

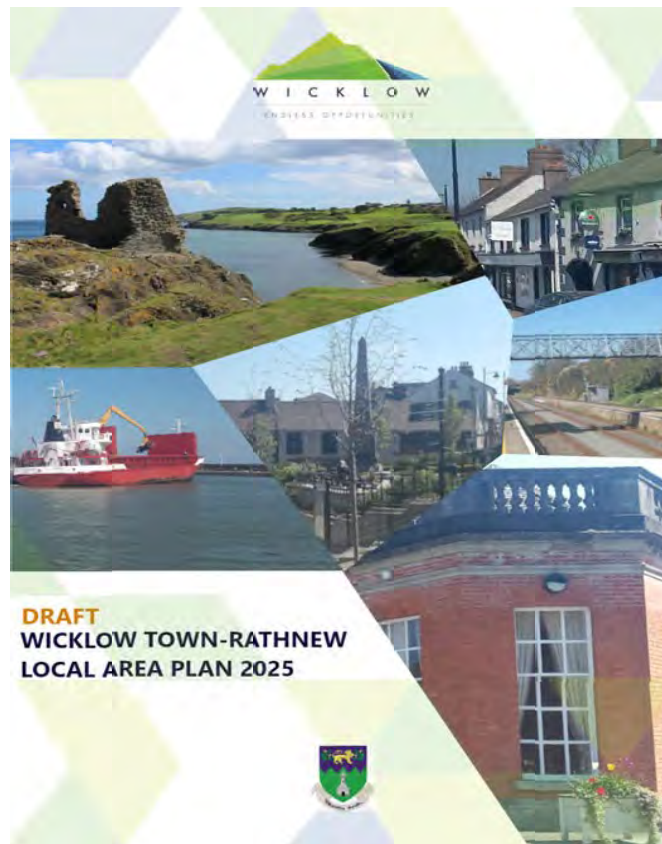


WICKLOW COUNTY COUNCIL

WICKLOW TOWN & RATHNEW LOCAL AREA PLAN 2025-2031

**Report to the members of Wicklow County Council under Section 20(3)(c)
of the Planning and Development Act 2000 (as amended)**

**on the submissions received during the public consultation of the
Draft Wicklow Town – Rathnew Local Area Plan 2025-2031**



CONTENTS		PAGE
SECTION 1 CONTENTS & INTRODUCTION		
1.1	Introduction	1
1.2	Next Steps	1
1.3	Draft Consultation Process	2
1.4	Proposed Variation No. 2 to the County Development Plan 2022-2028	2
1.5	Consideration of Submissions	2
SECTION 2 CHIEF EXECUTIVES RECOMMENDED PROPOSED AMENDMENTS		3
2.1	Chapter 3 Residential Development	4
2.2	Chapter 4 Economic Development	4
2.3	Chapter 5 Key Regeneration Areas	5
2.4	Chapter 6 Centres and Retail, including Opportunity Sites	8
2.5	Chapter 9 Infrastructure	10
2.6	Chapter 11 Zoning & Land Use	11
2.7	Map Amendments	22
2.8	Appendices	29
2.8.1	Appendix 1: Transport Strategy	29
2.8.2	Appendix 3: Infrastructure Delivery Schedule, Phasing and Implementation	29
2.8.3	Appendix 4: Strategic Flood Risk Assessment	47
SECTION 3 LIST OF SUBMISSIONS		48
SECTION 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS		52
4.1	Prescribed Bodies	
4.1.1	Office of the Planning Regulator	52
4.1.2	Eastern and Midlands Regional Authority	79
4.1.3	National Transport Authority	94
4.1.4	Transport Infrastructure Ireland	107
4.1.5	Department of Education	115
4.1.6	Department of the Environment, Climate and Communications	118
4.1.7	Department of Housing, Local Government and Heritage – Heritage Related	130
4.1.8	Department of Transport	133
4.1.9	Land Development Agency	137
4.1.10	Environmental Protection Agency	141
4.1.11	Office of Public Works	143
4.1.12	Inland Fisheries Ireland	147
4.1.13	Electricity Supply Board	154
4.1.14	Eirgrid	155
4.1.15	Uisce Éireann	157
4.1.16	Meath County Council	159
4.1.17	Health and Safety Authority (HSA)	160
4.2	SUBMISSIONS FROM ELECTED REPRESENTATIVES	161

4.3	GENERAL SUBMISSIONS	168
4.3.1	Chapter 2 – Overall Vision and Strategy	168
4.3.1.1	Issue 1: General	168
4.3.1.2	Issue 2: Vision	169
4.3.1.3	Issue 3: Economic Development and Employment	170
4.3.1.4	Issue 4: Removal of Strategic Land Bank	171
4.3.1.5	Issue 5: Overdevelopment of the area	172
4.3.2	Chapter 3 – Residential Development	173
4.3.2.1	Issue 1: Residential Zoning and Phasing	173
4.3.2.2	Issue 2: Impact of Residential Zoning on nature/biodiversity	178
4.3.2.3	Issue 3: Housing Scale & Delivery	179
4.3.2.4	Issue 4: Density at Transport Nodes	181
4.3.3	Chapter 4 – Economic Development	182
4.3.3.1	Issue 1: General	182
4.3.4	Chapter 5 – Key Regeneration Areas	185
	Topic 1: Wicklow Town Centre Strategy	
4.3.4.1	Issue 1: Improvements to Wicklow Town Centre	185
4.3.4.2	Issue 2: Retail, Entertainment and Leisure Facilities in the Town Centre	186
4.3.4.3	Issue 3: One Way System	187
4.3.4.4	Issue 4: Car Parking and Accessibility	188
4.3.4.5	Issue 5: Traffic Volumes, Vehicular, Pedestrian and Cyclist Movement	189
4.3.4.6	Issue 6: Big Belly Bins	190
	Topic 2: Rathnew Village Centre Strategy	
4.3.4.7	Issue 1: Public Realm, Retail and Business Opportunities	191
4.3.4.8	Issue 2: Amenities and Residential Development	192
4.3.4.9	Issue 3: Biodiversity and Ecology	193
4.3.4.10	Issue 4: Parks and Open Space	194
4.3.4.11	Issue 5: Heritage	195
	Topic 3: Waterfront Zone Strategy (inc. Murrough South, Harbour & Port)	
4.3.4.12	Issue 1: Protection of Coastline	196
4.3.4.13	Issue 2: Toilet, Shower and Locker Facilities at the Harbour	197
4.3.4.14	Issue 3: Tourist and Recreation Facilities	198
4.3.4.15	Issue 4: Redevelopment and Regeneration of the Murrough, Harbour and Port Area	199
4.3.4.16	Issue 5: Facilitate onshore Infrastructure/buildings to serve Offshore renewables	200

4.3.5	Chapter 6 – Retail and Opportunity Sites	
4.3.5.1	Issue 1: Not Enough Retail Offer	201
4.3.5.2	Issue 2: Use of Vacant and Derelict Sites in Town Centre for Retail	202
4.3.5.3	Issue 3: Provision of a Cinema	203
4.3.6	Chapter 7 – Community Development	
4.3.6.1	Issue 1: Schools, Childcare/Crèches and Services in particular Healthcare	204
4.3.6.2	Issue 2: Provision of Active Open Space, Sports Facilities and Public Parks	208
4.3.6.3	Issue 3: Provision of Playgrounds	215
4.3.7	Chapter 8 – Tourism	
4.3.7.1	Issue 1: Provision of a Greenway	217
4.3.7.2	Issue 2: The Murrough	218
4.3.7.3	Issue 3: Tourism Accommodation	219
4.3.7.4	Issue 4: Tourism Potential of Tinakilly Avenue	220
4.3.8	Chapter 9 – Infrastructure	
	Topic 1: Utilities	221
4.3.8.1	Issue 1: Electricity Supply, Water & Sewerage Infrastructure	221
	Topic 2: Transportation	223
4.3.8.2	Issue 1: General	223
4.3.8.3	Issue 2: Bus/Train services	226
4.3.8.4	Issue 3: Rathnew Inner Relief Road	228
4.3.8.5	Issue 4: Road objective from Tighe’s Avenue to R752	230
4.3.8.6	Issue 5: Local Roads/Traffic Management	232
4.3.8.7	Issue 6: Footpaths and Cycleways	234
4.3.8.8	Issue 7: Car Parking/Car charging	235
4.3.8.9	Issue 8: Accessibility & Safety	236
4.3.9	Chapter 10 – Heritage/Biodiversity/Heritage Maps	
4.3.9.1	Issue 1: Natural Heritage (Murrough, Biodiversity, Wildlife)	237
4.3.9.2	Issue 2: Light Pollution	239
4.3.9.3	Issue 3: Trees	240
4.3.9.4	Issue 4: Fairy Tree at SLO2 Tinakilly	241
4.3.9.5	Issue 5: Flooding and Coastal Erosion	242
4.3.9.6	Issue 6: Natural and Built Heritage at Tinakilly	243
4.3.9.7	Issue 7: Built Heritage and Character	244
4.3.9.8	Issue 8: Funding	244

4.3.10 Chapter 11 – Zoning and Land Use	
4.3.10.1 Requested changes to Land Use Map Zoning	255
4.3.10.2 Specific Local Objectives (SLO)	352
SLO 2 Tinakilly/Newrath	352
SLO 3 Milltown North	357
SLO 4 Bollarney North	360
SLO 6 Ballynerrin	362
SLO 7 Rosanna Lower (RIRR) and SLO8 Rosanne Lower (School Site)	368
4.3.11 Appendix 2 Social Infrastructure Audit	369
4.3.11.1 Issue 1: Quantum of CE Zoned Lands	369
4.3.11.2 Issue 2: Provision of Community, Leisure and Entertainment Facilities	371
4.3.12 Appendix 3 Green Infrastructure	373
4.3.12.1 Issue 1: Protection of Trees in the Settlement	373
4.3.12.2 Issue 2: Marlton Linear Park/Green Corridor	373
4.3.13 Appendix 4 Strategic Flood Risk Assessment	374
4.3.13.1 Issue 1: General	374
4.3.13.2 Issue 2: Residential Development in Flood zones	379
4.3.13.3 Issue 3: Open Space	383
4.3.13.4 Issue 4: Infrastructure	385

SECTION 5 STRATEGIC ENVIRONMENTAL ASSESSMENT AND APPROPRIATE ASSESSMENT 387

SECTION 6 STRATEGIC FLOOD RISK ASSESSMENT ADDENDUM 1

SECTION 7 PROPOSED AMENDED ADDITIONAL MAPS/DRAWINGS

Draft Map A Open Space Provision

Proposed Amended Map B Open Space Provision

Proposed Amended Map 4A Flood Risk Present Day

Proposed Amended Map 4B Flood Risk Present Day & Draft Zoning

Proposed Amended Map 4C Flood Risk Present Day & Proposed Amended Zoning

Proposed Amended Map 4D Flood Risk Future Scenario

Proposed Amended Map 4E Flood Risk Future Scenario and Proposed Amended Zoning

Map 5 Proposed Amended Transport Strategy Map

Map 6 Proposed Amended Rathnew Village Centre Strategy Map

Section 1 Introduction

1.1 Introduction

This Chief Executive's Report is submitted under Section 20(3)(c) of the Planning and Development Act 2000 (as amended). It is part of the formal statutory process of the preparation of a Local Area Plan. This Report contains the following:

- i. a list of the persons or bodies that made submissions,
- ii. a summary of the issues raised by them,
- iii. the opinion of the Chief Executive in relation to the issues raised, and her recommendations in relation to the proposed LAP, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

The members of the planning authority are required to consider the proposal to make the local area plan and this report of the Chief Executive.

1.2 Next Steps

Following consideration of this Chief Executive's Report, the local area plan shall be deemed to be made in accordance with the recommendations of the Chief Executive as set out in this Report, 6 weeks after the furnishing of the report to the members, unless the planning authority, by resolution, decides to either:

- i. make or amend the plan otherwise than as recommended in this report, or
- ii. not make the plan.

This matter is to be on the agenda for consideration at the County Council meeting on the 10th February 2025.

Where, following consideration of the Chief Executive's Report, it appears to the members of the authority that the Draft LAP should be altered, and the proposed alteration would if made be a material alteration of the draft LAP, the Planning Authority shall, not later than 3 weeks after the passing of a resolution publish notice of the proposed material alteration in one or more newspapers circulating in its area, and send notice of the proposed material alteration to the Minister, to the Office of the Planning Regulator, the Board and the prescribed authorities (enclosing where the authority considers it appropriate a copy of the proposed material alteration).

In the event that material amendments to the draft plan are proposed, the planning authority shall determine if a Strategic Environmental Assessment or Appropriate Assessment, as the case may be, is or are required to be carried out as respects one or more than one proposed material amendments to the Draft LAP.

The Chief Executive shall, not later than 2 weeks after a determination that SEA/AA of a material amendment is required, specify such period as she considers necessary following the passing of the resolution, as being required to facilitate an assessment. The planning authority shall carry out an assessment required of the proposed material amendment of the draft local area plan within the period specified by the Chief Executive.

The planning authority shall publish notice of the proposed material amendment, and where appropriate

in the circumstances, the making of a determination that a SEA/AA is required. The planning authority shall carry out the assessment within the period specified by the Chief Executive.

The notice relating to material amendments shall state –

- i. that a copy of the proposed material amendment and of any determination by the authority that a SEA/AA is required may be inspected during a stated period of not less than 4 weeks, and
- ii. that written submissions or observations with respect to the proposed material amendment and of any determination by the authority that a SEA/AA is required, may be made to the planning authority and shall be taken into consideration before the making of any material amendment.

1.3 Draft Consultation Process

The draft Wicklow Town – Rathnew Local Area Plan (LAP) 2025-2031 was placed on display during the period of 09 October 2024 to 20 November 2024 (6 weeks). The aim of the consultation process was to enable the public and interested parties to give their observations on the draft LAP. A total of **166 valid** submissions were made¹. The written submissions are held on file and are available for inspection on Wicklow County Council’s website [here](#).

1.4 Proposed Variation No. 2 to the County Development Plan 2022 – 2028

The process for making Proposed Variation No. 2 to the County Development Plan 2022 – 2028 is running alongside the draft Wicklow Town – Rathnew Local Area Plan process. The reason for the proposed variation is to integrate the LAP maps into the CDP and to ensure consistency of the draft and final Wicklow Town – Rathnew LAP with the CDP. The draft LAP and the proposed variation went out on display at the same time with submissions invited. Many submissions to the draft LAP referred to the Proposed Variation in the title / introduction of their submission however the content of the submission related to the draft LAP. Such submissions are dealt with in this CE report on the draft LAP.

The submissions to the variation are dealt with in a separate CE report on the Proposed Variation.

1.5 Consideration of Submissions

Each submission made has been summarized and assessed in Part 4 of this report.

Part 4 is broken into two sections – Section 1 relates to submissions from prescribed bodies and elected representatives, while Section 2 deals with submission from the public.

Section 1 is organised by submitter and addresses the issues in the order set out in the submission, whereas Section 2 is organised by topic, rather than by submitter. The topic order is as per the order topics are set out in the draft LAP.

For ease, a full list of all of the Chief Executive’s recommended amendments is provided in Part 2 of this report.

This report is submitted to the Council Members for their consideration.

¹ Please note that any submission received after the closing date, and any submission that did not meet the requirements of the Act with regard to identification of the submitter have been deemed invalid.

Section 2

Chief Executives Recommended Proposed Amendments

To follow is a list of the Chief Executive's recommended amendments to the Draft Local Area Plan.

New text is shown in red, deleted text in ~~blue strikethrough~~.

With respect to environmental matters:

1. The Proposed Amendments to the Draft LAP as set out in this document would further contribute towards provisions related to sectors and topics that are already provided for within the Draft Local Area Plan and the existing County Development Plan. Taking into account the measures that have already been integrated into the Draft Local Area Plan and the existing County Development Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, any potential effects arising from these changes would either: be present already (beneficial) and would be further contributed towards, but not to a significant extent; and/or would be mitigated so as not to be significant (adverse). Taking this into account, these changes would not be likely to result in significant environmental effects.
2. There are no additional sources for effects on European sites arising from the Proposed Amendments to the Draft LAP as set out in this document that have not been considered by the AA to date. Taking into account the mitigation measures that have already been integrated into the Draft Local Area Plan and the existing County Development Plan, these changes would not affect the integrity of any European site.

Section 2.1

Chapter 3 Residential Development

No.	Section	Proposed Amendment																																								
1	Table 3.1 New Residential Zoning	<table border="1"> <thead> <tr> <th>Location</th> <th>Area (ha)</th> <th>Status (Q3 2024)</th> <th>Zoning /Priority</th> </tr> </thead> <tbody> <tr> <td>Hawkstown Road</td> <td>5.5ha</td> <td>Permission granted on part of the site.</td> <td>RN1</td> </tr> <tr> <td>Marlton (N of Marlton Stream/ Marlton Link Road)</td> <td>4.6ha</td> <td>Permission granted on part of the site.</td> <td>RN1</td> </tr> <tr> <td>Marlton (S of Marlton Stream)</td> <td>5.9ha</td> <td>Current planning application on site.</td> <td>RN1</td> </tr> <tr> <td>West of Hawkstown Park</td> <td>1.6ha</td> <td>Local Authority Scheme</td> <td>RN1</td> </tr> <tr> <td>Hillview</td> <td>0.9ha</td> <td>Local Authority Scheme</td> <td>RN1</td> </tr> <tr> <td>Greenhills Road</td> <td>1.2ha</td> <td>Local Authority Scheme</td> <td>RN1</td> </tr> <tr> <td>Rathnew village</td> <td>0.1ha</td> <td>Local Authority Scheme</td> <td>RN1</td> </tr> <tr> <td>Rosanna Lower (Hunters Road)</td> <td>2.5ha</td> <td>Permission granted</td> <td>RN1</td> </tr> <tr> <td>Tinakilly Park</td> <td>11ha</td> <td>Linked to essential infrastructure</td> <td>RN1</td> </tr> </tbody> </table>	Location	Area (ha)	Status (Q3 2024)	Zoning /Priority	Hawkstown Road	5.5ha	Permission granted on part of the site.	RN1	Marlton (N of Marlton Stream/ Marlton Link Road)	4.6ha	Permission granted on part of the site.	RN1	Marlton (S of Marlton Stream)	5.9ha	Current planning application on site.	RN1	West of Hawkstown Park	1.6ha	Local Authority Scheme	RN1	Hillview	0.9ha	Local Authority Scheme	RN1	Greenhills Road	1.2ha	Local Authority Scheme	RN1	Rathnew village	0.1ha	Local Authority Scheme	RN1	Rosanna Lower (Hunters Road)	2.5ha	Permission granted	RN1	Tinakilly Park	11ha	Linked to essential infrastructure	RN1
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2	Residential Objectives	<p>Insert new Objective:</p> <p>WTR – XX:</p> <p><i>To promote and facilitate the development of a range of residential development types, tenures and sizes, including affordable and cost-rental properties, in order to cater for the varying housing needs and economic circumstances of the town's population. In particular, Wicklow County Council shall work with the Land Development Agency, and other relevant stakeholders, to deliver a range of residential tenures to meet the requirements of the population including (but not limited to) affordable and cost-rental housing types on appropriate lands, subject to compliance with the policies and objectives of the LAP, the Development Plan and other relevant national and regional policies and guidelines.</i></p>																																								

Section 2.2

Chapter 4 Economic Development

No.	Section	Proposed Amendment
3	Employment Objectives	<p>Add new objective as follows:</p> <p>WTR-X:</p> <p><i>To facilitate and support Wicklow Town Centre and Rathnew Village Centre as the priority locations for new employment, particularly 'people'-based employment development.</i></p>

Section 2.3

Chapter 5 Key Regeneration Areas

No.	Section	Proposed Amendment
4	Wicklow Town Centre Strategy objectives	<p>Add new objective as follows:</p> <p>WTR-X:</p> <p><i>To promote Wicklow Town Centre (and Rathnew Village Centre) in the first instance as the priority locations within the settlement for new residential, retail / retail services, community and employment use through the development of vacant or underutilised sites and via the reconfiguration / redevelopment of existing low density development, while at all times respecting the character and heritage of the town / village centres. In particular, to support the development of opportunity sites in accordance with the specific criteria set out for each identified area within this Local Area Plan.</i></p>
5	Rathnew Village Centre Strategy objectives	<p>Add new objective as follows:</p> <p>WTR-X:</p> <p><i>To promote Rathnew Village Centre (and Wicklow Town Centre) in the first instance as the priority locations within the settlement for new residential, retail / retail services, community and employment use through the development of vacant or underutilised sites and via the reconfiguration / redevelopment of existing low density development, while at all times respecting the character and heritage of the town / village centres. In particular, to support the development of opportunity sites in accordance with the specific criteria set out for each identified area within this Local Area Plan.</i></p>
6	Rathnew Village Centre Strategy objectives	<p>Add new objective as follows:</p> <p>WTR-X:</p> <p><i>To support and reinforce the unique identity and the key service role of Rathnew village centre as the priority location within the northern sector of the settlement of Wicklow Town – Rathnew for investment and new development through:</i></p> <ul style="list-style-type: none"> ▪ <i>enhancing the urban realm in the village centre and creating new urban spaces, in order to provide for a welcoming, safe and vibrant place for the community to meet and interact;</i> ▪ <i>investment in pedestrian and cyclist accessibility and safety, in order to ensure excellent linkages between the village and Wicklow County Campus, the surrounding existing residential areas and Wicklow Town;</i> ▪ <i>Protecting function of Rathnew as a service centre with its own level of retail, retail services, employment and community services appropriate to a village of its size and catchment, and not allowing it be absorbed as a 'suburb' of Wicklow town. In particular to resist the development of any new retail or commercial facilities outside of the village centre zone or within 1km of Rathnew core retail area;</i> ▪ <i>the re-development / regeneration of vacant or underutilised sites in the core of the village in particular Opportunity Site 5</i>
7	Rathnew Village Centre Strategy -	<p>Delete the following text from this section:</p> <p><i>This area is also part of the historical development of Rathnew with the c.18th century</i></p>

Wicklow County Campus to Tinakilly

estate houses of Clermont House to the northwest and Tinakilly House to the east, with the Rathnew Stream dividing the two estate grounds. In the central area (i.e. around the roundabout) the village centre has developed with strong 2-storey streetscape of retail and commercial developments that provide for some of the everyday retail and services needs of the residents of the village. The linkages between this area and the rest of the village are important given the services available here. Rathnew village centre has been extended to the north with the development of Aldi and Costa Coffee, on lands that historically formed part of Clermont House. The development of these lands has enhanced connection and linkages between the village centre and Clermont / Wicklow County Campus. *This connection with Wicklow County Campus will be further enhanced with the development of the Village Centre lands to the east of Clermont Grove.*

A new junction has also been created here facilitating pedestrian crossings between Wicklow County Campus and the area to the north of the Glenealy Road / Charvey Lane. The area along both sides of the Rathnew stream has been zoned appropriately to facilitate the development of a riverine public park with links down to the Murrough to the east. The development of the Clermont Grove housing estate includes the western element of this new park, fronting onto the bridge and R772. Some lands along the south bank of the stream have also been identified in the Flood Risk Assessment as being in the high flood risk zone and therefore an 'open space' zoning is the most appropriate for this area.

There are good footpaths in the area of the village but no cycleways. The pedestrian experience has been enhanced in parts with crossings available towards the old village and at Aldi. The pedestrian and cyclist experience is somewhat diminished by the existence of on-street parking in front of the shops, but until an alternative off street car parking can be developed, it is considered essential that this car parking remain for the convenience of shoppers and vitality of the village centre. The public realm at the existing bus stop / car park has been improved with the addition of bicycle parking, bus shelters and information signs.

8 Rathnew Village Centre Strategy

Update Rathnew Village Centre Strategy Map as follows:

Draft Map

Rathnew Village Centre Strategy Map

Proposed Amended Draft Map



Larger scale map is appended to this report.

