local Area Plan 2025 (the draft Local Area Plan) to:</b></p> <p><b>(i) provide for alignment between the draft Local Area Plan and the relevant climate adaptation and mitigation actions of the Wicklow CAP through the policy objectives; and</b></p> <p><b>(ii) include additional and more specific climate action policy objectives which relate to policy measures and actions in respect of transport and the built environment.</b></p>
<b>Chief Executive Response</b>
<p>Local Area Plans sit below the County Development Plan in the hierarchy of planning policy; the provisions of the County Development Plan will apply directly in the LAP area, and the provisions of the LAP must be consistent with the County Development Plan. The CE is satisfied that the very wide range of objectives set out in the County Development Plan, that will apply in the plan area, fully address the concerns raised in this point, and fully address the objectives of the <b>Wicklow Climate Action Plan</b>. For example, the following objectives relating to sustainable transportation, water protection and management, flood risk management and air quality control etc will apply in the plan area:</p> <p><b>Sustainable Transportation Objectives</b> CPO 12.1 CPO 12.2 CPO 12.5 CPO 12.6 CPO 12.7 CPO 12.8 CPO 12.11 CPO 12.12 CPO 12.13 CPO 12.14 CPO 12.15 CPO 12.16 CPO 12.17 CPO 12.18 CPO 12.19 CPO 12.20 CPO 12.21 CPO 12.22 CPO 12.23 CPO 12.25 CPO 12.26 CPO 12.27 CPO 12.28 CPO 12.29 CPO 12.33 CPO 12.59 CPO 12.62 CPO 12.63</p> <p><b>Water Protection &amp; Management Objectives</b> CPO13.1 CPO13.2 CPO13.3 CPO13.4 CPO 13.5 CPO 13.6 CPO13.7 CPO 13.14 CPO 13.20 CPO 13.21 CPO 13.22</p> <p><b>Flood Risk Management objectives</b> CPO 14.01 CPO14.02 CPO14.03 CPO 14.04 CPO14.05 CPO 14.06 CPO 14.08 CPO 14.09 CPO 14.10 CPO 14.11 CPO 14.12 CPO 14.13 CPO 14.14 CPO 14.15 CPO 14.16</p> <p><b>Air Quality objectives</b> CPO 15.9 CPO 15.10 CPO 15.11</p> <p>In addition, the draft LAP includes the following additional policies and objectives which address compact development, biodiversity resilience, active travel, sustainable economic development as well as climate action co-benefits and environmental protection requirements. <a href="#">Sections A2-A4, BLESS3, BLESS5, BLESS6, BLESS8, BLESS11, BLESS13, BLESS14, BLESS26, BLESS31, BLESS32, BLESS33, BLESS34, BLESS35, BLESS36, BLESS37, BLESS38, BLESS39, BLESS40, BLESS41, BLESS42, BLESS43, BLESS44, BLESS45, BLESS46, BLESS47, BLESS48, BLESS49, BLESS50, BLESS51, BLESS52.</a></p> <p>Therefore no changes are recommended.</p>
<b>CE Recommendation</b>
No change

## **Item 10 Environment, Heritage & Amenity**

### **Water Quality (Poulaphouca Reservoir)**

The Office notes that the draft Local Area Plan recognises the important environmental, amenity and tourism value of the Poulaphouca Reservoir, and includes associated objectives.

As the Poulaphouca Reservoir also supplies drinking water to a significant proportion of the Greater Dublin Area (GDA), the Office considers that protecting and enhancing the water quality of the reservoir is critical to managing this essential water resource. As such, this should be highlighted in the draft Local Area Plan to ensure consistency with RSES and County Development Plan policy objectives.

In this regard, while objective BLESS42 provides for applications for development to demonstrate that they would not individually nor cumulatively affect a water body's ability to meet its objectives under the Water Framework Directive, the draft Local Area Plan does not provide specific protection nor recognition of the Poulaphouca Reservoir as a public drinking water resource.

The Office considers that the Planning Authority should include a new section and associated objective in the Local Area Plan to protect the reservoir as a drinking water supply and ensure development will not negatively impact this drinking water source. The new section should highlight the importance of Poulaphouca Reservoir as a major source of drinking water for the GDA, including reference to Uisce Éireann's statutory role in assessing risks to the reservoir, and how the implementation of nature based solutions will help to manage the water quality of surface water run-off collected and discharged directly to the reservoir or to watercourses which drain into it.

In addition, reference should be made to the recently published Local Authority Waters Programme's Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents (2024).

### **Recommendation 6 – Poulaphouca Reservoir Water Quality**

**Having regard to the proximity of the Poulaphouca Reservoir and the provision of sustainable infrastructure and nature based water management solutions, in particular to:**

- **RPO 7.12 of the RSES to integrate sustainable water management solutions to create safe places;**
- **RPO 10.1 of the RSES to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment;**
- **RPO 10.15 of the RSES to improve storm water infrastructure to improve sustainable drainage; and**
- **policy objectives CPO 13.1, 13.9, 13.20, CPO 13.21, 13.22, 14.13, and**
- **17.24 of the County Development Plan to ensure the implementation of the EU Water Framework Directive, surface water run-off is managed for maximum benefit, and to promote the use of green infrastructure,**

**the Planning Authority is required to:**

- (i) include a new section of text to highlight:**
  - (a) the importance of Poulaphouca reservoir as a drinking water resource for the Greater Dublin Area;**
  - (b) the importance of protecting the reservoir as a drinking water supply; and**
  - (c) the Local Authority Waters Programme's Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents (2024) relevant guidance; and**
- (ii) include associated objective(s) to:**
  - (a) protect the Poulaphouca Reservoir as a drinking water supply;**
  - (b) ensure development will not negatively impact Poulaphouca Reservoir as a drinking water source;**
  - (c) support and facilitate the improvement of the quality of surface water runoff that directly (or indirectly) will reach the Poulaphouca Reservoir; and**
  - (d) support Uisce Éireann's statutory role in assessing risks to the reservoir.**

**The Planning Authority should consult with the Uisce Éireann regarding this recommendation.**

## Chief Executive Response

The protection of drinking water sources across the County is addressed in the objectives of the Wicklow County Development Plan, which were drafted in consultation with Uisce Eireann. These objectives will apply directly in the Blessington LAP area.

**CPO13.1** *To ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.*

**CPO13.2** *To prevent development that would pollute water bodies and in particular, to regulate the installation of effluent storage and disposal systems in the vicinity of natural water bodies or development that would exacerbate existing underlying water contamination.*

**CPO 13.9** *To protect existing and potential water resources of the County, in accordance with the EU Water Framework Directive, the River Basin Management Plans, the Groundwater Protection Scheme and source protection plans for public water supplies.*

**CPO 13.15** *In order to fulfil the objectives of the Core Strategy, Wicklow County Council will work alongside and facilitate the delivery of Irish Water's **Water Services Investment Programme**, to ensure that all lands zoned or identified for development are serviced by an adequate wastewater collection and treatment system and in particular, to endeavour to secure the delivery of regional and strategic wastewater schemes.*

*In particular, to support and facilitate the delivery of new / improved wastewater treatment plants in the following settlements:*

- Arklow
- Blessington
- Aughrim
- Tinahely
- Avoca
- Laragh – Glendalough
- Lakes area around Blessington
- Large and Small Villages

These objectives are supported by BLESS42 *'Where relevant, applications for development must demonstrate that the proposal for development would not, individually or cumulatively, affect a water body's ability to meet its objectives under the Water Framework Directive.'*

It is noted that Uisce Eireann in its submission has noted the County Development Plan objectives above and has requested the following objectives be added to the draft LAP:

*'Protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Drinking Water and Water Framework Directives. New developments which could pose an unacceptable risk to drinking water sources will not be permitted.'*

*"To support and facilitate the improvement of the quality of surface water runoff that directly (or indirectly) will reach Poulaphouca Reservoir. This shall be applied to both new developments and to any planned improvements to existing urban spaces. It is recommended that the hierarchy of discharge, outlined in the recently published guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" is used."*

The CE is happy to recommend the inclusion of the suggested objectives.

#### CE Recommendation

##### **Amend the plan as follows:**

Add the following text and objectives to Section B.7:

The Poulaphouca Reservoir is a critical source of raw water supply to the populations of Dublin, Kildare and parts of Wicklow. Significant measures are required to be taken to protect the water quality in the reservoir, including the management of surface water runoff in adjacent towns and villages.

Uisce Éireann recommends the use of the hierarchy of discharge outlined in the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" to complement the approach to surface water management set out in the Wicklow County Development Plan. In particular, Uisce Éireann encourages a specific focus on the water quality of surface water runoff collected in Blessington town and discharged either directly to the reservoir or to watercourses which drain to the reservoir. This is applicable to both new developments and to any planned improvements to existing urban spaces.

*BLESS-XX: To protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Drinking Water and Water Framework Directives. New developments which could pose an unacceptable risk to drinking water sources will not be permitted.*

*BLESS-XX: To support and facilitate the improvement of the quality of surface water runoff that directly (or indirectly) will reach Poulaphouca Reservoir. This shall be applied to both new/expanded developments and to any planned improvements to existing urban spaces. In this regard, developments shall be designed in accordance with the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" LAWPRO 2024.*

## Item 11 Environment, Heritage & Amenity

### Built Heritage

The Office welcomes the inclusion of the Blessington Architectural Conservation Area (ACA) in section B.6 of the draft Local Area Plan and Objectives BLESS32 and BLESS33 which offer protection to the architectural heritage of Blessington and resistance against any proposed demolition of protected buildings along Main Street / N81, Market Square and Kilbride Road.

With this in mind and having regard to the plans for regeneration of the town centre Opportunity Sites at section B.1 of the draft Local Area Plan, the Office would welcome the inclusion of a reference to the ACA and appropriate mapping in the Opportunity Sites section of the draft Local Area Plan.

### Observation 3 – Architectural Heritage

Having regard to:

- RPO 9.27 of the RSES; and
  - CPO 8.10 of the Wicklow County Development Plan 2022-2028,
- the Planning Authority is advised to overlay the Blessington Architectural Conservation Area with the Opportunity Sites maps contained within the Town Centre section B.1 of Draft Blessington Local Area Plan 2025.

### Chief Executive Response

The ACA boundary can be overlaid with the various drawings associated with opportunity sites; the draft plan does not provide a single drawing / map of all OP sites and this will be rectified.

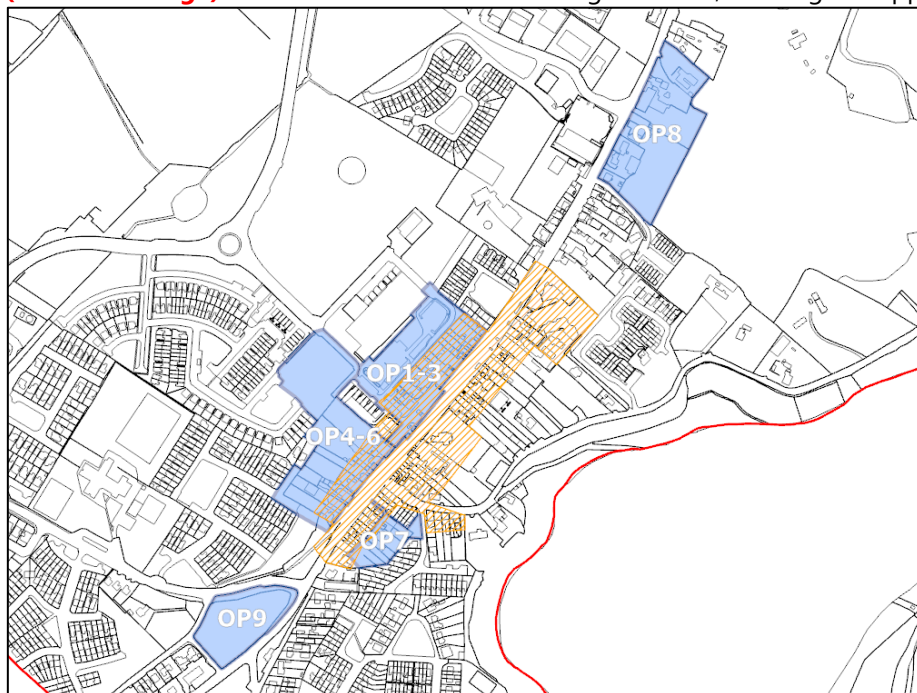
### CE Recommendation

Amend plan as follows

#### Part B.1 Town Centre Regeneration

Add new drawing under heading 'Opportunity Sites' showing all OP sites + TC zone boundary + ACA boundary

**Insert Figure X: Town Centre Opportunity Sites (blue) and Blessington Architectural Conservation Area (hatched orange) under Part B.1 Town Centre Regeneration, Blessington Opportunity Sites (OP)**



### **Item 12 Implementation and Monitoring**

Section 6.5 of the Local Area Plans, Guidelines for Planning Authorities (2013) states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effective monitoring systems such as reviewing the progress in securing the objectives of the County Development Plan in accordance with section 15 of the Act.

In this respect, the Office considers that a more systematic approach to monitoring would better assist the Planning Authority in implementing the key objectives / actions of the draft Local Area Plan, by identifying lead responsibility, suitable indicators for measuring policy objectives and a timeline for implementation of actions / projects. For example, tackling dereliction and vacancy rates, as detailed above.

Guidance on monitoring and implementation is provided in chapter 10 of the Development Plans Guidelines. Further, the Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 and the Newcastle West Local Area Plan 2023-2029 both provide examples of good practice in this area.

#### **Observation 4 – Monitoring and Implementation**

**Having regard to section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, the Planning Authority is requested to include a section on what the implementation and monitoring strategy will be and to provide a detailed systematic approach to monitoring the implementation of key objectives and / or actions of the Draft Blessington Local Area Plan 2025.**

### **Chief Executive Response**

The Wicklow Forward Planning Department has recently established a development plan monitoring unit and is currently working on building a plan monitoring and development pattern tracking system. It is intended that this system will be functional in 2025, and at that time, all objectives of this LAP will be inputted in order to allow for systematic monitoring to be established.

In the meantime, it is proposed that Appendix 3 be supplemented with additional tables and information on implementation and timeframes with respect to all objectives of the plan and a particular focus on identified development areas (SLOs).

### **CE Recommendation**

Insert new section into Appendix 6 (as attached)



Item 13 General and Procedural Matters
<p>The Office notes that policy objective BLESS7 sits within Appendix 6 Infrastructure Delivery Schedule and Implementation of the draft Local Area Plan. The Planning Authority should consider including policy objective BLESS7 in the main text of the draft Local Area Plan for ease of reference and to ensure equal weight is attributed to all policy objectives.</p> <p>In addition, the Office notes discrepancies between the description of when permission will be considered for the development of New Residential Priority 2 lands at policy objective BLESS7, Zoning Objectives at section B.8 Zoning and Phasing at section B.8 Zoning. The Planning Authority is advised to ensure that all descriptions of when permission will be considered for the development of New Residential Priority 2 lands are consistent with policy objective BLESS7.</p> <p><b>Observation 5 – Policy objective BLESS 7</b>  <b>The Planning Authority is advised to include policy objective BLESS7 within the main text of the Draft Blessington Local Area Plan 2025 and address discrepancies in the description of when permission will be considered for the development of New Residential Priority 2 lands to ensure consistency with policy objective BLESS 7.</b></p>
Chief Executive Response
<p>Within the LAP, the following objective is set out in Section B.2:</p> <p><b>BLESS7</b>  <i>Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:</i></p> <ul style="list-style-type: none"> <li>- <i>Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);</i></li> <li>- <i>It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.</i></li> </ul> <p>This is repeated in Appendix 6.</p> <p>In Section B.8, the same objective has a slightly different wording i.e.  <i>In order to ensure a long term supply of zoned residential land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this plan, this plan also provides for additional zoned residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Permission will not be considered during the lifetime of this plan for RN2 lands unless the following conditions are satisfied:</i></p> <ul style="list-style-type: none"> <li>- <i>75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);</i></li> <li>- <i>It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.</i></li> </ul> <p>Having considered the matter further, it is recommended that the '75%' provision is appropriate.</p>
CE Recommendation
<p>Amend the LAP as follows:</p> <p><b>Section B.7</b>  <b>Housing Targets &amp; Extant Planning Permissions</b></p> <p>Having regard to the Core Strategy and population / housing targets provided therein for Blessington, there is capacity within the lands zoned TC, RE (all located in the serviced, built up envelope) and lands zoned RN1 (greenfield residential lands either within the built envelope or with extant planning permission) to meet current targets.</p> <p>In order to ensure a long term supply of zoned land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this plan, this plan also provides for additional zoned serviced / serviceable</p>

residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Permission will not be considered during the lifetime of this plan for RN2 lands unless the following conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.

#### **BLESS7**

*Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:*

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.

#### **Appendix 6**

##### **BLESS7**

*Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:*

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.

#### **Item 14 Summary**

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed.

Where your authority decides not to comply with the recommendations of the Office, made to the draft Local Area Plan, please outline the reasons for the decision in the Chief Executive's report.

#### **Chief Executive Response**

Noted

#### **4.1.2 National Transport Authority**

##### **Item 1 Overview and Policy Context**

From a review of the Draft LAP and LTA, it is considered that the Plan is generally consistent with the Transport Strategy, as required by the Planning and Development Act 2000 (as amended), subject to the observations and recommendations set out in this report. These observations and recommendations are based on the following policy and guidance documentation, as well as the primary provisions of the Wicklow County Development Plan 2022 – 2028.

