



## Draft Blessington Local Area Plan Submission - Report

Who are you:	State Body
Name:	National Environmental Health Service
Reference:	DBLESSLAP-124426
Submission Made	December 10, 2024 12:49 PM

### File

Draft Blessington Local Area Plan EHIS 4318.pdf, 0.75MB



10<sup>th</sup> December 2024

**Re: Consultation on the Draft Blessington Local Area Plan 2025**

Dear Sir/Madam,

Please find enclosed the National Environmental Health Service consultation report in relation to the Draft Blessington Local Area Plan 2025

The following HSE departments were notified of the consultation request for this development plan on 30<sup>th</sup> October 2024

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

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

Yours Sincerely,

A handwritten signature in purple ink that reads 'Joanna Troughton'.

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Joanna Troughton  
A/Principal Environmental Health Officer



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 2<sup>nd</sup> 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 are made under the following headings

## **Introduction**

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

### **Town Centre Regeneration**

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 “promote healthy place making and prioritise walking and cycling.....” Elsewhere in this section emphasis is placed on “integrated communities that enjoy a high quality of life and well-being”.

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.

**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. 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.**

### **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.**

### **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.**

**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.**

## **Infrastructure**

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.

**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.**

## **Measuring Progress**

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?

**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.**

For ease of review the sections below are directly taken from the pre-draft consultation phase.

## **Climate Change**

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

The plan should support actions that move Ireland to “a low carbon, climate-resilient, and environmentally sustainable economy by 2050” as set out in the Climate Action and Low Carbon Development Act 2015 – 2021. The latest Climate Action Plan 2024 should form the basis for developing a low carbon, climate-resilient, and environmentally sustainable Blessington by 2050 with interim targets for 2030. Examples of actions include

- Citizen engagement – a plan that contributes to delivering “climate literacy” and enables citizens to take action to improve the quality of life for themselves and fellow citizens. The delivery of a low carbon, climate-resilient, and environmentally sustainable Blessington can only be achieved with the full participation of everyone. For example active travel options will only succeed if they are actually used by the community. Supporting behaviour/lifestyle change, such as the uptake of active travel, through climate literacy will be crucial to success.
- A plan that meets the National Planning Objective 54 under Project Ireland 2040 and the National Planning Framework which is to “reduce our carbon footprint by integrating climate action into the planning system in support of national

targets for climate mitigation and adaptation objectives, as well as targets for green-house gas emissions reduction”.

- A plan that supports a just transition that leaves no one behind to a Climate Neutral Ireland and by extension Blessington
- A plan that builds better, to Zero Emission Building (ZEB) standard in all new construction and supports retro-fitting of all other building stock.
- A plan that delivers healthier housing, healthier workplaces and healthier communities through effective urban planning, design and construction. The issues booklet does indicate that the new Local Area Plan will promote healthy placemaking through quality urban design, public realm and active travel.
- In the context of Healthy Placemaking the plan should consider how to measure how a healthier Blessington will be compared to the present Blessington. A number of metrics may need to be developed such as air quality, water quality, availability of recreational space, modes of transport used by those who live, work and play in Blessington etc. to help assess impact in this area.
- Development of a transport system that delivers on the principles of Shift – Avoid – Improve.
  - A plan that through land use planning assists people to Reduce or Avoid the need for travel, linked to some extent to the issue of compact growth and the question posed on what urban design standards should apply to Blessington.
  - A plan that enables people Shift to more environmentally friendly modes of transport such as walking, cycling or public transport.
  - A plan that improves the energy efficiency of vehicle technology – for example perhaps only allowing car share that utilises hybrid or fully electric vehicles or only allows the use of zero or near zero emission vehicles in the delivery of public transport.
  - A sustainable transport and infrastructure part of the plan that places sufficient emphasis on empowering or enabling people to transition through a balance on physical infrastructure (segregated cycle lanes, secure bike parking etc.) and “softer” enabling factors. “Soft” enabling factors may include bike libraries, safe cycling training for children, etc.
- A plan that facilitates the large scale deployment of renewable energy technologies to help deliver Ireland’s emission reduction targets. This should include the utilisation of public buildings (schools, health centres etc.) for the generation of on-site energy via for example solar panels, wind turbines and/or geothermal heat sources. A mix of wind, solar and geothermal energy sources would reduce the potential need for energy storage systems for periods when solar or wind generation are low.