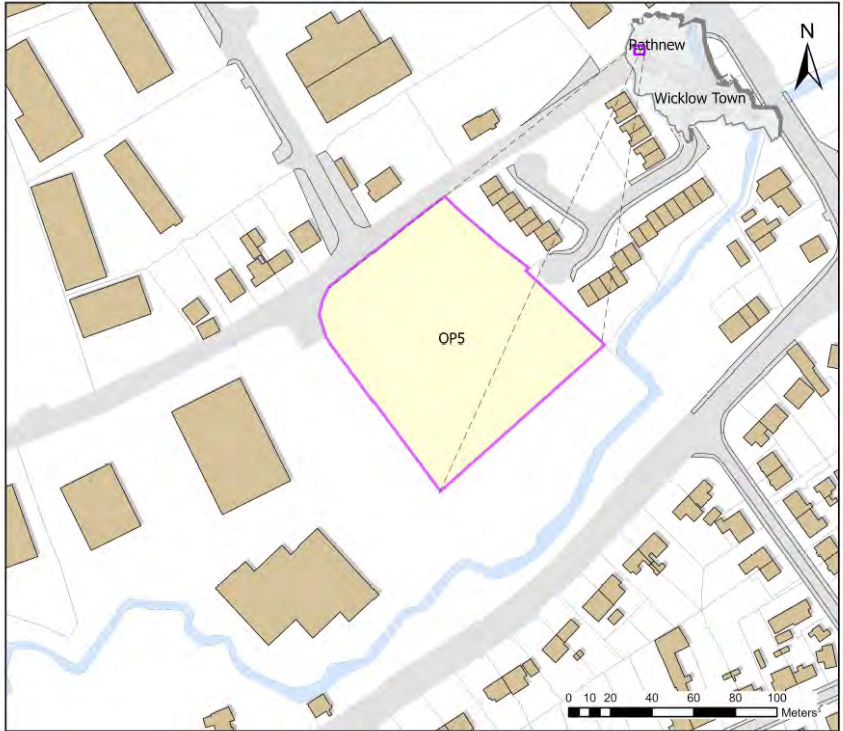
9 Key Regeneration Areas

Improve legibility of the following maps including clearer identification of Opportunity Sites and clearer numbering / labelling upon adoption of plan:

- Map 5.1 Wicklow Town Centre Strategy Map
- Map 5.2 Rathnew Village Centre Strategy Map
- Map 5.3 Wicklow Town Waterfront Strategy boundary map
- Map 5.4 Wicklow Town Waterfront Strategy zoning map
- Map 5.5 Wicklow Town Waterfront Strategy Map

Section 2.4

Chapter 6 Centres and Retail, including Opportunity Sites

No.	Section	Proposed Amendment
10	Opportunity Sites	<p>Insert new Opportunity Site as follows:</p> <p>OP5 – Charvey Lane</p> <p><i>These 'village centre' and 'open space' zoned lands measure c.1ha and have road frontage onto Charvey Lane and the R772. These lands are located in the heart of Rathnew Village and the development of same would provide an opportunity to make best use of serviced land, densify the centre of the village and to provide for additional community and commercial uses, and also to provide for a new amenity and biodiversity enhancement area along the natural corridor of the Rathnew River.</i></p> <p>Objectives OP5</p> <ul style="list-style-type: none"><i>To provide for a high density mixed use development on lands zoned VC which may include commercial, retail, retail services, residential, community and cultural uses;</i><i>Buildings shall be designed to the highest quality that provides for a strong street frontage along Charvey Lane, and maximum supervision of the OS lands along the Rathnew River.</i><i>Vehicular access shall be via Charvey Lane, with high quality pedestrian and cyclist access across the site linking Charvey Lane to the R772</i><i>Lands zoned OS to the south of the river and for a distance of not less than 10m to the north of the river shall be retained in as natural condition with maximum tree / vegetation retention as possible subject to any essential clearance to provide for new pedestrian / cyclist routes. Any river crossings shall be via a clean span bridges that maintain its natural character. Any remaining OS shall be laid out for amenity use.</i> <p>Proposed OP5 Site Charvey Lane</p> 

Proposed Indicative Concept Plan OP5 Charvey Lane



Section 2.5
Chapter 9 Infrastructure

No.	Section	Proposed Amendment
11	Transportation Objectives	<p>Include new objective</p> <p>WTR – XX</p> <p><i>In collaboration and with the support of the relevant transport agencies to prepare a Local Transport Plan for Wicklow Town – Rathnew. The preparation of the plan would be subject to screening for both SEA and AA and, as relevant, subsequent stages of assessment.</i></p> <p>Change Objective Number of all follow objectives thereafter.</p>
12	Transportation Objectives	<p>Add new objective</p> <p>WTR-XX:</p> <p><i>To promote the delivery of improved and new bus services and infrastructure within the plan area and connecting the plan area to the wider region by:</i></p> <ul style="list-style-type: none"> ▪ <i>supporting the development and delivery of bus service enhancement projects, under the Connecting Ireland programme and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate;</i> ▪ <i>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);</i> ▪ <i>supporting the development of enhanced bus shelters, of secure covered bicycle parking facilities at key locations along bus routes,</i> ▪ <i>to promote and support the improvement of M11 / N11 in a manner capable of facilitating greater free flow of public transport,</i> ▪ <i>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).</i>
13	Transportation Objectives	<p>Add new objective</p> <p>WTR – XX</p> <p><i>To support and facilitate the delivery of Transit-Oriented Development at locations that may be identified in the plan area as appropriate for such and continue to work with state agencies to identify TOD sites served by existing or planned public transport which are appropriate for high density development supporting a mix of uses.</i></p>
14	Flooding and Coastal Erosion	<p>Add the following text with respect to the Wicklow County Campus zoning:</p> <p><i>Some parts of the Wicklow County Campus zone are identified as being at risk of flooding. The zoning objective does not proscribe exactly where in the zone development should occur and the zone is sufficiently large to provide for the development of desired uses while avoiding development in any area at risk of flooding. Any proposals for new development are required to be accompanied by an appropriately detailed FRA, undertaken in accordance with 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009), as well as the relevant policies and objectives in the County Development Plan and Wicklow Town-Rathnew Local Area Plan. In particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within the site.</i></p>

Section 2.6

Chapter 11 Zoning & Land Use

No.	Section	Proposed Amendment
15	Section 11.1 Zoning Objectives	<p>Insert text as follows:</p> <p><i>Uses generally appropriate for residential (RN / RE) zoned areas include houses, apartments, residential open space, education, community facilities, retirement homes, nursing homes, childcare/crèche, health centres, guest house, bed and breakfast, places of public worship, home based economic activity, utility installations and ancillary development and other residential uses in accordance with the County Development Plan (CDP) and Local Area Plan (LAP).</i></p> <p><i>Uses generally appropriate for town and village centres (TC / VC) include residential development, childcare/crèche, commercial, education retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the CDP and LAP.</i></p> <p><i>Uses generally appropriate for neighbourhood centre (NC) include retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, residential development, childcare/crèche, commercial, education, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for neighbourhood centre uses in accordance with the with the CDP and LAP.</i></p> <p><i>Uses generally appropriate for local shops and services (LSS) include retail, retail services, health, public house, guest houses, parking, residential development, childcare/crèche, commercial, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for local shops and services uses in accordance with the with the CDP and LAP.</i></p> <p><i>Uses generally appropriate for Wicklow County Campus (CC) zoned land include Car Park, Community Facility, childcare / crèche, Education, Enterprise Centre, Industry (Light), Laboratory, Office-Based Employment, Open Space, Playground, Public Services, Recreational Building, Recreational Facility/Sports Club, Residential¹, Restaurant/ public house², Skate Park, Film sector, Food sector, Renewable energy sector and ancillary developments for Wicklow County Campus uses in accordance with the CDP and LAP.</i></p> <p><i>Uses generally appropriate for employment (E) zoned land include general and light industry, office uses, enterprise units, education, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, including sports grounds, childcare/crèche, community facilities including community and sports centres, utility installations and ancillary developments for employment and industry uses in accordance with the CDP and LAP.</i></p> <p><i>Uses generally appropriate for waterfront (WZ) zoned land include aquaculture / fishing, residential, childcare/crèche, civic / cultural uses, community facilities, education, employment / office uses, general and light industry, harbour uses, health related service /</i></p>

¹ Only Student accommodation related to the college

² Strictly only to meet the needs of the student population.

		<p>uses, hotels, maritime uses, recreational and leisure uses, retail, restaurants, parking, public house, tourism uses, utility installations and ancillary development in accordance with the CDP and LAP.</p> <p>Uses generally appropriate for community and educational (CE) zoned land include community, <i>childcare/crèche</i>, educational and institutional uses include burial grounds, places of worship, schools, training facilities, community hall, nursing homes, health related developments, sports and recreational facilities, utility installations and ancillary developments for community, educational and institutional uses in accordance with the CDP and LAP.</p> <p>Uses appropriate for open space (OS1) zoned land are recreational uses such as formal / informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, Mixed Use Games Areas and outdoor gyms <i>and allotments</i>.</p>
16	Section 11.1 Zoning Objectives	<p>Insert new sentence at end:</p> <p><i>Essential infrastructure, including roads / footpaths / cycleways and utilities that are necessary to support development lands, are generally permissible in all zones. Where such infrastructure would be required in OS1 or OS2 zones, and no other routes are viable, such infrastructure shall only be considered where it is shown it will not undermine the purpose of this zoning or give rise to significant adverse environmental impacts.</i></p>
17	Section 11.1 Zoning Objectives	<p>Amend uses generally permitted on OS1 lands as follows:</p> <p><i>Uses appropriate for open space (OS1) zoned land are recreational uses such as formal / informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, Mixed Use Games Areas and outdoor gyms <i>and allotments</i>.</i></p>
18	11.2 Waterfront Zone (WZ) Zoning Objectives	<p>Amend WZ Zoning Objectives Area 3 text and map as follows:</p> <p><i>Within Area 3 (Mixed Use Regeneration Area) the following uses are deemed 'priority uses' and will be permitted in principle</i></p> <ul style="list-style-type: none"> ▪ <i>High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc will not be considered;</i> ▪ <i>High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;</i> ▪ <i>High quality community, civic / cultural and recreation uses;</i> ▪ <i>High quality retail, retail services, restaurants, public house, café;</i> ▪ <i>High density residential use, where developed in conjunction with at least one and ideally a number of other priority uses described above.</i> <p><i>Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area. "</i></p>

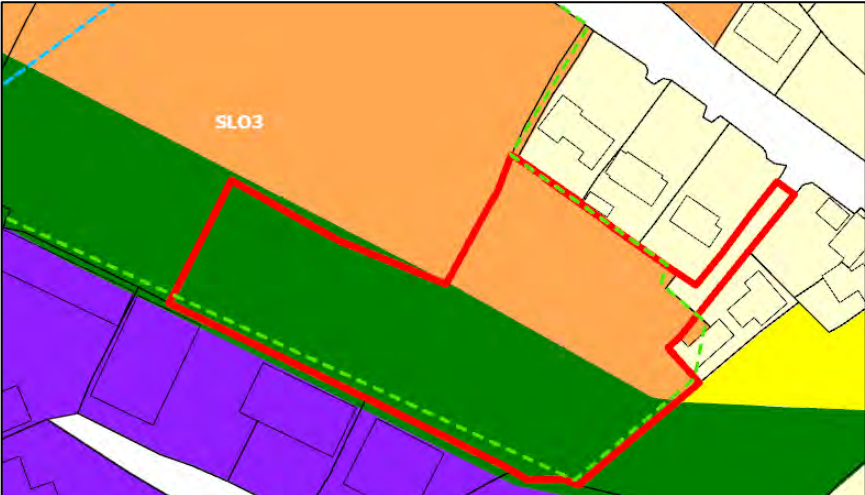
Map amendment

Change from 'unzoned':

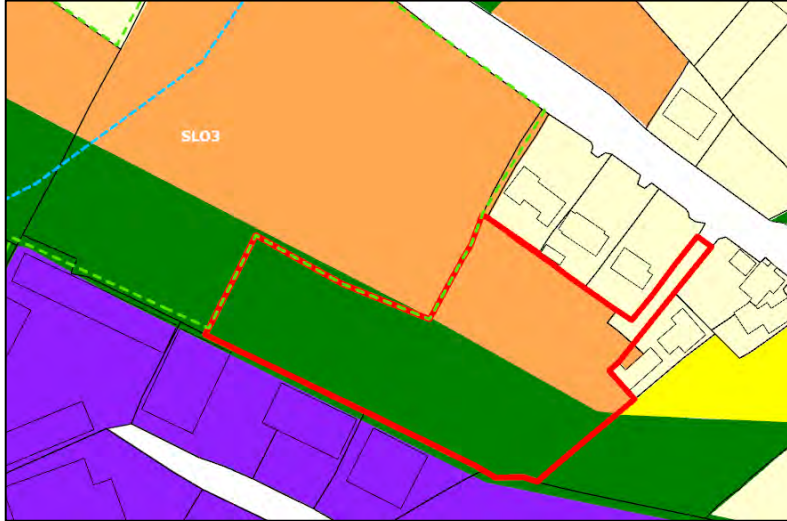


Change to 'regeneration area':



19	SLO2	<p>Amend SLO2 map and text as follows:</p> <p><i>This SLO is located in the townlands of Tinakelly and Newrath. The SLO comprises New Residential (RN1), Natural Areas (OS2) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:</i></p> <ul style="list-style-type: none"> - <i>Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area and to achieve good traffic circulation in the area. The RIRR shall be constructed in full by the developer from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road, be developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;</i> - <i>Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and</i> - <i>Retain the ‘fairy tree’ at its current location (shown with green tree symbol on map SLO 2).</i>
20	SLO3	<p>Amend SLO3 map and text as follows:</p> <p><i>This SLO is located in the townlands of Milltown North and Ballybeg. The SLO comprises Employment (E), New Residential (RN – Priority 2) and Natural Areas (OS2) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:</i></p> <ul style="list-style-type: none"> - <i>A new link road is to be provided that connects Tighe’s Avenue to the R752, to be developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;</i> - <i>No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752</i> - <i>Any development on these lands shall take into account the N11 set back distances as specified for different development types in the County Development Plan.</i> <p>Amend SLO3 zoning map as follows:</p> <p>Change from:</p> 

Change to: (remove the area in red from SLO3 area)



Change consequent: Amend SLO3 'Concept Plan'

21	SLO4	<p>Amend SLO4 map and text as follows:</p> <p><i>This SLO is located in the townland of Bollarney North. The SLO comprises New Residential (RN – Priority 2), Open Space (OS1), Public Utility (PU) and Community/ Education (CE). Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:</i></p> <p><i>To provide a new car park with access onto the Port Access Road for a minimum of 50 cars, with cycle parking facilities on lands zoned PU.</i></p> <ul style="list-style-type: none"> - <i>A minimum of 1.2ha on lands zoned CE shall be provided for community uses. Generally, this shall comprise a community / sports/ recreation type development of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and agreement with the Planning Authority.</i> - <i>The design and height of any development shall pay particular regard to the height of immediately adjoining (mostly 1 - 2-storey) residences and the visual impact of the proposed development on the Murrough Wetlands / coastline.</i> - <i>To provide a linear green route for walking and cycling, with a minimum width of 8 metres, on the lands zoned OS1 with pedestrian / cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly (indicative route shown with purple arrow.)</i> - <i>To provide a recreational open space park on the lands zoned OS1, to the east (lands closet to the Murrough Bridge) of a minimum of 2 hectares contiguous to the linear green route.</i> - <i>The overall site layout design shall locate the main public open space element/s of the residential development adjoining the OS1 green route/park (on the lands closed to the Murrough).</i> - <i>All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects. In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans.</i>
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Amend SLO4 zoning map as follows:

Change from:



Change to:



Change consequent: Amend SLO4 'Concept Plan'

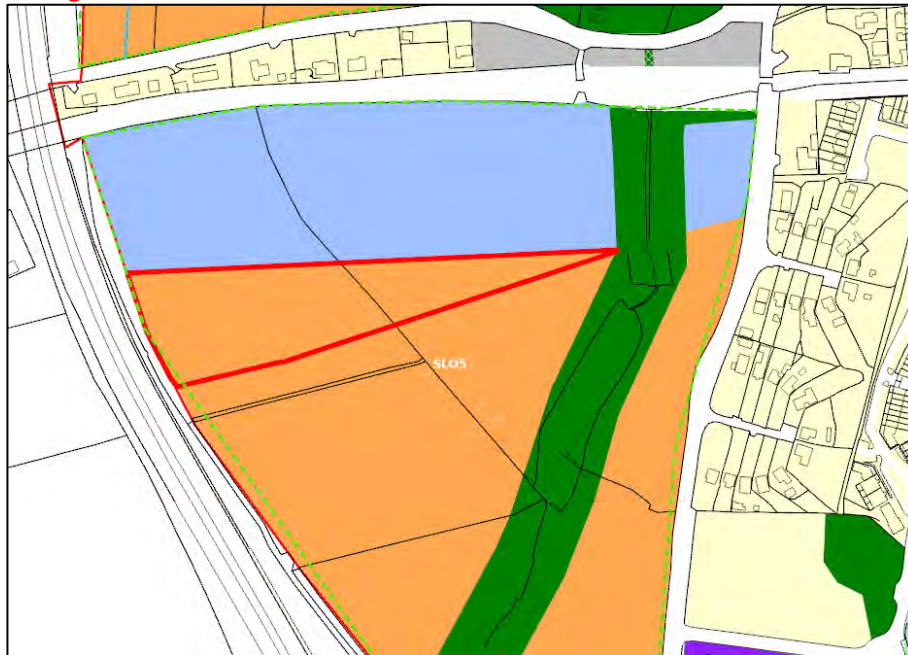
22 SLO5

Amend SLO5 map as follows:

Change from:



Change to:



Change consequent: Amend SLO5 'Concept Plan'

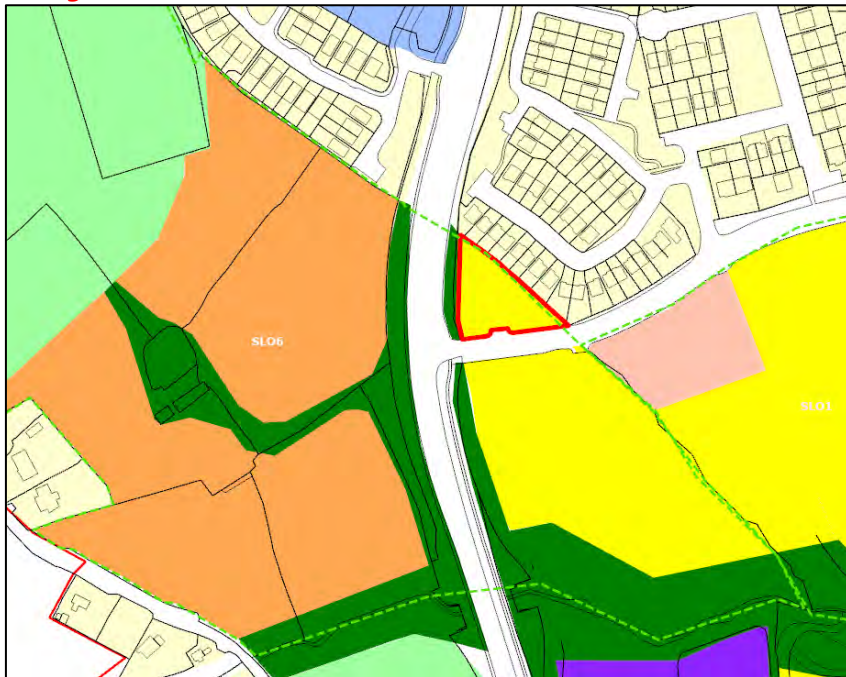
23 SLO6

Amend SLO6 map as follows:

Change from:



Change to:



Change consequent: Amend SLO5 'Concept Plan'

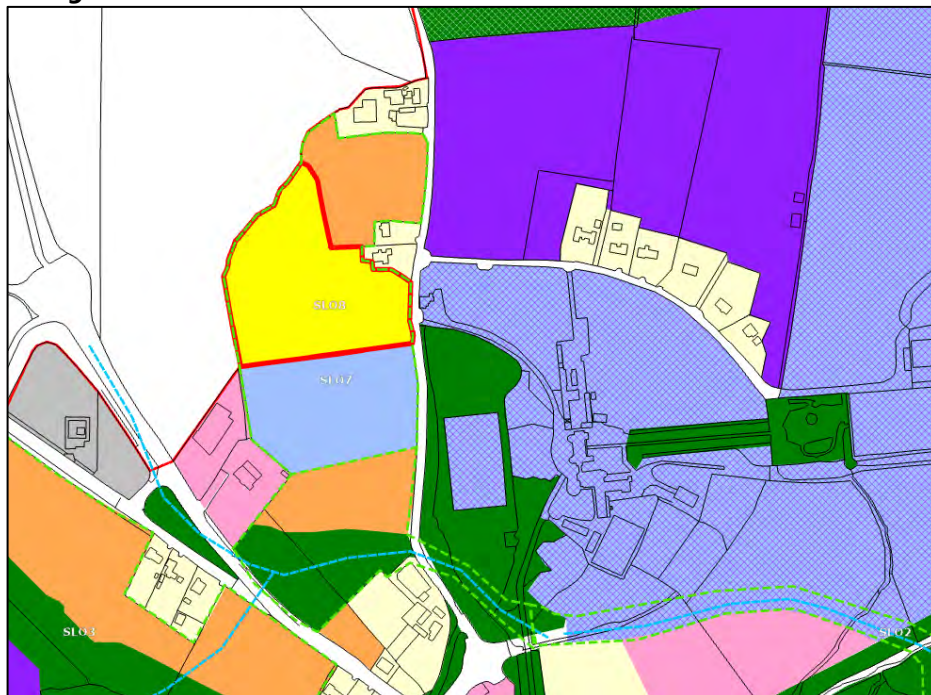
Amend SLO7 map and text as follows:

This SLO is located in the townland of Rosanna Lower. The SLO comprises New Residential (RN2), *Community & Education (CE)* and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

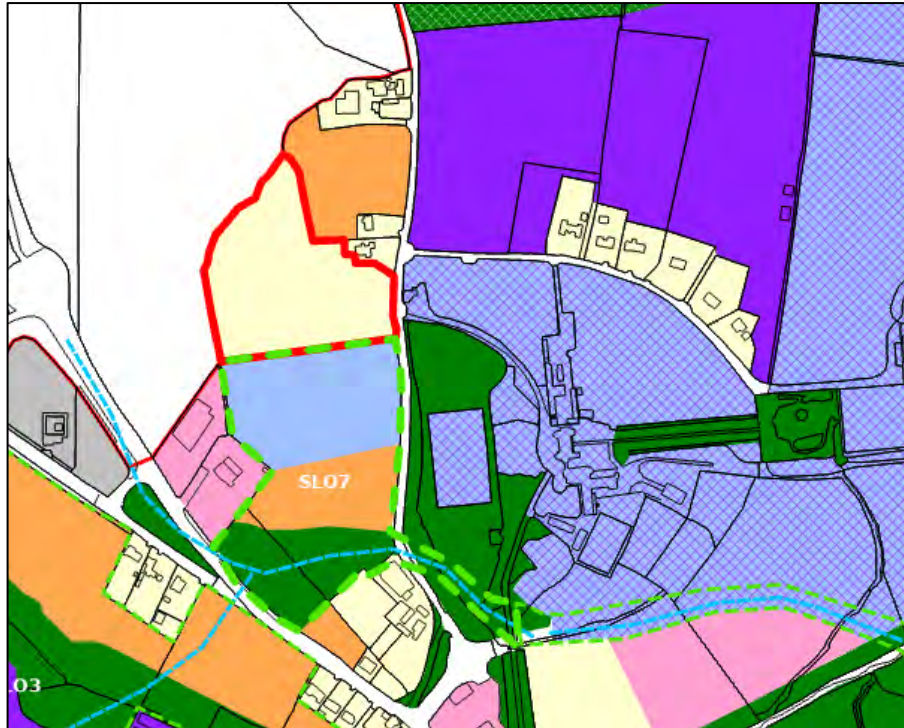
- *Lands zoned CE shall be reserved for future school use and shall not be developed for any other CE use during the lifetime of this plan.*
- *Provision of the Rathnew Inner Relief Road (RIRR). The RIRR shall be constructed in full by the developer. Any design shall make provision for the completion of the RIRR from Clermont Grove to the R750 at the Maxol Garage. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road. The RIRR shall be developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;*
- *No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752 as set out in the future Wicklow Town – Rathnew Local Transport Plan;*

Amend maps of SLO7 and SLO 8 as follows:

- Omit SLO8. Change RN1 is SLO8 to RE (permitted development under construction) and retain RN2 to north of same.
- Integrated CE site from former SLO8 into SLO7 and expand boundary of SLO7.

Change from:

Change to:



Red outline – zoning change from RN1 to RE
Green line – boundary of SLO7 area.

Change consequent: Amend SLO7 'Concept Plan'

25 SLO8

Delete SLO8 map and text

~~*This SLO is located in the townland of Rosanna Lower. The SLO comprises New Residential (RN1), New Residential (RN2) and Community & Education (CE) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:*~~

- ~~*— Lands zoned CE shall be reserved for future educational use and shall not be developed for any other CE use during the lifetime of this plan.*~~

Section 2.7

Map Amendments

(excluding map changes in SLO areas already detailed above)

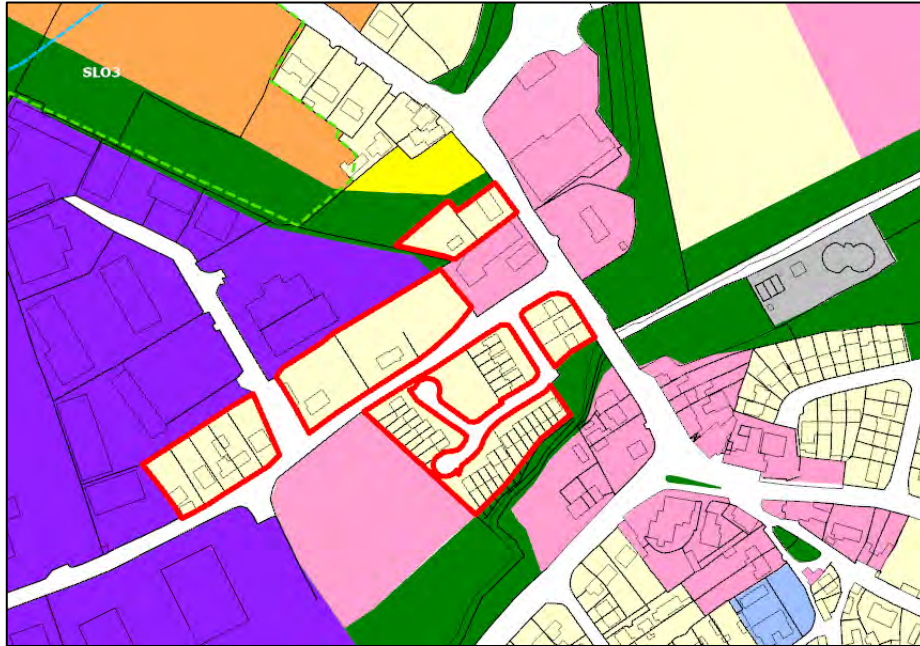
Map No. 1 Land Use Zoning Map

No.	Section	Proposed Amendment
26	Rathnew Village Centre	<p>Amend zoning of lands from 'VC Village Centre' to 'WCC-Wicklow County Campus' as illustrated below:</p> <p>Change from:</p>  <p>Change to:</p> 

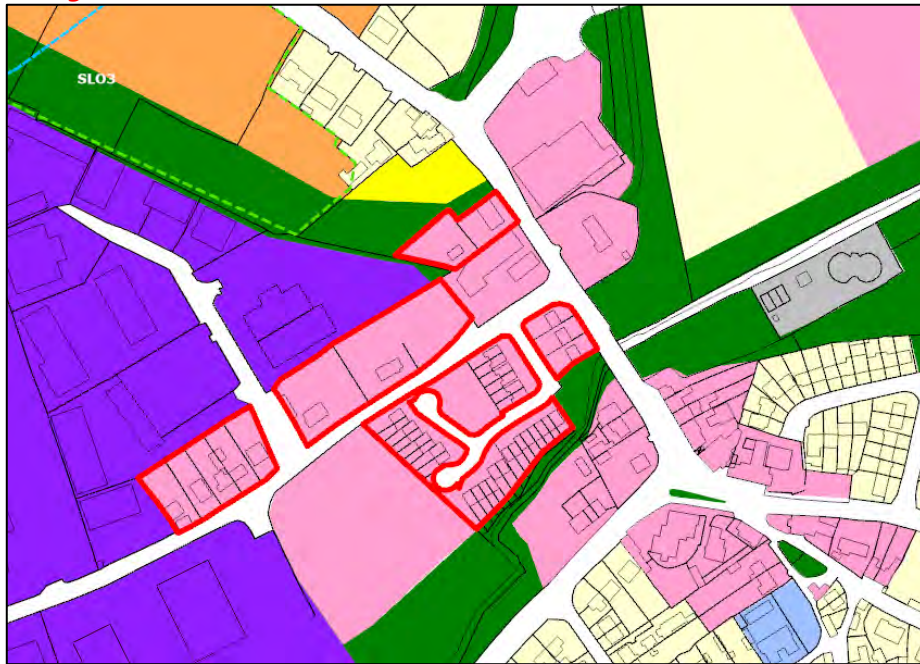
27 Rathnew Village Centre

Amend zoning of lands from 'RE – Existing Residential' to 'VC Village Centre' as illustrated below:

Change from:



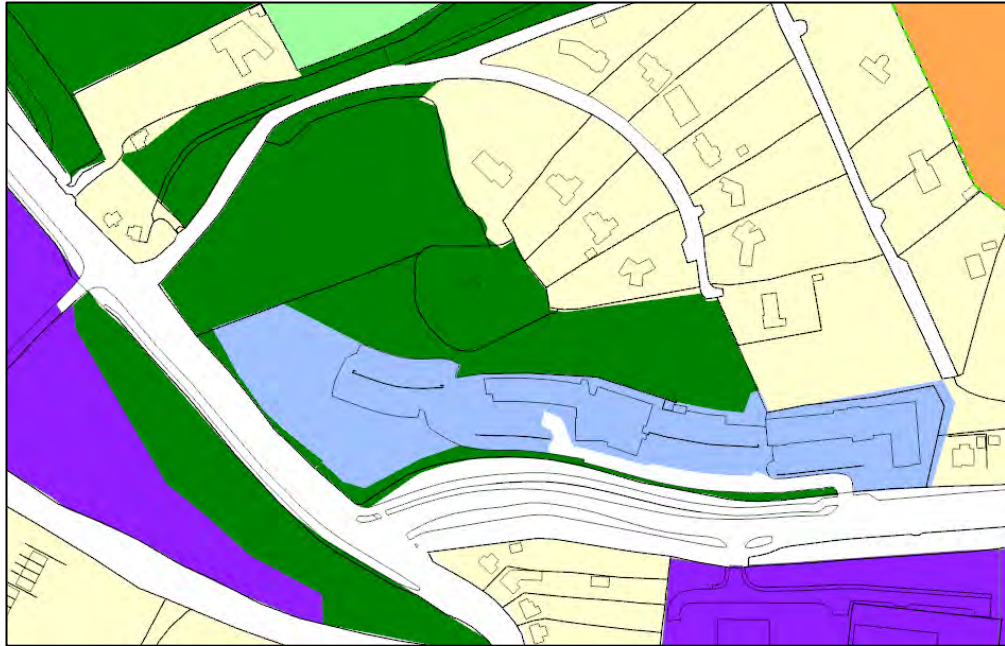
Change to:



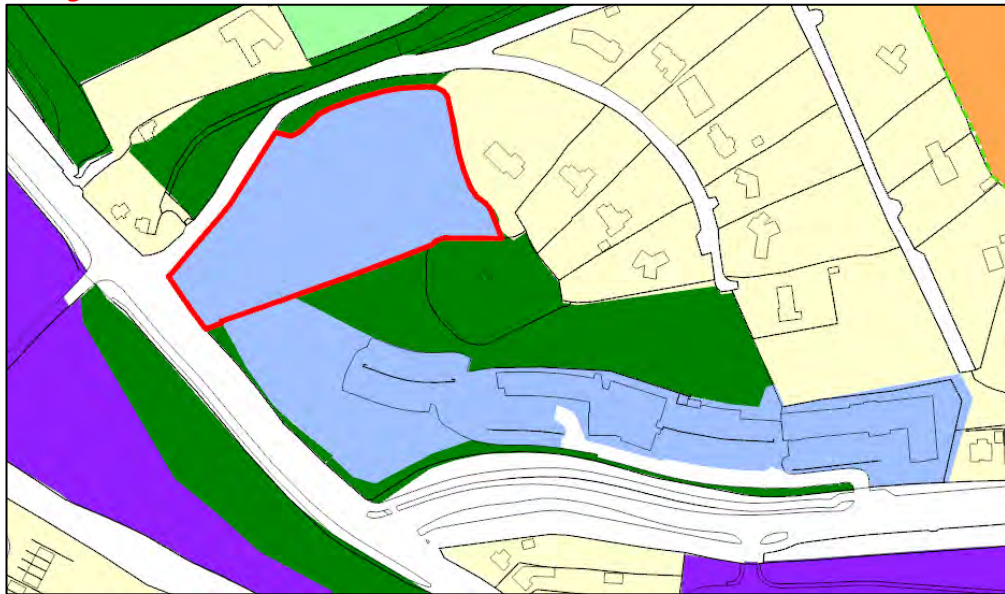
28 Knockrobin

Amend zoning of lands from 'OS1 – Open Space' to 'CE – Community & Education' as illustrated below:

Change from:



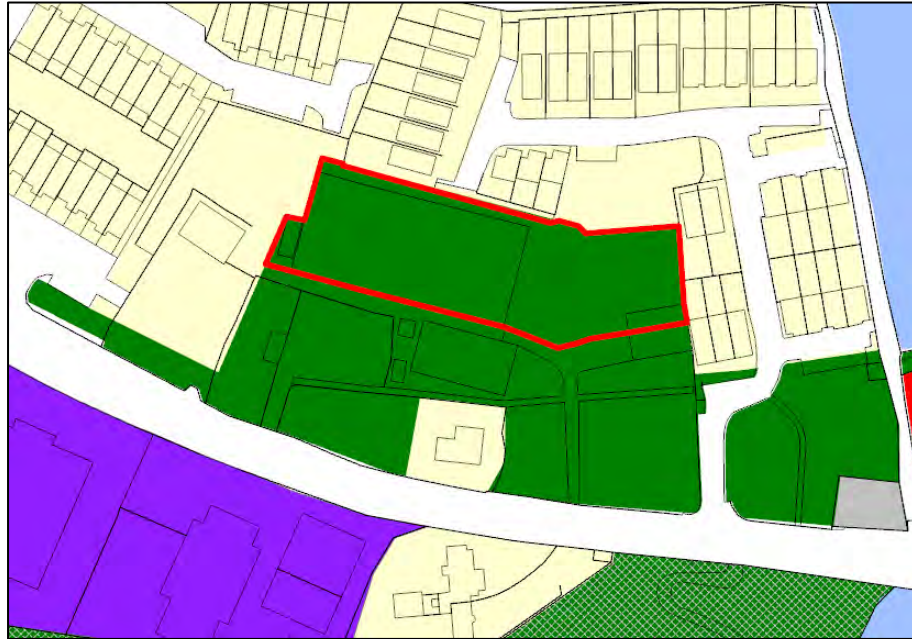
Change to:



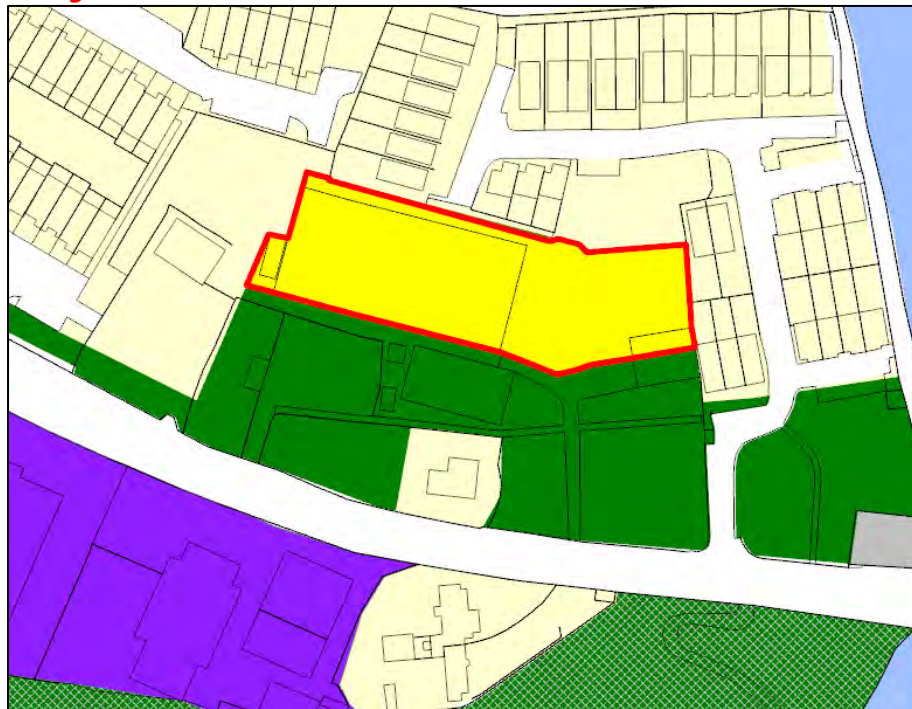
29 Bollarney North

Amend zoning of lands from 'OS1 – Open Space' to 'RN1 – New Residential' as illustrated below:

Change from:



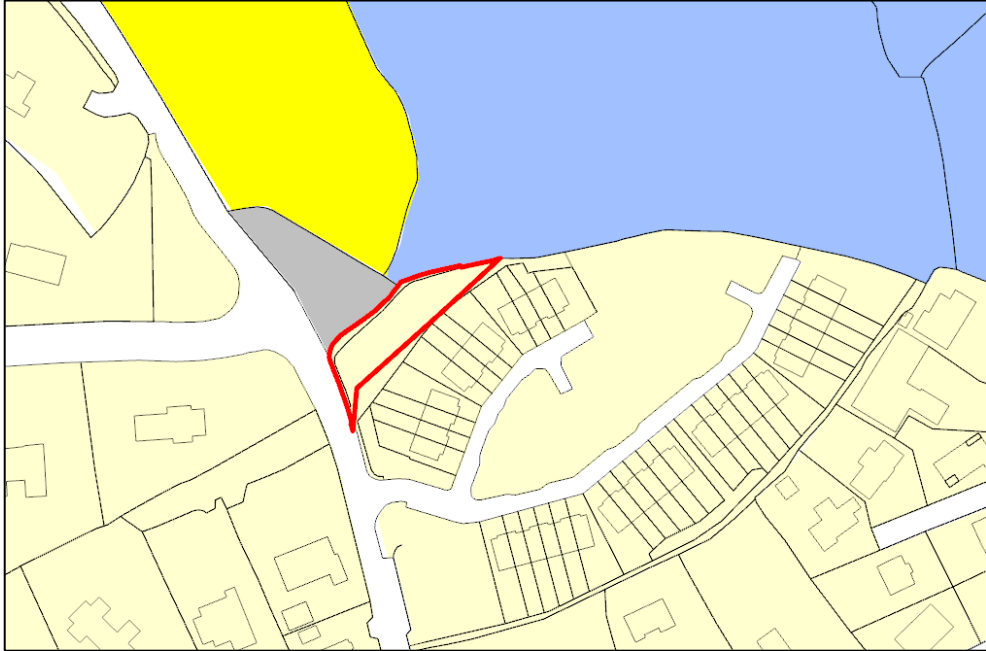
Change to:



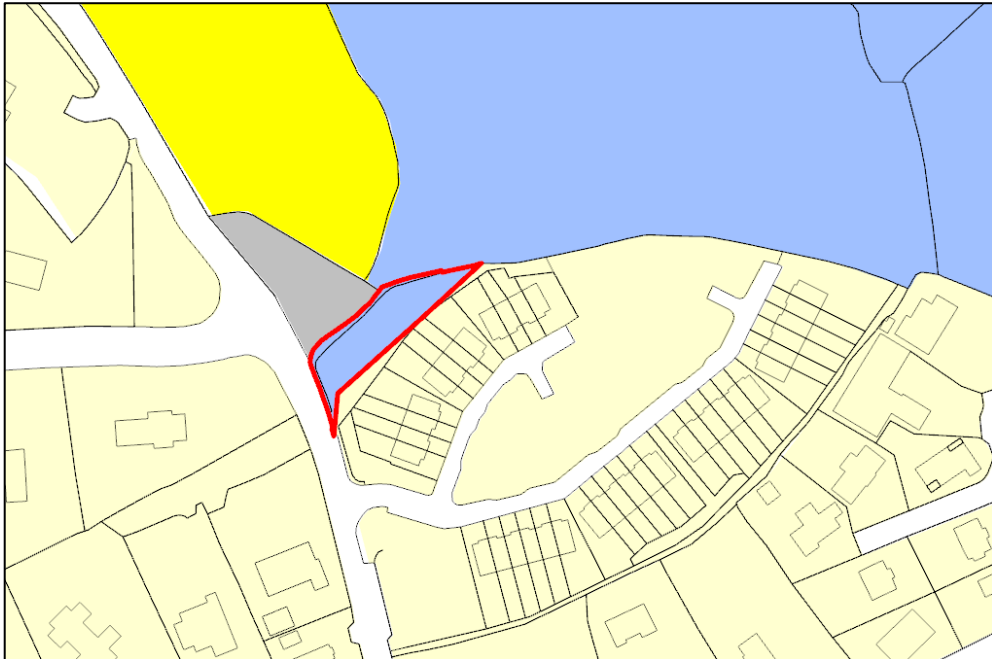
30 Corporation
Lands

Amend zoning of lands from 'RE – Existing Residential' to CE – Community & Education' as illustrated below:

Change from:



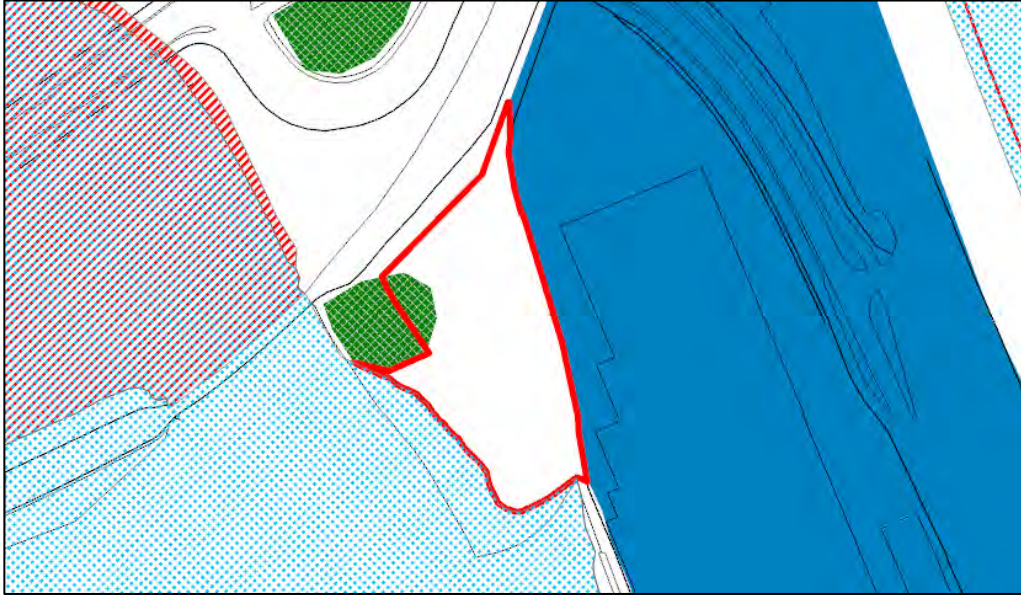
Change to:



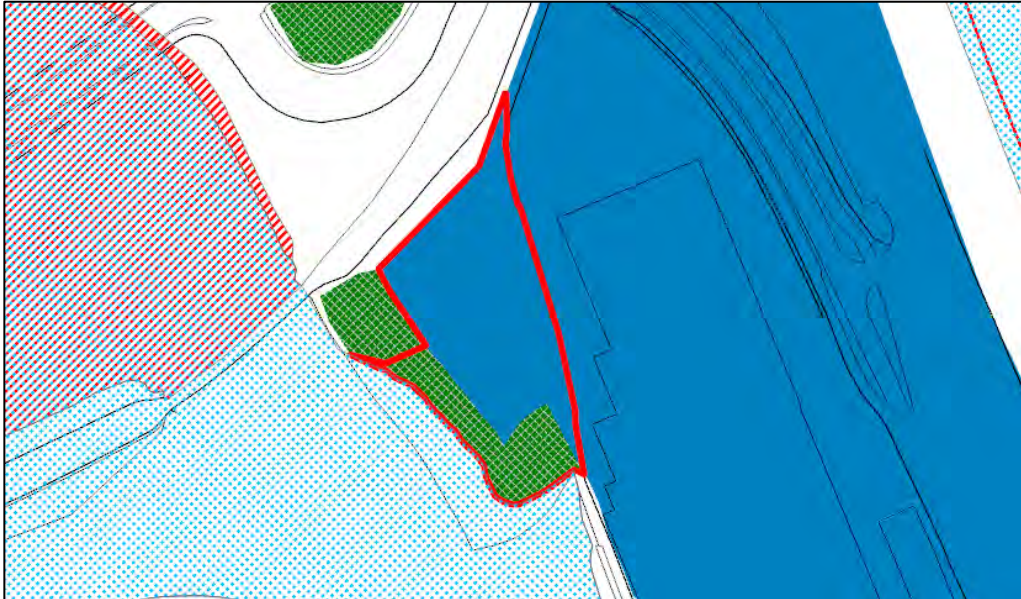
31 Waterfront Zone

Amend zoning of lands from Unzoned and 'OS2 – Natural Areas' to 'WZ Waterfront Zone' and OS2 as illustrated below:

Change from:



Change to:

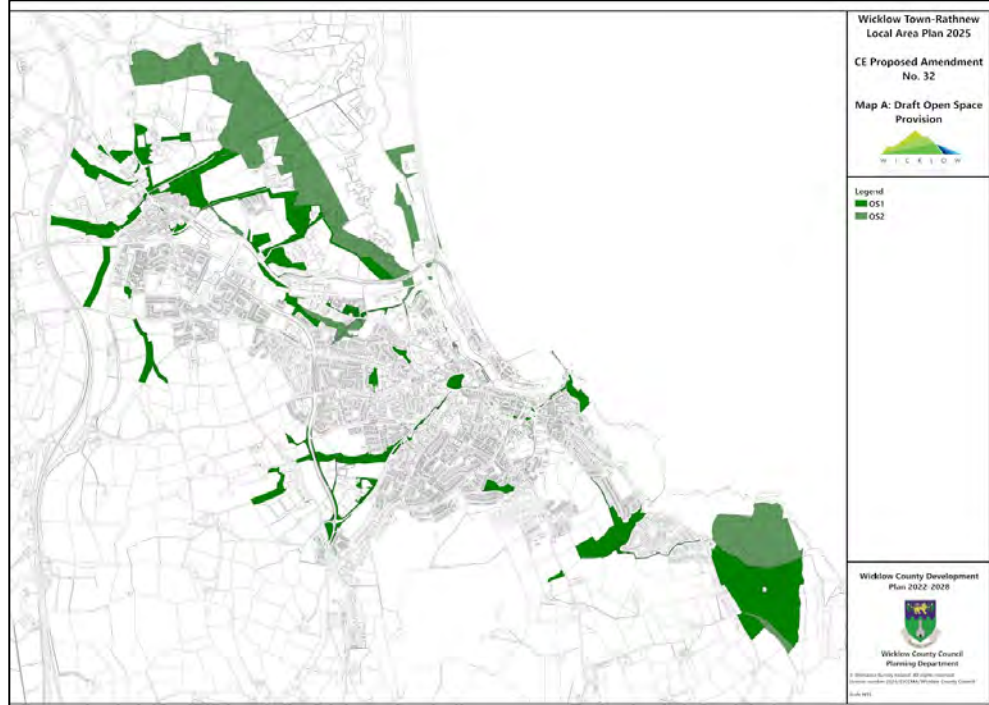


32 OS1 and OS2

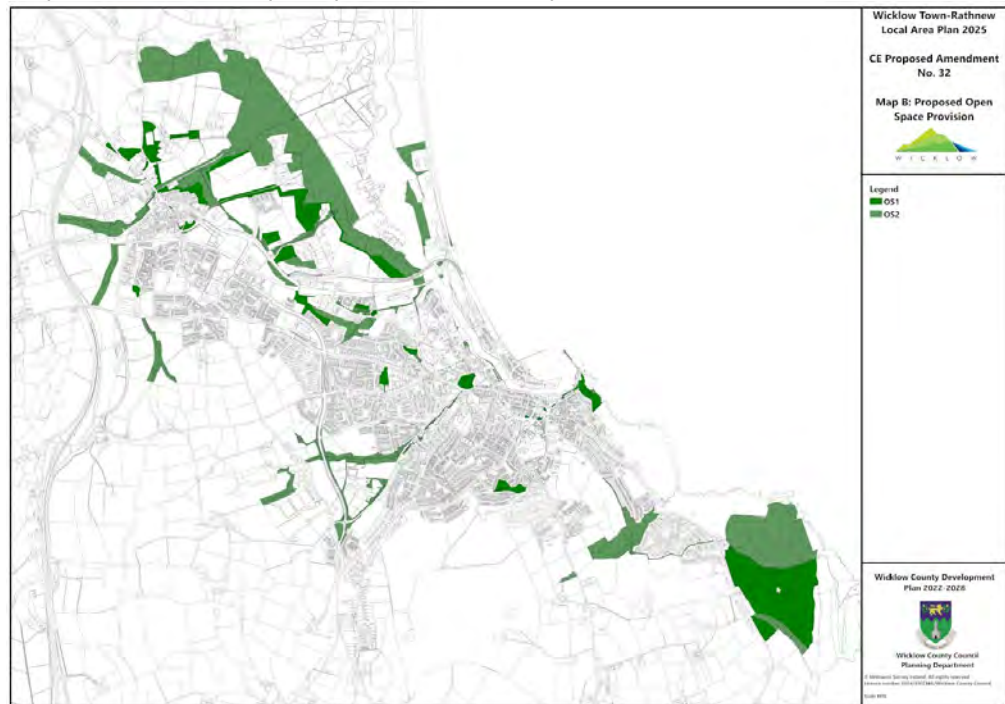
Amend OS1 zones to OS2 as follows:

- All lands where undeveloped in Flood Zones A or B shall be OS2
- All lands within 25m of a watercourse where undeveloped and feasible shall be OS2
- All lands that are host to natural habitats shall be OS2

Draft Open Space Provision Map



Proposed Amended Open Space Provision Map



Larger scale map is appended to this report.

Section 2.8 Appendices

2.8.1 Appendix 1: Transport Strategy

Proposed Amendment No. 33

See Proposed Amended Transport Strategy Map appended to this report.

2.8.2. Appendix 3: Infrastructure Delivery Schedule, Phasing and Implementation

Proposed Amendment No. 34

Insert the following tables and information on implementation and timeframes with respect to all objectives of the plan and a particular focus on identified development areas (SLOs).

Residential Objectives	Implementation	Timeframe
WTR1 All new housing developments shall be required to accord with the housing objectives and standards set out in the Wicklow County Development Plan	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR2 Development shall extend outwards from the centre of Wicklow Town and Rathnew Village with undeveloped land closest to the centre and public transport routes given priority. <u>'Leapfrogging' to peripheral areas shall be strongly resisted.</u>	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR3 In accordance with the County Development Plan, there shall be no quantitative restriction inferred from this plan on the number of units that may be delivered on town centre and village centre zoned lands, or on brownfield regeneration sites, or on infill sites located within the following zones – 'Town Centre', 'Village Centre' and 'Existing Residential'.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR4 Notwithstanding the zoning / designation of land for new residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied: <ul style="list-style-type: none"> - 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development 	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing

	<p>initiated);</p> <ul style="list-style-type: none"> - 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. 		
WTR5	In order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density appropriate given the site's location and access to services. The Council reserves the right to refuse permission for any development that is not consistent with this principle.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR6	Housing development shall be managed and phased to ensure that infrastructure and in particular, community infrastructure, is provided to match the need of new residents. Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. 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.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR7	To encourage in-fill housing developments, the use of under-utilised and vacant sites and vacant upper floors for accommodation purposes and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.	To be proactively pursued on an ongoing basis through the application of the Derelict Sites Act, Housing Act, Urban Regeneration and Housing Act, and Residential Zoned Land Tax, together with the delivery of projects and programmes under the Town Centre First Policy, TRO, Croí Cónaithe and Vacant Homes Officer.	Ongoing
Employment Objectives		Implementation	Timeframe
WTR8	To facilitate and support all forms of employment creation on appropriately zoned land in Wicklow Town-Rathnew and to promote the intensification of activities on existing employment sites and to take advantage of the existing economic assets in order to stimulate further employment within the area.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and the operations of the Council's Economic Development unit and LEO.	Ongoing
WTR9	To encourage the redevelopment of 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	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and the operations of the Council's	Ongoing

	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.	Economic Development unit and LEO.	
WTR10	To support and facilitate existing and future commercial port activities, in line with the Waterfront Strategy (chapter 5), and to resist developments that would undermine the commercial potential of the port area.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and the operations of the Council's Economic Development Unit, LEO, Municipal District team, TRO and Harbours team.	Ongoing
WTR11	To support and facilitate all forms of employment development in Wicklow Town Centre and Rathnew Village Centre, particularly retail and retail services uses.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and the operations of the Council's Economic Development unit and TRO.	Ongoing
WTR12	To support the continued operation of Rathnew Business Park as a manufacturing and warehousing area.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and the operations of the Council's Economic Development unit and LEO.	Ongoing
WTR13	To support the development of Wicklow County Campus; to support the development of adjacent employment zoned lands for higher order employment types such as film / food / renewable energy.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and the operations of the Council's Economic Development Unit, LEO and Clermont Campus project team.	Ongoing
WTR14	On lands zoned for employment on the 'Murrough North', it is the objective of the Council to: <ul style="list-style-type: none"> ▪ To facilitate the continued operation of established / permitted existing business / commercial activities subject to ensuring they operate in a manner which is respectful of the local environment, use environmentally friendly / innovative technologies and improve the visual amenity of the area; ▪ To resist further expansion / intensification of the existing industries / businesses and consideration will only be given to development that enhances nature conservation; ▪ To ensure that no development is permitted which would give rise to significant adverse impacts upon the conservation objectives of European sites. ▪ To encourage site operators to improve the overall visual amenity of the area including the provision of additional landscaping using native species 	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and Environmental Protection Unit.	Ongoing

	<p>appropriate to this natural coastal setting.</p> <p>While the Council acknowledges that these industries are established, permitted and operating businesses / commercial activities, it is important to have regard to (a) the need to ensure no significant adverse impacts on the European Sites arise from the intensification or change of use of this area for industry / employment and (b) the nature restoration goals of the Council and (c) the available of significant areas of zoned employment land within the settlement away from the coast and other environmentally sensitive locations.</p>		
Public Realm Objectives			
WTR15	<p>To protect and enhance the streetscape of Wicklow's Main Street through the appropriate control of alterations to existing buildings and the development of new structures; in particular</p> <ul style="list-style-type: none"> - building lines and heights which diverge from the established form will require to be justified; - shopfront and building frontages will require to be of an appropriate design and appearance; - frontages with no goods on display to the street or that are opaque will not be considered. 	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing
WTR16	<p>To strive to improve the appearance of junctions and gateway areas into the Main Street of the Town centre, particularly the Marlton Road – Abbey Street junction.</p>	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, the TRO and the Council's Roads and Transportation Department.	Short Term
WTR17	<p>New or extended / refurbished units shall, at all times that the unit is not in active use, provide an attractive temporary display or professionally designed artwork affixed to the glass frontage. The temporary use of the space during such times for creative, cultural or community purposes will be encouraged; however, such change of use may require planning permission, and advice will be provided by the Council on a case by case basis in this regard.</p>	To be proactively pursued on an ongoing basis during the lifetime of the plan via the Development Management system and projects and programmes of the TRO.	Ongoing
WTR18	<p>To support opportunities to create better linkages between the Main Street and the South Quay, in particular access routes and views between the two.</p>	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, the TRO and the Council's Roads and Transportation Department.	Short Term
WTR19	<p>To maintain and further enhance Fitzwilliam Square and Market Square and support other possibilities for the development of new urban spaces, including The Mall, with hard and soft landscaping and high quality street furniture</p>	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, the TRO and the Council's Roads and Transportation Department.	Short Term

WTR20	To improve hard and soft landscaped areas, lighting, seating and other street 'furniture' as funding allows, and require private developments providing such features to meet the highest standards of design and siting.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and projects and programmes of the Municipal District team, the TRO and the Council's Roads and Transportation Department.	Ongoing
Dereliction and Vacant Sites Objectives			
WTR21	To facilitate appropriate infill development and substantial redevelopment of under-utilised or vacant properties and vacant backlands within the town centre. Any redevelopment proposal that has frontage onto more than one road should be designed to address all roads appropriable. Where the site connects the Main Street to the South Quay or the Main Street to Fitzwilliam Road/High Street, the proposed development should include a pedestrian link where feasible.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR22	To positively consider proposals to improve, alter, extend or change the use of protected structures within the town centre so as to render them viable for modern use, subject to retention of any special features with use of suitable design, materials and construction methods.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR23	Proposals to significantly alter or demolish Protected Structures, or special features which contribute to the character of an ACA, only will be allowed in exceptional circumstances.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
Mix of Uses Core Area Objectives			
WTR24	To support and facilitate activities and developments that will improve the vitality and vibrancy of the Main Street area.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team and the TRO.	Ongoing
WTR25	Redevelopment proposals in the town centre shall generally be required to provide commercial use at ground floor / street level.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR26	All non-residential floors will be required to be designed to be suitable to a range of users.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR27	To control and restrict where necessary uses at ground / street level to prevent an excessive concentration of single outlet types / formats e.g. bookmakers, off-licences (including off-licences in convenience stores), charity shops, fast-food takeaways, amusement centres and financial institutions.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR28	Active 1 st floor uses will be required in all new developments and particular encouragement will be given to 'living over the shop'.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing

Retail Role Core Area Objectives			
WTR29	To support the function of the Main Street / Fitzwilliam Square / The Mall and Market Street and associated side streets as the principal retail area in Wicklow.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and the operations of the Council's Economic Development, as well as the projects and programmes of the Municipal District team and the TRO.	Ongoing
WTR30	To facilitate and support suitable proposals to merge or assemble multiple buildings / sites in order to develop modern retailing formats, including department stores or malls, having due regard to the protection of architectural heritage within the Town Centre.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR31	To promote and facilitate the conversion of non-retail premises to retail/retail service use and to strongly resist the conversion of existing retail/retail service premises to alternative, less active uses that would diminish vibrancy and daytime activity in the area.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
Vehicular, Pedestrian and Cyclist Movement Objectives			
WTR32	To maintain the Main Street as a principal vehicular route through the town centre and to exploit any opportunities that arise to improve safety for both vehicles and pedestrians / cyclists.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, the TRO and the Council's Roads and Transportation Department.	Ongoing
WTR33	To improve the pedestrian and cyclist environment and to promote ease of movement throughout the town centre and avail of any opportunities to improve footpaths, pedestrian routes, road crossings and the quality of service for cyclists including the provision of safe and secure cycle parking at key locations throughout Wicklow town centre.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, the TRO and the Council's Roads and Transportation Department.	Ongoing
WTR34	To facilitate the improvement of existing and the development of new linkages from the town centre to car/bike parks, amenity areas, to South Quay and to the port / Murrough areas and to the town's environs.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, the TRO and the Council's Roads and Transportation Department.	Ongoing

Car Parking Objectives			
WTR35	To provide new car parking options as funding allows, in proximity to the town centre including new 'park n stride' car parks on the edge of the town centre.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team and the Council's Roads and Transportation Department.	Ongoing
WTR36	To improve public car parking operations and management.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team and the Council's Roads and Transportation Department.	Ongoing
Enhancing access to public transport objectives			
WTR37	To continue to facilitate the improvement of public transport user facilities including, inter alia, shelters, covered bicycle parking, information points with maps, routes, timetables, real-time information and designated taxi ranks.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team and the Council's Roads and Transportation Department.	Short Term
WTR38	To facilitate improved access to bus stops particularly crossing points for passengers.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team and the Council's Roads and Transportation Department.	Short Term
Rathnew Village Centre Strategy Objectives			
WTR39	To facilitate the regeneration of Rathnew Village centre, by improving the public realm, facilitating road, footpath and cycling improvement works, creating urban spaces with hard and soft landscaped areas within the centre of the village. The regeneration of the centre will be further enhanced following the construction of the RIRR, and the new link road to the Glenealy Road, which will bring about a significant reduction in vehicular traffic travelling through the centre.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, the TRO and the Council's Roads and Transportation Department.	Medium Term
WTR40	To facilitate improved signage and interpretation of local heritage assets.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, the TRO, and the Council's Heritage and Tourism function.	Ongoing
WTR41	To encourage and facilitate improvements to the existing retail / services area along the Main Street, including the provision of new / expanded retail and retail services developments, including the provision of a new supermarket, and improved shops fronts	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing

WTR42	To enhance the amenity value of the Rathnew Stream and to facilitate improved access, subject to the protection of its environmental and ecological value.	To be proactively pursued on an ongoing basis during the lifetime of the plan via the Development Management system and projects and programmes of IFI, LAWPRO and the Council's Climate, Environment, Recreation and Amenity Directorate, Heritage and Biodiversity Officers.	Ongoing
WTR43	To improve pedestrian movement around the centre by facilitating the provision of pedestrian crossings at appropriate locations, including across the Glenealy Road to the 'Old Village' and across the Rathnew Inner Relief Road (from the VC zoning) to the Wicklow County Campus.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team and the Council's Roads and Transportation Department.	Short Term
WTR44	To encourage the development of a transport hub around the existing bus stops, including improved accessibility, car-parking, bus stop facilities, shelters and covered bicycle parking	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team and the Council's Roads and Transportation Department.	Ongoing
WTR45	To facilitate the delivery of the remainder of the Rathnew Inner Relief Road.	The delivery of the RIRR shall be actively progressed during the lifetime of the plan, subject to final detailed design and availability of funding mechanisms, including public funding (Council / NTA / TII) and through its delivery in tandem with development proposals on privately owned sites.	Medium Term
WTR46	To enhance and protect the built and natural heritage of Rathnew and to facilitate improved access to these amenities.	To be proactively pursued on an ongoing basis during the lifetime of the plan via projects and programmes of the Municipal District team, and the Council's Heritage and Biodiversity Officers.	Ongoing
WTR47	To require the vacant lands between the R752 and Charvey Lane to be developed as a single comprehensive development, with a masterplan, that provides for new frontage on the R752 and Charvey Lane, and which addresses all traffic movement issues arising from any development.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing

Wicklow Waterfront Regeneration Objectives			
WTR48	To support and facilitate existing and future commercial port activities on the north quay and to resist developments that would undermine the commercial potential of the area.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of Council's Economic Development Unit, Municipal District team, TRO and Harbours team.	Ongoing
WTR49	To facilitate the regeneration of the port, harbour, quays and Murrough, to intensify the potential of the area as a high density mixed use area, well connected to the existing town centre and the train station that will support the compact and sustainable growth of the town.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of Council's Economic Development Unit, Municipal District team, TRO and Harbours team.	Ongoing
WTR50	To facilitate the development of a broad mix of uses in the Waterfront Zone in accordance with the zoning objectives set out in this plan, with an emphasis on higher density residential, small scale enterprise, retail, recreation, cultural, civic facilities and maritime related activities and tourism accommodation and facilities. Large scale storage / warehousing, even where associated with maritime operations, will not be considered suitable in the WZ zone due to its high land take compared to the small area of the WZ zone; adequate alternative areas of zoned land are available within the settlement that would be suitable for such use.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR51	To encourage water based leisure activity / recreational use of the harbour, waterside or landside, where appropriate, which does not compromise the commercial operation of the port and the environmental quality of the surrounding area.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of Council's Economic Development Unit, Municipal District team, TRO and Harbours team.	Ongoing
WTR52	To ensure that all proposals for development have cognisance of European sites in the area and that no development is allowed which would have a significant adverse effect on the conservation interests of these sites.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing
WTR53	To require any new developments in the waterfront zone to meet a high standard of design that respects the unique historical, maritime, environmental, visual and recreational amenities of the area. To ensure there are active ground floor uses in all buildings fronting public spaces, walkways and streets.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing

WTR54	Seek the provision of a central civic space at the Murrough mixed use regeneration area; surrounded by retail, small enterprise and cultural or civic uses, with clear and legible connections to the surrounding development, the river edge and coast/linear public park.	To be proactively implemented and pursued during the lifetime of the plan via the Development Management system and via the projects and programmes of Council's Economic Development Unit, Municipal District team, TRO and Harbours team.	Medium Term
WTR55	To facilitate the development of a landscaped linear public park along the coastal edge of the Murrough recreational and amenity area, complete with formal and informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, 'Mixed Use Games Areas' and outdoor gyms, tourist / visitor infrastructure including car parking, Aires sites ³ , information signage / booths, toilets, buildings / infrastructure associated with safety, rescue, utilities etc, Seasonal markets / fairs / events.	To be proactively implemented and pursued during the lifetime of the plan via the Development Management system and via the projects and programmes of Council's Economic Development Unit, Municipal District team, TRO and Harbours team.	Short Term
WTR56	To facilitate the development of pedestrian and cycling links throughout the waterfront zone and to the town centre and train station. To consider the feasibility of a new pedestrian / cycling bridge connecting the Port to the town centre.	To be proactively implemented and pursued during the lifetime of the plan via the Development Management system and via the projects and programmes of the Municipal District team, TRO, the Council's Harbours team and the Council's Roads and Transportation Department.	Medium Term
WTR57	To support and facilitate the development of new infrastructure, including infrastructure that supports the O&M sector, necessary for the continued operation and development of the port.	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of Council's Economic Development Unit, Municipal District team, TRO and Harbours team.	Ongoing
WTR58	To facilitate the continued operation of the RNLI from Wicklow Harbour and to facilitate any redevelopment of the RNLI station to reinforce its identity as the permanent base for the RNLI.	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of Council's Economic Development Unit, Municipal District team, TRO and Harbours team.	Ongoing
WTR59	To consider the feasibility of the preparation of a Wicklow Waterfront Masterplan, to facilitate the continued development of the Port, Quays and Harbour, to be prepared by Wicklow County Council. Any approved Masterplan must adhere to the overall zonings, policies and objectives of the County Development Plan and this Local Area Plan.	To be proactively implemented and pursued during the lifetime of the plan via the projects and programmes of Council's Economic Development Unit, Municipal District team, TRO and Harbours team.	Short Term
WTR60	To facilitate the enhancement of the public realm around the Murrough and the harbour area and to facilitate the provision of appropriate information signage in the waterfront zone.	To be proactively pursued on an ongoing basis during the lifetime of the plan via the projects and programmes of the Municipal District team, TRO, Harbours team and the Council's Roads and Transportation Department.	Ongoing

³ Free or low-cost stopping places for motorhomes and caravans; offering just parking or basic facilities such as water, waste disposal and electricity.

WTR61	To facilitate the improvement of pedestrian/cyclist/transport movement and access to the Waterfront zone, by facilitating the provision of appropriate directional and information signage that increases access to and the legibility of the routes between attractions and facilities in the Waterfront zone. In the Waterfront area, no development will be considered that would reduce or remove existing public amenity access to the coast, river banks or port/harbour quays. Any development proposals will be required to show how existing access is to be maintained, improved or new access is to be provided.	To be proactively pursued during the lifetime of the plan via the Development Management system and via the projects and programmes of the Municipal District team, TRO, the Council's Harbours team and the Council's Roads and Transportation Department.	Ongoing
WTR62	To facilitate appropriate cultural, tourism, recreational and leisure development in the harbour and Murrough recreational and amenity areas including the provision of new clubhouses, pontoons / marinas, shops, cafes and other cultural, leisure and tourism related developments subject to a higher quality of design, as well as the existing environmental, visual and residential amenities in the area.	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Council's Economic Development Unit, the Municipal District team, TRO and the Council's Harbours, Heritage and Tourism function.	Ongoing
WTR63	To protect the unique historical character and recreational value of the harbour.	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Council's Economic Development Unit, the Municipal District team, TRO, the Council's Harbours, Heritage and Tourism function.	Ongoing
General Retail Objectives			
WTR64	To promote Wicklow town centre as the primary retailing and commercial sector location in the settlement. Retailing will be promoted as the core function of the town centre.	To be proactively implemented and pursued on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Council's Economic Development Unit, the Municipal District team and TRO	Ongoing
WTR65	To support Rathnew Village's role as a Level 4 local retail centre.	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Council's Economic Development Unit, the Municipal District team and TRO	Ongoing
WTR66	To allow for only one further (small scale) neighbourhood centre in the plan area, at Ballynerrin, on the Marlton Link Road, on the grounds that this will allow all existing / planned residential areas to be within 10 minutes' walk of either a core retail area or a neighbourhood centre.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing

Community Development Objectives			
WTR67	The Planning Authority will resist developments that entail the loss of existing community, education and open space/recreation lands or buildings unless it can be demonstrated that (a) adequate community, education and open space/recreation lands and buildings would be retained in the settlement having regard to the planned future population of the settlement or (b) the particular lands or buildings are not suitable or needed for current or future educational, community or open space / recreational usage. In particular, developments that would unduly constrain the ability of existing schools to expand will not be permitted.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing
Education Objectives			
WTR68	To 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, where it is in line with the County Development Plan, this Local Area Plan, relevant planning guidelines (including the Department of Education guidelines) and proper planning.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing
WTR69	To reserve Community and Education (CE) zoned land for the provision of schools at the Marlton Road, Ballybeg (SLO5) and Rosanna (SLO8).	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing
Tourism Objectives			
WTR70	To support opportunities to improve the tourism product in Wicklow Town – Rathnew and to facilitate appropriate tourism development within the settlement.	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Council’s Economic Development Unit, the Municipal District team, TRO, and the Council’s Tourism function.	Ongoing
WTR71	To positively consider the development of a) new hotels in Wicklow Town – Rathnew; b) the development of touring caravan (Aires park) and camping sites (not static mobile home parks) having due regard to surrounding land uses and proper planning and development of the area; c) the development of hostels along established walking routes and adjacent to existing tourism facilities; d) the improvement of, and extension to, existing tourist accommodation related developments, subject to the proper planning and sustainable development of the area.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing
WTR72	To encourage and facilitate tourism and leisure related uses in the Mixed Use Regeneration Area of the Waterfront zone including hotel / accommodation facilities and leisure uses to complement the marina and associated boating	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Council’s Economic	Ongoing

	uses and activities.	Development Unit, the Municipal District team, TRO, and the Council's Tourism function.	
WTR73	To promote and encourage the sustainable recreational use of coastline, rivers and lakes for eco-tourism activities. Where such recreational uses involve the development of structures or facilities, the Council will ensure that the proposals will respect the natural amenity and scenic character of the area.	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Council's Economic Development Unit, the Municipal District team, TRO, and the Council's Heritage and Tourism function.	Ongoing
WTR74	To support the development of linkages to connect Wicklow Town-Rathnew with adjoining towns / villages via cycle and walking trails.	To be supported on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Council's Economic Development Unit, the Municipal District team, the Council's Roads and Transportation Unit, TRO and the Council's Heritage and Tourism function.	Ongoing

Transportation Objectives			
WTR75	<p>Support the implementation of the recommendations of the Transport Assessment with regard to the delivery of new regional/distributor roads and road improvements⁴, including</p> <ul style="list-style-type: none"> (a) The completion of the Rathnew Inner Relief Road including reconfiguration of road network between Junction 16 and Rathnew Village to re-direct Wicklow Town-bound flows away from the Aldi-Tinakilly traffic lights and the village centre; (b) A new link road between Tighe's Avenue and the R752 (for Glenealy – Rathdrum bound traffic); (c) The improvement of the road connections between the Wicklow Town – Rathnew and M11 Junctions 17 and 18, namely the L-1099 and R751, and; (d) To facilitate and support the improvement of the operational efficiency of the regional / local road network to ensure that the M11 is not utilised as a 'local' route for trips internal to the settlement. 	<p>The delivery of these road improvement projects and programmes shall be actively progressed by the Council's Roads and Transportation Unit during the lifetime of the plan, subject to final detailed designs and availability of funding mechanisms, including public funding (Council / NTA / TII) and through their delivery in tandem with development proposals on privately owned sites.</p>	<ul style="list-style-type: none"> (a) Medium Term (b) Long Term (c) Short Term (d) Short Term
WTR76	<p>Support the implementation of the recommendations of the Transport Assessment with regard to the delivery of road improvements, including pedestrian and cycling infrastructure, to the existing road network, including</p> <ul style="list-style-type: none"> (a) Upgrading the Rocky Road (b) Upgrading access roads to schools and public transport services. 	<p>The delivery of these road improvement projects and programmes shall be actively progressed by the Council's Roads and Transportation Unit during the lifetime of the plan, subject to final detailed designs and availability of funding mechanisms, including public funding (Council / NTA / TII) and through their delivery in tandem with development proposals on privately owned sites.</p>	<ul style="list-style-type: none"> (a) Short Term (b) Ongoing
WTR77	<p>Support the implementation of the recommendations of the Transport Assessment with regard to active travel and public transport measures, including</p> <ul style="list-style-type: none"> (a) Major public realm improvements in Wicklow Town and Rathnew village centres; (b) Active Travel Bridge Wicklow Train Station to Port Access Route; (c) Ballyguilemore footpath; and (d) providing improved, safer sustainable transport linkages (including permeability linkages in existing areas) to schools, public transport facilities, shops and services. 	<p>The delivery of these road improvement projects and programmes shall be actively progressed by the Council's Roads and Transportation Unit during the lifetime of the plan, subject to final detailed designs and availability of funding mechanisms, including public funding (Council / NTA / TII) and through their delivery in tandem with development proposals on privately owned sites.</p>	<ul style="list-style-type: none"> (a) Ongoing (b) Short Term (c) Short term (d) Ongoing

⁴ The detail associated with new transport or green/blue infrastructure projects referred to in this Plan and accompanying Transport Assessment, including locations and associated mapping, that are not already permitted or provided for by existing plans / programmes / etc. is non-binding and indicative. Such new projects shall be subject to feasibility assessment, taking into account the environmental constraints and the objectives of the Plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken for such projects where appropriate. Proposed interventions will be required to demonstrate that they are consistent with all relevant legislative requirements.

WTR78	To continue to work with Iarnrod Eireann and the NTA on the improvement of mainline train services to Wicklow Town station and to extend the DART services to Wicklow Town station and to provide for the significant enhancement of facilities and infrastructure at Wicklow train station, including but not limited to enhanced pedestrian and cycling connectivity and enhanced car / bike / bus parking.	To be proactively pursued on an ongoing basis during the lifetime of the plan by Council's Roads and Transportation Department.	Ongoing
WTR79	To 'future proof' the development of rail services to reserve land at (a) Rathnew (in the area west of the former Rathnew station) and (b) Merrymount for possible future halts / stations.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing
WTR80	To facilitate the upgrading of the Rocky Road, from Junction 17 of the M11 to Wicklow town centre.	To be proactively pursued during the lifetime of the plan by Council's Roads and Transportation Department and Municipal District team.	Short Term
Coastal Erosion and Flood Management Objectives			
WTR81	To ensure the natural coastal defences are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system, and through the projects and programmes of the Council's Climate, Environment, Recreation and Amenity Directorate and other state / semi-state agencies such as the OPW and Irish Rail.	Ongoing
WTR82	To continue to work with the OPW and other agencies to deliver Flood Defence Schemes and Coastal Erosion Schemes.	To be implemented on an ongoing basis during the lifetime of the plan through the projects and programmes of the Council's Climate, Environment, Recreation and Amenity Directorate.	Ongoing
WTR83	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.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system.	Ongoing

Heritage, Biodiversity and Green Infrastructure Objectives			
WTR84	To consolidate and safeguard the historical and architectural character of Wicklow Town and Rathnew Village through the protection of individual buildings, structures, shopfronts and elements of the public realm that contribute greatly to this character.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Municipal District team, the TRO, and the Council's Heritage and Tourism function.	Ongoing
WTR85	To protect the listed views and prospects from development that would either obstruct the view / prospect from the identified vantage point or form an obtrusive or incongruous feature in that view / prospect. Due regard will be paid in assessing development applications to the span and scope of the view / prospect and the location of the development within that view / prospect.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
WTR86	Protect and enhance the character, setting and environmental quality of natural, architectural and archaeological heritage, and in particular those features of the natural landscape and built structures that contribute to its special interest. The natural, architectural and archaeological heritage of the area shall be protected in accordance with the objectives set out in the Wicklow County Development Plan.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Municipal District team, the TRO, and the Council's Heritage Officer.	Ongoing
WTR87	To consolidate and safeguard the historical and architectural character of Wicklow quay side through the protection of individual buildings, structures, shopfronts and elements of the public realm that are of architectural merit and/or contribute greatly to this character.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system and via the projects and programmes of the Municipal District team, the TRO, and the Council's Heritage Officer.	Ongoing
WTR88	To reinforce the coastal character of the settlement and to provide for the enjoyment of the coast as a recreational and natural asset.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system and through the projects and programmes of the Municipal District team, the Council's Climate, Environment, Recreation and Amenity Directorate, the TRO and the Council's Heritage function.	Ongoing
WTR89	To facilitate the development of initiatives to highlight Wicklow's maritime heritage in the public realm.	To be implemented on an ongoing basis during the lifetime of the plan via the projects and programmes of the Municipal District team, the TRO, and the Council's Heritage and Tourism function.	Ongoing
WTR90	To facilitate the development and enhancement of green infrastructure resources, including access to, connectivity between areas of interest and linkages between green spaces including the coast, where feasible within the plan settlement boundary.	To be implemented on an ongoing basis during the lifetime of the plan through the projects and programmes of the Municipal District team, the Council's Climate, Environment, Recreation and Amenity Directorate, the TRO and the Council's Heritage and Biodiversity Officers.	Ongoing
WTR91	To promote and support the development of enhanced or new greenways, blueways and amenity walks at the following locations and require	To be implemented during the lifetime of the plan through the projects and programmes of the Municipal District team, the	(a) Medium Term (b) Long Term

	<p>development in the vicinity of same to enhance existing routes and / or provide new links:</p> <p>(a) Wicklow to Greystones coastal greenway. Any development proposal within the route corridor study area/ preferred route option will be assessed for acceptability having regard to the potential effects on the future viability of the proposed greenway;</p> <p>(b) Wicklow to Arklow coastal route;</p> <p>(c) Wicklow Head Lighthouse Walk</p>	<p>Council's Climate, Environment, Recreation and Amenity Directorate, the TRO and the Heritage service, subject to detailed design and availability of funding mechanisms and through their delivery in tandem with development proposals on privately owned sites</p>	<p>(c) Short Term</p>
WTR92	<p>To facilitate the provision of green linkages along and between green / river corridors / Open Space / Active Open Space, to create inter connected routes and develop parks and linkages between existing and proposed green areas, to form 'necklace' effect routes including development of walkways, cycleways, bridleways and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.</p>	<p>To be implemented during the lifetime of the plan through the projects and programmes of the Municipal District team, the Council's Climate, Environment, Recreation and Amenity Directorate, the TRO and the Heritage service, subject to detailed design and availability of funding mechanisms and through their delivery in tandem with development proposals on privately owned sites</p>	<p>Ongoing</p>
WTR93	<p>To facilitate the enhancement of existing, and development of new recreational facilities along the coastal area, such as walking routes, car parking areas, signage, changing / toilet facilities and water based clubs, subject to compliance with the provisions of the EU Habitats Directive and other planning considerations.</p>	<p>To be implemented during the lifetime of the plan through the projects and programmes of the Municipal District team, the Council's Climate Action, Environment, Recreation and Amenity Directorate, the TRO and the Heritage service, subject to detailed design and availability of funding mechanisms and through their delivery in tandem with development proposals on privately owned sites</p>	<p>Ongoing</p>
WTR94	<p>To facilitate the protection of the coastline from erosion through the maintenance of existing and development of new measures of protection from erosion, subject to compliance with the provisions of the EU Habitats Directive.</p>	<p>To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system, and through the projects and programmes of the Council's Climate, Environment, Recreation and Amenity Directorate and other state / semi-state agencies such as the OPW and Irish Rail.</p>	<p>Ongoing</p>
WTR95	<p>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.</p>	<p>To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system</p>	<p>Ongoing</p>

Infrastructure assessment and requirements for key development areas (identified as SLOs)

Site ID	Current servicing status				Additional infrastructure needs to support full development of site
	Water Supply	Wastewater Infrastructure	Surface Water Infrastructure	Roads & Transportation	
SLO1 Ballynerrin	1	1	1	1	Community facilities – developer delivered Retail facilities – developer delivered Amenity walkways along river – developer delivered
SLO2 Tinakilly / Newrath	1	2	2	2	Development to provide for portion of the RIRR – Developer + State +WCC Development to provide for on-site water infrastructure Community facilities (childcare) – developer delivered
SLO3 Milltown North	1	2	2	2	Development to provide for new link road from Tighe’s Avenue to Glenealy Road – Developer + State + WCC Development to provide for on-site water infrastructure
SLO4 Bollarney North	1	2	2	1	Community facilities – developer delivered Amenity areas including walkways and amenity car parking – developer delivered Development to provide for on-site water infrastructure
SLO5 Ballybeg	1	2	1	1	Community facilities (school site) – land reservation Development to provide for on-site water infrastructure
SLO6 Ballynerrin	1	2	1	2	Upgraded Rocky Road – Developer + State + WCC Community facilities (AOS) – Developer Development to provide for on-site water infrastructure
SLO7 Rosanna Lower	1	1	2	2	Development to provide for portion of the RIRR – Developer + State + WCC Community facilities (childcare) – developer delivered Development to provide for on-site water infrastructure
SLO8 Rosanna Lower	1	2	2	2	Community facilities (school site) – land reservation Development to provide for on-site water infrastructure

1 = serviced, 2 = serviceable, 3 = unserved

2.8.3 Appendix 4: Strategic Flood Risk Assessment

Proposed Amendment No. 35

SFRA Addendum 1 –See Section 6 of this report.

Updated Flood Risk Maps –See Section 7 of this report.