##### National Investment Framework for Transport in Ireland (NIFTI)

This is the strategic framework for future investment decision making in land transport. It guides transport investment in the years ahead to enable the National Planning Framework, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland.

NIFTI sets out the road user modal hierarchy in Ireland as; 1. Active Travel (Walking & Cycling); 2. Public Transport; 3. Private Vehicles.

NIFTI also outlines an intervention hierarchy which is: 1.Maintain; 2.Optimise; 3.Improve; 4.New.

##### National Sustainable Mobility Policy

This sets out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.

##### Climate Action Plan 2024

Under the Climate Action and Low Carbon Development (Amendment) Act 2021, emissions must reduce by 51% by 2030, setting a path towards a zero net-emissions scenario by 2050. The transport sector is committed to meeting those targets in full. For transport, there are three main actions required that should inform the policies, objectives and measures of the Local Area Plan, namely:

- Reducing the demand for travel;
- Increasing use of public transport, walking and cycling and a reduction in trips by car;
- Conversion of the transport fleet to zero emissions vehicles.

##### National Planning Framework (NPF)

The National Planning Framework sets out the National Policy Objectives (NPO) which align with the National Development Plan (NDP) through delivery of National Strategic Outcomes (NSO).

##### Eastern & Midland Regional Assembly – Regional Spatial & Economic Strategy

The RSES provides a high-level development framework for the Eastern & Midlands Region that supports the implementation of the NPF.

##### Greater Dublin Area Transport Strategy 2022 – 2042

The Transport Strategy sets out a framework for the delivery of transport infrastructure and services in the GDA region as well as key policy objectives that support the integration of land use and transport planning at a local level.

As part of the Transport Strategy, the N81 corridor is designated as a 'Regional Bus Corridor', with an objective to provide for enhanced levels of bus priority on this route.

##### **Chief Executive Response**

Noted

## Item 2 Integration of Local Transport Assessment and Local Area Plan

The preparation of a 'Local Transport Assessment' for Blessington, to accompany the LAP, is noted and welcomed given the importance of integrating land use and transport planning, as set out in the Transport Strategy. An integrated approach will ensure that the future transport needs of the Plan area are a central consideration as the Council identify land use objectives and zonings and this can support sustainable travel patterns in the area going forward.

Whilst the provisions of the transport assessment undertaken are generally welcomed, subject to the observations detailed below, it is noted that the LTA has not been undertaken in line with the ABTA guidelines which are used for the preparation of Local Transport Plans. Objective CPO 12.3 of the Wicklow County Development Plan states the following:

*"In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy (namely Bray and environs, Wicklow–Rathnew, Arklow, Greystones–Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy and any other settlement where it is deemed necessary by the Planning Authority) and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plans."*

The key outputs of the ABTA process which the NTA recommends are given full expression in a Local Transport Plan are as follows:

- 1) Map of Proposed Permeability and Walking Interventions;
- 2) Cycling Network Map;
- 3) Map of Proposed Cycling Schemes graphically represented by Short-Term, Medium-Term and Long-Term Priority;
- 4) Proposed Public Transport Services Route Map;
- 5) Map of Proposed Public Transport Interventions;
- 6) Road Network Map;
- 7) Traffic Circulation Map; and
- 8) Map of Proposed Roads and Traffic Management Interventions, including Car Parking.

In order to ensure that sustainable transport is central to statutory land use planning policy in Blessington, the following should be provided for in the LAP:

- A comprehensive stand-alone Transport Chapter;
- A set of transport policies and objectives which explicitly reflect the NSMP, NIFTI, DMURS, CDM, and any relevant regional or metropolitan Transport Strategy; and the accompanying Local Transport Plan; and
- All 8 Key Outputs of the Local Transport Plan outlined above as fully and explicitly expressed in text and figures.

Further detail on these aspects is provided later in this report.

### NTA Recommendation

- **To ensure the future transport needs of Blessington are identified based on a robust and comprehensive assessment, it is recommended that the current transport assessment prepared for the town is further developed in consultation with the NTA to form a Local Transport Plan (LTP), closely aligned with the updated ABTA guidance; and**
- **In the event that the LTA is not further developed in line with the above as part of the finalisation of the LAP, the preparation of an LTP should be included as a specific objective of the LAP in line with Objective CPO 12.3 of the Wicklow County Development Plan.**

### Chief Executive Response

No ABTA or Local Transport Plan has been prepared as part of this LAP. This is regrettable but technical resources have not been available for this, and it was decided that the lack of such a study should not hold up progress on preparing new LAP. Instead, available internal resources were deployed to carry out a Local Transportation Assessment that did accompany the draft LAP. The CE is satisfied that this assessment did allow for transportation considerations to be fully integrated into the plan development process.

At this stage of plan making, where a period of only 6 weeks is provided for the CE to prepare a report and make recommendations to the members for amendments if necessary, inadequate time would be available to allow for development and production of a Local Transport Plan, of the form and detail as envisaged by the NTA / TII guidance. As suggested in the submission, a LTP can be prepared after the adoption of the LAP and the CE is agreeable to a new objective to this effect.

#### **Chief Executive Recommendation**

##### **Amend the plane as follows:**

Include new objective in Section B.7

*BLESS - XX      In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Blessington.*

### Item 3 Active Travel Proposals

The assessment undertaken of existing active travel infrastructure in the settlement is noted and the recommendations to improve existing infrastructure and provide new infrastructure, are welcomed.

It is submitted, however, that active travel measures should be more explicitly identified, with a focus on establishing coherent and integrated walking and cycling networks for the whole settlement, including locations where permeability schemes are required to reduce walking distances to key services such as schools. These networks should be detailed in the LAP and LTA as part of legible maps.

Further to the above, it is submitted that that information should be provided on the potential phasing of the primary active travel measures, which measures will be prioritised and the rationale for same, given potential funding limitations. This can ensure the most primary transport corridors based on demand, potentially in proximity to schools and other key destinations, are served by improved infrastructure in the short term. It is submitted that with regards to potential active travel and general traffic management measures for Main Street, measures should not be solely reliant on the delivery of the relief road and that appropriate targeted measures are brought forward in the short term to improve the urban environment of Main Street for people walking and cycling.

Specific measures related to reducing speed limits, improving the safety and function of junctions for active travel use and providing more frequent and high-quality pedestrian crossings could be more explicitly portrayed and highlighted. It is also submitted that the hierarchy of road users should be incorporated and should form the basis for the identification of measures generally.

From an assessment of the LTA, it is noted that there is limited information provided on the potential for an increased provision of bicycle parking at key destinations in the town, despite the Town Centre First Plan highlighting the limited provision of bicycle parking in the town at present. Furthermore, there is currently an absence of objectives to provide for bicycle/scooter/car share schemes that can accommodate increased rates of active travel use and reduce the need to own a private vehicle. It is submitted that appropriate objectives should be incorporated into the LTA and LAP to support the provision of such schemes going forward.

#### NTA Recommendation

- (i) **Reference to the hierarchy of transport users, as set out in the National Sustainable Mobility Policy should be made in the LAP and LTA;**
- (ii) **Active travel measures should be more explicitly identified in both the LAP and LTA with a focus on identifying overall walking and cycling networks, to be included on appropriate maps in both documents;**
- (iii) **Further objectives could be included and more explicitly identified aimed at improving existing junctions, reducing speed limits and providing more frequent and high-quality pedestrian crossings;**
- (iv) **Objectives should be included to improve the number and quality of bicycle parking locations at key destinations, particularly at Main Street;**
- (v) **Objectives should be included to support the provision of bicycle/scooter/car share schemes at appropriate locations in the town.**

#### Chief Executive Response

- (i) The LTA prepared clearly sets out that the National Sustainable Mobility Policy was one of a suite of higher order strategies, policies and guidelines that were considered in the preparation of the LTA and LAP. In light of same, and other guidance, the LTA clearly states that the key aims of the LTA are to:
  - Ensure that transport and settlement patterns mutually support each other.
  - To assist plan makers to deliver land use policies and objectives to produce a settlement of such form and layout that facilitates and encourages sustainable forms of movement and transport, prioritising active travel modes of walking and cycling and use of public transport.
  - Minimise the need for travel and reduce the length of journeys by maximising the proximity of people, business and the services they require;
  - Promote greater investment in, and usage of, public transport modes, such as rail and bus networks, with the

support of complementary land use policies;

- Protect the capacity, efficiency and safety of national roads and associated junctions;
- Ensure that zoning strategies are consistent with value for money considerations applying to the provision of public infrastructure, including roads and public transport.

In addition, the draft LAP (Chapter 9) states: *'The Transport Assessment has been carried out as part of this plan. The key aims of this assessment is to identify ways to facilitate a modal shift away from private vehicles, to encourage walking, cycling and use of public transport, and to provide a sustainable and safe transport environment'.*

It is therefore considered that the LTA and LAP are very clear as to the hierarchy of transport users, and no change is required.

- (ii) It is considered that the transport objectives map adequately show all active travel measures – both those already in train and desired future projects, where known. At this stage of plan making, given the time limits involved, it would not be possible to carry out fresh survey, evaluation and determination of significant or nascent additional transportation measures that might be necessary in the settlement. The CE is committed to such assessment being undertaken as part of the development of a LTP for the plan area. With respect to significant development areas (SLO areas) these will be added to the 2 transport objectives maps to show connectivity.
- (iii) Until further detail study is undertaken of existing junctions, opportunities for reducing speed limits and options for additional pedestrian crossings it would not be possible to include these in the LTA or LAP. The CE is committed to such assessment being undertaken as part of the development of a LTP for the plan area.
- (iv)+(v) The CE is committed to addressing bicycle parking and bicycle/scooter/car share schemes as part of the development of a LTP for the plan area.

#### **Chief Executive Recommendation**

##### **Amend Transport Objectives Maps as follows:**

- Add additional information on active travel projects
- Add SLO areas
- Add OP sites



#### Item 4 Public Transport Measures

It is considered that objectives seeking the further enhancement of public transport infrastructure and services should be referenced in both the LAP and LTA/LTP. This should include referencing support for the continued enhancement of bus services under the Connecting Ireland and Bus Connects programmes and the improvement of bus stop environments. Furthermore, it is requested that the routing of bus services is a central consideration in any active travel projects, to ensure service routings are protected and enhanced where possible.

#### NTA Recommendation

- **Include appropriate objectives to support the continued enhancement of bus services under the Connecting Ireland and Bus Connects programmes;**
- **Include general objectives to support the continued improvement and addition of bus stop infrastructure in the settlement.**

#### Chief Executive Response

Support for bus service and infrastructure enhancement is already provided by County Policy Objective 12.26 which will apply directly in the plan area. However, as this is identified as a key local issue it is recommended that this county objective, adapted to local circumstances, be included in the LAP.

#### Chief Executive Recommendation

**Replace Objectives BLESS 49 with the following revised wording:**

- BLESS-49*** *To continue to work with the NTA to promote the delivery of improved and new bus services, facilities and infrastructure within the plan area and connecting the plan area to the wider region by:*
- *supporting the development and delivery of bus service enhancement projects, under the Connecting Ireland and Bus Connects programmes and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate;*
  - *facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);*
  - *supporting the development of enhanced bus shelters, of secure covered bicycle parking facilities at key locations along bus routes,*
  - *to promote and support the improvement of N81 in a manner capable of facilitating greater free flow of public transport,*
  - *to support and facilitate the existing service providers and encourage the further development of the Local Link Rural Transport Programme (and any other or subsequent rural transport programmes).*
  - *Enhancing pedestrian and cycling connectivity to public transport services.*

<b>Item 5 Car Parking</b>
With regards to the provision of car parking generally in the settlement, it is considered that the LTA/LTP and LAP could be strengthened in terms of objectives to reduce parking over-time in central areas and generally manage it to ensure sustainable forms of transport are encouraged and facilitated. To facilitate a reduction and consolidation of parking over time, it is recommended that a car parking management strategy is undertaken to accompany the LTA/LTP, in line with the recommendations of the Town Centre First Plan. This could assist with objectives to improve active travel facilities and the general urban environment in the town centre through the reallocation of road space.
<b>NTA Recommendation</b> <ul style="list-style-type: none"> <li>▪ <b>Prepare a car parking management strategy for the settlement to consider a reduction in on-street parking and a consolidation of parking at appropriate sites on the periphery of core town-centre areas.</b></li> </ul>
<b>Chief Executive Response</b>
The CE is agreeable to preparing car parking strategy for the settlement as part of a future LTP.
<b>Chief Executive Recommendation</b>
No change

<b>Item 6 Modal Share Ambitions</b>
It is noted that the Office of Planning Regulator (OPR) typically favour the inclusion of modal share targets as part of a LAP. It is submitted that this should be considered and that generally there should be stronger objectives to reduce private car use in the settlement in favour of active travel and public transport trips. This is in the context of the existing dominance of the car for trip making in the settlement and in the context of wider national objectives to reduce car use, including the objectives of the Climate Action Plan 2024. The Climate Action Plan seeks to reduce daily car journeys by 25% by 2030 and increase the number of active travel journeys in the same time frame by 50%.
<b>NTA Recommendation</b> <ul style="list-style-type: none"> <li>▪ <b>Consider the inclusion of modal share ambitions for the Plan area in the LTA and LAP/LTP.</b></li> </ul>
<b>Chief Executive Response</b>
While the suggestion of the NTA is noted, no advice is given as to how these targets may be calculated and it is not considered rational or reasonable to come up with arbitrary modal share targets as part of this plan making process. This is a matter that can be considered in the future LTP.
<b>Chief Executive Recommendation</b>
No change

## Item 7 Employment Development

The concurrent preparation of a Local Area Plan and Local Transport Assessment represents an important opportunity to ensure that both existing areas and future development locations in the town are well served by sustainable modes of transport and to generally link land use objectives with transport objectives.

The provisions of the LAP that support a compact and sequential form of development for residential and retail uses are therefore welcomed. Such provisions will assist in promoting a pattern of development that supports trips by sustainable modes of transport. It is, however, submitted that the compact and sequential approach to development should also apply to economic development and this should be noted in the LAP. In particular, it should be highlighted that trip intensive forms of employment uses should not be considered appropriate in peripheral areas not served by sustainable transport.

### NTA Recommendation

- **Ensure that appropriate objectives are in place in the LAP to promote a sequential and compact form for employment-based development, with a focus on locating trip intensive development at locations well served by sustainable modes of transport.**

### Chief Executive Response

It is considered that the draft LAP promotes a sequential and compact form for employment development e.g. (specific sections highlighted)

#### **Town Centre & Retail Objectives**

- *To support the continued enhancement of Blessington Town Centre as the heart of the settlement, where people of all backgrounds, ages and abilities can avail of services and interact within their communities;*
- *Ensure that the town centre is an attractive places to live in, to work in and to visit, easy to get to, easy to walk and cycle within and is a competitive place to conduct business;*
- *Create a compact town by reusing existing buildings and maximising the potential of infill and brownfield sites; use all mechanisms and processes available to drive forward the redevelopment and regeneration of vacant, underutilised and derelict sites;*
- *Use public realm improvements to stimulate investment and economic confidence; encourage public art in publicly accessible spaces such as town streets and squares and along existing or future parks and amenity routes;*
- *Promote healthy placemaking and prioritise walking and cycling; improve linkages between core town centre and existing community infrastructure and lands earmarked for future housing development;*
- *Embracing the historic character and heritage attributes of the town centre and strengthen the strong sense of place;*
- *The redevelopment of lands within the town core area, particularly those sites with frontage onto the main streets and squares of Blessington, shall provide for street fronting buildings of a high quality design or for a high quality urban space, including hard and soft landscaping, and appropriate street fixtures and furniture, in order to enhance and create a more attractive streetscape;*
- *To allow a relaxation in certain development standards in the town centre zone in the interest of achieving the best development possible, both visually and functionally while maintaining the highest quality of design in all new developments;*
- *Facilitating a diverse mix of uses, and particularly encourage residential usage at appropriate town centre densities, and the concept of 'living over the shop';*
- *Facilitate an expansion of retail floorspace to reduce leakage of expenditure from both the town itself and the wider County. Guide and promote the expansion of retail floorspace first and foremost within the core retail area and thereafter in accordance with the sequential approach to retail development;*
- *Provide for an expansion in the variety of retail and retail service facilities so that the town includes a range of retail outlets that provide for the day to day needs of the local population and the needs of other businesses and tourists, in accordance with the provisions of the "Retail Planning Guidelines for Planning Authorities" (DoEHLG 2012), and any subsequent Ministerial Guidelines or directives and the Wicklow County Retail Strategy.*

#### **Economic Development & Employment Objectives**

- *Increase the quality and range of employment opportunities by facilitating developments that involve foreign and local investment in a variety of forms, including 'people' and 'product' intensive industries. The Council will particularly support the development of 'people' intensive employment generating developments at locations served*

by sustainable and active modes of transport, those that provide for the local convenience and social service needs of the area and those that provide for the needs of tourists and visitors. The Council will support the development of 'product' intensive industries at appropriate locations, and will particularly support developments based on the use of a local rural resource.