- A plan that adapts to climate change and builds resilience for the residents of Blessington. In practical terms this implies
  - A community that is resilient to severe weather events such as floods, but not just floods and including windstorms, extreme heat, including the contribution of heat/dry spells to the risk of forest fires, and other potential severe weather hazards including cold snaps.
  - Incorporating rain water harvesting/water recycling to build resilience to dry spells/drought conditions.
  - Particular attention is drawn to protecting vulnerable people such as older persons and young children from extreme heat events and planning a landscape that limits the urban heat island effect, provides green and blues spaces, provides shade and other measures to cool the local environment in advance of and during heatwave events. This includes green and blue spaces within the town.
  - A plan where rain water harvesting, drainage (including sustainable drainage) and waste management infrastructure limit the opportunities for vectors of disease, such as mosquitos and flies to breed.
  - Land use management that reduces exposure to aero-allergens that may contribute to the burden of asthma and other allergic impacts on people.
  - A plan that anticipates and prepares for climate related displacement of people locally and a potential influx of migrants from other places (locally and globally). Connected to DRR below.
  - Health specific reference under adaptation can be found in the Dept. of Health's Health Sector Adaptation Plan 2019 – 2024 which is due for renewal shortly.

### **Sustainable Development Goals**

The plan should support action towards the achievement of the Sustainable Development Goals as set out in Agenda 2030. Specifically it should deliver towards SDG 3, which is to “ensure healthy lives and promote well-being for all at all ages”. The achievement of SDG 3 is dependent on achieving so many other SDGs and the plan should map out the SDGs that will make the greatest contribution to SDG 3. One of the most relevant in the context of this Local Area Plan is SDG 11 “sustainable cities and communities”

The plan should align with the Government's National Implementation Plan for the Sustainable Development Goals 2022 – 2024. A key principle to deliver is the principle of “Leave No One Behind”.

### **Disaster Risk Management including Disaster Risk Reduction (DRR)**

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

The issues booklet make specific reference to a Strategic Flood Risk Assessment which undoubtedly is one of the main challenges the town will face in the context of climate change. However, the types of hazards that potentially give rise to a disaster are numerous and go beyond floods. To fully understand the potential risks that may impact on health a Climate Change Risk Assessment is recommended which may fit under priority one of the Sendai Framework referred to below.

The plan should apply the Sendai Framework for Disaster Risk Reduction 2015 – 2030 and adopt the four priorities of

- Understanding disaster risk
- Strengthening disaster risk governance to manage disaster risk
- Invest in disaster risk reduction for resilience
- Enhancing disaster preparedness for effective response, and to “Build Back Better” in recovery, rehabilitation and reconstruction

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

### **Inclusiveness**

The plan should aim to be as inclusive as possible taking account of the demographic and lifestyle mix in Blessington, as highlighted in the issues booklet. The following outlines some of the issues to consider in the plan:-

- A plan that is Age Friendly for the likes of older and younger persons. Takes account of the National Positive Aging Strategy and literature around to support Older People Remaining at Home (OPRAH).
- A plan that delivers for Persons with a Disability ensuring people are not impaired or excluded from active participation in their community – may include issues around street lighting, footpaths, roads, public seating etc.)
- A plan that delivers for Youth/Adolescents supporting safe spaces to socialise and play
- A plan that delivers for disadvantaged and marginalised groups, such as the homeless, travellers and others.
- A plan that delivers for the present and future ethnic and cultural mix in Blessington. For example supporting cricket players as well as hurlers.

- A plan that delivers for all genders and empowers women and girls in particular. For example a plan that supports girls to remain physically active and protects boys from engaging in dangerous activities.