Section 3 List of submissions

Reference Number	Name	Portal Reference
1	David Czerniak	203246
2	Darren Fitzgerald	211131
3	The Health and Safety Authority	150204
4	Galal Aly	021526
5	Wicklow Enterprise Park	152831
6	Marian Nelligan	170415
7	Darren Fitzgerald	185841
8	Environmental Protection Agency	103005
9	Darren Fitzgerald	145647
10	Knockrobin Developments Ltd	103018
11	Jackson Dsouza	114733
12	Eastern and Midland Regional Assembly	111908
13	Meath County Council	123313
14	Jen Properties Ltd	100325
15	Stephens	No online ref
16	Stafford Family Partnership	152725
17	Department of Transport	165103
18	Roisin Snell	083948
19	Woodroffe Family & William Parle	095152
20	Darren Fitzgerald	095418
21	Siofra Quigley	104402
22	Inbhear Dee Athletic Club	130259
23	Alex Ward	145947
24	Henry & Aoife Clarke Seamus & Evelyn Ryan David & Caroline O Neill	185913
25	Thomas O Sullivan	162950
26	Emer Cashman	105147
27	Amanda Cummins	151653
28	Wicklow Planning Alliance	202425
29	Wicklow Town Team	No online ref
30	Stephanie Gavin	110933
31	Andrew Sullivan	115529
32	Shane Cowell	120640
33	Orla Malone	122859
34	Robert Byrne	123040
35	Deirdre Malone	123205
36	Caoimh Bruton	124533
37	Nitin Sharma	130137
38	Mary Byrne, Liz Byrne, Carmel Whelan	131457
39	Catherine Ryan	134204
40	Cyril McGuire of VC Land Investments Ltd	143107
41	Amy McNabb	152435
42	Siobhan Connery	155959
43	Durkan Group	164446
44	Fiona Fitzsimons	164436
45	Amy McNabb	165943

46	Susan Gavin	170719
47	Susan Gavin	171625
48	Eileen Howell	No online ref
49	Rosaleen and Martin McNabb	210520
50	William Parle	082014
51	Stephen Reynolds	081816
52	David O' Rorke	093521
53	Inland Fisheries Ireland	101117
54	Mezen Consultancy Services Ltd	100103
55	Paul Walsh	No online ref
56	Lynda Bremner	111936
57	Uisce Éireann	111346
58	Wicklow Town & District Chamber of Commerce	120652
59	Fiona Weldon	120112
60	Peter Dignam	121504
61	Wicklow Tennis Club	121422
62	Dominican Convent Wicklow	125947
63	Luciana Queiroz Rufino	114036
64	Wicklow Squash Club	122833
65	Niamh Breslin	135501
66	Paula Humby	141200
67	R.F. Conway & Company Ltd	142720
68	Anne Marie Kelly	150042
69	Therese O' Rorke	150417
70	Rathnew Partnership	145913
71	Carolyn Flynn	163207
72	Anna Pocock	163511
73	HK Partnership	175606
74	HK Partnership	175917
75	Mairead Coffey	175829
76	Lauryn	180641
77	John P. Hopkins & Sons	181735
78	Therese O' Rorke	183214
79	Jenny Keogh	184601
80	Catherine Clare	184937
81	Bill Clare	191200
82	Fiona Clarke	200028
83	Mia Merrigan	202755
84	Sean Doherty	225718
85	John and Julie Fitzgerald	210037
86	Therese O' Rorke	203844
87	Claire McGettigan	205842
88	Deirdre Moore	205344
89	Sinéad Ryan	211109
90	Louiaw McNabb	202834
91	Noel Heatley	210849
92	Richie Dignam	211333
93	Cormac Byrne	220805
94	Róisín McCullagh	201848
95	F Mc Getti	215343

96	James O'Neill	230742
97	Andrew Malone	212613
98	Vincent Collard	231629
99	Stan Breathnach	000330
100	Lisa Mc Gettigan	234627
101	Ann O Sullivan	060729
102	Margaret Geary, Roisin Snell, Olive Stafford	No online ref
103	Louise Ruttledge	065711
104	Louise Ruttledge	070955
105	Pathway Homes Ltd	090551
106	Department of Housing, Local Government & Heritage	092218
107	Ardale Property Group	092310
108	Ardale Property Group	092009
109	Melissa McNabb	093952
110	Silviu	093814
111	The Land Development Agency	101729
112	Cormac Byrne, Emmett O' Byrne	No online ref
113	Department of the Environment, Climate and Communications	110139
114	Glenveagh Homes Ltd	112102
115	Broomhall Estates Ltd	115224
116	Noreen O'Reilly	111620
117	Helen Doyle	120257
118	Multi Metals Recycling Ltd	123027
119	Kyran and Maeve O'Grady	131316
120	Claire Tracey	133727
121	Anja Karamalis	142758
122	Colm Ó Broin	142644
123	The Meadows Estate Residents Association	143928
124	Epi Karamalis	144557
125	Transport Infrastructure Ireland	150659
126	Isabel Hughes	150631
127	Garrett Kennedy	150541
128	Office of Public Works	152014
129	G Kennedy	152438
130	Rathnew Boxing Club	No online ref
131	John Wilding	No online ref
132	Codling Wind Park	153852
133	Electricity Supply Board	152646
134	Lyndsay Martin	161122
135	National Transport Authority	155246
136	Anne Carr	161906
137	Anne Dowling	155101
138	Caroline Cullen	163112
139	EirGrid	162836
140	Beata Farcas	164606
141	The Clarke Family and Rycroft RW Ltd	165650
142	The Delahunt Family	133706
143	NO SUBMISSION	

144	Office of the Planning Regulator	174832
145	Cairn Home Properties Ltd.	180639
146	Lusra Teo	182907
147	Lusra Teo	183127
148	Clouddale Ltd	182429
149	Department of Education	194305
150	Helen Fitzsimons	200032
151	Aoife Kirwan	211650
152	Stephen and Nicola Mac Manus	212550
153	Rathnew AFC	215121
154	Ronan O' Caoimh	194856
155	Ronan O' Caoimh	220916
156	Ronan O' Caoimh	221123
157	Cllr John Snell	221347
158	Dark Sky Ireland	221749
159	Cllr John Snell	222407
160	Mark McGettigan	223707
161	Wicklow Basketball Club	225317
162	Albert Morley	224844
163	Cllr John Snell	223713
164	Leonie Quinn	231637
165	Clare McEvoy	234603
166	Rathnew GAA	No online ref

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 Area 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. 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 two (2) 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, Wicklow County Council (the 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 consolidation and regeneration of Wicklow town and Rathnew village to enhance compact growth, public realm and improve connectivity across the plan area.

Wicklow Town - Rathnew has been identified as a settlement of strategic potential under the RSES for the EMRA. 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 consolidation of the Local Areal Plan boundary and the rationalisation of substantial strategic reserve lands included in the Wicklow Town – Rathnew Development Plan 2013-2019, which were less favourably located, and / or had significant infrastructure constraints.

The Office strongly commends the identification of strategic sites for regeneration, including the objectives for public realm improvements and active travel enhancements focused on Wicklow town centre, the Waterfront area and Rathnew village. The Office supports the provision of a clear development basis to facilitate land activation of these sites over the plan period.

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 1 to the draft Local Areal Plan, it is of concern that an Area Based Transport Assessment 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 and under RPO 8.6 of the RSES. 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.

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 Local Area Plan and building on the ambition of the County Development Plan to develop well-served, 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 Wicklow Town – Rathnew 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 Wicklow Town – Rathnew 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. As suggested in the submission from the NTA, 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's Recommendation

Include new objective

WTR - XX *In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Wicklow Town – Rathnew.*

Item 3 Consistency with the Regional, Spatial and Economic Strategy
<p>Wicklow Town - Rathnew is located within the Eastern and Midland Region and is designated as a Key Town in the RSES. The RSES recognises the strategic importance of Wicklow Town – Rathnew as a central point of the coastal area of the county where the potential to strengthen the local employment base, promote compact growth and deliver sustainable transport exists.</p> <p>Key priorities are to strengthen the local employment base, improve sustainable transport and promote compact growth with a focus on regeneration, development of the port and harbour area, and to expand Wicklow - Rathnew’s role as a hub for tourism, training and education.</p> <p>Overall, the Office is satisfied that the provisions of the draft Local Area Plan are broadly consistent with the RSES.</p>
Chief Executive Response
Noted

Item 4 Consistency with development plan and core strategy
<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 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. The core strategy allocates a projected population increase of 7,850 with a corresponding housing supply target of 1,742 units to Wicklow Town – Rathnew up 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 Areal Plan which promotes consolidation and sequential development, and regeneration within the central area is generally consistent with the strategic objectives and Objective CPO 4.1 of the County Development Plan.</p>
Chief Executive Response
Noted

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 75 ha for New Residential development. In determining land area required to accommodate the projected growth, the Office notes that residential use is also open for consideration on lands identified as Town and Village Centre, Local Shops and Services and the Waterfront land use zoning objectives.

The Office welcomes the zoning objectives for New Residential Priority 1 lands which are well located and will facilitate the compact and sustainable growth of the town in a sequential manner.

Further, the clear policy approach outlined in the draft Local Area Plan in respect of density and the sequential approach to zoning is welcomed.

However, no SCA / Infrastructure Assessment has been included in the draft Local Area Plan to demonstrate that the lands zoned as New Residential Priority 1 and/or 2 have been evaluated to ensure the infrastructure capacity exists or will be delivered over the plan period and to demonstrate either Tier 1 or Tier 2 status for these undeveloped lands contrary to RPO 4.2 of the RSES and CPO 4.1 of the County Development Plan to align the settlement / core strategy to infrastructure.

Recommendation 1 - Co-ordination of housing delivery and infrastructure

Having regard to the provision of new homes at locations that can support compact 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 a Settlement Capacity Audit 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

Further to the response to item 2 above, the CE is satisfied that:

- all lands zoned for town centre, village centre, waterfront 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. With respect to transportation services, all zoned lands are serviced or can be serviced by roads, footpaths, cycle ways and public lighting. In addition, all lands zoned are within either a 30 minutes' walk of the train station or a 15 minutes' walk of a bus stop, 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.

Item 6 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 the RSES, LTPs are required for key towns to set out transport investment priorities across all modes for the plan area and to ensure the integration of land use and transport planning and the achievement of the National Planning Framework's objective of compact growth.

Given the key town status of Wicklow – Rathnew under the RSES and noting its county town function, 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.

Table 3 of the LTA highlights 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. The LTA notes this is concerning given the increase in investment in these modes over the last decade. It recognises 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 or the draft Local Areal Plan and it is recommended that ambitious but realistic mode share targets are proposed together with an effective monitoring programme.

As noted above, the number of people using active travel in the plan area is declining, with particularly low cycle usage identified for secondary school students in Wicklow town. These issues merit strong attention and the Office welcomes the appraisal in the LTA, section 2, of the regional routes (R772, R752, and R750 & R751) within the plan area, and the setting out of specific recommendations with respect to cycle and pedestrian improvements.

It is noted however, that the detail of these recommendations is not reflected in the Transport Strategy map or in section 3.1 of the LTA. While there is a general reference to pedestrian and cycle improvements 'along all main routes', it is recommended that the interventions are listed, mapped and prioritised as appropriate for implementation.

In addition, while the appraisal of the regional routes is welcome, it is critical that the transport assessment also focuses on active travel desire lines to key destinations, which may not be on the regional routes, including but not limited to schools, with network deficiencies identified. It is recommended that an assessment in this respect is included in the LTA with deficiencies and interventions highlighted and prioritised for progression.

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.

In addition, while the Office understands the intent of objective CPO 12.5 of the County Development Plan, as listed in the LTA section 3.1, it is likely that network deficits will exist in areas outside of developers' control and it is recommended that these are identified through the LTA and prioritised for improvements within the Local

Area Plan. An overlay of the emerging active travel network for the plan area with a map of key development areas is strongly recommended.

The Office commends the progression of public realm and active travel related projects in the town, including the pathfinder project from the train station to the town centre. It is recommended that projects being progressed or within scope, are included in the Transport Strategy map together with the wider suite of proposed active travel interventions, to form a clear picture of the emerging active travel network for the plan area. The interventions to be prioritised for progression during the plan period should be clearly highlighted.

The LTA notes in particular that the completion of the Rathnew Inner Relief Road scheme will facilitate the progression of active travel and public realm improvements in the village. The Office also welcomes the inclusion of Strategy maps in Chapter 5, Key Regeneration Areas, for Wicklow town centre, the Waterfront area and Rathnew village. It is recommended however that the Strategy maps, be revised together with the supporting objectives to include stronger detail and clarity regarding the proposed public realm and active travel enhancements for these key regeneration areas. It would also be useful to distinguish proposed interventions from existing public realm enhancements on the Strategy maps and to highlight which measures are to be progressed during the plan period

As already noted, there has been no significant increase in public transport usage over the last three census periods. This issue merits particular attention and while the inclusion of public transport related objectives in the draft Local Area Plan, chapter 9, is welcome, there is a concern that the LTA has not assessed the adequacy of existing facilities for bus based public transport, including bus stop waiting facilities, suitability of stop locations and accessibility for existing and proposed development areas as well as general efficiency of existing bus operating conditions through the plan area.

Further, it is considered that the LTA and draft Local Area Plan should be stronger in terms of objectives to reduce car parking over time in central areas and to ensure sustainable forms of transport are encouraged and facilitated. Linked to this is the objective to develop a car park on the Port Access Road adjacent to Wicklow train station and how over provision of car parking at this location would not be in accordance with the principles of proper and sustainable Transit Orientated Development.

It is recommended that an assessment in this regard is incorporated into the LTA with recommendations for improvements highlighted and incorporated into the objectives of the draft Local Area Plan.

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 8.3 of the RSES that future development is planned and designed in a manner which maximises the efficiency and protects the strategic capacity of the metropolitan area;**
- **RPO 8.6 of the RSES to prepare Local Transport Plans 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 & Walking Objectives CPO 12.13, CPO 12.14, CPO 12.15, CPO 12.16 and CPO 12.17 of the County Development Plan; and**
- **Public Transport Objectives CPO 12.20 and CPO 12.21 of the County Development Plan,**

the Planning Authority is required to:

- (i) Revise the Local Transport Assessment (LTA) and Transport Strategy in order to address the following items:**
 - a) assess the active travel connectivity needs of new housing and employment development areas including access onto the wider town network;**
 - b) assess deficiencies along pedestrian and cycle desire lines to key destinations;**
 - c) incorporate the specific active travel recommendations, identified in section 2 of the LTA under the appraisal of regional routes R772, R752, R750 & R751, into section 3.1 of the LTA and into the Transport Strategy map;**
 - d) amend the Transport Strategy map to include all planned and proposed active travel interventions to form a clear picture of the emerging active travel network; and**
 - e) assess conditions for bus based public transport, including waiting facilities, stop locations and accessibility as well as efficiency of bus operating conditions through the plan area. Measures to address deficiencies should be clearly highlighted and included in section 3 of the LTA and incorporated into the Draft Wicklow Town - Rathnew Local Area Plan 2025 (the draft Local Area Plan);**
- (ii) revise the draft Local Area Plan to incorporate the measures and proposed modal networks of the LTA and include policy support for the proposed interventions together with clear mapping of all measures on the Transport Strategy map;**
- (iii) amend the draft Local Area Plan to include mode share targets and an effective monitoring programme;**
- (iv) amend the Key Regeneration areas' objectives and Strategy Transport maps in chapter 5 of the draft Local Area Plan, to include stronger detail and clarity regarding the proposed public realm and active travel enhancements;**
- (v) amend chapter 9 of the draft Local Area Plan to identify the sustainable transport initiatives to be prioritised during the life of the plan; and**
- (vi) review the extent of land identified for car parking at the Port Access road adjacent to Wicklow Train Station, in the context of the planned strategic Ashford Park & Ride facility and the Transit-Oriented Development (TOD) principle and include appropriate objectives within the draft Local Area Plan to support TOD in line with the provisions of the Greater Dublin Area Transport Strategy 2022-2024.**

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 suggested in the submission from the NTA, a LTP can be prepared after the adoption of the LAP and the CE is agreeable to a new objective to this effect.

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.

Active Travel desire lines

In order to show such information, it would be necessary to carry out considerable additional survey and evaluation of all routes throughout the plan area. Resources and sufficient time would not be available at this

stage of plan making to carry out this additional assessment. This is a matter that can be considered in the future LTP.

Public Realm Improvements

At this time, public realm improvements in key regeneration areas, such as Rathnew Village centre, are objectives and the detail of same has not been determined. Therefore it would not be considered possible or appropriate to provide more detail or clarity on what such improvements would comprise, or how they would function. Significant additional consultation would be required with a wide range of stakeholders, including local residents and landowners, as well as transportation agencies and providers, before the final details of such projects could be established.

Bus Services / Infrastructure

The key issue arising with respect to bus use in the plan area is the frequency and routes of services; the service is simply not good enough to make it an attractive alternative to the car. This is a matter that is outside the control of the Local Authority and the LAP process. The LAP however can ensure that no lands are zoned that would be beyond walking distance of a bus service, and this has been delivered.

The LTA carried out did not evaluate the suitability of bus stop locations, as it is considered that this is a matter for the transport agencies, rather than the LAP. The land use - transportation assessment carried out was on the basis of the existing services routes and stop locations.

The LTA does not detail and evaluate the adequacy of local bus infrastructure, as the vast majority of bus stops are only that – there are limited shelters, secure bicycle parking facilities etc. It is a stated objective in the County Development Plan to strive to improve such facilities, with County Development Plan objective directly applicable in the LAP area. In particular, County Policy Objective 12.21 states that it is an objective to encourage the improvement of bicycle parking facilities at all transport interchanges; to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; to support the development of bus shelters and bicycle parking facilities where possible; and to promote and support the development of fully accessible public transport services and infrastructure, that can be used by all people, regardless of their age, size, disability or ability.

Car parking

The draft LAP does not support or facilitate additional car parking in the town centre of Wicklow, where there is already ample public and private parking available.

The development of new car parking on the Port Access Road, adjacent to Wicklow train station, is a project being driven and funded by the NTA on the basis on its being an important component of a more joined up and sustainable transportation system in Wicklow Town and Rathnew that will encourage and facilitate enhanced use of the train. It is unclear why the OPR is unhappy with this objective. It is possibly due to the fact that an area larger than the currently planned bus parking and drop-off car park is zoned 'PU' in the draft plan. It is not an objective of this draft plan that these lands are reserved for or are desired to be developed for a larger commuter type private vehicle car park; the objective of the PU zoning is to reserve lands in this key location for all and any type of service infrastructure / utilities that may be required in the future which may or may not include car parking; for example additional services not comprising commuter car parking may be required for infrastructure associated with railway line electrification / upgrades or the the planned Greystones-Wicklow Town greenway. In this regard, it is recommended that the amenity car parking objective included in SLO4 opposite this site should be omitted.

Chief Executive's Recommendation

1. Include new objective in LAP

WTR - XX *In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Wicklow Town – Rathnew.*

2. Update Transport Objectives Map (attached)

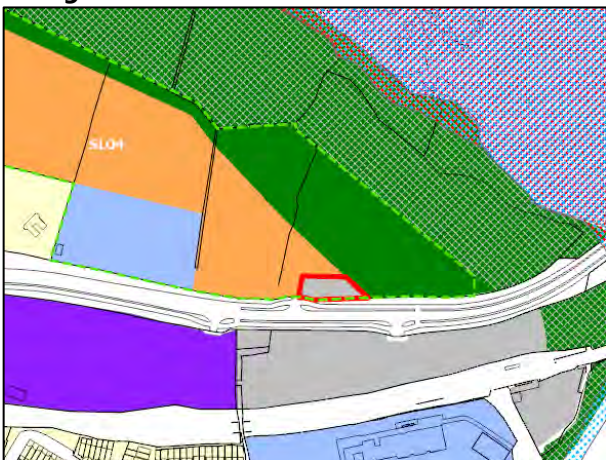
3. Amend text and map for SLO4 as follows

This SLO is located in the townland of Bollarney North. The SLO comprises New Residential (RN – Priority 2), Open Space (OS1), Public Utility (PU) and Community/ Education (CE). Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

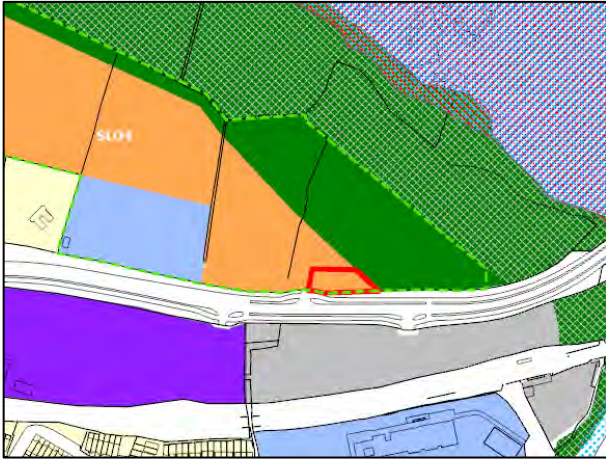
~~*To provide a new car park with access onto the Port Access Road for a minimum of 50 cars, with cycle parking facilities on lands zoned PU.*~~

- *A minimum of 1.2ha on lands zoned CE shall be provided for community uses. Generally, this shall comprise a community / sports/ recreation type development of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and agreement with the Planning Authority.*
- *The design and height of any development shall pay particular regard to the height of immediately adjoining (mostly 1 - 2-storey) residences and the visual impact of the proposed development on the Murrough Wetlands / coastline.*
- *To provide a linear green route for walking and cycling, with a minimum width of 8 metres, on the lands zoned OS1 with pedestrian / cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly (indicative route shown with purple arrow.)*
- *To provide a recreational open space park on the lands zoned OS1, to the east (lands closet to the Murrough Bridge) of a minimum of 2 hectares contiguous to the linear green route.*
- *The overall site layout design shall locate the main public open space element/s of the residential development adjoining the OS1 green route/park (on the lands closed to the Murrough).*

Change from:



Change to:



Item 7 Flood Risk Management

The Office welcomes the preparation of the SFRA and high quality 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 also acknowledges and supports the identification of flood risk zones in 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 addition, the SFRA utilises data from the national scale coastal flood hazard maps from the ICPSS which are now superseded by the outputs of the National Coastal Flood Hazard Mapping (NCFHM) project.

The Office also welcomes the inclusion of Justification Tests. However, the Office requests Part 3 of the Justification Test is reviewed to ensure that it is clearly demonstrated that the specific risk, at the sites which have failed the Justification Test, can be mitigated. For example, in respect of the Justification Test for the lands zoned at the Waterfront, Area 2 (Recreation and Amenity Area) where tourist car parking of motorhomes and caravans, which are classified as a highly vulnerable use, are permitted in principle.

In addition, it is noted that the lands at Wicklow County Campus failed the Justification Test, but the concluding recommendation of the Justification Test outlines that significant areas within the *'the zone is sufficiently large to provide for development of the desired uses which avoiding development in the at risk area'*. In such instances, in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines), any undeveloped lands in Flood Zone A should be zoned for water compatible development, and in Flood Zone B for less vulnerable usage, unless all criteria of the Justification Test can be satisfied.

For existing development, when avoidance or substitution is not possible and all criteria cannot be satisfied, a policy should be included to limit development to minor extensions only in accordance with section 5.28 of the Flood Guidelines and limit new development accordingly.

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 Wicklow Town - Rathnew Local Area Plan 2025;
- (ii) review and amend the flood zone maps to ensure the correct datasets and probability extents have been illustrated or provide a justification to disregard the data from the National Coastal Flood Hazard Mapping (NCFHM);
- (iii) include a policy where all criteria of the Plan Making Justification Tests (Justification Tests) cannot be satisfied, 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
- (iv) review the undeveloped lands zoned for Wicklow County Campus which are located within Flood Zone A and / or B and, where they do not pass the Justification Tests, rezone such lands in Flood Zone A for water compatible use, and in Flood Zone B for water compatible 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) The Flood Risk maps and the SFRA will be updated to include the National Coastal Flood Hazard Mapping (NCFHM)
- (iii) It is considered that objective suggested is already covered in the Wicklow CDP:

CPO 14.06 *To implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009).*

CPO 14.08 *The zoning of land that has been identified as being at a high or moderate probability of flooding (flood zones A or B) shall be in accordance with the requirements of the Flood Risk Management Guidelines and in particular the 'Justification Test for Development Plans' (as set out in Section 4.23 and Box 4.1 of the Guidelines).*

CPO 14.09 *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 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 Guidelines.*
- *Flood Risk Assessments shall be in accordance with the requirements set out in the 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, 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.*

- (iv) With respect to the zoning at Wicklow County Campus, additional objectives are recommended to ensure consistency with flood risk management guidelines and principle.

Chief Executive's 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. Add the following text with respect to the Wicklow County Campus zoning in Chapter 9:

Some parts of the Wicklow County Campus zone are identified as being at risk of flooding. The zoning objective does not proscribe exactly where in the zone development should occur and the zone is sufficiently large to provide for the development of desired uses while avoiding development in any area at risk of flooding. Any proposals for new development are required to be accompanied by an appropriately detailed FRA, undertaken in accordance with 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009), as well as the relevant policies and objectives in the County Development Plan and Wicklow Town-Rathnew Local Area Plan. In particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within the site.

Item 8 Economic Development and Employment

The Office welcomes the economic development strategy set out in chapter 4 of the draft Local Area Plan which aligns with the town's Key Town status in the RSES. The regional policy of the RSES focuses on enhancing the role of Wicklow Town - Rathnew as a hub for employment, training and education and to provide for strategic employment locations to improve the economic base by increasing the ratio of jobs to work.

The County Wicklow Economic Development Hierarchy identifies that the settlement's economic function is to attract major investment through foreign direct and local investment and people and product intensive industries. To support and grow the economic activity in the settlement, 37ha of undeveloped land has been zoned for employment uses in the draft Local Area Plan to strengthen and promote economic development in the settlement and build on its existing assets such as Wicklow Port and Harbour, the Wicklow County Campus and its strategic location on the M/N11 corridor and south-eastern rail corridor.

In terms of consistency with regional planning policy RPO 4.2 of the RSES to ensure lands developed for employment uses can be serviced and SCO5 of the County Development Plan to support the integration of land use and transportation to encourage sustainable mobility it is critical that the draft Local Area Plan does not zone lands for employment uses which are located on lands which are not serviced and which are poorly served by public transport.

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. This is particularly relevant to the lands at Newrath and Charvey Lane / Milltown North, which are located outside the CSO settlement boundary and in peripheral locations that are inconsistent with the achievement of compact growth, will contribute to the continuance of a dispersed settlement pattern and also encourage car-based development that will not 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 fails to 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 Transportation as required by RPO 8.1 of the RSES.

Recommendation 4 - Economic Development 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 for the extent and location of Employment zoned land and to demonstrate that the criteria of the aforementioned national and regional policies have been satisfied, and specifically in respect of the following Employment zonings:**
 - (a) Newrath, North of Wicklow County Campus**
 - (b) Charvey Lane/Milltown North**
- (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 Wicklow Town – Rathnew Local Area Plan.

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 additional lands are proposed to be zoned for employment use compared to the previous plan, and the amount of land has been moderated by changes in zoning at some locations to more appropriate uses, including identifying additional lands 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 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 Wicklow Town – Rathnew 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,

Undeveloped Employment Lands	Assessment of suitability
Charvey Lane / Milltown North	<p>These lands are currently zoned for new employment use. The extent of the zoning has been reduced however with the more northern portion changed to more appropriate OS and R uses.</p> <p>Employment use comprises the most appropriate use for these lands in the future given the surrounding land uses and proximity to Rathnew and the N11.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>
Newrath	<p>These lands are currently zoned for new employment use. The extent of the zoning has been reduced from previous plan with the more northern portion changed to more appropriate OS uses along the Vartry corridor.</p> <p>Employment use comprises an appropriate use for these lands in the future given the surrounding land uses (Clermont Campus) and the proximity to Rathnew and the N11.</p> <p>Water supply is currently available to the lands. Wastewater infrastructure is currently under construction on the Newcastle Road. Access is available to public roads and existing public transport services.</p>
Merrymeeing (north of Railway line)	<p>These lands are currently zoned for employment and tourism uses. The lands are located within the BUA of the settlement.</p> <p>Employment use comprises the most appropriate use for these lands in the future given the surrounding land uses and the constraints of the site, with roads on two sides and a rail line on the third. Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport</p>

	services.
Ballynabarney (east of R772)	<p>These lands are currently zoned for employment use. The extent of the zoning has been reduced however with the more northern portion changed to more appropriate AOS use and the southern boundary regularised having regard to the existence of a watercourse in this area.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads. This location is not however currently serviced by public transport services and is peripheral to existing bus and train routes.</p> <p>Nonetheless, employment zoning is maintained for these lands given that (a) part of the lands have planning permission for employment development and (b) part of the lands are owned by Wicklow County Council and Wicklow Enterprise Park Ltd (a company with charitable status established for the support of enterprise in the area) for the purpose of developing employment use.</p>
Broomhall Business and Enterprise Park	<p>These lands form the logical extension of the existing Broomhall Business and Enterprise Park and are currently zoned for new employment use. The lands are located within the BUA of the settlement. The extent of the zoning has been reduced however with the more northern portion changed to more appropriate PU use (to allow for possible new train station) and CE use (to reflect permission granted for a childcare facility).</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>
Port Access Road (south of the road and north of the railway line)	<p>These lands are currently zoned for employment use and are partially developed. The lands are located within the BUA of the settlement. The extent of the zoning has been reduced however with the more eastern portion changed to more appropriate PU use to facility public transport improvements at Wicklow train station.</p> <p>Employment use comprises the most appropriate use for these lands given their location of the Port Access Road and existing adjacent employment 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>
Ballynerrin (Hawkstown Road / Marlton Road)	<p>These lands are currently zoned for employment use. The lands are located within the BUA of the settlement. The extent of the zoning has been reduced however with the eastern boundary changed to more appropriate OS use to reflect local biodiversity assets.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>

With respect to Charvey Lane/Milltown North, these lands form the logical extension of the existing Charvey Lane business park, which is fully serviced. With respect to the identification of these lands as 'outside' the CSO boundary of the settlement, this is due to the redrafting of settlement boundaries that occurred as part of the 2022 Census, which has resulted in areas of developed lands being deemed 'outside' of settlements and areas of undeveloped agricultural lands being deemed 'inside' settlements. The whole of Charvey Lane business park for example is now deemed to be 'outside' the settlement boundary whereas in previous censuses, it was within the town. This change alone is not considered a sound basis for spatial planning assessments or decisions.