- To facilitate and support the highest degree possible, all forms of employment creation on appropriately zoned land and to promote the intensification of activities on existing employment sites and to take advantage of the existing economic assets of the town in order to stimulate further employment within the area.
- Promote in the first instance the growth of economic activity and employment in the town centre and built up parts of the town; and where a demand for 'greenfield' employment development is identified, to ensure zoned, serviced land is available in appropriate locations in accordance with the zoning principles of the County Development Plan.
- To encourage the redevelopment of town centre and brownfield sites for enterprise and employment creation throughout the settlement and to consider allowing 'relaxation' in normal development standards on such sites to promote their redevelopment, where it can be clearly demonstrated that a development of the highest quality, that does not create an adverse or unacceptable working environment or create unacceptable impacts on the built, natural or social environment, will be provided.
- To encourage and facilitate the development of small to medium scale indigenous industries and services at appropriate locations within Blessington. The Council acknowledges that the development of small scale projects with long term employment potential are important in sustaining both urban and rural settlements in County Wicklow and as such, the Council will adopt a proactive and flexible approach in dealing with applications on a case-by-case basis.
- Support a shift towards low carbon and climate change resilient economic and enterprise activity, reducing energy dependence, promoting the sustainable use of resources and leading in the Smart Green Economy.
- To promote high quality housing, community facilities and a built and natural environment that is attractive to indigenous and foreign industry and employees.
- To promote tourist developments at suitable locations that are of an appropriate scale and design, particularly developments that are associated with the tourism products or themes associated with the town and its hinterland and maximise the town's location as a destination and gateway between the tourism assets.
- To facilitate home-working, the development of co-working hubs and innovative forms of working, which reduce the need to travel.

### **Integration of Land-Use and Transportation**

While the overarching rationale for the production of a development plan is to guide land-use, the integration of good land use planning with transportation is a key that can unlock significant improvements in the quality of life, in ways that are tangible to many in the settlement, who have long identified car dependency and commuting as being a major drawback to living in the area. Reducing the need to travel long distances by private car, and increasing the use of sustainable and healthy alternatives, can bring multiple benefits to both our environment and communities. Specifically, while the current built-up are of Blessington is generally within walking distance of public transport, future development patterns should not reverse this situation. In that regard, the crafting of land use zoning within this plan has had regard to the walking distance to public transport and a variety of other facilities.

The draft LAP also includes objective BLESS11 and BLESS14

*'To facilitate and support Blessington Town Centre as the priority for 'people'-based employment development, in line with the Core Retail Area as set out in the Wicklow County Development Plan'.*

*'To facilitate and support the incremental reconfiguration of Blessington Business Park/Oak Drive toward a secondary 'people'-based employment area with a high quality public realm, active frontages, and safe active travel accessibility. New applications for employment developments will be considered subject to the inclusion of proposals for the above public realm improvements. New applications for developments deemed to be 'product'-based, or applications concerning existing developments of that type, will be further required to demonstrate that HGV traffic sufficient to create a hazard to active travel users within and around a subject site would not be generated'.*

### **Chief Executive Recommendation**

No change

#### 4.1.3 Transport Infrastructure Ireland

##### Item 1 Preamble

Transport Infrastructure Ireland (TII) welcomes notice of the preparation of a Local Area Plan (LAP) for Blessington by Wicklow County Council and notes that the draft LAP which is the subject of concurrent proposed Variation no. 3 of the Wicklow County Development Plan 2022 – 2028.

TII is responsible for the maintenance and operation of safe and efficient national road and light rail networks. Future Luas, Metro and BRT alignments are a matter for the NTA. In addition, TII also has a remit designated by the Department of Transport, which includes greenways and the development of a plan for an inter-urban cycle network which is delivered by the National Cycle Network Plan (NCN) published in January 2024.

*Project Ireland 2040, National Development Plan 2021 - 2030*, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome (NSO) no. 2 of the *National Planning Framework*. This requirement is reflected in the existing statutory Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and recorded at subsection 3.6 *Transport & Accessibility of Chapter 3 Core Strategy of the County Development Plan 2022 – 2028*.

The maintenance and protection of the strategic function of the national road network, that includes junctions, is also amongst the guiding principles of the transport strategy of the *Eastern & Midland Regional Spatial and Economic Strategy* (RSES) at Regional Policy Objective (RPO) 8.1. RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management. In addition, RPO 8.3 requires that future development is to be planned and designed in a manner that inter alia protects and maintains regional accessibility.

The NTA *Greater Dublin Area Transport Strategy 2022-2042* at Measure ROAD2 sets out National Roads Requirements explicitly complementary to the Guidelines and includes provision 1: - *"The primary function of national roads is to cater for strategic traffic and this function must be protected"*.

*Chapter 12 Sustainable Transportation of the Wicklow County Development Plan 2022 – 2028* includes National Road Objectives set out at County Plan Objectives (CPOs) 12.35 to 12.42 with roadside signage objectives for the N/M11 and N81 at CPO 12.69 and 12.70 respectively. CPO 12.40 expressly recognises the *DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*.

As part of TII's responsibilities for managing and improving the country's national road and light rail networks, the Authority sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology to be prepared to precede or accompany applications for developments or works. Technical guidance and standards are contained in TII Publications, available at <https://www.tiipublications.ie/>.

By review of the draft LAP maps, TII notes the following interactions between the draft LAP and the N81: -

- The "Settlement Boundary" indicated in the draft LAP maps includes the N81 which is currently subject to 100kmh, 80kmh, 60kmh and 50kmh limits within that LAP settlement boundary.
- Draft LAP Map No. 1 Land Use Zoning Objectives indicates two "Specific Local Objective" (SLO) areas adjoining the N81 at its northern end within the LAP area. SLO 3 appears to adjoin the western side of the N81 at the 100kmh speed limit zone and SLO 4 appears to adjoin the eastern side of the N81 at the 80kmh zone.
- Also indicated on draft LAP Map No. 1 Land Use Zoning Objectives are "Road Objectives" interacting with the N81 toward the northern and southern end of the draft LAP area.
- Draft LAP Map No. 1 Land Use Zoning Objectives and Map No. 5 Transport Strategy indicate "*Preferred Route Alignment N81 Tallaght to Hollywood Cross Road Improvement Scheme*" that bypass Blessington to the north and is indicated to interchange with the existing N81 inside the southern end of the draft LAP boundary and outside of the northern end of the draft LAP boundary.
- Draft LAP Map No. 1 Land Use Zoning Objectives, Map No. 5 Transport Strategy, Map No. 6 Active Travel Strategy, and Map No. 7 Greenway Supporting Infrastructure indicates the inclusion of a section of the "Blessington

eGreenway" within the LAP boundary.

- Draft LAP Map No. 7 Greenway Supporting Infrastructure also indicates a "Local Greenway Feeder" annotation along the N81
- Also noted indicated on the western side of the N81 in the vicinity of the transition is a "Potential Supporting Car Park Location". Another "Potential Supporting Car Park Location" is noted located far east of the N81 toward the north-eastern extremity of the draft LAP area.
- The items annotated on draft LAP Map No. 7 are repeated Map No. 6 Active Travel Strategy. TII notes that the "Potential Supporting Car Park Location" in the vicinity of the N81 and Blessington WWTP is annotated with a "Route Greenfield / Brownfield".

The following TII observations seeks to address the safety, capacity, and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outlined in Project Ireland 2040, the Section 28 Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (2012), and the Eastern Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES).

#### **Chief Executive Response**

Noted

**Item 2 Strategic Transport Context**

The Authority advises that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances and taking account of the Exchequer financial position and levels of funding available to the Authority, the priority or timeframe for national road schemes may be subject to alteration. TII advises that a realignment scheme for the N81 in the vicinity of Blessington is not currently or resourced under the National Development Plan 2021 – 2030 (NDP).

TII observes that the draft LAP at Map No. 1 Land Use Zoning Objectives and Map No. 5 Transport Strategy identifies "N81 Tallaght to Hollywood Cross Road Improvement Scheme" and "N81 Preferred Route corridor". The Council is aware of the foregoing status of the "N81 Tallaght to Hollywood Cross Road Improvement Scheme". TII reminds the Council that the implementation of land use and transposition objectives, including Specific Local Objectives (SLOs) and interventions reliant on this national road scheme should have regard that this project is not currently resourced under the NDP and/or Government Exchequer funding.

**Chief Executive Response**

Noted

**Chief Executive Recommendation**

No change



### Item 3 Draft LAP, National Roads and Appropriate Transport Assessment

Regional Policy Objective (RPO) 8.6 of the EMRA RSES requires Local Transport Plans (LTPs) to be prepared for selected settlements in the Region by local authorities in conjunction with the NTA. *The GDA Transport Strategy* includes *MEASURE PLAN17 – Local Transport Plans* are to be based on the ABTA methodology as part of the statutory plan-making process. Wicklow County Development Plan *Sustainable Transport Objectives* in Chapter 12 includes *Sustainable Mobility Objectives* including CPO 12.3 to prepare and / or update existing Area Based Transport Assessments (ABTAs) and LTPs for all towns in Levels 1-4 of the County settlement hierarchy which includes Blessington.

The TII submission to the pre-draft stage of the Blessington LAP recommended that land use transportation assessment for any future Local Area Plan should be prepared based on an evidence-based area transport assessment in accordance with the requirements of the *Spatial Planning and National Roads Guidelines* and the *Greater Dublin Area Transport Strategy* and should demonstrate compatibility with the strategic function of the national road network. TII further recommended that any land use transportation assessment to support the LAP should be prepared in accordance with the ABTA Guidance and referred the Council to section 1.4 of the TII Traffic and Transport Assessment Guidelines (2014) that addresses Area Based Transport Assessment (ABTA) for Forward Planning. In addition, TII directed attention to guidance also available in TII Publications PE-PDV-02046 (Area Based Transport Assessment (ABTA) Guidance Notes), jointly prepared by TII and the NTA.

TII notes the inclusion of Appendix 4 Blessington Local Transport Assessment as part of the draft LAP and highlights the following:

- TII notes and supports that the draft LAP Appendix 4 Transport Assessment is stated at Part 1 to have had regard inter alia to the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and ABTA guidance. TII also notes that the draft LAP Appendix 6 Infrastructure Delivery Schedule and Implementation includes the statement to “implement measures identified” in the Transport Assessment. However, TII is of the opinion that the draft LAP Transport Assessment does not represent nor meet the requirements of evidence based transport planning as would be expected to accompany an ABTA or an LTP nor the requirements of County Development Plan Sustainable Mobility Objective CPO 12.3 for the preparation of an LTP for Blessington.
- TII advises that having regard to proposed Transport Assessment active travel, public transport and roads “recommendations” and “objectives” that potential interactions with the national road network including its interchanges/junctions and ancillary infrastructure such as structures and drainage will also occur but have not been addressed. This is a concern.
- Having regard to the draft LAP’s extent including the N81 and interactions identified at the outset of this submission, TII recommendations for an ABTA process to inform a draft LAP for Blessington require that that any measures, objectives or recommendations identified that interact with the national road network do so in a manner that: -
  - observes national roads policy set out in Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012); and
  - recognises of the existence of and compliance responsibilities for the design and delivery of projects impacting the national roads network under TII Publications (<https://www.tiipublications.ie/>).
- In the interests of aiding future reviews, TII recommends an editing review of the Transport Assessment for uniformity of contents headings with those utilised in the document and to ensure that numbering of subheadings is in order. For example, the contents list part 3 as Transport Objectives and the body of the document entitles this part Transport Strategy & Objectives, the body of the document appears of have subsection 2.3.2. followed by 2.3.4, section 2.4 is entitled Roads Infrastructure but certain of the subheadings begin with 2.3 rather than 2.4, and there is a repeat of section 2.4 entitled Car Parking.

#### **Recommendation 1:**

**Clarification of the role of the draft LAP Transport Assessment and the requirement under County Development Plan Sustainable Mobility Objective CPO 12.3 for the preparation of an LTP as part of the LAP.**

In this regard, TII recommends a review and revision of the proposed Transportation Objectives BLESS 43 to BLESS 50 to include a dedicated Transportation Objective for the undertaking of an LTP which observes the ABTA methodology and takes account of policy and interactions with national road networks infrastructure.

#### **Chief Executive Response**

No ABTA or Local Transport Plan has been prepared as part of this LAP. This is regrettable but technical resources have not been available for this, and it was decided that the lack of such a study should not hold up progress on preparing new LAP. Instead, available internal resources were deployed to carry out a Local Transportation Assessment that did accompany the draft LAP. The CE is satisfied that this assessment did allow for transportation considerations to be fully integrated into the plan development process.

At this stage of plan making, where a period of only 6 weeks is provided for the CE to prepare a report and make recommendations to the members for amendments if necessary, inadequate time would be available to allow for development and production of a Local Transport Plan, of the form and detail as envisaged by the NTA / TII guidance. An LTP can be prepared after the adoption of the LAP and the CE is agreeable to a new objective to this effect. All of the concerns raised by the TII with respect to interactions with the N81 for example can be addressed in detail in this future LTP.

The LTA prepared can be edited to correct any numbering or heading issues as identified by the TII.

#### **Chief Executive Recommendation**

**Amend the plan as follows:**

**Include new objective in Section B.7**

***BLESS - XX*** *In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Blessington.*

**LTA Appendix**

Review numbering and headings of sections

#### Item 4 Draft LAP Transportation Objectives in Chapter B.7 Infrastructure of the draft LAP

The indicated extent of land use and transportation objectives of the draft LAP that will create interactions with the N81 especially at locations outside urban speed limit zones. TII strongly recommends explicit recognition of official national roads development policy and TII Publications amongst the Transportation Objectives of the LAP to ensure compatibility of future development with the maintenance of the safe and efficient operation of the national road network in accordance with official national roads policy and TII Publications.

In this regard, TII notes that the current Transportation Objectives of the draft LAP BLESS 43 to BLESS 50 include the objectives to “support the implementation of the recommendations of the Transport Assessment” for improvement and safety schemes and greenway that interact with the N81 at BLESS43; regional / distributor roads and road improvements at BLESS44; and active travel routes along the existing road network including the N81 at BLESS45.

TII further notes that other Transportation Objectives include provisions that could interact with the N81 such as the greenway feeder route that is indicated along the N81, BLESS46; additional car parking along the N81 and assumed to include “Potential Supporting Car Park Locations” indicated on Map No. 7 Greenway Supporting Infrastructure as BLESS 48; consideration of bus stops potentially located outside the urban speed limit zone on the N81 associated with welcomed improvements to bus services under BLESS49. The implementation of all and any of these Objectives have the potential to interact directly and indirectly with the national road network and associated assets.

TII recommends that TII Publications (Standards and Technical) that should be recorded to be observed as part of the Transportation Objectives. TII Publications set design guidance for the national road network and associated infrastructure as echoed in section 1.3 Application of this Manual of DMURS and Government’s NGS Circular No. 2 of 2022 re. Application of Guidelines and Standards in relation to works on Public Roads in Ireland.

In this way, transport objectives and/or measures promoted in the draft LAP will have had regard to national road network requirements by assessment of land use transportation measures sought to be developed against national road policy and standards ensuring the implementation of local transport objectives are complementary to maintaining the strategic function of the national road network.

TII also notes the stated intention of the “on-going” implementation of the Transport Assessment as part of a “living programme” at draft LAP Appendix 6 Infrastructure Delivery Schedule and Implementation. TII is concerned that transport interventions that may impact the national road network may progress without regard to the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) or compliance with the requirements of TII Publications, and therefore may be contrary to the interests of the safe and efficient operation of the national road network.

Having regard to the above and in the interests of coherent implementation of the draft LAP that appears to include future intended reviews and implementation of the recommendations of the Transport Assessment, TII recommends the following critical revision to LAP Transportation Objective BLESS 50:

#### **Recommendation 2:**

**Revision of proposed draft LAP Transportation Objective BLESS 50 to reflect official national roads policy and for the requirements of TII Publications for works potentially impacting the national road network.**

**Revision of Transportation Objective BLESS50 in Chapter B.7 Infrastructure as follows:**

***“To protect the strategic function of the N81 ~~(and any upgrade/bypassed route thereof)~~ as it relates to the plan area in accordance with Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.”***

#### **Chief Executive Response**

This draft LAP has been prepared to be consistent with the Wicklow County Development Plan, including all strategies, principles, policies and objectives contained therein.

In addition, this LAP sits under the County Development Plan in the hierarchy of local plans, and therefore the

provisions of the County Development Plan apply directly in the LAP area, and as set out in the draft plan, it was not considered necessary to re-state all of the County principles / strategies / policies / objectives in the LAP itself.

In particular, the County Development Plan includes the following objectives with respect to national roads that will apply directly in the plan area:

- CPO 12.37** *To ensure that the N/M11 and N81 route improvement corridors as defined by TII are protected from inappropriate development and ensure that no development is permitted which would interfere with route options identified (as shown on Map 12.01).*
- CPO 12.38** *To co-operate with TII in the upgrade of existing interchanges on the National Routes and where appropriate and necessary, to restrict development immediately adjacent to interchanges to provide for the future enlargement of interchanges.*
- CPO 12.40** *To safeguard the capacity and safety of the National Road network by restricting further access onto National Primary and National Secondary roads in line with the provisions of the 'Spatial Planning and National Roads' Guidelines' (DoECLG 2012). In particular, a new means of access onto a national road shall adhere to the following:*
- a. Lands adjoining National Roads to which speed limits greater than 60kmh apply: The creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmh apply shall generally be avoided. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.*
  - b. Transitional Zones: These are areas where sections of national roads form the approaches to or exit from urban centres that are subject to a speed limit of 60kmh before a lower 50kmh limit is encountered. Direct access onto such road may be allowed in limited circumstances, in order to facilitate orderly urban development. Any such proposal must, however, be subject to a road safety audit carried out in accordance with the TII's requirements and a proliferation of such entrances, which would lead to a diminution in the role of such zones, shall be avoided.*
  - c. Lands adjoining National Roads within 50kmh speed limits: Access to national roads will be considered by the Planning Authority in accordance with normal road safety, traffic management and urban design criteria for built up areas.*
- CPO 12.41** *To ensure that all new developments in proximity to National Routes provide suitable protection against traffic noise in compliance with S.I No. 140 of 2006 Environmental Noise Regulations and any subsequent amendments to these regulations.*
- CPO 12.42** *To protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions, significant applications either in the vicinity of or remote from the national road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development taken in conjunction with other developments with planning permission that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts.*

It is therefore considered that the change request is not essential, but the CE has no objection to the suggested alternative wording.