### **Physical Activity/Sustainable Movement**

The plan should enable/support all of all ages to engage in active play/sport (in formal and informal spaces) and active travel that results in a more active and healthy community with the co-benefits of safer streets, less congestion, reduced carbon emissions, better air quality and a positive climate impact. Transport options should be prioritised in line with the transport hierarchy putting pedestrians first followed by cyclists, public transport and private vehicles at the bottom and deliver on the Road Safety Authorities strategy 2021 – 2030 priority seven regarding safe and healthy modes of travel. Wicklow County Council (WCC) should give consideration to the physical separation of pedestrian and cycling paths to ensure safe and healthy travel for all. Separating different modes of transport from one another may be another factor to bring about the actual use of such infrastructure.

Rights of way should be prioritised in line with the transport hierarchy and cyclists should be supported with ample and secure bike parking (including those with electric bikes) in the right locations.

The issue of scooters will need to be considered in the context of active travel and road safety.

In the drafting of the plan reference should be made to the following

- National Sustainable Mobility Policy 2022
- Smarter Travel Policy 2009 – 2020 and/or recent updates
- National Cycle Policy Framework 2009 – 2020 and/or recent updates
- Government Road Safety Strategy 2021 – 2030
- Get Ireland Active – National Physical Activity Plan for Ireland
- Healthy Ireland - A Healthy Weight For Ireland Obesity Policy and Action Plan 2016 – 2025
- Every Move Counts, National Physical Activity and Sedantary Behaviour Guidelines for Ireland, March 2024

### **Air Quality**

The plan should look to deliver the highest attainable air quality for the people of Blessington and beyond. Hotspots of poor air quality should be identified, in areas with high traffic volumes for example, and mitigation measures put in place to improve air

quality to the latest health protection standards of the WHO Air Quality Guidelines 2021.

The development of the plan may also refer to the Clean Air Strategy published in April 2023

### **Energy**

Energy systems chosen should aim to reduce or eliminate air pollution and support renewables including energy storage systems towards the goal of being carbon neutral by 2050

### **Noise**

Noise is widely recognised as the second biggest environmental determinant in Europe after air pollution. The plan should have a noise map of the area and look to ensure existing noise levels that are potentially detrimental to health are minimised. The plan should also look to ensure future developments do not breach noise thresholds at day, evening and night times that are potentially harmful to health and/or are a nuisance to people and their pets/animals.

### **Water Quality and Waste Water**

The plan should look to protect existing and future planned water bodies from potential sources of pollution. Blessington Lake is a major source of drinking water for the region including West Dublin and Kildare, therefore extra care is needed to protect this water body from pollution.

In the context of growth the issues booklet refers to the need for an extra 474 new homes between 2022 – 2031 and that these homes must be provided in a sustainable manner. In the context of this growth, water supply and waste water treatment capacity must be capable of coping with existing and future growth loads.

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

### **Circular Economy/Waste**

The plan should look to be aligned with the Circular Economy and Miscellaneous Provisions Act of July 2022. The plan should follow the principles of the waste hierarchy to first of all eliminate the generation of waste in the first place, including single use items, thereafter reduce, reuse and recycle waste including supporting “the right to repair” and work towards a Circular Economy. Some key areas to highlight include

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

In drafting the plan reference could also be made to

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

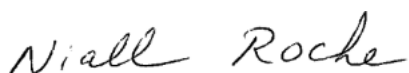
### **Sustainable/Healthy Diets**

The plan should look to support sustainable diets for all the people of Blessington. This may include some or all of the following:-

- Leading by example in Wicklow County Council to source food locally and to promote sustainable diets that are more plant based.
- Enabling the communities of Blessington to Grow their Own Food
- Balancing the mix of food businesses and “fast food” businesses in the area to give people the option to “make the healthy choice the easy choice”

### **Tobacco and Disposable Vapes Free Ireland**

The plan should look to assist in the delivery of a Tobacco Free Ireland as outlined in the Tobacco Free Ireland Report 2013 and respond to anticipated changes regarding the accessibility of Disposable Vapes in Ireland.




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Niall Roche  
Environmental Health Officer