With respect to lands at Newrath, north of Wicklow County Campus, while these lands are not currently fully serviced, they will become serviceable as development at Clermont Campus and across the road on lands zoned for 'New Residential' further progress (both projects are already in train). Water supply is currently available to the lands; wastewater infrastructure is currently under construction on the Newcastle Road, as are footpaths, to a point less than 75m from the lands. Access is available to public roads and existing public transport services (located c. 500m from R772).

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 9 Village Centre Regeneration

The Office welcomes the inclusion of chapter 5 on the Key Regeneration areas in the draft Local Area Plan for both Wicklow town centre and Rathnew village. The strategic 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 and village 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 policy. 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).

While the Office welcomes the approach of the Planning Authority, there is a concern that the zoning of undeveloped lands beyond the existing village centre as Village Centre / Local Shops and Services has the potential to undermine the vitality and vibrancy of the established Rathnew village centre. In addition, there is an opportunity to improve permeability and ensure that the Wicklow County Campus can positively interact with Rathnew Village Centre, which should be more strongly supported in the draft Local Area Plan.

The lands to the east of Clermont Grove, which extend to circa 2.4 ha have no clear function identified in the Rathnew Village Regeneration Strategy other than to enhance connections with the Wicklow County Campus. It is identified as an opportunity site in the Village Centre Strategy Transport map but there is no supporting detail on the vision for these lands and how or if there is any opportunity to improve access to and from the Wicklow County Campus directly into the village as part of their development. It is also noted that these lands are located outside of the CSO settlement boundary.

In addition, 1.4 ha of lands are zoned which are undeveloped along Charvey, Lane for which Objective WTR47 requires that a masterplan be prepared. The draft Local Area Plan identifies that there are access constraints due to deficiencies of the Charvey Lane – R752 junction.

The Office considers that the inclusion of these lands as Village Centre / Local Shops and Services requires an improved focus and they should only be included where it can be clearly demonstrated that they can support the overall regeneration strategy for the village centre with clearer co-ordination of development and infrastructure delivery provided.

Further, it is considered necessary that it is demonstrated by way of the SCA and/or Infrastructure Assessment as required by Recommendation 1 and 4 that the lands can be serviced over the plan period.

Recommendation 5 - Rathnew Village Centre

Having regard to the vitality, viability and regeneration of Rathnew village, and in particular to:

- **RSO 2 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) include Objectives to implement the Rathnew Regeneration Strategy integrated with other objectives of the Draft Wicklow Town - Rathnew Local Area Plan 2025 for village centre development;**
- (ii) set out the regeneration aims and principles which demonstrates how the following sites will**

promote regeneration and revitalisation of Rathnew village:

- (a) Undeveloped lands located to the east of Clermont Grove; and**
- (b) Undeveloped lands to the south of Charvey Lane.**

(iii) demonstrate by way of a Settlement Capacity Audit and/or an Infrastructure Assessment that the sites at (ii) (a) and (b) above are serviced and/or serviceable within the plan period;

(iv) include measurable targets for the reduction of vacancy for the plan period and a strategy for the monitoring of same; and

(v) include permeability measures on the Transport Strategy map to ensure that the Wicklow County Campus can positively interact with Rathnew village centre.

Where the criteria requested at (i) - (v) of this recommendation cannot be demonstrated the lands identified at (ii) above the land use zoning objectives for the lands identified to the east of Clermont Grove and south of Charvey Lane should be omitted.

Chief Executive Response

With respect to the specific recommendations made:

- (i) While not completely clear, it appears that the OPR is seeking for the plan to include a stronger statement of support, via a new objective, for the regeneration 'strategy' for Rathnew. The strategy is clearly set out in the draft plan as follows but this is described as a 'strategy' rather than an 'objective'; there would be no issue with replicating the stated 'strategy' as an 'objective'.

The **strategy for Rathnew Village** centre is:

- To reinforce the unique identity of the village centre as the focal area of Rathnew, through regeneration of opportunity sites, enhancing the urban realm and creating healthy places, all with pedestrian and cyclist movement to the fore.
- To retain and reinforce the role of Rathnew with its own level of retail and other services appropriate to a village of its size and not allow it be absorbed as a 'suburb' of Wicklow town;
- To resist the development of any new retail or commercial facilities outside of the village centre activities zone and within 1km of the retail core, and
- To improve accessibility to the centre of the village, with enhanced linkages to Wicklow County Campus and the surrounding existing residential areas.

(ii) Lands to the east of Clermont Grove and on Charvey Lane

The lands to the east of Clermont Grove were proposed to be zoned 'village centre' in the draft LAP, which would allow for future mixed use development. It was considered that this could be an appropriate zone type for these lands, which could provide a mixed use 'bridge' between Clermont Campus (employment, education) and the historic village centre, and could allow the lands to be developed for a wide range of uses, including employment, commercial, community and residential uses that might be needed for both future residents of Rathnew and users of the campus. However, it is accepted that some normally acceptable 'village centre' type uses on these lands, such as retail or retail services could potentially draw trade away from the established village centre and this may not be optimal.

It is therefore recommended that this zoning be changed from VC to 'Wicklow County Campus' (which is its current zoning) which would preclude retail / retail services etc uses on the lands and instead promote its use for sustainable economic and educational / community use.

With respect to Charvey Lane, these lands comprise the obvious expansion zone in Rathnew village, for dense mixed use village centre type uses, given their location adjoining the existing historic village centre on two roads (R772 and R752). It is recommended that this site be identified as an 'opportunity site' and specific development objectives indicated in the plan. In addition, to make it clear that these lands form part of the 'village centre' it is recommended that the VC zone be expanded in this area.

- (iii) The need for a settlement capacity audit for the plan area has already been addressed in this response. With respect to the two areas of lands identified
- The lands east of Clement Grove are serviceable with water and wastewater infrastructure, and will be serviced by roads infrastructure on the construction of the RIRR.
 - The lands at Charvey Lane are fully serviced
- (iv) It is not considered appropriate to include an arbitrary target for the reduction of vacancy; notwithstanding the application of penalty measures such as the VSL or RZLT, and the inducements offered by way of various supports and grants, properties / sites may remain vacant due to the property owner's choice and the Local Authority has limited powers to interfere with such private property rights, other than through CPO. Via a new development pattern monitoring system currently being developed (further details to follow), the Local Authority will going forward be in a stronger position to monitor vacancy and regeneration activity.
- (v) The Rathnew Village Centre Strategy map and the Transport Objectives map shall be updated to provide more details of the measures to improve connections between Clermont campus and Rathnew village centre.

Having regard to the above assessment and the locations of both parcels of land, with existing development beyond in both cases, there is deemed to be no reasonable grounds for the removal of the zoning of these lands.

Chief Executive Recommendation

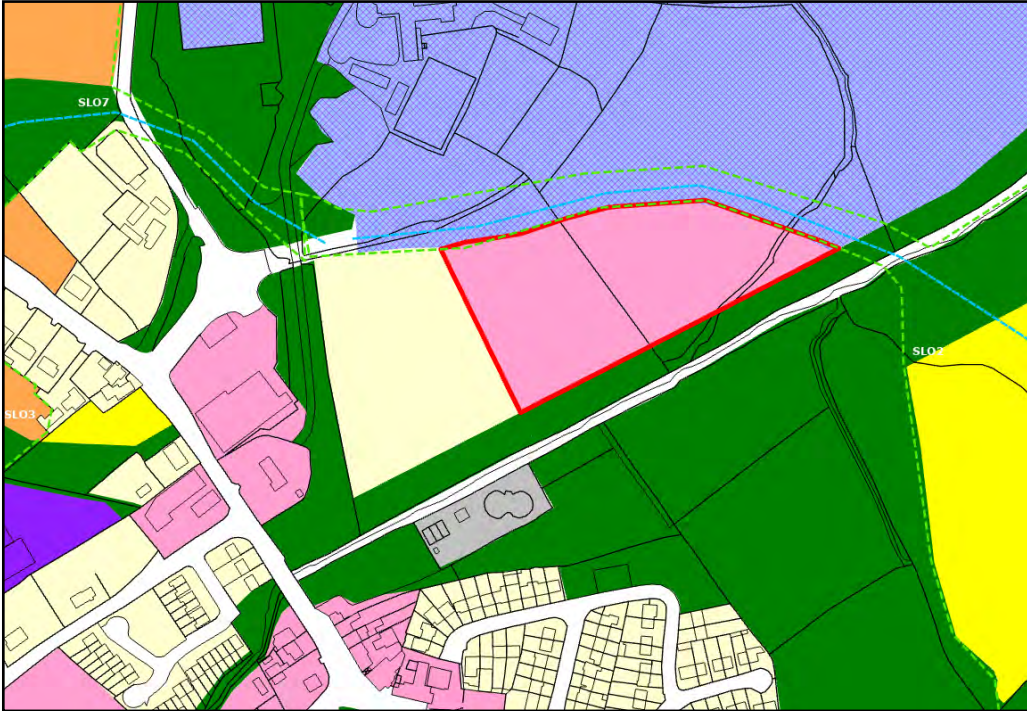
1. Add new objectives as follows:

WTR-X: *To support and reinforce the unique identity and the key service role of Rathnew village centre as the priority location within the northern sector of the settlement of Wicklow Town – Rathnew for investment and new development through:*

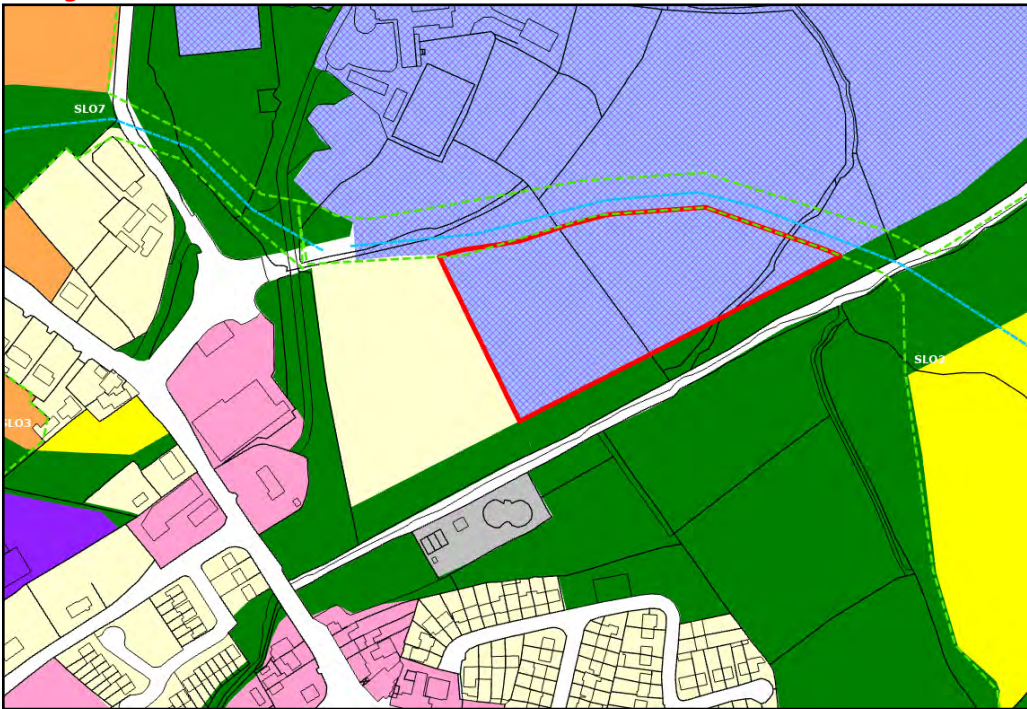
- *enhancing the urban realm in the village centre and creating new urban spaces, in order to provide for a welcoming, safe and vibrant place for the community to meet and interact;*
- *investment in pedestrian and cyclist accessibility and safety, in order to ensure excellent linkages between the village and Wicklow County Campus, the surrounding existing residential areas and Wicklow Town;*
- *Protecting function of Rathnew as a service centre with its own level of retail, retail services, employment and community services appropriate to a village of its size and catchment, and not allowing it be absorbed as a 'suburb' of Wicklow town. In particular to resist the development of any new retail or commercial facilities outside of the village centre zone or within 1km of Rathnew core retail area;*
- *the re-development / regeneration of vacant or underutilised sites in the core of the village in particular Opportunity Site 5*

2. Change zoning of lands to east of Clermont Grove from 'VC' to 'WCC' and remove said lands as an 'opportunity site' for Rathnew village.

Change from:

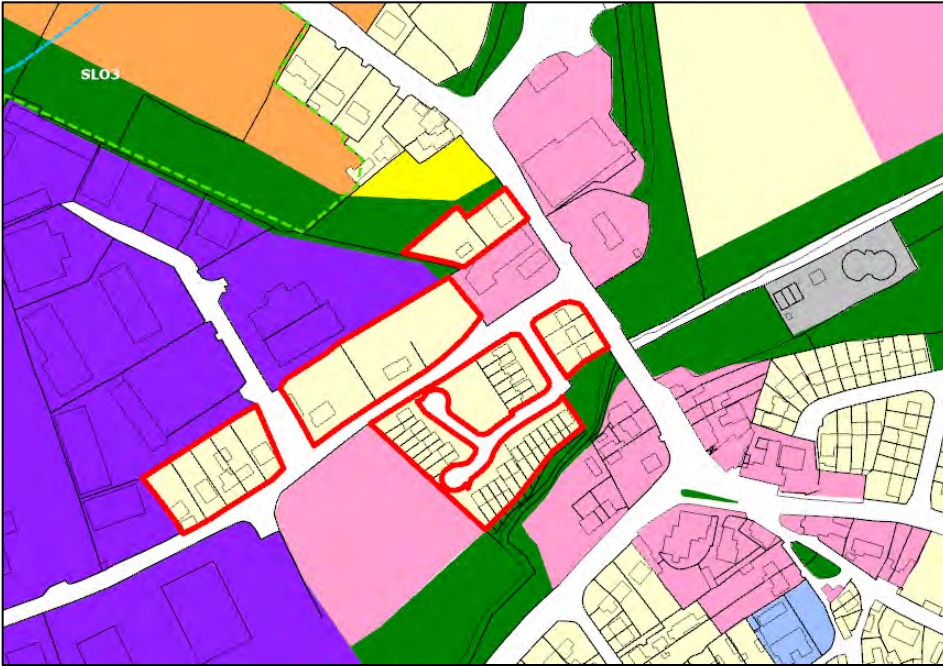


Change to:

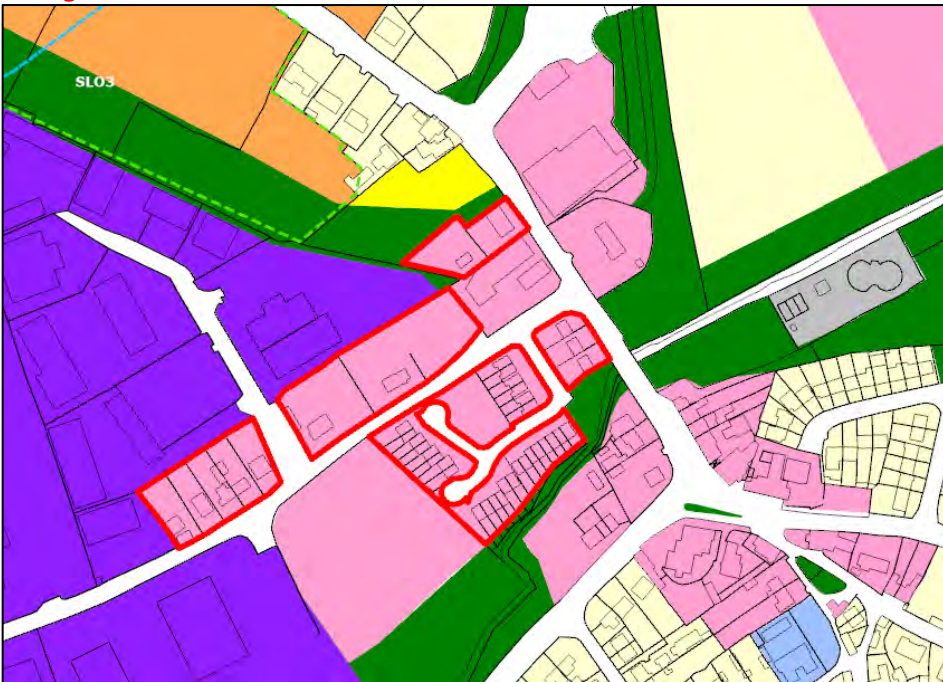


3. Change zoning of lands in Rathnew centre from RE to VC

Change from:



Change to:



4. Add one new **Opportunity Sites** as follows:

WTR OP5 – Charvey Lane

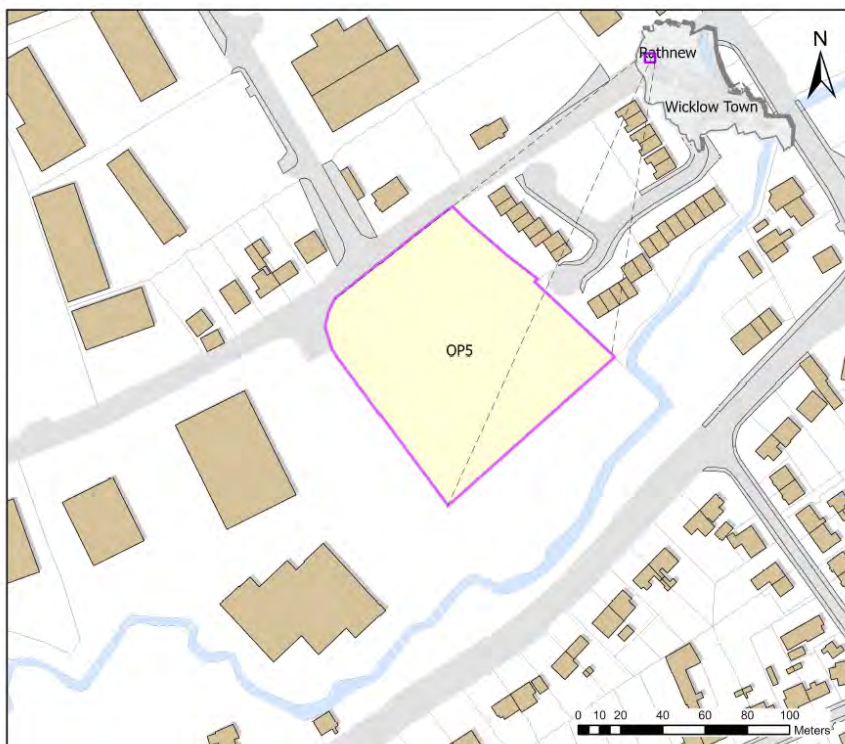
OP5 – Charvey Lane

These 'village centre' and 'open space' zoned lands measure c. XXha and have road frontage onto Charvey Lane and the R772. These lands are located in the heart of Rathnew Village and the development of same would provide an opportunity to make best use of serviced land, densify the centre of the village and to provide for additional community and commercial uses, and also to provide for a new amenity and biodiversity enhancement area along the natural corridor of the Rathnew River.

Objectives OP5

- *To provide for a high density mixed use development on lands zoned VC which may include commercial, retail, retail services, residential, community and cultural uses;*
- *Buildings shall be designed to the highest quality that provides for a strong street frontage along Charvey Lane, and maximum supervision of the OS lands along the Rathnew River.*
- *Vehicular access shall be via Charvey Lane, with high quality pedestrian and cyclist access across the site linking Charvey Lane to the R772*
- *Lands zoned OS to the south of the river and for a distance of not less than 10m to the north of the river shall be retained in as natural condition with maximum tree / vegetation retention as possible subject to any essential clearance to provide for new pedestrian / cyclist routes. Any river crossings shall be via a clean span bridges that maintain its natural character. Any remaining OS shall be laid out for amenity use.*

Proposed OP5 Site Charvey Lane



5. Amend the Rathnew Village Centre Strategy map

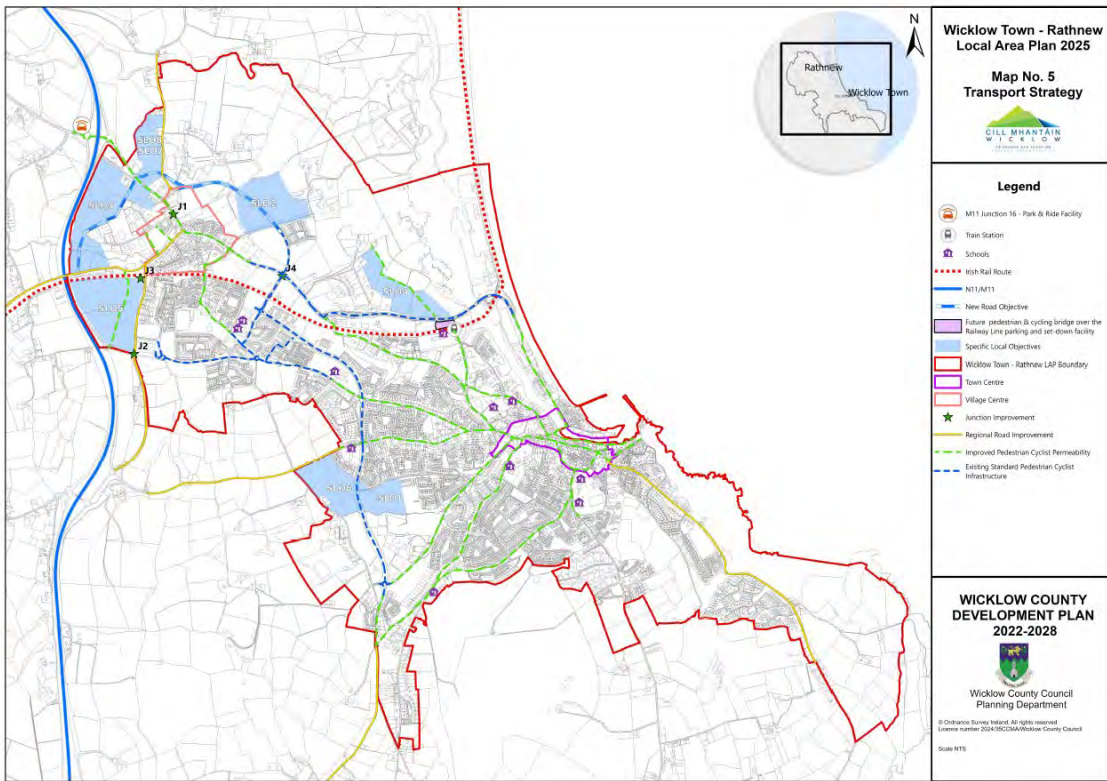
Proposed Amended Draft Rathnew Village Centre Map



Larger scale map is appended to this report.

6. Amend Transport Strategy map

Proposed Amended Draft Transport Strategy Objectives Map



Larger scale map is appended to this report.

Item 10 Climate Action

The Office welcomes the key vision 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. 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 from the Wicklow CAP which are specific to Wicklow Town – Rathnew and have a strong relationship to planning such as transport and the built environment, for example the inclusion of mode share targets.

Observation 1 – Integrating Climate Action

Having regard to:

- **RPO 3.7 of the RSES;**
- **the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%; and**
- **the Wicklow Local Authority Climate Action Plan 2024-2029 (Wicklow CAP),**

the Planning Authority is advised to review and revise the draft Wicklow Town - Rathnew Local Area Plan 2025 (the draft Local Area Plan), having regard to the Wicklow CAP to:

- (i) provide for alignment between the draft Local Area Plan and the relevant climate adaptation and mitigation actions through the policy objectives; and**
- (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.**

Chief Executive Response

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 **Wicklow Climate Action Plan**. 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:

Sustainable Transportation Objectives 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

Water Protection & Management Objectives 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

Flood Risk Management objectives 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

Air Quality objectives CPO 15.9 CPO 15.10 CPO 15.11

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. Section 2.3 Development Strategy, WTR2, WTR5, WTR, WTR9, WTR14, WTR21, WTR32, WTR33, WTR34, WTR35, WTR37, WTR42, WTR43, WTR44, WTR46, WTR49, WTR52, WTR56, WTR57, WTR61, WTR62, WTR73, WTR76, WTR77, WTR78, WTR79, WTR83, WTR90, WTR91, WTR92, WTR94, WTR95.

Therefore no changes are recommended

Item 11 Environmental Assessments

The Office notes that the lands identified as SLO 4 at Bollarney North have been zoned to provide a range of land uses, including Residential, Car Parking, Community / Education and Recreation. There is a concern in respect of the potential environmental impacts of the proposed zonings which are in close proximity (circa 75m) to the Murrough Special Protection Area and the Murrough Special Area of Conservation. While development within and close to European sites is not precluded, any likely significant effects of the proposed objective would need to be fully assessed and addressed by means of site-specific mitigation measures. The draft Natura Impact Report (NIR), however, includes only high-level mitigation measures.

The Planning Authority should therefore review the mitigation measures set out in the NIR to ensure that the stated conclusion that *'upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site'* is a complete, precise or definitive finding and conclusion, and that no reasonable scientific doubt remains as to the adverse effects of zoning SLO 4 on the European sites.

Recommendation 6 - The Murrough SPA and SAC

Having regard to the protection of natural heritage and the appropriate assessment of plans, and in particular to:

- **RSO 7.16 of the RSES to support the implementation of the Birds and Habitats Directives and ensure alignment with development plans; and**
- **Policy Objectives CPO 17.4 and CPO 17.6 of the County Development Plan to protect designated ecological sites including Special Areas of Conservation and Special Protection Areas, and to ensure any projects giving rise to adverse effects on the integrity of European sites shall not be permitted;**

the Planning Authority is required to:

- (i) **review the mitigation measures outlined in the draft Natura Impact Report for the Draft Wicklow Town Rathnew Local Area Plan 2025; and**
- (ii) **where it cannot be concluded that there would be no adverse effect on the integrity of any European site, omit the proposed zoning objectives for the lands identified as SLO 4.**

Chief Executive Response

Please see a detailed response under, Chapter 11 Zoning and Land Use, SLO4 Bollarney North, of this report.

On foot of same, it is recommended that the text of SLO4 be amended as follows:

This SLO is located in the townland of Bollarney North. The SLO comprises New Residential (RN – Priority 2), Open Space (OS1), Public Utility (PU) and Community/ Education (CE). Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

~~*To provide a new car park with access onto the Port Access Road for a minimum of 50 cars, with cycle parking facilities on lands zoned PU.*~~

- *A minimum of 1.2ha on lands zoned CE shall be provided for community uses. Generally, this shall comprise a community / sports/ recreation type development of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and agreement with the Planning Authority.*

- *The design and height of any development shall pay particular regard to the height of immediately adjoining (mostly 1 - 2-storey) residences and the visual impact of the proposed development on the Murrough Wetlands / coastline.*
- *To provide a linear green route for walking and cycling, with a minimum width of 8 metres, on the lands zoned OS1 with pedestrian / cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly (indicative route shown with purple arrow.)*
- *To provide a recreational open space park on the lands zoned OS1, to the east (lands closet to the Murrough Bridge) of a minimum of 2 hectares contiguous to the linear green route.*
- *The overall site layout design shall locate the main public open space element/s of the residential development adjoining the OS1 green route/park (on the lands closed to the Murrough).*
- *All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects. In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans.*

Item 12 Implementation and Monitoring

Section 6.5 of the Local Area Plans, Guidelines for Planning Authorities (2013) (LAP Guidelines) 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.