#### **Chief Executive Recommendation**

**Amend plan as follows:**

#### **Section B.7 Infrastructure**

**BLESS - XX** To protect the strategic function of the N81 ~~(and any upgrade/bypassed route thereof) as it relates to~~

~~the plan area~~ in accordance with *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and in compliance with TII Publications.

#### **Item 5 Draft LAP Chapter B.8 Zoning, Specific Local Objectives SLO 3 and SLO 4**

TII notes that Chapter B.8 Zoning of the draft LAP at section 11.5 Specific Local Objectives states that Specific Local Objectives (SLOs) are provided "...to guide developers as to the aspirations of the plan regarding development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where lands are zoned for 'mixed use' to give more detail on the development objective of these lands. A masterplan for the entire SLO area may be required to be agreed prior to the submission of the first application within the SLO." A total of 8 no. SLO areas are identified and described in the draft LAP, most accompanied by a "Concept Plan".

At the outset of this submission TII noted that two Specific Local Objectives (SLOs) adjoin the N81 at its northern end within the draft LAP area; SLO3 appears to adjoin the western side of the N81 at the 100kmh speed limit zone, and SLO4 appears to adjoin the eastern side of the N81 at the 80kmh zone.

TII has also observed that each of the proposed SLOs holds, or, is bounded by indicative "Road Objectives" that appear to consist of "R01" an "Arterial Street" west of the N81 in SLO3 and "R04" a "Link Street" to the east of the N81 in SLO4 that are indicated to join the N81 in a revised junction arrangement in the vicinity of the access to Doran's Pit and the junction of the L-8734.

Draft LAP SLO3 and SLO4 lands relative the N81 national strategic asset are at locations where the 80kmh and 100kmh limits apply. TII would highlight that these proposed SLOs have potential for impacts and interactions on the national road network.

TII reminds the Council of the requirements of Section 2.5 of the *Spatial Planning and National Roads Guidelines* for Planning Authorities (DoECLG, 2012) which requires careful forward planning consideration of the speed limit and capacity of the national road network.

In addition, having regard to the indicated roundabout connection of the proposed local roads to the N81 which will create a new national road junction, regard should be had to Section 2.7 of the Guidelines which indicates that planning authorities exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

TII advises that the Guidance indicates that planning authorities must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning existing or planned junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

TII would have expected that these requirements associated with the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) would be addressed as part of the Transport Assessment associated with the draft LAP. This apparent omission of addressing national planning policy in an evidenced manner for these significant development areas is a serious concern to the Authority.

Related to the above matters, future potential development physical interactions with national roads infrastructure will need to demonstrate compliance with TII Publications.

In summary, TII are of the opinion that there is a serious deficiency in the draft Local Area Plan and these SLO's with respect to already indicated deficiencies in transport assessment, consideration of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and in turn addressing the protection of national roads physical assets in compliance with TII Publications. TII are therefore of opinion that taking account of the contents of

location and proposed development profile of SLO(s) 3 and 4 that these objectives and the SLO4 concept plan are premature and require revision prior to adoption of the draft Local Area Plan.

### **Recommendation 3:**

**Review and Revision of Specific Local Objectives SLO3 and SLO4 to reflect official national roads policy and for the requirements of TII Publications.**

**Review and revision of SLO's 3 and 4 to take account of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and the maintenance of the safe and efficient operation of national road network assets in accordance with TII Publications.**

### **Chief Executive Response**

It is intended that on the completion of the BIRR, that the speed limit from the new roundabout at the northern end of the BIRR on the N81 and the existing southern roundabout at Blessington Industrial Estate, will be reduced as traffic not bound for Blessington is diverted onto the BIRR. This will allow for significant town centre / public realm / public transport improvements to be carried out in Blessington.

With respect to SLO3, these lands which are currently in quarry use, already access directly onto the N81. It is the objective of this plan that these lands, following rehabilitation, may be suitable for additional forms of development including general employment / enterprise and a public amenity park. It is intended that general vehicular traffic associated with such uses would access the public road network via the BIRR but that HGVs should continue to access the road network onto the N81, as they do currently.

As indicated in the draft Plan, it is intended that SLO4 will be serviced by a new link road from the new N81 roundabout (to be developed as part of the BIRR) to the Kilbride Road. Only cyclist / pedestrian traffic is indicated as desired from SLO3 onto the current N81.

Any concerns that arise with respect to interactions of these SLOs with the N81 can be addressed in appropriate detail in the future LTP and indeed in any future planning applications that may be made for these lands. It is recommended that additional text may be added to the plan for SLOs to address the *Spatial Planning and National Roads Guidelines for Planning Authorities*.

### **Chief Executive Recommendation**

**Amend plan as follows:**

#### **Section B.8 Zoning**

##### ***Specific Local Objectives (SLO)***

*The purpose of an SLO is to guide developers as to the aspirations of the plan regarding the development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where the lands are zoned for 'mixed use' to give more detail on the development objective of these lands. A masterplan for the entire SLO area may be required to be submitted as part of the first application within the SLO. All masterplans / development applications shall have regard to the requirements of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and in compliance with TII Publications.*

Item 6 Conclusion
<p>TII has identified potential significant interaction of the draft LAP with the national road network with the N81, a vital inter-regional route part of o the national road network and upon which Blessington relies.</p> <p>The recognition of the foregoing provisions of official policy and national objectives in relation to spatial planning and national roads by specific written reference to the DoECLG <i>Spatial Planning and National Roads Guidelines for Planning Authorities</i> (2012) and TII Publications in the draft LAP is critical also having regard to Appendix 4 Blessington Local Transport Assessment of the draft LAP that includes recommendations likely to directly or indirectly impact the N81.</p> <p>The 3 no. recommendations in this submission accord with existing national, regional and local development policy and objectives related to national road networks and seek to advance certain relevant draft Transportation and Specific Local Objectives (SLOs) in a manner that will foster future development compatibility with the maintenance of the safe and efficient operation of the national road network.</p>
Chief Executive Response
Noted



#### **4.1.4 Department of Housing, Local Government & Heritage**

##### **Archaeology**

1. All objectives and development control measures relating to the archaeological heritage included in the current Wicklow County Development Plan 2022-2028 (including Chapter 8, CPO 8.1 – CPO 8.9) shall be reflected in the Blessington Local Area Plan to ensure sustainable development and the continued protection and enhancement of the archaeological heritage.
2. All references in the Blessington Local Area Plan to the relevant Government Department responsible for the protection of the archaeological heritage in the Local Area Plan jurisdiction should read “Department of Housing, Local Government & Heritage” as the National Monuments Service is currently part of that particular Government Department. The formulation and implementation of policy relating to the protection of Ireland's archaeological heritage is the responsibility of the Department.
3. It is noted that reference is made to the archaeological heritage in Section B.6 of the Draft plan, entitled ‘Heritage, Biodiversity and Green Infrastructure.’ While it is acknowledged in the draft plan that there are a number of archaeological sites within the plan area that are listed on either the Record of Monuments and Places or the Sites and Monuments Register, it would be useful to include a list and/or details of the known and protected archaeological sites identified within the jurisdiction area to ensure awareness of the presence of these sites within development zoned lands and to ensure the continued protection and enhancement of the archaeological heritage within the LAP area.

The Department recommends that the content of the Record of Monuments & Places for the planning area covered by the Blessington LAP be included, perhaps as an appendix to the plan - including the link to the legal RMP documents at [www.archaeology.ie](http://www.archaeology.ie). It should also be made clear that additional archaeological sites and monuments have been identified by the Archaeological Survey of Ireland, the Department, in the Historic Environment Viewer (HEV), which is also available at [www.archaeology.ie](http://www.archaeology.ie). Similar provision within the Blessington Local Area Plan is recommended in relation to the potential underwater archaeological heritage in the area and reference is made to the many archaeological sites that were flooded during the creation of the Poulaphouca Reservoir. It is important to note that these archaeological sites may survive underwater and provision for protection within the plan should also be considered.

4. Land Use Zoning & Development Control: It is considered best practice by the Department for archaeological assessment, where applicable, to be completed at the earliest possible stage in the planning process. Adhering to this approach will ensure that an appropriate archaeological strategy can be formulated in advance of a planning decision, so resulting in an informed planning decision and the attachment to any grant of permission of archaeological conditions which secure both sustainable development and the protection of the archaeological heritage.
5. Archaeological assessment will be considered necessary where proposed development is located within the ‘Zone of Notification’ associated with archaeological sites listed on the Record of Monuments & Places and it would be useful in this regard to include mapping in the Blessington LAP which shows the location of the known archaeological sites relative to the Land Use Zoning objectives and associated mapping included in the draft plan (i.e. Specific Local Objective lands). For example, it would be informative to include location details for identified archaeological site WI005-131 ring-ditch on the ‘Specific Local Objective 2 – Blessington Demesne (West)’ mapping (Figure B.8.2) and WI005-023 enclosure on Specific Local Objective 3 (Figure B.8.3).
6. Community Archaeology: It would be useful and informative to include reference in the Blessington Local Area Plan to the potential for obtaining funding for community-based archaeological projects from the recently established ‘Community Monuments Fund’ which is currently administered by the Department of Housing, Local Government & Heritage. See link for further details:  
<https://www.gov.ie/en/publication/bd7d6-community-monuments-fund-2023-call-for-projects/>

##### **Chief Executive Response**

1. This draft LAP has been prepared to be consistent with the Wicklow County Development Plan, including all strategies, principles, policies and objectives contained therein. In addition, this LAP sits under the County Development Plan in the hierarchy of local plans, and therefore the provisions of the County Development Plan

apply directly in the LAP area, and as set out in the draft plan, it was not considered necessary to re-state all of the County principles / strategies / policies / objectives in the LAP itself and therefore no change is recommended. In particular, the County Development Plan includes the following objectives with respect to archaeology that will apply directly in the plan area:

- CPO 8.1** *To secure the preservation of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological interest generally. In the development management process, there will be a presumption of favour of preservation in-situ or, as a minimum, preservation by record. In securing such preservation, the Planning Authority will have regard to the advice and recommendations of the National Monuments Service of the Department of Housing, Local Government and Heritage.*
- CPO 8.2** *No development in the vicinity of a feature included in the Record of Monuments & Places (RMP) or any other site of archaeological interest will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.*
- CPO 8.3** *Any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance as identified in Schedules 08.01 & 08.02 and Maps 8.01 & 8.02 of this plan) shall be subject to an archaeological assessment.*
- CPO 8.4** *To require archaeological assessment for all developments with the potential to impact on the archaeological heritage of riverine, intertidal or sub tidal environments.*
- CPO 8.5** *To facilitate new or improved public access to and erection of appropriate interpretive signage at National Monuments, archaeological sites, castles, sites of historic interest and archaeological landscapes in State or private ownership, as identified in Schedule 08.02 and Map 8.02 of this plan, in co-operation with landowners.*
- CPO 8.6** *To protect the integrity of Baltinglass Hills archaeological landscape including identified monuments and their wider setting by resisting development that may adversely impact upon the significance and understanding of this important landscape.*
- CPO 8.7** *To support the inscription of Glendalough to Ireland's tentative UNESCO World Heritage Site list and promote a conservation led approach to facilitating visitor access and enjoyment of this internationally significant landscape.*
- CPO 8.8** *To protect and promote the characteristics of historic towns in County Wicklow identified as zones of archaeological potential in the Record of Monuments and Places (RMP), ensuring that cognisance is given in relevant development proposals to retaining existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins.*
- CPO 8.9** *To protect and promote the conservation of historic burial grounds (those that are generally no longer in use but which may contain sites and features on the Record of Monuments and Places (RMP) and/or RPS) and support greater public access to these where possible.*

2. It should be noted that there are no references in LAP to the National Monuments Service or the Department of Housing, Local Government & Heritage so this issue does not arise and therefore no change is recommended.

3+5 All National Monuments and Areas of Archeological Potential, in accordance with data provided by the Department as the time of production of the draft plan, are shown on Map 2A of the draft plan. A link can be

provided in the legend on this map to the Department data sources. In addition, the SLO maps can be enhanced to identify any National Monuments.

4. As provided for by CPO 8.1 *'In the development management process, there will be a presumption of favour of preservation in-situ or, as a minimum, preservation by record. In securing such preservation, the Planning Authority will have regard to the advice and recommendations of the National Monuments Service of the Department of Housing, Local Government and Heritage'.*

With respect to the stage in the planning application process that archeological assessments are carried out, it would not be within the remit of the Planning Authority to require such assessments be submitted with any application; it can only advise that such assessment may be necessary should pre-planning advice be sought. Where it becomes evidence upon receipt of any application that archeological impact assessment is required, legislation provides scope for a Planning Authority to seek such additional information. This is not a matter for planning policy or for this LAP and therefore no change is recommended.

6. This is not a matter for planning policy or for this LAP and therefore no change is recommended.

#### **Chief Executive Recommendation**

**Amend plan as follows:**

##### **Section B.8 Zoning**

##### ***Specific Local Objectives (SLO)***

*Add National Monuments points onto SLO maps.*

**Map 2A:** Include link to Department archaeology data sources [www.archaeology.ie](http://www.archaeology.ie)

#### 4.1.5 Department of Transport

There are a number of key policies and requirements relevant to accessible, integrated and sustainable public transport which the Department of Transport (DoT) considers should be reflected in the proposals. The Department notes and welcomes reference to some of these policies in the appended Local Transport Assessment.

#### **Accessible public transport for All, and especially for Disabled People, Persons with Disabilities, Persons with Reduced Mobility and Older People**

- the “whole of Government” National Disability Inclusion Strategy (NDIS) 2017-2022 included specific actions assigned to local authorities. For example, action 108 related to the ‘dishing’ of footpaths and action 109 related to accessible infrastructure, including bus stops. Lack of dishing is often cited as a major concern for wheelchair users. The Department of Children, Equality, Disability, Integration and Youth are currently finalising the new National Disability Strategy.
- the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD) puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas.
- making transport fully accessible for all requires a ‘whole journey approach’. This refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment’. This including footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.
- the Sustainable Mobility Policy contains a number of specific actions and commitments underpinning this approach. It sets out a strategic framework to 2030 for active travel (walking and cycling) and public transport journeys to help Ireland meet its climate obligations. It is accompanied by an action plan to 2025 which contains actions to improve and expand sustainable mobility options across the country by providing safe, green, accessible and efficient alternatives to car journeys. It also includes demand management and behavioural change measures to manage daily travel demand more efficiently and to reduce the journeys taken by private car.
- the Design Manual for Urban Roads and Streets (DMURS) Interim Advice Note – Covid-19 Pandemic Response includes guidance that designers should ensure that measures align with the principles of universal design, consider Government policy on accessibility for people with disabilities and consult people with disabilities to further appraise measures.
- the Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity, particularly for people living outside the major cities and towns.

The Department of Transport can assist with appropriate text in the development plan regarding integrated, accessible public transport if desirable.

#### **Chief Executive Response**

The CE agrees fully with all of the points raised with respect to improving accessibility and mobility for all in society.

The majority of the above suggestions relate to road design or public transport infrastructure / systems issues, such as the design guidance set out in the DMURS. It is not considered necessary to include objectives relating to same in the LAP as all of the requirements of these national guidance documents already apply in the plan area, via the application of the provisions and design standards of the Wicklow County Development Plan.