It is not clearly outlined what implementation and monitoring strategy will be implemented for draft Local Area Plan sets out the implementation and monitoring strategies of the Planning Authority. It is considered that a 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-Graigucullen 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 2 - 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 Wicklow Town - Rathnew 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).

Chief Executive Recommendation

Insert new tables in Appendix 3 (attached)

Item 13 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 EASTERN AND MIDLANDS REGIONAL AUTHORITY

Item 1 Legislative Context & Regional Spatial and Economic Strategy (RSES)

The role and function of the Regional Assembly, including the scope of the RSES, is provided for in the Planning and Development Act 2000, as amended. It should be noted that the Planning and Development Act 2023 was enacted into legislation recently. The new Act will commence on a phased basis. The provisions in the Planning and Development Act, 2000, as amended, will remain in place until the relevant provisions in the new Act are commenced.

The Regional Assembly is not required under Section 27 of the Planning and Development Act 2000, as amended, to prepare a submission and observation on a local area plan prepared by a local authority as is the case for a development plan, or variation thereof, however the Regional Assembly considers that regionally important and strategic plans should be commented upon by the Assembly, and in this case a plan for a designated Key Town in the Region is considered as such. In this regard the Assembly makes this submission and the comments hereunder to be taken into consideration by the local authority in the making of the Wicklow Town - Rathnew Local Area Plan 2025.

The RSES for the Eastern and Midland Region, which was made by the Members of the Assembly on 28th June 2019, is a strategic plan and investment framework to shape future growth throughout the Region. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives (RPOs).

The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision is supported by sixteen Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan 2021- 2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES is of critical importance for the delivery of Project Ireland 2040, given that it is the succeeding tier of policy delivery in Ireland.

The RSES for the Eastern and Midland Region presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; identifying Regional Growth Centres which act as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns that provide employment and services to their surrounding areas.

All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places. The RSES identifies Regional Growth Centres and Key Towns within the Region; however Self-Sustaining Growth Towns, Self- Sustaining Towns and Rural areas are to be defined by Development Plans.

Wicklow Town – Rathnew is identified as a Key Town in the RSES growth strategy, strategically located on the M/N11 and rail corridor within the Core Region. Wicklow Town is the County Town of Wicklow sited at the centre point of the coastal area of the County. The RSES outlines that Key Towns have capacity for above average growth in the Core Region with the requisite investment in employment creation, services, amenities and sustainable transport.

Furthermore, the RSES states that Wicklow has an important position as the County Town, providing higher order services and facilities for the residents and its catchment. Rathnew has a distinct identity and functions as

a local service centre for its local community. Key priorities are to strengthen the local employment base, improve sustainable transport and promote compact growth with a focus on regeneration, development of the port and harbour area, and to expand Wicklow-Rathnew's role as a hub for tourism, training and education.

Chief Executive Response

Noted

Item 2 Introduction and Context

Chapter 1 of the draft LAP states that the purpose of the plan is to put in place a land use framework that will guide the future sustainable development of Wicklow Town while acknowledging that the majority of policies, objectives and development standards that will apply in the Wicklow Town and Rathnew area are already determined in the Wicklow County Development Plan (CDP) 2022-2028. In this regard, the draft LAP has been framed in accordance with the contents of the Wicklow CDP, particularly in relation to residential development objectives and Core Strategy population and housing targets. The draft LAP includes flexibility in the zoning provisions to ensure that (a) the targets can be achieved in the event of unforeseen impediments to the development of certain lands arise and (b) the LAP does not have to be formally amended to reflect any of the changes in the Core Strategy or population/housing targets that may arise during the lifetime of the CDP due to changes in the NPF, the RSES or changes to planning legislation.

The draft LAP is also informed by a number of studies and appendices, including:

- Strategic Environmental Assessment
- Natura Impact Assessment (Appropriate Assessment)
- Strategic Flood Risk Assessment
- Local Transport Assessment
- Social Infrastructure Audit

The Assembly considers the overall plan preparation to be comprehensive, with the structure and content being in accordance with Local Area Plan Guidelines for Planning Authorities 2013 and the Development Plans Guidelines for Planning Authorities 2022 (where relevant).

Chief Executive Response

Noted

Item 3 Overall Vision and Strategy

Section 2 of the draft LAP explains that a key aim of the draft plan is to set out the vision and development strategy for the future development of the area framed by the overarching themes of the Wicklow CDP being namely; healthy placemaking, climate change, and economic opportunity. It is considered that these themes strongly correlate to the 3 key principles of the RSES (being Healthy Placemaking, Climate Action and Economic Opportunity) which is welcomed by the Assembly. This chapter also states that the vision of the draft LAP must also be consistent with the Core Strategy of the Wicklow CDP following the hierarchy of plans, including the NPF at national level, the RSES at regional level and the Wicklow CDP at county level.

Section 2.3 of the draft LAP sets out a clear framework as to how the draft plan is influenced and adheres to the RSES, with the identification of Wicklow Town – Rathnew as a Key Town in Core Region and includes a number of RSES Policy Objectives for Wicklow Town – Rathnew into Table 1 of the draft LAP (see below):

RSES Policy Objectives : Wicklow – Rathnew Core Region Key Town	
RPO 4.54	Support an enhanced role and function of Wicklow-Rathnew as the County Town, particularly as a hub for employment, training and education.
RPO 4.55	Support Wicklow-Rathnew's role in the provision of third level education at the Wicklow County Campus Rathnew (in association with Institute of Technology Carlow) and in particular, to support the development of the campus as a hub for the Film Industry and Screen Content Creation Sector.
RPO 4.56	Support enhancement and expansion of Wicklow port and Harbour, to expand commercial berthing and pleasure craft capacity subject to a feasibility study with particular focus on avoiding adverse impacts on the integrity of adjacent European Sites.
RPO 4.57	Support the development of Wicklow-Rathnew as a tourism hub having regard to its accessibility to key tourist destinations in the Region.
RPO 4.58	To support ongoing investment in rail infrastructure to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity.

Source: Table 1 of the draft LAP (RSES Policy Objectives)

The Assembly welcomes the inclusion of relevant Regional Planning Objectives into the content of this chapter, along with acknowledgement of the hierarchal nature of the national, regional, and local policy to which the draft LAP is situated within.

The Assembly also supports the inclusion in this section a broad outline regarding potential regeneration opportunities in Wicklow Town and Rathnew, with key regeneration opportunities including the development of Wicklow port and harbour, served by the port access road, to expand commercial berthing and pleasure craft capacity and redevelopment of underutilised industrial units in the port and quayside area. The draft LAP also acknowledges the many opportunities for densification and enhancement of residential and retail uses in Wicklow Town and Rathnew village centres and to improve pedestrian mobility and connectivity. There is also potential for further development of the Wicklow County Campus as a third level educational facility for enterprise, education, training, research and development. The above regeneration references are aligned with the narrative for regeneration in Wicklow Town – Rathnew in the RSES.

Section 2.4 of the draft LAP provides commentary on population and housing. The inclusion of Table 2.1 in the draft plan outlines the population and growth targets for Wicklow Town – Rathnew as provided for in the Wicklow CDP. This includes a population target of 19,400 persons and a housing target of 7,850 units by 2031. The draft LAP states that it will ensure there is adequate zoned land and supporting objectives to allow for the housing targets as set out in the CDP prevailing at the time of adoption of this draft LAP. It further states that the lands that are needed to be zoned to meet the current target will be zoned 'New Residential' and identified in this draft plan as 'New Residential Priority 1' lands. Moreover, the draft LAP states the following;

"In order to ensure an adequate future supply of housing lands, should the need arise for their development having regard to any changes to housing targets that might arise during the lifetime of this LAP, additional lands

shall be zoned - 'New Residential' and identified as 'New Residential Priority 2' which shall only be considered for consent where it can be shown that such development would accord with the Core Strategy targets after the activation of Priority 1 lands."

Chief Executive Response

Noted

Item 4 Residential Development

Chapter 3 of the draft LAP provides details of the residential development strategy for the plan area. The Assembly welcomes the focus on encouraging new residential development into the serviced existing built envelope of the settlement which aligns with the compact growth aims set out in Section 9.3 of the RSES (Housing and Regeneration) which accords with the NPF ambitions to encourage compact growth in urban centres with development being focused within existing, and close to existing, built-up areas. A key approach to achieving same is encouraging appropriate levels of infill and brownfield regeneration sites which the draft LAP acknowledges in Chapter 3 with the potential for significant housing opportunities through densification of the existing built-up area, re-use of derelict or brownfield sites, infill and backland development.

Chief Executive Response

Noted

Item 5 Economic Development

Chapter 4 of the draft LAP covers economic development stating that it is an over-arching and cross cutting theme of the CDP and the draft LAP. The economic development strategy of the draft LAP aims to take advantage of the existing economic assets in order to stimulate employment opportunities within the plan area. Section 4.1 of the draft LAP sets out the key functions to achieve the economic development vision for Wicklow Town-Rathnew including;

- Availability of zoned land for employment (Table 4.1 provides a location list of both existing/developed employment lands and undeveloped employment lands by area which is welcomed by the Assembly)
- Promoting and facilitating healthy communities and a high quality of life
- Reinforcing Wicklow Town Centre's role in retail provision and the services industry
- Supporting Wicklow Town and Rathnew Village Centres
- Facilitating further development of industrial/business parks
- Supporting Wicklow County Campus with education and employment potential
- Managing employment at Murrough North
- Facilitating employment on Wicklow Port Access Road (PAR) and Hawkstown Road

It is stated that other key LAP functions in the achievement of economic development include; 1) supporting the maritime sector and Wicklow port, 2) facilitating and promoting entrepreneurial activity, 3) supporting home based economic activity and 4) supporting the growth of tourism and recreation.

This chapter includes 7 no. employment objectives for the plan area including '*WTR 8 To facilitate and support all forms of employment creation on appropriately zoned land in Wicklow Town-Rathnew and to promote the intensification of activities on existing employment sites and to take advantage of the existing economic assets in order to stimulate further employment within the area.*' It is considered that this employment objective compliments RPO 4.54 in the RSES which seeks 'to support an enhanced role and function of Wicklow-Rathnew as the County Town, particularly as a hub for employment, training and education.'

Overall, the Assembly welcomes the emphasis provided in the draft LAP in relation to employment and enterprise development in Wicklow Town/Rathnew to drive its development as a Key Town in the Region. However, this chapter would benefit by referencing the 'Guiding Principles to Identify Strategic Employment Development' contained in Section 6.3 of the RSES (Economic Strategy) as to how strategic employment sites in the urban centre have been identified. The OPR Practice Note PN04 on 'Planning for Employment Growth – The Development Plan and Employment Lands' (August 2024) is also a noteworthy publication that should be considered in this context.

It is also considered that this chapter could be enhanced further by making reference to Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management.

Recommendations

- **Chapter 4 of the draft LAP should make reference to Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management.**

Reason: In the interest of demonstrating consistency with the RSES.

- **Chapter 4 of the draft LAP would benefit by referencing the 'Guiding Principles to Identify Strategic Employment Development' contained in Section 6.3 of the RSES (Economic Strategy) as to how strategic employment sites in the town have been identified. The OPR Practice Note PN04 on 'Planning for Employment Growth – The Development Plan and Employment Lands' (August 2024) is also a noteworthy publication that should be considered in this context.**

Reason: In the interest of demonstrating consistency with the RSES.

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.
In particular, the economic development provisions of the draft LAP have been drawn up to accord particularly with the provisions of Chapter 9 of the Wicklow County Development Plan. This chapter in the County Development Plan includes **Figure 6.3 of the RSES** and indeed further details of the key elements of the RSES economic strategy that have applicability to County Wicklow and to Wicklow Town. It is therefore not considered necessary to include the reference requested in the LAP.
2. As above, this LAP has been prepared in light of the provisions of the County Development Plan, which includes details principles around the zoning of employment land. These principles, while prepared in advance of the OPR guidance note, are generally consistent with same. It is not considered therefore necessary to amend the draft plan as recommended.

Chief Executive Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 6 Key Regeneration Areas
<p>Chapter 5 of the draft LAP discusses Key Regeneration Areas in the plan area and includes regeneration strategies under the three areas identified as having significant potential for regeneration consisting of a) Wicklow Town Centre Strategy, b) Rathnew Village Strategy and c) Wicklow Town Waterfront Zone Strategy. It is stated that these regeneration areas have the potential to be the heart of the settlement providing for healthy placemaking and a mix of uses where people want to live, visit, shop and work.</p> <p>Overall, the Assembly welcomes the content of this chapter with the emphasis on regeneration complimenting Regional Strategic Outcome (RSO) 2 of the RSES in relation to the delivery of compact growth and urban regeneration in the settlement centres of Wicklow Town and Rathnew.</p> <p>In addition, it is noted that under the Wicklow Town Centre Strategy, the associated map on page 28 of the draft LAP does not appear to include the potential opportunity sites in the map legend which should be clarified. It would also be useful to readers that each map contained in this chapter be provided with a label/map number that corresponds to the text in the chapter. It is noted that the paragraph located under Map 5.3 refers to a separate map (Map 5.4) which is not labelled in this chapter but appears to relate to the map found on page 36 of the draft LAP.</p> <p>Recommendation</p> <ul style="list-style-type: none"> • Within Chapter 5 of the draft LAP, it is noted that under the Wicklow Town Centre Strategy, the associated map on page 28 of the draft LAP does not appear to include the potential opportunity sites in the map legend which should be clarified. It is also recommended that each map contained in this chapter be provided with a label/map number that corresponds to the text in the chapter. It is noted that the paragraph located under Map 5.3 refers to a separate map (Map 5.4) which is not labelled in this chapter but appears to relate to the map on page 36 of the draft LAP. <p>Reason: In the interest of clarity.</p>
Chief Executive Response
All maps / drawings can be reviewed to include opportunity sites and clearer labelling / numbering.
Chief Executive's Recommendation
On adoption of the final plan, all maps to be improved with respect to labelling, site numbering etc

Item 7	Centres and Retail, including Opportunity Sites
<p>Chapter 6 of the draft LAP provides commentary on retail and opportunity sites in the draft plan area. At the outset, the draft LAP acknowledges the position of Wicklow Town as being identified as a Level 2 Major Town Centre and County Town Centre, with Rathnew being a Level 4 Small Town in accordance with the Retail Hierarchy set out in the RSES and the Wicklow CDP 2022-2028. This chapter highlights that new retail development should support the high order retail function of Wicklow Town which is welcomed by the Assembly. The RSES states that there is potential for Wicklow town centre to strengthen and promote economic development associated with retail and commerce which this chapter compliments in particular with general retail objective WTR64.</p> <p>This chapter also highlights a number of potential retail opportunity sites in Wicklow town centre including WRT OP1 (The Upper Mall), WRT OP2 (Greentree House, Fitzwilliam Square), WRT OP3 (Vacant Building and Site beside the Bridge Tavern) and WRT OP4 (Quarantine Hill). The Assembly would be generally supportive of and welcome the detailed objectives provided in this chapter in relation to same.</p>	
Chief Executive Response	
Noted	

Item 8	Community Development
<p>Chapter 7 of the draft LAP covers the theme of community development with particular focus on 1) the provision of enhanced social infrastructure, 2) open space and 3) education. It is stated that the social infrastructure audit has informed the amount of open space requirements to meet the needs for a future catchment population. In this respect 46.4ha of open space would be required for the future projected population of 19,400 persons; however, as Wicklow Town-Rathnew provides for a large catchment for sports clubs and facilities, a future catchment population of c.27,900 persons is assumed, with a requirement for c.66 hectares. There is currently a total of c. 45ha zoned as open space use in the area, and the draft LAP has zoned 30.4ha of additional undeveloped lands, or future open space development, with these locations listed in a table in Chapter 7.</p> <p>The draft LAP also outlines that there are currently 8 no. primary schools and 4 no. post primary schools within the settlement, along with a third level facility branch of the South-East Technological University (SETU) located on the Wicklow County Campus Rathnew. The draft LAP also includes for additional lands zoned CE 'Community and Education' to ensure that there is adequate capacity in both the primary and secondary schools in the town with additional schools at the Marlton Road, Ballybeg and Rosanna having regard to the Department of Education requirements. These locations and quantum of lands zoned to accommodate education needs are also listed in a table in Chapter 7.</p> <p>In general, the Assembly welcomes the detail and objectives provided in this chapter in relation to community, open space and educational provisions which align with RSO 13 (Improve Education Skills and Social Inclusion) of the RSES and RPO 4.54 'Support an enhanced role and function of Wicklow- Rathnew as the County Town, particularly as a hub for employment, training and education'</p>	
Chief Executive Response	
Noted	

Item 9	Tourism
<p>Chapter 8 of the draft LAP outlines the tourism strategy for Wicklow-Rathnew and recognises the important role of tourism and the visitor economy to the settlement. The draft plan acknowledges the tourism industry affording significant potential for economic development and employment opportunities in the plan area and to County Wicklow as a whole. The draft LAP tourism strategy aims to promote and facilitate the development of sustainable tourism with a number of tourism objectives listed to achieve same including objectives relating to tourism accommodation, facilities and services. It is considered that the objectives listed in this chapter are aligned to RPO 4.58 of the RSES that seeks to 'support the development of Wicklow-Rathnew as a tourism hub having regard to its accessibility to key tourist destinations in the Region.'</p>	
Chief Executive Response	
Noted	

Item 10	Infrastructure
<p>Chapter 9 of the draft LAP provides commentary on the infrastructure needs of the settlement, indicating that the provision of adequate infrastructure is critical to facilitate and sustain the growth of Wicklow Town-Rathnew over the lifetime of the plan and beyond. The draft LAP draws attention to the infrastructure strategies, objectives and standards set out in the Wicklow CDP 2022-2028 which will apply directly to this plan including sustainable transportation, water supply and demand, wastewater infrastructure, storm and surface water infrastructure, flood risk management, waste and environmental emissions and energy and information infrastructure. The draft LAP asserts that it is not intended to re-state the majority of infrastructure objectives contained in the Wicklow CDP 2022- 2028, however this chapter does focus on three physical infrastructure concerns that are most relevant to Wicklow-Rathnew, being namely 1) integration of land use and transportation, 2) active and sustainable travel and 3) flooding and coastal erosion.</p> <p>The RSES highlights the travel and infrastructure challenges facing Wicklow Town – Rathnew, '<i>Wicklow-Rathnew has high levels of car-based commuting to Dublin with issues in relation to public transport capacity, particularly rail, and traffic congestion on the M/N11</i>'. The draft LAP recognises the need to provide public transport alternatives to create a modal shift away from private car travel while also acknowledging the limitation that Wicklow County Council is not a public transport provider.</p> <p>Of note is Appendix 1 of the draft LAP which includes a Local Transport Assessment (LTA) which was prepared as part of this draft LAP which aims to encourage sustainable forms of movement and transport and prioritising active travel modes of walking, cycling and public transport. The overall transport strategy and objectives for Wicklow Town and Rathnew are listed in Section 3 of the LTA which is welcomed by the Assembly. It is noted that RPO 8.6 requires the preparation of Local Transport Plans for selected settlements in the Region which includes Wicklow-Rathnew. The draft LAP therefore aligns with this requirement.</p> <p>The LTA highlights that car driver and passenger as a means of travel was 59.1% in 2022 down from 66.3% in 2016 but this was primarily driven by a switch to working from home rather than a modal shift to public transport/walking/cycling.</p> <p>The Assembly also notes objective WTR75 of the draft LAP which supports '<i>completion of the Rathnew Inner Relief Road</i>' and '<i>improvement of the road connections between the Wicklow Town – Rathnew and M11</i>' as well as objective WTR78 – '<i>to continue to work with Iarnród Eireann and the NTA on the improvement of mainline train services to Wicklow Town station and to extend the DART services to Wicklow Town station</i>'.</p>	
Chief Executive Response	
Noted	

Item 11 Heritage, Biodiversity and Green Infrastructure

Chapter 10 of the draft LAP provides commentary on how the draft plan will protect and enhance natural heritage and biodiversity. The draft LAP considers that Wicklow Town has good built heritage stock, many associated with its historical development like the Black Castle and Abbey, and the town has also inherited a town centre street pattern, something which Rathnew Village lacks but retains a unique built heritage with a range of building types. The draft LAP builds upon the heritage strategies, objectives, schedules and standards set out in the Wicklow CDP. In terms of heritage assets, there are 41 entries in the Record of Protected Structures, 5 designated Architectural Conservation Areas, a number of 'Recorded Monuments', and a zone of archaeological potential' in the Wicklow Town area.

In terms of biodiversity and natural heritage, there are also a number of areas affected by statutory designations within the plan boundary such as the Murrough SPA, Wicklow Head SPA, Murrough Wetlands SAC, Wicklow Reef SAC and the Natural Heritage Areas at Murrough and Wicklow Head. The draft LAP recognises the importance of the area's proximity to the sea in shaping its future development by stating that *'Wicklow Town's seascape is arguably it's finest asset which has greatly influenced it's socio-economic development'* and that *'the seafront of Wicklow Town should be effectively celebrated through increased access, the design of good buildings and public spaces, and the increased usage of its shoreline and adjacent areas for leisure and cultural purposes.'*

The Assembly also welcomes the inclusion within the draft LAP of policy objectives WTR90, WTR91, and WTR92 to improve and enhance greenways, green infrastructure, and green linkages that could help preserve the natural heritage of the plan area and improve the recreation and amenity value of these areas in keeping with RPO 7.22 (Green Infrastructure) of the RSES.

Furthermore, in relation to Green Infrastructure, it noted that this chapter draws reference to a Green Infrastructure Map (Map No. 3) which accompanies the draft plan. Notwithstanding same, and the narrative for green infrastructure contained in the chapter, there does not appear to be a specific objective included in the draft LAP for the preparation of a Green Infrastructure survey and strategy for Wicklow-Rathnew. The preparation of same would further enhance alignment with RPO 7.22 of the RSES in relation to Green Infrastructure. It is also considered that this section of the draft LAP could be further strengthened by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

Recommendations

- **Chapter 10 of the draft LAP could be further enhanced through the inclusion of an objective for the preparation of a Green Infrastructure survey and strategy for Wicklow-Rathnew.**
Reason: In the interest of demonstrating consistency with RPO 7.22 of the RSES.
- **Chapter 10 of the draft LAP could be further strengthened by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.**
Reason: In the interest of demonstrating consistency with the RSES.

Chief Executive Response

1. The Green Infrastructure that forms part of the draft plan has been prepared following detailed data collection, survey and assessment and it is unclear therefore why a survey is recommended. The Green

Infrastructure 'strategy' for the plan area is a combination of the identification of GI assets in the GI map and the application of the objectives of the County Development Plan and the LAP as follows, and therefore it is not considered necessary to prepare a separate GI 'strategy' as part of this plan making process.

County Development Plan objectives

CPO 18.1 *To recognise the importance and contribution of Green Infrastructure for the maintenance of biodiversity and ecosystem services, ensuring that the region and county will be better able to adapt and respond to climate change issues.*

CPO 18.2 *To protect existing Green Infrastructure resources and to facilitate, in consultation with relevant stakeholders, the development of green infrastructure that recognises the benefits that can be achieved with regard to the following:*

- provision of open space amenities,*
- sustainable management of water,*
- protection and management of biodiversity,*
- protection of cultural heritage, and*
- protection of protected landscape sensitivities.*

CPO 18.3 *New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment.*

CPO 18.4 *To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, European sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.5 *To identify and facilitate the provision of linkages along and between green / river corridors within the county and adjoining counties to create inter connected routes and develop riverside parks and create linkages between them to form 'necklace' effect routes including development of walkways, cycleways, bridleways and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.6 *To promote and facilitate the development of coastal trails linking up with existing recreational trails, creating new linkages between coastal sites and inward linkages to settlements and green spaces in built up areas and extensions to existing facilities where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.7 *To facilitate the development of green bridges / wildlife crossings over existing physical transport barriers to repair fragmentation of the Green Infrastructure network caused by such grey infrastructure developments.*

CPO18.8 *To require the integration of Green Infrastructure principles and inclusion of native planting schemes in all development proposals in landscaped areas, open spaces and areas of public space.*

CPO 18.9 *To facilitate the use of natural areas for active outdoor pursuits, subject to ecological and cultural heritage assessment and associated mitigation as appropriate and all other normal planning controls.*

CPO 18.10 *To facilitate access to amenity areas in the County for the benefit of all, on the basis of cooperation with landowners, recreational users and other relevant stakeholder groups to promote "agreed access" on public and privately owned land in the County on the basis of sustainability, consultation and consensus.*

CPO 18.11 *To support the development of greenways, blueways and other access routes along natural corridors while ensuring that there is no adverse impact on the flora and fauna, biodiversity or water quality of natural assets. Wicklow County Council prioritises environmental protection in our design and construction of routes and surface selection.*

In particular, to support the development of existing and examine the feasibility of new walking, cycling, horse riding and water based routes and trails along the following routes:

- from Bray Head, via the Sugarloaf Mountains, joining up with The Wicklow Way;*
- the extension of the 'Blessington Greenway' walk around the Poulaphouca reservoir;*
- the expansion of a lakeshore walk around the Vartry reservoir;*
- the extension of the old Shillelagh branch recreational trail - railway walk from Arklow to Shillelagh;*
- the development of a route along the disused Great Southern and Western Railway line (Naas to Tullow branch) through Dunlavin and Baltinglass;*
- the development of a coastal route from Bray to Arklow as well as links between this potential route and the coast road;*
- the Wicklow Way and St. Kevin's Way (as permissive waymarked routes);*
- the Wicklow to Glendalough "pilgrim walk" incorporating ancient wells; and*
- 'Mountains to the Sea' amenity route incorporating Glendalough, Laragh, Annamoe, Roundwood, Newtownmountkennedy and Kilcoole-Newcastle.*

CPO 18.13 *To facilitate greater public recreational access to the Wicklow coast and improved linkages between the coast and the coast road, subject to full ecological and heritage impact assessment and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.17 *Where projects for significant green infrastructure identified in this chapter are not already provided for by existing plans / programmes or are not already permitted, then the feasibility of progressing these projects shall be examined, taking into account planning need, environmental sensitivities as identified in the SEA Environmental Report and the objectives of the plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new green infrastructure in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection.*

CPO 18.18 *Where relevant, the Council and those receiving permission for development under the plan, shall manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant environmental effects, including loss of habitat and disturbance. Management measures may include ensuring that new projects and activities are a suitable distance from ecological sensitivities; visitor/habitat management plans will be required for proposed projects as relevant and appropriate.*

Potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.

Draft LAP Objectives

WTR1: *To facilitate the development and enhancement of green infrastructure resources, including access to, connectivity between areas of interest and linkages between green spaces including the coast, where feasible within the plan settlement boundary.*

WTR2: To promote and support the development of enhanced or new greenways, blueways and amenity walks at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links:

- Wicklow to Greystones coastal greenway. Any development proposal within the route corridor study area/ preferred route option will be assessed for acceptability having regard to the potential effects on the future viability of the proposed greenway;
- Wicklow to Arklow coastal route;
- Wicklow Head Lighthouse Walk

WTR3: To facilitate the provision of green linkages along and between green / river corridors/ Open Space/ Active Open Space, to create inter connected routes and develop parks and linkages between existing and proposed green areas, to form 'necklace' effect routes including development of walkways, cycleways, bridleways and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.