#### **Chief Executive Recommendation**

No change

4.1.6 Department of the Environment, Climate and Communications
Item 1 Preamble
<p>The Government is committed to achieving climate neutrality no later than 2050 with a 51% reduction in GHG emissions by 2030. These legally binding objectives are set out in the Climate Action and Low Carbon Development (Amendment) Act 2021 (the Climate Act).</p> <p>The Climate Act supports Ireland’s transition to net-zero and the achievement of a climate neutral economy no later than 2050. It also establishes a legally binding framework with clear targets and commitments, to ensure the necessary structures and processes are in place to deliver national, EU and international climate goals and obligations in the near and long term. Against this background, strategies must be devised to reduce and manage climate change risks through a combination of mitigation and adaptation responses, both in the medium and longer term.</p> <p>The Department of the Environment, Climate and Communications’ vision of a climate neutral, sustainable, and digitally connected Ireland will be achieved by collaboratively delivering policies and programmes to empower people, communities, and businesses to continue the transition to a better quality of life for current and future generations. This vision also aligns with the UN 2030 Agenda for Sustainable Development and the 17 SDGs, which provide a plan of action for people, prosperity and planet, with the commitment to leave no-one behind.</p> <p>The step change in our ambition from a low carbon to climate neutral Ireland requires strong leadership across Government and the wider public sector. This Department will drive the climate agenda by engaging with local authorities to build resilience in citizens, communities, and business to overcome climate adaptation challenges, maximising climate mitigation and adaptation opportunities and facilitating the transition to a truly Circular Economy.</p> <p>This will also help to deliver on the Government’s ‘whole-of-society’ approach for the successful implementation of the SDGs, driving in particular the achievement of Goal 7 on Affordable and Clean Energy, Goal 12 on Responsible Consumption and Production, and Goal 13 on Climate Action. Achieving the SDGs overall will require fundamental changes in many parts of Irish life, but it is also an opportunity to create a cleaner, greener, fairer economy and society.</p> <p>The Department asks that you take the material outlined in the following sections into consideration when finalising the Draft Blessington LAP, which align with our Statement of Strategy for the period 2024-2025, Le Chéile 25, which itself sets out our vision, mission, and six strategic goals in key policy areas.</p> <p>The Department also asks that you take into consideration the framework of Agenda 2030, the Sustainable Development Goals (SDGs) and their respective targets, in the overall drafting of the Plan, and in relation to the specific areas outlined below.</p>
Chief Executive Response
Noted

**Item 2 Wicklow County Development Plan (WCDP) 2022-2028**

The Planning and Development Acts 2000 (as amended) require the LAP to be consistent with the objectives of the Development Plan and its Core Strategy. In this regard, DECC note the positive objectives of the WCDP 2022-2028, which places climate action as a strategic principle of the plan. Objectives at County level for climate action, renewable energy infrastructure, communications infrastructure inter alia should be reflected by objectives and actions of the LAP, as relevant for the plan area, to support implementation of national, regional and county level policy on these themes. The following recommendations, which are reflected in the Department's previous submission for the Pre-Draft public consultation for the Blessington LAP, are an opportunity to further strengthen objectives of the LAP.

**Chief Executive Response**

As set out in the introduction to the draft LAP: *'The majority of policies, objectives and development standards that will apply in the Blessington area are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan, other than the summary provided in Section A.2, unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the area. While this will facilitate the streamlining of this plan to just those issues that are relevant to this area, and an overall reduction in the content of the plan, this should not be seen a diminution of the level of importance or indeed protection afforded to this area.'*

*In particular, development standards, retail strategies, housing strategies etc that are included in the County Development Plan shall not be repeated, and shall be complied with throughout the implementation of this Local Area Plan. Any specific policies / objectives or development standards required for this area will be stated as precisely that, and in all cases will be consistent with the County Development Plan. Thus development standards will therefore be the same across the entire County, and any differences for specific settlements would be clear and transparent, to both those adopting the plans, and the general public alike.*

*It is also important to note that the land-use objectives of this plan aim to support other plans and strategies prepared by Wicklow County Council, including the Wicklow Local Economic and Community Plan, the Wicklow Climate Action Plan, Wicklow Tourism Strategy and Marketing Plan, Wicklow Biodiversity Action Plan, Wicklow Heritage Plan etc., all which have a wider remit than this LAP. However, this Local Area Plan shall only include objectives that are area specific and achievable, and avoid those that are aspirational or are best dealt with in the annual budget, road works programme, etc. The role of land use plan is to put in place a framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan'.*

Therefore the positive elements of the County Development Plan identified by the Department do not require to be re-iterated in this LAP, as they directly apply already.

**Chief Executive Recommendation**

No change

### Item 3 Climate Action

The Climate Action Plan 2024 (CAP24) is the third annual update in the series of Ireland's Climate Action Plans. The CAP24 lays out a roadmap of actions to meet our national climate objective of pursuing and achieving the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The draft LAP makes no reference to the CAP24. Having regard to same, the Local Authority should ensure that the LAP includes reference to, supports the implementation of and is consistent with the CAP24, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).

#### Recommendation 1:

**The Department recommends that an objective and / or policy is included in the LAP to support the implementation of CAP24 (and annual revisions thereof).**

National Adaptation Framework: The Department notes the new National Adaptation Framework (NAF) was approved by Government on the 5th of June 2024.

#### Recommendation 2:

**The Department recommends that an objective and /or policy is included in the LAP to support the implementation of the NAF.**

Local Authority Climate Action Plan: The Wicklow County Council Climate Action Plan 2024-2029 (Wicklow LACAP) was adopted on the 8th January 2024. The Wicklow LACAPs central aims are aligned with the Government's national climate objective.

Under section 10(2)(n) of the Planning and Development Act 2000 (as amended), a CDP must, when being prepared, take into account the LACAP. While this provision is relevant to County Development Plans, the preparation of the draft LAP provides a positive opportunity to support the implementation of the WCDP 2022-2028 objectives for climate action and the Wicklow LACAP. It is important that the Wicklow LACAP and related actions are appropriately reflected in the policies and objectives of the draft LAP, thereby ensuring consistency and alignment between both plans.

#### Recommendation 3:

**The Department recommends that the LAP include objectives and / or policies to ensure the implementation of the Wicklow LACAP and related actions, thereby ensuring consistency and alignment between both Plans.**

### Chief Executive Response

1. The CAP and NAF (as they were constituted at the time) were both considered in detail in the development of the Strategic County Outcomes and County Policy Objectives of the Wicklow County Development Plan (Chapter 2 of the County Development Plan refers), which in turn have shaped the draft LAP. With respect to the request that objectives relating to the CAP and NAF be included in this LAP, as national policy and legislation, their provisions apply directly in the plan area and in all local authority decision making, and it is not considered that a local land-use plan is the appropriate or best location for such objectives, which have county wide application; such objectives would be more appropriate for the Wicklow County Development Plan or Wicklow County Council Climate Action Plan.
2. The Wicklow County Council Climate Action Plan 2024 was considered in the development of the draft LAP. In particular, the following CAP objectives were integrated into the plan crafting process:
  - *Screen Local Area Plans and future Development Plans for climate resilience ensuring they consider compact development, biodiversity resilience, active travel, sustainable economic development, consider associated climate action co-benefits and environmental protection requirements.*
  - *Deliver the development of a high quality cycling and pedestrian network through Active Travel measures in urban areas and connecting communities. Ensure supported active travel development is carried out in a manner that has due regard to environmental sensitivities such as biodiversity, European sites, water quality and*



hydrology.

- Promote and support participation of schools in Safer Routes to School, ensuring any ancillary development has due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
- Strengthen towns and villages through enhancement of green infrastructure measures and/or sustainable transport linkages, having due regards for environmental sensitivities such as biodiversity, European sites, water quality and hydrology.
- Complete Local Area Transport Studies for Greystones and Arklow and progress plans for other communities whilst ensuring such plans have due regard to opportunities for promoting climate action co-benefits and planning and environmental protection considerations.
- Facilitate the planning and delivery of the Bus Connects and Bus Service Corridors to facilitate modal transfer to bus services on the N11 including the N11 Bus Corridor and the Park and Ride Infrastructure Strategy for facilities at the following locations: Fassaroe, Ashford / Rathnew, Kilpedder
- Assist the development of shared mobility services by increasing the number of bike facilities, e-bike schemes and shared mobility parking areas.
- Ensure all relevant legislation and regulation on climate change and flood management is integrated into council policies and guidelines, including the promoting of natural flood measures.
- Undertake Strategic Flood Risk Assessment of all Local Area Plans and Development Plans.
- Implement the OPW Flood Risk Management Guidelines and best practices to ensure that all developments consider climate resilience and demonstrate that they integrate Nature-Based SuDS and Nature-Based Solutions to address surface water management. Ensure due regard is given to environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.
- Seek a buffer of generally 25-metre along watercourses as riparian zones for urban areas in line with the Inland Fisheries Ireland publication 'Planning for Watercourses in the Urban Environment' and the Wicklow County Development Plan.
- Develop and implement an integrated SuDS policy to guide planning, installation, monitoring and maintenance to improve storm-water management. Provide training on SuDS implementation to key staff, having due regard to environmental sensitivities such as biodiversity, European sites and water quality.
- Develop demonstration sites highlighting Nature-Based SuDS providing flood attenuation systems within existing urban areas, having due regard to environmental sensitivities such as biodiversity, European sites and water quality.
- Work with the OPW in order to review and progress more detailed studies on schemes including: Blessington Flood Relief Scheme, Greystones & Environs Flood Relief Scheme, Wicklow & Ashford Flood Relief Scheme, facilitate the hydraulic modelling of the Bray Flood Relief Scheme; facilitate the OPW to conduct a review of the PFRA with regard to flood risk arising from floods on surface water infrastructure such as culverts.
- Having due regard to the need to promote nature-based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
- Map green infrastructure for the five largest towns to develop an integrated approach, implementing objectives in the County Development Plan and Local Area Plans.
- Provide accessible bus stops on new and existing routes.
- Develop a renewables hub at the Wicklow Campus in Clermont to support development of the sector in County Wicklow, while ensuring that the businesses and projects supported accord with relevant planning and environmental protection criteria.
- Promote sustainability in the tourism, food and the hospitality sector.
- Facilitate development of local markets for food producers in the county encouraging sustainable practice in the sector.

Therefore no changes are recommended.

#### **Chief Executive Recommendation**

No change

#### Item 4 Renewable Energy & Electricity Grid

The National Development Plan 2021-2023 (NDP) and the CAP24 commits to increase Ireland's proportion of electricity from renewable sources to 80% by 2030. This measure will be achieved through a combination of onshore and offshore renewable sources supported by various support schemes, including the Renewable Electricity Support Scheme (RESS), the Small-Scale Renewable Electricity Support Scheme (SRESS) and the Micro-Generation Support Scheme (MSS).

Small-scale and community generation will be supported via the SRESS. SRESS offers a simpler route to market for community and other small-scale renewable projects. Unlike RESS, the SRESS is not auction-based and support for projects will be provided through a guaranteed tariff. The MSS delivers a range of measures to support micro-generation (both for self-consumption and for export).

The Local Authority should note the updates to the national policy context, in particular the CAP24, including Government's renewable electricity generation targets: Solar PV Capacity targets of 8GW by 2030. Onshore wind capacity of 9GW by 2030, in addition to the commitment to supporting at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation

The Department notes the positive objectives of the WCDP 2022-2028 concerning the support and promotion of renewable energy, including:

- 'To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel'.
- 'To support and promote the development of 'Sustainable Energy Communities' and in particular to encourage and facilitate developments that are energy neutral / low emission, integrate renewable energy technology or involve local renewable energy production'.
- 'To facilitate and support the development of small-scale electricity generation installations'.
- 'To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required'.

#### Recommendation 4:

**The Department recommends the inclusion of an objective of the Council in the LAP to promote the development of appropriately scaled renewable energy installations (rooftop solar, geothermal energy and other types of installations appropriate to urban environments) and to support the development of additional supporting grid infrastructure. It is crucial that all future development seek to increase their contribution to the national renewable electricity generation target and, where possible, aim for developments that are carbon or energy use neutral.**

#### Recommendation 5:

**The Department recommends that the draft LAP should include reference to:**

- **Shaping Our Electricity Future 1.1, EirGrid's updated roadmap for the development of the transmission grid out to 2030 to deliver on the 80% renewable energy targets.**
- **ESB's Networks Strategy: Networks For Net Zero, which sets out ESB Networks' role in enabling the delivery of the Government's Climate Action Plan 2023 and supports the decarbonisation of the electricity system by 2040.**

#### Chief Executive Response

As set out above, in the introduction to the draft LAP, the majority of policies, objectives and development standards that will apply in the Blessington plan area are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan. Therefore it is not considered necessary to re-state the existing policy supports that are already provided for in the County Development Plan for renewables and grid development in this LAP as they directly apply already in the plan area.

#### Chief Executive Recommendation

No change

### Item 5 Built Environment and Heating

The CAP24 includes measures to support the electrification of heating by strengthening our existing Building Regulations and implementing an ambitious National Residential Retrofit Plan. Targets set are 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030. The National Residential Retrofit Plan commits the Government to retrofit 120,000 dwellings to B2 or cost optimal by 2025 and 500,000 by 2030.

The Department notes policy of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) 2022-2032 and the WCDP 2022-2028, which states:

- 'Local authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retrofitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings.
- All new buildings within the Region will be required to achieve the Nearly Zero- Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD)'.
- 'To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel'.
- 'To facilitate retrofitting of existing building with heat saving devices and installations, where permission is required for such works'

#### Recommendation 6:

**The Department recommends that the Local Authority consider including policy to support the ambitions of the National Residential Retrofit Plan, in particular, the development of the electrification of heating, having regard to the CAP24, WCDP, and the RSES.**

#### Compact Growth and District Heating

When preparing the draft LAP, due regard should be given to the ambition of the National Planning Framework, Regional Spatial and Economic Strategy and the WCDP which requires the achievement of compact growth and explicitly recognises the potential for such compact growth to facilitate the development of low carbon district heating.

Examples include:

- National Planning Framework: 'District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland's GHG emissions'.
- Regional Policy Objective 7.38: 'Local authorities shall consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in local authority areas shall be carried out and statutory planning documents shall identify local waste heat sources'.
- CPO 16.34: 'To support the development of district heating systems, particularly those generating heat from renewable sources.'

#### Recommendation 7:

**The Department recommends that the Local Authority examine the potential of district heating, including district heating derived from waste heat, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies, having regard to the CAP24, RPO 7.38 of the EMRA RSES, CPO 16.34 of the WCDP, NSO 9 of the NPF and the National Heat Study. As such, policies in support of same are encouraged in the draft LAP**

### Chief Executive Response

1. As set out above, in the introduction to the draft LAP, the majority of policies, objectives and development standards that will apply in the Blessington plan area are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan. Therefore it is not considered necessary to re-state the existing policy supports that are already provided for in the County Development Plan for retrofitting and heating in this LAP as they directly apply already in the plan area.

2. As detailed in the submission, the County Development Plan already supports the development of district heating systems, and therefore such support is not necessary to re-state in this LAP. It is not a matter for a land-use plan to include an objective for a feasibility study; this would be more a matter for the Wicklow CAP and the Council's annual programme and budget.

<b>Chief Executive Recommendation</b>
No change

## Item 6 Circular Economy and Waste

The Department notes the objective of the Local Authority in the Wicklow County Development Plan 2022-2028, CPO 9.21, which states:

*'To encourage and facilitate the 'circular economy' and the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies, material / waste recycling and conservation'.*

New guidance in respect of construction waste management, titled "Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects" published by the Environmental Protection Agency in 2021. The purpose of these guidelines is to provide a practical approach to construction and demolition (C&D) waste, which is informed by best practice in the prevention and management of such wastes and resources from design through to construction and deconstruction.

The implementation of this best practice is consistent with the circular economy consistent with Government policy under Whole of Government Circular Economy Strategy 2022 – 2023 and The Circular Economy Programme 2021-2027 (EPA).

### **Recommendation 8:**

**The Department recommends that the LAP includes objectives and / or policies to support circular economy principles and includes reference to the EPA's Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects (2021).**

In this regard, the Department would advise the Local Authority to consult with their respective Regional Waste Management Planning Office regarding development of the LAP, particularly in relation to any policies which may preclude the continued use of existing waste management infrastructure or development of new waste management infrastructure.

The Department would also ask the Council to have regard to the targets set out in the SDGs, in particular in relation to SDG12 – Responsible Consumption and Production.

## Chief Executive Response

1. As set out above, in the introduction to the draft LAP, the majority of policies, objectives and development standards that will apply in the Blessington plan area are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan. Therefore it is not considered necessary to re-state the existing objectives and standards that are already provided for in the County Development Plan regarding construction management in this LAP as they directly apply already in the plan area. In addition, it is not considered necessary to overload local plans with references to every possible guidelines produced by another state agency when these will be considered as a matter of course and good practice in the operations of the Council.

Attention is drawn to provisions of Chapter 15 and the 'Development & Design Standards' of the Wicklow County Development Plan which state:

**CPO 15.1** *To require all developments likely to give rise to significant quantities of waste, either by virtue of the scale of the development or the nature of the development (e.g. one that involves demolition) to submit a construction management plan, which will outline, amongst other things, the plan to minimise waste generation and the plan to protect the environment with the safe and efficient disposal of waste from the site.*

### **1.4.6 Construction Management**

*All construction sites shall be appropriately managed to ensure that environmental emissions are strictly controlled. Where necessary (such as for larger scale developments or developments in ecologically sensitive areas) this will be enforced by requiring (by planning condition) the agreement and implementation of a 'construction environmental management plan' (CEMP), which should set out, at a minimum, the various best practice construction*

*measures/mechanisms that will be put in place during the construction phase to avoid or mitigate the impacts of: construction traffic, waste, noise, lighting, dust, storm water run-off etc, on adjoining residences and properties, on existing biodiversity, public roads etc.*

*In particular, such plans will set out:*

- Construction programme for the works;*
- Hours of operation;*
- A traffic management plan;*
- Noise and dust mitigation measures;*
- Details of construction lighting;*
- Waste minimisation and management plan, including recycling / re-use of waste where possible (in accordance with circular economy principles);*
- Measures for the protection of natural features, including (but not limited to) mature trees and hedgerows, protected species, ecological corridors and watercourses.*

*A Construction Manager will be required to be appointed to liaise directly with the various sections of the Local Authority and that should include a biodiversity officer, should one be appointed.*

2. With respect to waste management, draft plans are prepared within the local authority as a collaborative exercise across all functions and in this regard, the waste management team were consulted in the preparation of this plan. This exercise determined that no localised waste management issues were arising in the plan area that required more localised planning policy.
3. With respect to SDGs, in particular in relation to 'SDG12 – Responsible Consumption and Production', such a high level strategic goal, which would be applicable across the whole county and across a wide range of sectors, is not considered an appropriate matter for addressing via a local land-use plan.

#### **Chief Executive Recommendation**

No change

Item 7 Telecommunications	
<p>The facilitation and support of the development of telecommunications infrastructure is crucial to the development of the modern economy. In this regard National Strategic Objective 6 of the National Development Plan 2021-2023, states that high-quality, secure, and reliable connectivity to global telecommunications networks is of significant strategic importance to the Irish State. In addition, Harnessing Digital – the Digital Ireland Framework’ (Department of the Taoiseach, 2022) recognises the importance on supporting 5G rollout across all populated areas of Ireland by 2030.</p>	
<p><b>Recommendation 9:</b>  <b>The Department recommends that the draft LAP includes reference to and includes objectives and /or policies to support and facilitate the development telecommunications infrastructure in line with Government policy, including the rollout of 5G.</b></p>	
Chief Executive Response	
<p>As set out above, in the introduction to the draft LAP, the majority of policies, objectives and development standards that will apply in the Blessington plan area are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan. Therefore it is not considered necessary to re-state the existing objectives and standards that are already provided for in the County Development Plan regarding telecommunications this LAP as they directly apply already in the plan area.</p> <p>In this regard, the Wicklow CDP set out the following objectives:</p>	
<b>CPO 16.35</b>	<i>To facilitate and support the roll out of the National Broadband Plan and the development/expansion of communication, information and broadcasting networks, including mobile phone networks, broadband and other digital services, subject to environmental and visual amenity constraints.</i>
<b>CPO 16.36</b>	<i>To support the national objective to promote Ireland as a sustainable international destination for Information Communications Technology (ICT) infrastructure such as data centres and associated economic activities at appropriate locations.</i>
<b>CPO 16.37</b>	<i>The development of new masts and antennae shall be in accordance with the development standards set out in Appendix 1 of this plan.</i>
<b>CPO 16.38</b>	<i>Facilitate and support the development of public Wi-Fi zones at appropriate public spaces where possible.</i>
<b>CPO 16.39</b>	<i>To support and facilitate to the greatest extent possible the development of new structures and the conversion of existing structures for the development of co-working spaces / hubs providing access to reliable high quality ICT infrastructure within towns and villages, including smaller rural settlements, subject to normal planning criteria.</i>
Chief Executive Recommendation	
No change	



Item 8 Air Quality	
<p>The Department encourages the Local Authority to have regard to the <u>Clean Air Strategy for Ireland</u>, bearing in mind the impacts of measures adopted in the draft CDP on current and future air quality.</p> <p>Air quality data is available from EPA at <u>www.airquality.ie</u>. This gives details of the locations of all monitoring stations currently in operation, along with real-time and historic data from each station</p>	
Chief Executive Response	
<p>As set out above, in the introduction to the draft LAP, the majority of policies, objectives and development standards that will apply in the Blessington plan area are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan. Therefore it is not considered necessary to re-state the existing objectives and standards that are already provided for in the County Development Plan regarding air quality in this LAP as they directly apply already in the plan area.</p> <p>In this regard, the Wicklow CDP set out the following objectives:</p>	
<b>CPO 15.9</b>	<i>To regulate and control activities likely to give rise to emissions to air (other than those activities which are regulated by the EPA).</i>
<b>CPO 15.10</b>	<i>To require proposals for new developments with the potential for the accidental release of chemicals or dust generation, to submit and have approved by the Local Authority construction and/or operation management plans to control such emissions.</i>
<b>CPO 15.11</b>	<i>To require activities likely to give rise to air emissions to implement measures to control such emissions, to undertake air quality monitoring and to provide an annual air quality audit.</i>
Chief Executive Recommendation	
No change	

<b>4.1.7 Department of the Education</b>
<b>Item 1 Population and school place projections</b>
<p>In the context of future population trends and their potential impact on school place requirements, the department notes that this draft LAP refers to the population growth identified for Blessington in the recent draft Wicklow CDP 2022-2028. The department notes that the population scenario envisaged for Co Wicklow overall is the high NPF target of 157,500 people by 2026 and 164,000 by 2031. The plan also states that the NPF identifies Blessington as a "Self-Sustaining Growth Town" with a projected population of 6,145 by 2028. The department made its submissions to the draft CDP regarding Blessington on the basis of the potential population growth within the town and its environs between 2022 and 2031.</p> <p>In terms of future population growth in Blessington, the department notes the reference to the 6,145 population figure for 2028 and the 6,313 population figure for 2031 in Table 2.1 of the draft LAP. The department also notes that Table 2.8 of the Kildare CDP 2023-2029 has a population figure of 251 for Blessington for 2028. The department is equally mindful that the current NPF review has the potential to allocate a further population projected increase that may even go beyond 6,313. Another consideration for the department is the 2031 housing target of 2,433 for Blessington as outlined in Table 2.2 of the draft LAP. Allowing for the Census 2022 average per household figure of 2.84 identified for County Wicklow, the population of Blessington could be closer to 7,000 should that housing target figure be reached.</p> <p>The department notes in the Blessington Social Infrastructure Audit that it is stated that the analysis of current and projected education needs is based on the following assumptions:</p> <ul style="list-style-type: none"> <li>- 11.5% of the population at any given time is of primary school going age.</li> <li>- 7.5% of the population at any given time is of secondary school going age.</li> </ul> <p>The department currently uses an average of 10.25% to determine primary school place needs and an average of 7.5% to determine post-primary school place needs. It should be noted that these percentage figures are subject to review. In terms of assessing current and future capacity, the Department of Education has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time. The department will engage with the Councils where the findings of an assessment require a review of existing or future school site provision within a specific location.</p>
<b>Chief Executive Response</b>
Noted
<b>Chief Executive Recommendation</b>
No change

## **Item 2 Sites / Zoning for future schools / school expansion**

1. There are six schools (five primary and one post-primary) located in Blessington town, four of these schools are within the LAP area. The department's preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases. Therefore, the department requests the Planning Authority to examine the potential of protecting a land buffer around each of these schools to enable them to expand further if required.
2. In respect of primary provision, the department welcomes the reference within Blessington Social Infrastructure Audit to zone additional land for education for Gaelscoil na Lochanna in the event the school cannot be delivered on the current permitted site. It is expected that the capacity of this school when completed will be able to cater for future potential needs resulting from the potential future population growth scenarios as identified above. However, the department is also mindful of potential population growth beyond 2031 and will continue to assess its requirements on an ongoing basis.
3. In respect of post primary provision, Blessington Community College's expansion will increase capacity to 1,000 pupils. It is expected that the capacity of this school will be able to cater for future potential needs resulting from the potential future population growth scenarios as identified above. However, the department is also mindful of potential population growth beyond 2031 and will continue to assess its requirements on an ongoing basis.
4. The department also anticipates that additional Special Education Needs provision at both Primary and Post Primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation or space to meet this growing need. The department will consult with the Council if and when additional SEN accommodation or sites for future special schools are required within specific locations. In the context of this LAP, explicit support within the plan for the provision of school accommodation for children and young people with special educational needs would be welcomed.
5. In terms of the identification of future school place requirement that necessitates the need for the reservation and acquisitions of sites for future new schools or the requirement of new sites to facilitate the relocation of existing schools, the department would like to highlight the following points.
  - It is generally considered that schools are enabling infrastructure for housing and as such, schools should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and outside school hours. Further to this, other community facilities and amenities should also be positioned close to school facilities to allow for all community facilities be complimentary to each other for the benefit of the whole community.
  - Sites for future schools or for the redevelopment of existing schools should be identified on appropriate and suitable land for development and zoned accordingly, with specific land use zonings. All enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools. This infrastructure includes road, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school facilities. It should be noted that it is not within the remit of the Department of Education to develop or fund this enabling infrastructure.
6. The department notes and welcomes Lands Zoned for Community & Education Use in the Draft LAP that three additional sites have been zoned for Community and Education in the Blessington area.

## **Chief Executive Response**

1. With respect to the four existing schools in the plan area, all efforts have been made to ensure there is adequate land zoned to allow for expansion where feasible:
  - The maximum area available, which is 4ha, is zoned for CE used around Blessington Community College. these lands are already occupied by the school and are in the ownership of KWETB. This is slightly below the Department's desired size of 4.57ha for a 1000 pupil secondary school. However as set out in the submission, the Department expects that the capacity of this school will be able to cater for future potential needs resulting from the potential future population growth scenarios as identified

- An area of 2.2ha is zoned of CE use at and adjoining St. Mary's senior NS. These lands are owned by the Minister for Education & Science. Having regard to Departmental guidelines, this would be an adequate size to accommodate a 32 classroom school.
- Lands measuring 3.6ha are zoned for CE use adjoining Blessington No. 1 School (which separated occupies a site of 1.1ha). These lands are in private ownership and the draft plan has made provision for the reservation of these lands for future education uses. Such lands would be adequate in size for both existing school expansion and new school provisions.
- St. Mary's junior NS is located on a site on 0.68ha in the centre of Blessington, adjacent to the Church of Our Lady. Given its historical development and the pattern of development surrounding, there are no options for the reservation of lands for expansion at this location.

Other than these sites, additional lands are zoned for CE use in the plan area, with one additional site of 1.3ha on the Naas Road in SLO1 reserved for future possible education use. A site if this site would be suitable for up to a 16 classroom school.

2. Noted. Option would be available (as detailed under Point 1) should an alternative site be required.
3. Noted
4. While this point is noted, the suggestion for policy support special education needs is not considered appropriate to a land-use plan; the plan does not distinguish between education users types but support all education and care development at appropriate locations
5. Noted.
6. Noted.

#### **Chief Executive Recommendation**

No change

<b>Item 3 Education Objectives</b>
<ol style="list-style-type: none"> <li>1. The department notes and welcomes Social Infrastructure Objective BLESS24 that the Council will resist developments that entail the loss of existing education lands or building and developments that would unduly constrain the ability of existing schools to expand will not be permitted.</li> <li>2. The department notes and welcomes Social Infrastructure Objective BLESS25 that the Council will facilitate the provision of schools on lands zoned Community and Education (CE) and to consider the provision of schools on any land use zoning, excluding OS1 and OS2 zones.</li> <li>3. The department notes the section Active Travel in the Local Transport Assessment that it is a Council objective to improve pedestrian infrastructure along all roads within Blessington prioritising all locations within 15 minutes' walk times of school. The department supports the development of sustainable travel links between schools and residential areas.</li> </ol>
<b>Chief Executive Response</b>
Noted
<b>Chief Executive Recommendation</b>
No change

<b>4.1.8 Environmental Protection Agency</b>
The EPA has provided a detailed document providing key EPA recommendations for Local Authorities to consider when carrying out SEA and AA of land use plans at county and local level.
<b>Chief Executive Response</b>
This document and the advice / data therein is addressed in Section 5 SEA and AA of this report.
<b>Chief Executive Recommendation</b>
See Section 5 SEA and AA of this report.

<b>4.1.9 Office of Public Works OPW</b>
<b>Item 1 Preamble</b>
<p>The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Blessington Local Area Plan 2025.</p> <p>This submission is made specifically concerning flood risk management. Further submissions on the Draft Local Area Plan may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.</p> <p>The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA).</p>
<b>Chief Executive Response</b>
Noted
<b>Chief Executive Recommendation</b>
No change

<b>Item 2 Flood Zone Mapping &amp; Flood Risk Assessment Stages</b>
<p>It is difficult to assess whether the sequential approach has been followed without the inclusion of flood zone mapping overlaid on lands use zoning mapping.</p> <p>A Strategic Flood Risk Assessment should, among other outputs, identify principal rivers, and the location of any flood risk management infrastructure. Wicklow County Council might consider including discussion on the study area, including sources of risk such as watercourses in the town.</p>
<b>Chief Executive Response</b>
The SFRA prepared overlays the flood risk maps and the zoning maps throughout the assessment. However if this is not sufficiently clear, additional maps can be provided. Maps can be enhanced to more clearly identify principal rivers, and the location of any flood risk management infrastructure.
<b>Chief Executive Recommendation</b>
<p><b>Insert at end of SFRA –</b></p> <p>Map 1 Flood Risk Zones (Present day)</p> <p>Map 2 Flood Risk Zones (Future Climate Change Scenario)</p> <p>Map 3 Overlay of Flood Maps with Zoning Map</p>



<b>Item 3 Sustainable Drainage Systems (SuDS)</b>
<p>The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites.</p> <p>The Guidelines also recommend that the SFRA identifies where integrated and area based provision of SuDS are appropriate in order to avoid reliance on individual site by site solutions.</p> <p>Discussion on linear green space on a vacant site between 'The Forge' and the Market House/Credit Union which widens into a larger public realm/green square is noted. Wicklow County Council may consider whether this might offer opportunities for integrated area based provision of SuDS.</p>
<b>Chief Executive Response</b>
<p>The SFRA sets out a schedule of 'mitigation objectives' in Section 4.3, which includes the following County Development Plan objective, which will apply in the plan area:</p> <p><i><b>CPO 14.13</b> Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.</i></p> <p>The Council SuDS policy and development guidance sets out a range of SuDS techniques for managing surface water, that will be applied at development sites through the Development Management process. It is not considered necessary to re-state or insert the entire Wicklow County Council SuDS document into the SFRA or the LAP in this regard.</p>
<b>Chief Executive Recommendation</b>
No change

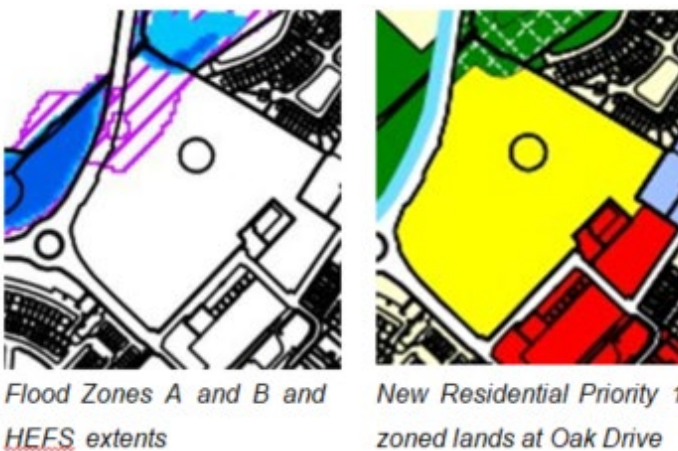
<b>Item 4 Construction, Replacement or Alteration of Bridges and Culverts over Watercourses</b>
<p>Road objectives that cross watercourses have been referenced in the Draft Plan, including Blessington Demesne Link Road and Blessington Inner Relief Road (southern section).</p> <p>It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.</p>
<b>Chief Executive Response</b>
Noted. This would be a matter pertinent to any development application / consent procedure.
<b>Chief Executive Recommendation</b>
No change

### Item 5 Consideration of Climate Change Impacts

The OPW welcomes the discussion on flood risk and climate change in section 5 of the SFRA, and the inclusion of future scenario extents on the flood zone mapping. It is noted therein that while the increase in fluvial flood extent generally affects already developed areas, *"Where green field land is affected by future scenario flood mapping, the sites are generally large enough such that the development of desired uses may avoid development in the at risk area utilising the sequential approach in site planning. In some cases, zonings have been changed to more appropriate uses."*

In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.

An area zoned for highly vulnerable New Residential – Priority 1 has been shown as at risk in both the mid-range and high-end future scenarios. Wicklow County Council might provide further detail regarding how risk to this area might be mitigated.



### Chief Executive Response

With respect to the lands in question, a small area is identified as being at 'present day' risk and these lands are zoned open space'. However, there are lands proposed to be zoned for new residential development RN1 located in the mid-range and high-end future scenarios.

The draft LAP objectives already provide that where land is zoned for development, but future scenario flood mapping indicates a risk of flooding, a site specific flood risk assessment will be required. This objective can however be strengthened to address the concerns raised.

### Chief Executive Recommendation

Amend the following objective:

#### Section B.7 Infrastructure

##### Bless 51

~~Applications for new developments or significant alterations/extension to existing developments in an area at risk of flooding shall comply with the following:~~

- ~~• Follow the 'sequential approach' as set out in the Flood Risk Management' Guidelines~~
- ~~• An appropriately detailed flood risk / drainage impact assessment will be required with all planning applications, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site), taking into account all sources of flooding;~~

- ~~Restrict the types of development permitted in Flood Zone A and Flood Zone B to that which are 'appropriate' to each flood zone, as set out in Tables 3.1 and 3.2 of the Flood Risk Management Guidelines unless the 'plan making justification test' has been applied and passed;~~
- ~~Where an development application site located in Flood Zone A or B a site has been subject to and satisfied the 'Plan Making Justification Test' development will only be permitted where a proposal complies with the 'Justification Test for Development Management', as set out in Box 5.1 of the Flood Risk Guidelines.~~
- ~~Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Guidelines and the SFRA.~~

~~Where flood zone mapping does not indicate a risk of flooding but the Planning Authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, including the latest future scenario flood mapping, an appropriate flood risk assessment will be required to be submitted by an applicant for planning permission and the sequential approach shall be applied as the 'Plan Making Justification Test' will not be satisfied.~~

Applications for new developments or significant alterations/extension to existing developments in an area identified as at risk of flooding (Flood Zones A and B) as set out in the SFRA and flood maps appended to this plan **OR** in Flood Zone C but within an area

- that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to new information with respect to flood risk in the area that has come to light; or
- that is identified as at possible future risk of flooding having regard to climate change scenarios either on Map X attached to this plan or on any future maps prepared by the OPW during the lifetime of the plan;

shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'the Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this plan) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the plan SFRA.

**Item 6 Justification Tests**

The OPW welcomes the inclusion of plan making justification tests in the draft plan.

Part 3 of the Plan Making Justification Tests included in the SFRA notes in all cases that *"Assessment of flood risk has been incorporated into the Plan SEA Process"*. Part 3 of the Plan Making Justification Test as set out in the Guidelines is that *"A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere"*. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should not be passed on to development management.

All criteria of the Plan Making Justification Test must be demonstrably satisfied for a zoning to be considered justified. Criterion 2 (iii) is a requirement that in order for the test to be satisfied, the zoning must be located either within the core of a settlement, or adjoining the core. A proposed or existing development in such a zoning which might *"serve all parts of established or designated urban settlements, including the core"* does not satisfy this requirement, unless the proposed zoning is within or adjoining the core.

**Chief Executive Response**

The SFRA sets out the policies, objectives, requirements, mitigations etc that are already provided for in the Wicklow County Development Plan (Section 4.3 of the SFRA). These requirements will directly apply in the LAP area, being requirements / objectives of the County Development Plan which is 'parent' plan to this LAP. It is not considered necessary to re-state all of the County Development Plan flood risk management related measures in this LAP as they already apply in the plan area.

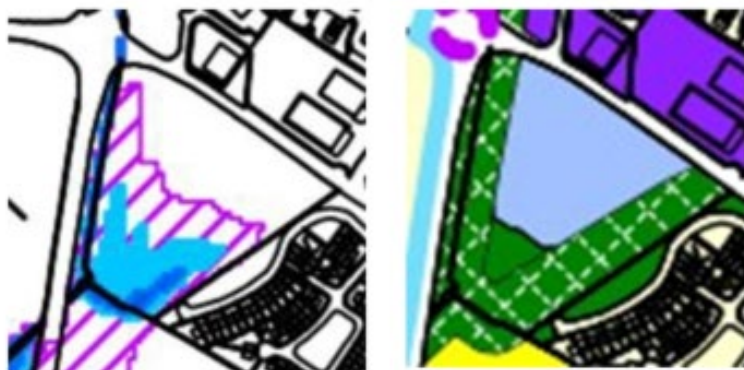
With respect to the Justification Test criteria, the OPW has not identified any specific deficiencies in this regard with respect to the Blessington LAP SFRA.

**Chief Executive Recommendation**

No change

### Item 7 Community & Education Zoned Lands

An area of undeveloped lands overlapping with Flood Zone B has been zoned Community & Education, which can allow for highly vulnerable development such as schools and nursing homes. No commentary has been included to demonstrate whether this zoning has been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zone B unless the planning authority can demonstrate that all criteria of the Plan Making Justification Test have been satisfied.



*Flood Zones A and B*

*Community & Education  
Zoned Lands at Oak Drive*

### Chief Executive Response

The zoning of CE lands at this location, on the south side of Oak Drive, has been amended significantly from the previous plan; in the previous plan these lands were fully zoned 'E – Employment' whereas the new draft plan shows the lands zoned for the mixture of OS - Open Space and CE – Community & Education.

The OS zones cover the area at 'present day' flood risk. No part of the CE zone is within the 'present day' flood risk and therefore did not require to be subject to a Justification Test in accordance with the Guidelines.

It is noted that some of the proposed CE lands are identified as at risk in the mid-range and high-end future scenarios. The draft LAP objectives already provide that where land is zoned for development, but future scenario flood mapping indicates a risk of flooding, a site specific flood risk assessment will be required. This objective can however be strengthened to address the concerns raised.

In addition, it should be noted that the draft LAP does not specify exactly what form a CE use may take on these lands, and a wide range of possibilities would be available under the CE zoning (ranging from parks / open spaces / sports facilities and graveyards, to schools, churches and nursing homes), and therefore it is not possible to say at plan making stage whether any potential use would be acceptable or not in accordance with the Guidelines given the level of flood risk identified.

### Chief Executive Recommendation

Amend the following objective:

#### Section B.7 Infrastructure

##### Bless 51

~~Applications for new developments or significant alterations/extension to existing developments in an area at risk of flooding shall comply with the following:~~

- ~~• Follow the 'sequential approach' as set out in the Flood Risk Management' Guidelines~~
- ~~• An appropriately detailed flood risk / drainage impact assessment will be required with all planning applications, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site), taking into account all sources of flooding;~~

- Restrict the types of development permitted in Flood Zone A and Flood Zone B to that which are 'appropriate' to each flood zone, as set out in Tables 3.1 and 3.2 of the Flood Risk Management Guidelines unless the 'plan making justification test' has been applied and passed;
- Where an development application site located in Flood Zone A or B a site has been subject to and satisfied the 'Plan Making Justification Test' development will only be permitted where a proposal complies with the 'Justification Test for Development Management', as set out in Box 5.1 of the Flood Risk Guidelines.
- Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Guidelines and the SFRA.

Where flood zone mapping does not indicate a risk of flooding but the Planning Authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, including the latest future scenario flood mapping, an appropriate flood risk assessment will be required to be submitted by an applicant for planning permission and the sequential approach shall be applied as the 'Plan Making Justification Test' will not be satisfied.

Applications for new developments or significant alterations/extension to existing developments in an area identified as at risk of flooding (Flood Zones A and B) as set out in the SFRA and flood maps appended to this plan **OR** in Flood Zone C but within an area

- that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to new information with respect to flood risk in the area that has come to light; or
- that is identified as at possible future risk of flooding having regard to climate change scenarios either on Map X attached to this plan or on any future maps prepared by the OPW during the lifetime of the plan;

shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'the Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this plan) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the plan SFRA.

#### 4.1.10 Health Service Executive HSE

##### Item 1 Introduction

The National Environmental Health Service (NEHS) has drafted this consultation to support Wicklow County Council deliver a local area plan for Blessington that protects and promotes population health. The Blessington 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 should be read in conjunction with the submission made during the pre-draft consultation phase. The HSE submission during the pre-draft consultation phase was submitted to Wicklow County Council on April 2nd 2024 under our reference number EHIS 3740. For ease of review the key submission elements from the pre-draft consultation phase are included at the end of this submission.

The observations below are primarily informed by a review of the written statement of the Draft Blessington Local Area Plan 2025. The written statement is sub-divided into Part A and Part B addressing several issues, such as infrastructure, that have the potential to impact on public health.

It is noted that the purpose of the plan is to put in place a land use framework that will guide the future sustainable development of the Blessington Area. It was also noted that the issues of Healthy Place making, Climate Change and Economic Opportunity are stated as Strategic Goals and over-arching cross-cutting themes of the Wicklow County Development Plan.

While the purpose of the plan is to guide the future sustainable development of the Blessington Area, specific reference to the Sustainable Development Goals (SDGs) was not found in the literature reviewed.

Likewise, little direct reference could be found to the issues of Healthy Place making and Climate Change in the draft plan. Reference is made under A2.0 where it is stated that place making integrates with the creation of sustainable communities which includes

- Housing
- Sustainable Mobility
- Healthy Town Centres

##### Chief Executive Response

As set out in the introduction to the draft LAP: *‘The majority of policies, objectives and development standards that will apply in the Blessington area are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan, other than the summary provided in Section A.2, unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the area. While this will facilitate the streamlining of this plan to just those issues that are relevant to this area, and an overall reduction in the content of the plan, this should not be seen a diminution of the level of importance or indeed protection afforded to this area.*

*In particular, development standards, retail strategies, housing strategies etc that are included in the County Development Plan shall not be repeated, and shall be complied with throughout the implementation of this Local Area Plan. Any specific policies / objectives or development standards required for this area will be stated as precisely that, and in all cases will be consistent with the County Development Plan. Thus development standards will therefore be the same across the entire County, and any differences for specific settlements would be clear and transparent, to both those adopting the plans, and the general public alike.*

*It is also important to note that the land-use objectives of this plan aim to support other plans and strategies prepared by Wicklow County Council, including the Wicklow Local Economic and Community Plan, the Wicklow Climate Action Plan, Wicklow Tourism Strategy and Marketing Plan, Wicklow Biodiversity Action Plan, Wicklow Heritage Plan etc., all which have a wider remit than this LAP. However, this Local Area Plan shall only include objectives that are area specific and achievable, and avoid those that are aspirational or are best dealt with in the annual budget, road works programme,*



*etc. The role of land use plan is to put in place a framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan’.*

In this regard, the County Development Plan addresses high level strategy matters as the Sustainable Development Goals (SDGs) and integrates them where relevant into Strategic Policy Objectives and County Policy Objectives, that apply directly in the LAP area and shape its contents. It is not considered necessary to re-state in each LAP the international, national or regional strategies that have shaped the County Development Plan.

<b>Chief Executive Recommendation</b>
No change

<b>Item 2 Town Centre Regeneration</b>
<p>One of the few places where direct reference is made to healthy place making is under the Town Centre and Retail objectives where an objective set is to <i>"promote healthy place making and prioritise walking and cycling....."</i> Elsewhere in this section emphasis is placed on <i>"integrated communities that enjoy a high quality of life and well-being"</i>.</p> <p>Key to delivering on healthy place making and providing a community where people can enjoy a high quality of life and well-being is to start by understanding the determinants of health for the people of Blessington, and how those determinants can be addressed to protect and promote public health and therefore deliver on the objectives.</p> <p>It is recommended that Wicklow County Council include an assessment of health determinants for the Blessington area that in turn will inform a Local Area Plan that delivers on the objectives set. This assessment would identify hazards/risks for the people of the Blessington Area (not just floods) and identify ways in which health co-benefits can be delivered in meeting climate action obligations for example.</p> <p>Sustainable mobility for example will be one component to deliver a more active population and better air quality. This in turn will help deliver health gain in the area of cardio-vascular and respiratory health.</p>
<b>Chief Executive Response</b>
<p>While the delivery of a healthy County and settlement is at the core of both the Wicklow CDP and the LAP, these plans are not the 'health improvement plans' for these areas. There is no requirement or advice that an 'assessment of health determinants' be carried out as part of land use plan making.</p> <p>As identified in the submission, the plan making process does however address a significant number of components that contribute to human health and well-being, such as the provision of a more compact settlement where active modes of travel become more feasible and attractive, and the delivery of enhanced community facilities including parks and sports grounds.</p> <p>In addition, given the short time frame available to the CE to prepare this report and make recommendations with regard to possible amendments to the draft plan, it would not be feasible to carry out such a detailed assessment (if one were considered necessary) for integration in to the plan.</p>
<b>Chief Executive Recommendation</b>
No change

### Item 3 Social and Community Development

Part A 2.6 of the written statement addresses Social and Community Development issues of relevance to the protection and promotion of public health. An important objective set in this regard is *"to support the creation of functional and healthy public spaces and pedestrian routes within..... to maximise opportunities for outdoor activities"*

The objectives set under Social and Community Development could be expanded to include for example the provision of green and blue spaces to support mental health objectives in addition to supporting outdoor activities.

In addition greater emphasis could be put on to ensure these spaces are inclusive and deliver on the needs for all of all ages.

### Chief Executive Response

It is considered beyond the remit of a land-use plan to distinguish between types of 'health' (i.e. physical, mental etc) in its provisions. As above, this LAP is not the Council's health promotion plan, but it one element of an overall suite of plan and strategies, by both the Council and range of other State agencies, that contribute to overall societal well-being.

With respect to delivering spaces for all in society, the Wicklow CDP explicitly address this matter with the following objectives and text:

#### 7.2 Community Development & Land Use Planning

*The term "community development" refers to a complex and broad range of actions and measures involving a wide range of practitioners and bodies with the common aim of improving various aspects of local communities. There are however two key strands to the development of 'sustainable communities':*

- *Facilitating communities in developing the skills, capacities and projects needed to enable them to have a greater say in the management of their own futures; and*
- *Facilitating access to the goods, services and powers structures within society for all, and particularly for those that are marginalised and powerless ('social inclusion').*

*A wide range of stakeholders and agencies will be required to deliver the LECP goals. It is the role of the LCDC to coordinate the various organisations and actions required to fulfil the goals of the LECP. The County Development Plan plays the following roles in delivering these goals:*

1. *Facilitating the delivery of community infrastructure through:*
  - *Identifying where possible community / social infrastructure deficiencies and needs of towns and villages including, for example, local community centres, schools, health facilities, broadband hubs, remote working facilities in community spaces, age-friendly facilities such as accessible internet spaces and increased post /delivery and collection facilities;*
  - *The reservation of land for the development of new or enhanced social and community infrastructure in County and local development plans where a need for new facilities is identified;*
  - *Managing the expansion of residential development commensurate with the community infrastructure available;*
  - *Requiring the delivery of new community infrastructure as part of development proposals; and*
  - *Cooperating with other service providers in the delivery of new community infrastructure.*
2. *Facilitating improved physical access to community infrastructure and services through:*
  - *Promoting a development pattern that maximises the accessibility of social / community facilities infrastructure by public transport, cycle or foot;*
  - *Requiring all new facilities to be accessible and useable by those with special needs, including mobility or other impairments; and*
  - *Facilitating enhancement of communications infrastructure.*
3. *Facilitating the maintenance, restoration and upgrading of the cultural and natural heritage of communities, environmental upgrading and general actions to enhance the environmental, amenity and physical attributes of*

communities.

### **Community Facilities Hierarchy Model**

The community facilities hierarchy model, as shown in Table 7.1 below, is a list of the social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however, the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal.

Where a new significant residential or mixed-used development is proposed, the Planning Authority may require certain social and community facilities to be provided as part of the proposed development and/or may require a special financial contribution to be made to contribute to the development of such facilities.

In the development management process, the Planning Authority will determine whether there is a need for a particular development to include the provision of a social or community facility by either:

- a) Considering the particular social infrastructure needs and deficiencies of each location and the appropriateness of the particular proposed development as to whether the deficiency needs to be rectified as part of that development proposal; or
- b) Requiring a 'Social Infrastructure Audit' (SIA) to be carried out by the developer, to determine if facilities in the area are sufficient to provide for the needs of the future residents and where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

With any significant residential development, the applicant will be required to prepare a SIA as part of the documentation required as part of the planning application process. The importance of a SIA is in assessing the impact a large scale residential development may have on the existing social infrastructure in the area, and to identify if any deficiencies exist that will be compounded or put under undue stress by the proposed development. A SIA assesses the overall impact a residential development will have on the infrastructure which is key to the functioning of the community. This is generally assessed based on the percentage increase of population that a development once completed will bring to the community where the development is planned to occur. While not an exhaustive list these generally include the following infrastructure:

- Transport (bus routes, cycle routes, green infrastructure, road networks, pedestrian pathways);
- Education (third level, post-primary, primary, crèche facilities);
- Health (primary health care, care homes, doctor surgery, G.P, dentist facilities, pharmacy);
- Community facilities (places of worship, burial grounds, community halls, sports facilities).

The applicant shall as part of the SIA be requested to obtain and submit **supporting documentation** from any social / community infrastructure providers, educational institutions, community organisations and other social service providers to be included as part of the audit. The audit shall detail that the potential increase in population that would arise from the proposed development, and take in account other new (permitted and proposed) developments in the area that are intended to be serviced by existing facilities. If the cumulative increase in population cannot be supported by the existing facilities locally, written assurance from the facility providers must be submitted confirming that there shall be sufficient accommodation to support the increased population prior to the commencement of any development.

Furthermore, in recognition of the potentially significant impacts large residential developments may have on the receiving environment the applicant must include any similar type developments to the proposed within the same locality regardless of their stage in the planning process. The cumulative impacts of these developments as well as the proposed shall be included as part of any assessment to determine the suitability of the proposed development.

Where it is determined that existing social infrastructure in an area will not be adequate to accommodate the needs of the new residents, and new infrastructure / facilities are deemed to be required to allow the development to be positively considered, the manner in which the deficiency will be addressed, by who and when, shall be detailed in the proposal, and agreed through the development management process.

*All proposals for community and social infrastructure including public open space should incorporate the principles of Universal Design. Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability. An environment (or any building, product, or service in that environment) should be designed to meet the needs of all people who wish to use it. New development shall have regard to the provisions of the National Disability Authority's document 'Building for Everyone: A Universal Design Approach' which provides comprehensive best practice guidance on how to design, build and manage buildings and spaces so that they can be readily accessed and used by everyone, regardless of age, size ability or disability.*

**CPO 7.8**      *To promote and support Universal Design whereby all environments and facilities can be used to the greatest extent possible by all people, regardless of age, ability or disability.*

**Chief Executive Recommendation**

No change

#### Item 4 Service Infrastructure

Part A 2.8 of the written statement refers to Service Infrastructure and more specifically transport infrastructure plus infrastructure related to water, drainage, energy, waste management and communications infrastructure.

The first part of this section places heavy emphasis on transport infrastructure though it lacks specific measures to be adopted in order to deliver on the "Avoid, Shift, Improve" framework introduced in the National Climate Action Plan 2023. Much of the section seems to focus on shifting people from one transport mode to another without detailing ways to avoid the need for travel (e.g. improving communications infrastructure) and improving on some modes of travel by for example supporting EV charging infrastructure, bike libraries, secure bike parking etc.

It is recommended to revisit the provision of transport infrastructure and consider it as part of a wider transition in avoiding the need for travel, shifting to more sustainable modes of travel and improving the sustainability of some existing modes of travel.

Under the aspects of infrastructure outside of the transport the plans refers to the delivery of reliable and effective water, drainage, energy, waste management and communications infrastructure to service the existing and future development needs of the settlement.

Some reference is made to increased resilience in the context of water but this section doesn't adequately consider the role such infrastructure plays in adapting to and being resilient to the hazards posed by climate change as well as the role such infrastructure plays in mitigating green-house gas emissions. It is worth stating that climate change poses the greatest threat to global health this century and therefore all actions in these areas should consider climate action from both a mitigation and adaptation point of view.

More specifically water infrastructure should not only be resilient to all potential hazards, not just climate related, but the water infrastructure should be adapted. For example will rain water harvesting be included as a mechanism in the plan to both adapt to drought like events and reduce dependence on treated water as a mitigation measure?

In the area of wastewater and drainage, embedding climate action from a mitigation and adaptation perspective should be incorporated into the plan. The opportunities to generate clean energy from renewable sources (solar, wind and geothermal) should be incorporated into the plan and waste management should be viewed in the context of a circular economy.

#### Chief Executive Response

##### Transportation

All of the suggestions made, where relevant to a land-use plan, are considered to be addressed either in the LAP, the LTA associated with the plan or the Wicklow CDP (which addresses for example communications, EV infrastructure etc). As detailed in response to other submissions made, it is intended to prepare a **Local Transport Plan** for Blessington after the adoption of this plan, which can flesh out these areas in more detail.

##### Water / Energy / Waste Management

All of the suggestions made, where relevant to a land-use plan, are considered to be addressed either in the LAP or the Wicklow CDP (which addresses for example effective management of wastewater, flood risk management, water demand reduction, renewable energy strategies, energy demand reduction, waste management etc). It should be noted however that the LAP is not the Council's water or waste 'management plan' nor the Council's 'climate action plan' or 'renewable energy plan' but as detailed above, it is plan that forms a suite of plans that aim to address such areas.

#### Chief Executive Recommendation

No change

## Item 5 Community Development

Part B.5 Community Development covers a number of issues including Health and Care plus Leisure and Recreation. The Health and Care section refers to health and social care facilities such as GP surgeries, nursing homes and childcare facilities. The Leisure and Recreation section refers to sports, children's play, facilities for teenagers and adults.

This interpretation of health and leisure/recreation is perhaps limited in viewing health as being about health infrastructure and likewise for leisure recreation.

The NEHS recommends that the draft plan take a more holistic view of community development, to view the protection and promotion of health and physical activity as dependent on a more enabling environment. This would in practice mean that everyone takes responsibility for the protection and promotion of public health and that for example, would view the construction of bus shelters as a health protection measure (protecting people from harmful weather including UV radiation from sun exposure). Other actions might be supporting public transport infrastructure that enables people to access health care and recreational facilities via a more sustainable mode of transport and/or providing incentives/subsidies to encourage all to access recreational facilities. In other words viewing use of such facilities are a behavioural issue as much as an infrastructure issue.

An additional aspect to consider is the building of community resilience, to climate change for example, as a part of community development. Others may refer to the term "Climate Literacy" through citizen engagement. An example would be to apply the principles of Disaster Risk Reduction (DRR) for known severe weather hazards such as floods by for example establishing Early Warning Systems and being prepared for such events through evacuation plans for example.

### Chief Executive Response

It is not quite clear what the HSE is suggesting for the LAP under this heading. This LAP is not the Council's community development or community resilience improvement 'plan' or 'strategy'; but as detailed above, it is plan that forms a suite of plans, including for example the Local Economic and Community Plan (LECP), that aim to contribute to such areas.

In terms of the definitions of community / social development, the LAP is guided in this regard by the County Development plan, which provides that (as already detailed above):

*The term "community development" refers to a complex and broad range of actions and measures involving a wide range of practitioners and bodies with the common aim of improving various aspects of local communities. There are however two key strands to the development of 'sustainable communities':*

- *Facilitating communities in developing the skills, capacities and projects needed to enable them to have a greater say in the management of their own futures; and*
- *Facilitating access to the goods, services and powers structures within society for all, and particularly for those that are marginalised and powerless ('social inclusion').*

*A wide range of stakeholders and agencies will be required to deliver the LECP goals. It is the role of the LCDC to coordinate the various organisations and actions required to fulfil the goals of the LECP. The County Development Plan plays the following roles in delivering these goals:*

- *Facilitating the delivery of community infrastructure*
- *Facilitating improved physical access to community infrastructure and services*
- *Facilitating the maintenance, restoration and upgrading of the cultural and natural heritage of communities, environmental upgrading and general actions to enhance the environmental, amenity and physical attributes of communities.*

It is in accordance with these three headings that the objectives of the LAP with regard to community development are framed. It is accepted that improved transportation services and infrastructure can contribute to community wellbeing, and hence why it is addressed in some detail in the Wicklow CDP, this LAP and the LTA supporting the plan.

### Chief Executive Recommendation

No change



<b>Item 6 Infrastructure</b>
<p>Part B7 addresses the topic of Infrastructure placing priority on the three areas of (a) Sustainable Transport, (b) Flood Risk Management and (c) Wastewater Infrastructure. Some observations have been made under Service Infrastructure above but here some emphasis is put on risk assessment.</p> <p>The NEHS recommends that a risk assessment including a climate change risk assessment (CCRA) is undertaken to determine the threats posed to the people of Blessington and its surroundings. This should go beyond Flood Risk Management but extend to other potential hazards (i.e. windstorms, heat, drought and other slower onset hazards such as aeroallergens). It is suggested to utilise the Sendai Framework for Disaster Risk Reduction in assessing hazards, vulnerability and capacity.</p>
<b>Chief Executive Response</b>
<p>It is not clear if the HSE understands fully the function and nature of a Local Area Plan, its required contents under legislation and guidance etc but it is not the role of a Local Area Plan to provide a 'climate change risk assessment' or to provide a strategy for 'disaster risk reduction'. This may be a suggestion that would be more appropriately directed to the Climate Action team for consideration.</p>
<b>Chief Executive Recommendation</b>
No change

<b>Item 7 Measuring Progress</b>
<p>The review of the written statement didn't find reference to ways in which progress will be measured during and at the end of the plan?</p> <p>To help assess the delivery of the plan on the strategic goal "Healthy Placemaking" the NEHS recommends that a Monitoring and Evaluation Framework is developed with health specific metrics incorporated. Metrics to include may relate to air quality, water quality, noise levels, temperature variations in areas potentially prone to the urban heat island effect, etc. The indicators set should be SMART with baseline measurements established for comparison with during and at the plans lifetime.</p>
<b>Chief Executive Response</b>
<p>The draft LAP includes an Implementation Appendix, which on foot of other submissions, it is recommended be enhanced. The SEA associated with the LAP also detailed Monitoring Measures, Indicators and Targets for various environmental components.</p> <p>The Wicklow Forward Planning Department has recently established a development plan monitoring unit and is currently working on building a plan monitoring and development pattern tracking system. It is intended that this system will be functional in 2025, and at that time, all objectives of this LAP will be inputted in order to allow for systematic monitoring to be established.</p>
<b>Chief Executive Recommendation</b>
No change

<b>Item 8 Pre-Draft Submission</b>
<p>The HSE has appended their pre-draft plan submission. This submission set out in some detail advice from the HSE with regard to the following topics</p> <ul style="list-style-type: none"> <li>- Climate change</li> <li>- Sustainable Development Goals</li> <li>- Disaster Risk Management including Disaster Risk Reduction</li> <li>- Inclusiveness</li> <li>- Physical Activity/Sustainable Movement</li> <li>- Air Quality</li> <li>- Energy</li> <li>- Noise</li> <li>- Water Quality and Waste Water</li> <li>- Circular Economy/Waste</li> <li>- Sustainable/Healthy Diets</li> <li>- Tobacco and Disposable Vapes Free Ireland</li> </ul>
<b>Chief Executive Response</b>
<p>The pre-draft submission was considered carefully by the plan team in the preparation of the draft plan and advice / recommendations integrated in to the draft LAP or associated appendices where relevant.</p> <p>A number of the suggestions however were found to be either already addressed in the Wicklow County Development Plan, were more relevant to plans of other departments of the Council or other State agencies, or not applicable to this type of plan.</p>
<b>Chief Executive Recommendation</b>
No change

<b>4.1.11 Uisce Éireann (Irish Water)</b>
<b>Item 1 Preamble</b>
<p>UÉ is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of UÉ to provide both drinking water and wastewater capacity to support national, regional and local economic and spatial planning policy (subject to the constraints of the UÉ Capital Investment Plan).</p> <p>UÉ acknowledges the planning policy and direction provided in the National Planning Framework and the East &amp; Midlands Regional Spatial and Economic Strategy (RSES) and we are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard, we would draw your attention to RPO10.1 in the RSES which provides general policy direction in relation to the sustainable management of water resources.</p>
<b>Chief Executive Response</b>
Noted
<b>Chief Executive Recommendation</b>
No change

<b>Item 2 Water Supply and Network</b>
<p>Blessington is supplied from Ballymore Eustace which has capacity. However, it does form part of the overall Greater Dublin Area (GDA) water resource zone that experiences constraints from time to time. UÉ publishes Water Supply Capacity Registers annually for each county. The register is currently being updated and will be revised before the Draft LAP is completed. UÉ will issue the Council a copy of the Water Supply Capacity Register as soon as it is completed.</p> <p>Note the capacity register is only an indication of available capacity at a point in time and will change over the lifetime of the Plan. The long-term solution for the GDA is the Water Supply Project (WSP). The WSP has been identified in the National Planning Framework as a 'National Strategic Outcome' and is also listed as one of the key 'Strategic Investment Priorities' of the National Development Plan</p>
<b>Chief Executive Response</b>
Noted
<b>Chief Executive Recommendation</b>
No change

<b>Item 3 Wastewater Collection and Treatment</b>
<p>As noted above, the wastewater capacity registers are also being revised and will be available in the coming weeks. UÉ will issue the Council a copy of the Wastewater Capacity Register as soon as it is completed.</p> <p>There is currently sufficient capacity available to service the growth envisaged in the County Development Plan Core Strategy.</p> <p>As above, the register is only an indication of available capacity at a point in time.</p> <p>There are no significant issues with the Blessington sewer network. Uisce Éireann are continually progressing sewer rehabilitation activities, capital maintenance activities at pump stations, storm water overflow assessments county wide. We will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.</p>
<b>Chief Executive Response</b>
Noted
<b>Chief Executive Recommendation</b>
No change

#### Item 4 Drinking Water Source Protection & Human Health

Protection of public drinking water sources is of the highest priority to Uisce Éireann. It is a requirement of the Drinking Water Directive and the Water Framework Directive that waters used for the abstraction of drinking water are protected so as to avoid deterioration in quality. It is Uisce Éireann's current policy to maintain safe and secure drinking water supplies and that no development will negatively impact drinking water sources.

Uisce Éireann is currently preparing Drinking Water Safety Plans (DWSPs) for each of our Drinking Water Supplies in line with the requirements of the Drinking Water Directive and National Source Protection Guidelines. As part of this Catchment Action Plans will be prepared which include a risk assessment of the source and source protection and mitigation measures. These Catchment Action Plans will be developed in collaboration with Source Protection Agencies (e.g. EPA, GSI and Local Authorities). The deadline for completed of this work is July 2027 under the Drinking Water Regulations.

In addition to LAP Objective BLESS42 under Biodiversity and Natural Heritage *"Where relevant, applications for development must demonstrate that the proposal for development would not, individually or cumulatively, affect a water body's ability to meet its objectives under the Water Framework Directive."*

an additional specific objective to further support water quality (Poulaphouca reservoir in particular) and public health would be welcomed.

**Proposed New Objective under Part B Specific Objectives - in line with Wicklow County Development Plan Policy Objectives 13.1 and 1.32 in relation to Water Quality and 13.09 in relation to Water Supply.**

***"Protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Drinking Water and Water Framework Directives. New developments which could pose an unacceptable risk to drinking water sources will not be permitted."***

#### Chief Executive Response

The CE is happy to recommend additional text and objectives to address the issue raised.

#### Chief Executive Recommendation

**Amend the plan as follows:**

Add the following text and objectives to Section B.7:

The Poulaphouca Reservoir is a critical source of raw water supply to the populations of Dublin, Kildare and parts of Wicklow. Significant measures are required to be taken to protect the water quality in the reservoir, including the management of surface water runoff in adjacent towns and villages.

Uisce Éireann recommends the use of the hierarchy of discharge outlined in the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" to complement the approach to surface water management set out in the Wicklow County Development Plan.

In particular, Uisce Éireann encourages a specific focus on the water quality of surface water runoff collected in Blessington town and discharged either directly to the reservoir or to watercourses which drain to the reservoir. This is applicable to both new developments and to any planned improvements to existing urban spaces.

**BLESS-XX:** *To protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Drinking Water and Water Framework Directives. New developments which could pose an unacceptable risk to drinking water sources will not be permitted.*

**BLESS-XX:** *To support and facilitate the improvement of the quality of surface water runoff that directly (or indirectly) will reach Poulaphouca Reservoir. This shall be applied to both new/expanded developments and to any planned improvements to existing urban spaces. In this regard, developments shall be designed in accordance with the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" LAWPRO 2024.*

#### Item 5 Nature Based Solutions for Surface Water Runoff & Water Quality

The Poulaphouca Reservoir is a critical source of raw water supply to the populations of Dublin, Kildare and parts of Wicklow. Significant measures should be taken to protect the water quality in the reservoir, including the management of surface water runoff in adjacent towns and villages.

Uisce Éireann recommends the use of the hierarchy of discharge outlined in the recently published guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" to complement the approach to surface water management set out in the Wicklow County Development Plan. In particular, Uisce Éireann encourages a specific focus on the water quality of surface water runoff collected in Blessington town and discharged either directly to the reservoir or to watercourses which drain to the reservoir. This is applicable to both new developments and to any planned improvements to existing urban spaces.

It is recommended that proposals such as the public realm enhancements to Market Square and Blessington Main Street are designed to manage the quality of surface water runoff collected in the town before discharge to the reservoir or watercourses which drain to the reservoir.

**Proposed New Objective under Part B Specific Objectives - in line with Wicklow CDP Policy Objectives CPO 13.20 to 13.22 in relation to Sustainable Urban Drainage Systems (SUDS) and the management of surface water runoff:**

***To support and facilitate the improvement of the quality of surface water runoff that directly (or indirectly) will reach Poulaphouca Reservoir. This shall be applied to both new developments and to any planned improvements to existing urban spaces. It is recommended that the hierarchy of discharge, outlined in the recently published guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" is used."***

#### Chief Executive Response

The CE is happy to recommend additional text and objectives to address the issue raised.

#### Chief Executive Recommendation

**Amend the plan as follows:**

Add the following text and objectives to Section B.7:

The Poulaphouca Reservoir is a critical source of raw water supply to the populations of Dublin, Kildare and parts of Wicklow. Significant measures are required to be taken to protect the water quality in the reservoir, including the management of surface water runoff in adjacent towns and villages.

Uisce Éireann recommends the use of the hierarchy of discharge outlined in the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" to complement the approach to surface water management set out in the Wicklow County Development Plan.

In particular, Uisce Éireann encourages a specific focus on the water quality of surface water runoff collected in Blessington town and discharged either directly to the reservoir or to watercourses which drain to the reservoir. This is applicable to both new developments and to any planned improvements to existing urban spaces.

**BLESS-XX:** *To protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Drinking Water and Water Framework Directives. New developments which could pose an unacceptable risk to drinking water sources will not be permitted.*

**BLESS-XX:** *To support and facilitate the improvement of the quality of surface water runoff that directly (or indirectly) will reach Poulaphouca Reservoir. This shall be applied to both new/expanded developments and to any planned improvements to existing urban spaces. In this regard, developments shall be designed in accordance with the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" LAWPRO 2024.*

<b>Item 6 Blessington Town Centre First</b>
Planned public realm and road projects have the potential to impact on Uisce Éireann assets and projects e.g., tree planting, building over of assets, new connections, requirement to programme upgrade works in advance of road projects. Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.
<b>Chief Executive Response</b>
Noted. This would be a matter for the project teams for any regeneration projects.
<b>Chief Executive Recommendation</b>
No change

<b>Item 7 Planning Applications &amp; Connections to the Uisce Eireann Network</b>
The Planning Authority should continue to refer planning applications for developments through the current planning referral route, for assessment in relation to the protection of drinking water sources. New Planning Applications are to submit an EIAR Scoping Request to Uisce Éireann (for qualifying developments) ahead of lodging a planning application to avoid delays.
All new residential and commercial/industrial developments wishing to connect to a Uisce Éireann network are to be assessed through Uisce Éireann's Connections and Developer Service process which will determine the exact requirements in relation to network and treatment capacity. Connections to Uisce Éireann networks are subject to our Connections Charging Policy. Further information on this process is available at: <a href="https://www.water.ie/connections/developer-services/">https://www.water.ie/connections/developer-services/</a>
Uisce Éireann will only process Connection Applications for 'authorised developments'. An authorised development is any development that has been granted planning permission. Queries for the Development Management Planning Team and EIAR Scoping Requests should be sent to <a href="mailto:planning@water.ie">planning@water.ie</a>
<b>Chief Executive Response</b>
Noted
<b>Chief Executive Recommendation</b>
No change