2. The provisions and guidance of the RSES with respect to GI strategies has been fully considered and integrated into the Green Infrastructure chapter of the Wicklow County Development Plan. The draft LAP for Wicklow Town – Rathnew has been drawn up in accordance with the provisions, policies and objectives of the County Development Plan and it is not considered necessary to re-state RSES provisions already addressed in the County Development Plan, that have been taken into account in the development of this LAP.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031 -2031.

Item 12 Zoning and Land Use

Chapter 11 of the draft LAP draws attention to the land use zoning objectives map (Map No. 1) that accompanies the draft plan and sets out the development boundary for the plan area. The various zoning objectives for the draft LAP are identified and described in Table 11.1 of the draft plan. The Assembly particularly welcomes the clarity provided for within Section 11.2 for the Waterfront Zone (WZ) zoning objective which is divided into distinct planning areas. Furthermore, the Assembly welcomes the additional detail provided in Section 11.5 of the draft LAP for Specific Local Objectives (SLOs) and concept plans which may require further detail to be agreed via a masterplan approach between the planning authority and the developer. This is a welcome approach to ensure the future development of these sites is carried out in a plan led, sustainable and phased manner.

Chief Executive Response

Noted

Item 13 SEA, AA and SFRA
<p>The Assembly welcomes the preparation of the draft LAP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).</p> <p>The SEA Environmental Report sets out an assessment of the environmental effects in combination with the wider planning framework arising from the draft LAP to provide a clear understanding of the likely environmental consequences of decisions arising from the LAP. Regarding mitigation, the draft LAP states that by integrating all related recommendations into the draft LAP, the Council has ensured that both the beneficial environmental effects of implementing the LAP have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset.</p> <p>The draft LAP is also subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has been prepared which states that having incorporated mitigation measures into the draft LAP, it has been demonstrated that the draft LAP is not foreseen to give rise to any significant adverse effects to designated European sites, alone or in combination with other plans or projects. This demonstration has been made in view of the conservation objectives of the habitats and/or species, for which these sites have been designated. The Natura Impact Report will, alongside any other inputs from the plan preparation/AA process, inform the Competent Authority when it undertakes the final AA determination at adoption of the LAP. The AA process is ongoing and will inform and be concluded at adoption of the LAP.</p> <p>Finally, a Strategic Flood Risk Assessment (SFRA) has been undertaken, which aligns with RPO 7.12 of the RSES, alongside the preparation of the draft LAP, the SEA and the NIR. The recommendations from the SFRA are stated to have been integrated into the draft LAP which is welcomed. In keeping with best practice, it is recommended that the local authority take opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.</p>
Chief Executive Response
Noted

Item 14	Climate Action
<p>Recommendations</p> <ul style="list-style-type: none"> • The draft LAP should be amended to include reference to the RSES for the Region which includes Climate Action as one of the three key principles of the RSES, in addition to reference to Section 7.9 of the RSES regarding climate change. Reason: In the interest of demonstrating consistency with the RSES. • The Assembly considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect the Assembly would like to draw attention to Figure 7.4 Climate Strategy of the RSES which should be referred to in the draft LAP. Reason: In the interest of demonstrating consistency with the RSES. • The draft LAP should align with RPOs 7.14 and 7.15 of the RSES regarding flood risk management. Reason: In the interest of demonstrating consistency with the RSES. 	
<p>Chief Executive Response</p>	
<ol style="list-style-type: none"> 1. As detailed above in relation to other issues raised in this submission, this LAP sits under the Wicklow County Development Plan in the hierarchy of plans. All of the County Development Plan provisions will apply directly in the LAP area and therefore, as set out in the introduction to the plan, there is no need for repetition of County Development Plan principles, strategies, policies and objectives in the LAP unless it is unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the local area. The Wicklow County Development Plan addresses in much detail the climate action goals of the RSES and integrates the climate action objectives of the RSES into the County Development Plan provisions, which will apply directly in the LAP area; it is not considered necessary to re-state RSES provisions already addressed in the County Development Plan, that have been taken into account in the development of this LAP. 2. The SFRAs prepared for both the County Development Plan and the LAP take into account RPO 7.14 which relates to Flood Risk Management Plans. 3. RPO 7.15 relates to the proper consideration of biodiversity and environmental protection in the design of flood risk management measures. This objective is already addressed in the Wicklow County Development Plan and is therefore not necessary to repeat in this LAP (in particular the objectives of chapters 14 and 17 of the County Development Plan). 	
<p>Chief Executive's Recommendation</p>	
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031</p>	

4.1.3 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 Northern and Western 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, there is an objective to extend DART services to Wicklow Town by 2042, whilst the M11 corridor is designated as a ‘Regional Bus Corridor’, with ancillary objectives to provide for park and ride facilities along this route.

Chief Executive Response

Noted

Item 2	Local Transport Assessment
	<p>The preparation of a 'Local Transport Assessment' for Wicklow Town – Rathnew, 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.</p> <p>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:</p> <p><i>"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."</i></p> <p>NTA Recommendation</p> <ul style="list-style-type: none"> • To ensure the future transport needs of Wicklow Town-Rathnew 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), in line with the updated ABTA guidance; and • The preparation of a LTP be included as a specific objective of the LAP in line with Objective CPO 12.3 of the Wicklow County Development Plan.
	<p>Chief Executive Response</p>
	<p>The CE accepts the recommendation of the NTA with respect to the reparation of a LTP.</p>
	<p>Chief Executives Recommendation</p>
	<p>Include new objective in LAP</p> <p>WTR - XX <i>In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Wicklow Town – Rathnew.</i></p>

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. These networks should be detailed in the LAP and LTA, particularly on the 'Transport Strategy Map', that at present primarily identifies the proposed roads projects for the settlement. This network should be based on the current GDA Cycle Network, as published as part of the Transport Strategy. In addition to the core walking and cycling networks, a comprehensive assessment of potential permeability measures should be undertaken to identify potential active travel connections that could reduce walking and cycling times between areas and to key services and public transport stops.

The existing recommendations and objectives of the LTA could be further strengthened by measures aimed at improving junctions from an active travel perspective, reducing speed limits and providing more frequent and high-quality pedestrian crossings. Greater reference should be made to the Design Manual for Urban Roads and Streets and the Cycle Design Manual in this regard and the hierarchy of road users should be incorporated which should form the basis for the identification of measures generally.

Furthermore, objectives would be welcomed that target an increase in bicycle parking at key destinations as well as facilitating bicycle/scooter/car share schemes that can accommodate increased rates or active travel use and reduce the need to own a private vehicle.

Further to the above, it is submitted that that information should be provided on the potential phasing of 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.

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) **An assessment of potential active travel permeability measures throughout the town should be undertaken to identify measures with the potential to reduce walking and cycling times between areas and key services including public transport stops and schools;**
- (iv) **Further objectives could be included aimed at improving existing junctions, reducing speed limits and providing more frequent and high-quality pedestrian crossings;**
- (v) **Greater reference should be made to the *Design Manual for Urban Roads and Streets* and the *Cycle Design Manual*.**

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)+(iii) It is agreed that the transport objectives map should be enhanced to show all active travel measures – both those already in train and desired future projects, where known. However, 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.

(iv) 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.

(v) This LAP sits under the Wicklow County Development Plan in the hierarchy of plans. All of the County Development Plan provisions will apply directly in the LAP area and therefore, as set out in the introduction to the plan, there is no need for repetition of County Development Plan principles, strategies, policies and objectives or development standards in the LAP unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the local area.

In particular, the following County Policy Objectives which address *Design Manual for Urban Roads and Streets* and the *Cycle Design Manual*. will apply directly in the plan area:

CPO 12.12: *To require all new or improved roads to include pedestrian facilities, cycle lanes / tracks (unless the scale / design of the road does not warrant such infrastructure having regard to the guidance set out in the National Cycle Manual and DMURS) and public lighting as deemed appropriate by the Local Authority.*

CPO 12.30: *Traffic Impact Assessments will be required for new developments in accordance with the thresholds set out in the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG) and the 'Traffic & Transport Assessment Guidelines' (TII).*

CPO 12.31: *Road Safety Audits, Road Safety Impact Assessments, Street Design Audits as per DMURS, or Accessibility Audits shall be required at the discretion of the Planning Authority, but shall generally be required where new road construction or a permanent change to the existing road / street layout is proposed.*

CPO 12.33: *To require all new or improved roads (of all designations) to include pedestrian facilities, cycle lanes / tracks (unless the scale / design of the road does not warrant such infrastructure (having regard to the guidance set out in the National Cycle Manual and DMURS), public lighting and bus stop facilities as deemed appropriate by the Local Authority.*

CPO 12.34: *The design of new roads or improvements to existing local roads and new means of access onto roads shall generally comply with the guidance set out in the 'Design Manual for Roads & Bridges' DMRB (TII), the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG), the 'Traffic Management Guidelines' (DoT-DoELG-DTO) and 'Recommendations for Site Development Works for Housing Areas' (DoELG) as appropriate as may be amended and revised, unless local conditions determine otherwise.*

In addition, the preamble to the **Development & Design Standards** of the County Development Plan sets out the following:

This document intends to set out Wicklow County Council's requirements with respect to development and design standards and should be read in conjunction with the policies and objectives set out in Volume 1 of this County Development Plan, with particular regard to policies and objectives relating to quality design and place-making. These standards and guidance are not exhaustive with respect to every type of development that might be proposed but intend to set out the principal factors that should be considered in the design of any new development.

More comprehensive and complete guidance for a number of development types have been produced by other bodies, in particular the Department of Housing, Local Government & Heritage (and its predecessors), and particular regard shall be taken of guidelines issued by the Minister under Section 28 of the Planning Act. In addition, the guidance issued by other Government Departments and agencies such as the Department of the Environment, Climate and Communications; the Department of Rural and Community Development; the Department of Transport; the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media; the Department of Education, as well as the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) shall be considered.

All of this guidance should be read in conjunction with this document or in cases where this document does not give enough guidance to the designer for any particular development type, as these documents will be used by Wicklow County Planning Authority as a tool in the assessment of planning applications.

The key documents that should be considered in this regard are:

- **Design Manual for Urban Roads and Streets DMURS (DoHPLG / DoTTS 2019)**
- **Permeability Best Practice Guide (NTA 2015)**
- **Traffic Management Guidelines (DoT / DoELG 2019)**
- **Road Safety Audit (TII 2017 Publication: TII GE-STY-01024)**
- **National Cycle Manual (NTA 2011)**
- **Smarter Travel (DoT 2009)**
- **Traffic & Transport Assessment Guidelines (TII 2014)**
- **Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG 2012)**
- **Design Manual for Roads and Bridges (TII 2011)**

The above list is not exhaustive or definitive, any guidelines updated or new guidelines produced during the currency of the plan will be utilised in the assessment of applications.

It is therefore considered that DMURS and the CDM to not require further specific reference in the LTA or LAP.

Chief Executive's Recommendation

Amend Transport Objectives map. Please see Section 7 Proposed Amended Additional Maps/Drawings.

Item 4 Public Transport Measures

The inclusion of objectives seeking the further enhancement of public transport infrastructure is welcomed including Objective WTR78 of the LAP which references future enhancements to rail services. It is submitted that a similar objective should be included referencing support for the continued enhancement of bus services under the Connecting Ireland programme, which at present is not referenced in the LAP or LTP.

General objectives to support the continued improvement of bus stop infrastructure and the potential identification of new stops should also be included. 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

- (i) Include appropriate objectives to support the continued enhancement of bus services under the Connecting Ireland programme;**
- (ii) 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.

With respect to the routing of bus services, this is considered more a matter for a future LTP and the transport agencies.

Chief Executive's Recommendation

Add new objective as follows:

- WTR-X** *To promote the delivery of improved and new bus services 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 programme 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 M11 / N11 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).*

Item 5	Car Parking
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The NTA is concerned at the extent of land shown on the 'Transportation Strategy Map', which is subject to an objective to develop a car park on the Port Access Road, adjacent to Wicklow Train Station. It is noted that the extent subject to the objective as well as a 'Public Utilities' zoning objective is in excess of the land parcel currently the subject of a Part 8 proposal to develop a car park at this site, along with bus stops and active travel infrastructure. Given the quantum of parking proposed under the Part 8 application in addition to the existing car parking provision at the station, it is considered that any further provision of parking could be excessive and could attract additional car traffic into Wicklow-Rathnew, particularly in the context of strategic bus-based park and ride being proposed at present at Junction 16 of the M11.

This objective is also of concern given that it would not be in accordance with the principles of proper and sustainable Transit-Oriented Development planning as it would negate the potential delivery of housing or employment development at this strategically important site. Transit-oriented development is a key objective of the Transport Strategy under Measure Plan7 which states the following:

"Measure PLAN7 – Transit-Oriented Development

*The NTA will continue to support and facilitate the delivery of Transit-Oriented Development at locations identified as appropriate for such, and will work with EMRA and the local authorities in identifying further locations served by existing and proposed public transport which are appropriate for high density development supporting a mix of uses."*¹

Given the objective to extend the DART to Wicklow Train Station under Measure RAIL3 of the Transport Strategy, it is considered that the function of this area as a key transport hub will be enhanced over time and that as a result this land bank could accommodate mixed use development of a relatively high density.

With regards to the provision of parking generally in the settlement, it is considered that the LTA 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. This could assist with objectives to improve active travel facilities and the general urban environment in town centres through the reallocation of road space.

NTA Recommendation

- (i) Review the extent of land identified for car parking at the Port Access Road adjacent to Wicklow Station, in the context of the planned strategic Ashford Park & Ride facility and the Transit-Oriented Development principle;**
- (ii) 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.**

Chief Executive Response

Additional land to the west of the proposed train station car park are proposed in the draft LAP to be zoned 'PU – Public utility' to allow for the potential expansion of service infrastructure, including transport related infrastructure if required in the future. This is considered a reasonable measure in order to ensure that land is reserved for future infrastructure needs. It is not an objective of this draft plan that these lands are reserved for or are desired to be developed for a larger commuter type private vehicle car park; the objective of the PU zoning is to reserve lands in this key location for all and any type of service infrastructure / utilities that may be required in the future which may or may not include car parking; for example additional services not comprising commuter car parking may be required for infrastructure associated with railway line electrification / upgrades or the planned Greystones-Wicklow Town greenway. In this regard, it is recommended that the amenity car parking objective included in SLO4 opposite this site should be omitted.

With respect to the suggestion that the land proposed for this PU designation could be more appropriately used for high intensity mixed use development, it should be noted that the land in question is currently zoned for Employment use, and having regard to the provisions of the Core Strategy, this is insufficient scope to change the zoning from employment to a more residential intensive mixed use or pure residential type zoning.

With respect to Transport Oriented Development generally, Wicklow County Council has contributed to a report being prepared by the Department with respect to the identified of TOD sites (i.e. sites with access to high quality public transport with potential for significant residential development) and has proposed that the Murrough regeneration area be so identified.

- (iii) The CE is agreeable to preparing car parking strategy for the settlement as part of a future LTP.

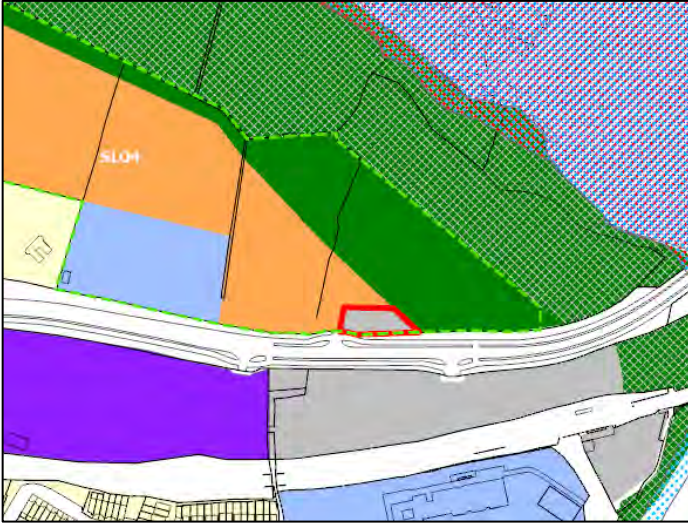
Chief Executive's Recommendation

Amend text and map for SLO4 as follows

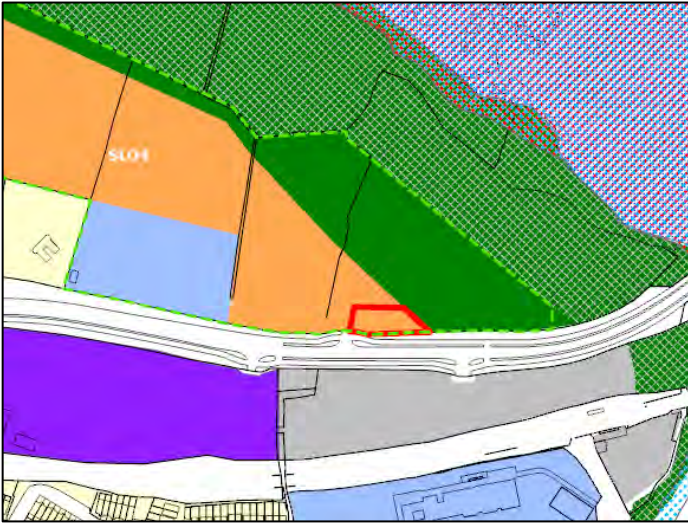
This SLO is located in the townland of Bollarney North. The SLO comprises New Residential (RN – Priority 2), Open Space (OS1), Public Utility (PU) and Community/ Education (CE). Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- ~~*To provide a new car park with access onto the Port Access Road for a minimum of 50 cars, with cycle parking facilities on lands zoned PU.*~~
- *A minimum of 1.2ha on lands zoned CE shall be provided for community uses. Generally, this shall comprise a community / sports/ recreation type development of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and agreement with the Planning Authority.*
- *The design and height of any development shall pay particular regard to the height of immediately adjoining (mostly 1 - 2-storey) residences and the visual impact of the proposed development on the Murrough Wetlands / coastline.*
- *To provide a linear green route for walking and cycling, with a minimum width of 8 metres, on the lands zoned OS1 with pedestrian / cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly (indicative route shown with purple arrow.)*
- *To provide a recreational open space park on the lands zoned OS1, to the east (lands closet to the Murrough Bridge) of a minimum of 2 hectares contiguous to the linear green route.*
- *The overall site layout design shall locate the main public open space element/s of the residential development adjoining the OS1 green route/park (on the lands closed to the Murrough).*

Change from:



Change to:



<p>Item 6 Modal Share Ambitions</p>
<p>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%.</p> <p>NTA Recommendation</p> <p>(i) Consider the inclusion of modal share ambitions for the Plan area in the LTA and LAP.</p>
<p>Chief Executive Response</p> <p>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.</p>
<p>Chief Executive’s Recommendation</p> <p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031</p>

Item 7 Integration of Local Area Plan & Local Transport Assessment

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. In this regard, it is important that the primary objectives and measures of the LTA, including appropriate network maps for active travel and public transport, are integrated to the LAP. The LAP objectives should also express support for the current or forthcoming active travel projects that are being advanced in the settlement including the Station Road active travel scheme. To ensure the LAP provides a comprehensive overview of the primary measures and objectives of the LTA, it is recommended that the LAP has a dedicated transport chapter.

The provisions of the LAP that support a compact and sequential form of development for residential and retail uses are 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. Furthermore, the principle of Transit-Oriented Development should be an objective of the LAP given the proposed enhancements to the public transport network in the settlement.

NTA Recommendation

- (i) Incorporate the primary measures, objectives and network maps of the LTA into the LAP as part of a dedicated transport chapter;**
- (ii) 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;**
- (iii) Include appropriate objectives to support Transit-Oriented Development in line with the provisions of the GDA Transport Strategy.**

Chief Executive Response

- (i) At this stage of plan making, it is not considered appropriate to insert an entirely new chapter into the draft plan as amendment; the requested enhancements to the transport objectives map can be made.
- (ii) With respect to employment development, the priority for new or more intensive employment is within the existing town centres and other built up parts of the wider settlement, where services, including public transport, are available. It is recommended that this be re-inforced with additional objectives. In order to ensure a robust employment growth strategy, the plan also makes provision for the zoning of greenfield sites for employment use. 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 additional lands are proposed to be zoned for employment use compared to the previous plan, and the amount of land has been moderated by changes in zoning at some locations to more appropriate uses, including identifying additional lands for the protection of watercourses and biodiversity.

In light of the concerns raised by both the OPR and the NTA with respect to the suitability of these greenfield land for employment use, the CE has undertaken a review of all proposed employment lands with respect to services /serviceability. For all zones the lands are either partially developed or serviced / serviceable within the lifetime of the plan. 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 Wicklow Town – Rathnew as envisaged by the RSES and County Development Plan would not benefit from the dezoning of already zoned and serviced employment land.

In particular:

Undeveloped Employment Lands	Assessment of suitability
Charvey Lane / Milltown North	<p>These lands are currently zoned for new employment use. The extent of the zoning has been reduced however with the more northern portion changed to more appropriate OS and R uses.</p> <p>Employment use comprises the most appropriate use for these lands in the future given the surrounding land uses and proximity to Rathnew and the N11.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>
Newrath	<p>These lands are currently zoned for new employment use. The extent of the zoning has been reduced from previous plan with the more northern portion changed to more appropriate OS uses along the Vartry corridor.</p> <p>Employment use comprises an appropriate use for these lands in the future given the surrounding land uses (Clermont Campus) and the proximity to Rathnew and the N11.</p> <p>Water supply is currently available to the lands. Wastewater infrastructure is currently under construction on the Newcastle Road. Access is available to public roads and existing public transport services.</p>
Merrymeeting (north of Railway line)	<p>These lands are currently zoned for employment and tourism uses. The lands are located within the BUA of the settlement.</p> <p>Employment use comprises the most appropriate use for these lands in the future given the surrounding land uses and the constraints of the site, with roads on two sides and a rail line on the third. Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>
Ballynabarney (east of R772)	<p>These lands are currently zoned for employment use. The extent of the zoning has been reduced however with the more northern portion changed to more appropriate AOS use and the southern boundary regularised having regard to the existence of a watercourse in this area.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads. This location is not however currently serviced by public transport services and is peripheral to existing bus and train routes.</p> <p>Nonetheless, employment zoning is maintained for these lands given that (a) part of the lands have planning permission for employment development and (b) part of the lands are owned by Wicklow County Council and Wicklow Enterprise Park Ltd (a company with charitable status established for the support of enterprise in the area) for the purpose of developing employment use.</p>
Broomhall Business and Enterprise Park	<p>These lands form the logical extension of the existing Broomhall Business and Enterprise Park and are currently zoned for new employment use. The lands are located within the BUA of the settlement. The extent of the zoning has been reduced however with the more northern portion changed to more appropriate PU use (to allow for possible new train station) and CE use (to reflect permission granted for a childcare facility).</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>
Port Access Road (south of the road and north of the railway line)	<p>These lands are currently zoned for employment use and are partially developed. The lands are located within the BUA of the settlement. The extent of the zoning has been reduced however with the more eastern portion changed to more appropriate PU use to facility public transport improvements at Wicklow train</p>

	<p>station.</p> <p>Employment use comprises the most appropriate use for these lands given their location of the Port Access Road and existing adjacent employment 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>
Ballynerrin (Hawkstown Road / Marlton Road)	<p>These lands are currently zoned for employment use. The lands are located within the BUA of the settlement. The extent of the zoning has been reduced however with the eastern boundary changed to more appropriate OS use to reflect local biodiversity assets.</p> <p>Water supply and wastewater infrastructure are available in the area, as is access to public roads and existing public transport services.</p>

Therefore no changes to the employment zoning provisions are recommended.

- (iii) With respect to support for 'transit-oriented development', an additional objective can be included in the plan.

Chief Executive's Recommendation

Add new objectives

Chapter 4

WTR – XX

To facilitate and support Wicklow Town Centre and Rathnew Village Centre as the priority locations for new employment, particularly 'people'-based employment development.

Chapter 5

WTR – XX

To promote Wicklow Town Centre and Rathnew Village Centre in the first instance as the priority locations within the settlement for new residential, retail / retail services, community and employment use through the development of vacant or underutilised sites and via the reconfiguration / redevelopment of existing low density development, while at all times respecting the character and heritage of the town / village centres. In particular, to support the development of opportunity sites in accordance with the specific criteria set out for each identified area within this Local Area Plan.

Chapter 9

WTR – XX

To support and facilitate the delivery of Transit-Oriented Development at locations that may be identified in the plan area as appropriate for such and continue to work with state agencies to identify TOD sites served by existing or planned public transport which are appropriate for high density development supporting a mix of uses.

4.1.4 TRANSPORT INFRASTRUCTURE IRELAND

Item 1 Preamble & General

Transport Infrastructure Ireland (TII) welcomes notice of the progression of the preparation of a Local Area Plan (LAP) for Wicklow Town – Rathnew by Wicklow County Council and notes that the draft LAP is the subject of concurrent proposed Variation no. 2 of the Wicklow County Development Plan 2022 – 2028.

As set out in TII’s previous submission to the pre-draft stage of the LAP, the M/N11 corridor is identified as part of the TEN-T Comprehensive Network and critical for access to Rosslare Europort. The international dimension is reflected in the Eastern and Midland Assembly Regional Spatial and Economic Strategy (EMRA RSES) Regional Policy Objective RPO 8.16.

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, which 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 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 12.35 relates specifically to the N/M11, CPO 12.38 to interchanges and CPO 12.40 expressly recognises the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012).

TII is responsible for the maintenance and operation of safe and efficient national road and light rail networks. The Council will be aware that the N/M11 is a critical enabler of national, regional, and local development policy and elements of the national road network in this area are operated and managed by a Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. In this regard, TII observes that the draft LAP *Transport Assessment* at Appendix 1 encompasses the N/M11 at a location where the motorway, including the interchange at Junction 16 (Wicklow (north)), is part of MMaRC Area A. Junction 17 (Rathnew) is also part of MMaRC area A and Junction 18 is part of a PPP area operated by N11 Arklow Rathnew PPP Ltd.

TII notes the following interactions between the draft LAP and the N/M11: -

The *“Settlement Boundary”* indicated in the draft *LAP Land Use Zoning Objectives Map* (Map 1) occurs east of the N/M11 and further indicates zoned land coinciding with the N/M11 between Junction 16 and Junction 17 contained within SLO3 and SLO5, north and south respectively of the R752.

The draft LAP *Transport Strategy Map* (Map 5) identifies the N/M11 and denotes an *“area inside 15 min walking time to public transport or schools”* that includes the entire of the motorway interchange that is Junction 16 of

the M11.

The *Wicklow Town and Rathnew Local Area Plan – Transport Assessment* is Appendix 1 of the Draft LAP and reviews Junctions 16, 17 and 18 of the N/M11, each of which is and interchange part of the national road network; M11 Junction 16 (Wicklow (North)) with the R772; Junction 17 (Rathnew) with the R772; and Junction 18 (Wicklow (south)) with the R751.

The following TII submission 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 at European, national regional and local levels.

TII reiterates that any proposals which interact with the national road network must observe *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) in the first instance and require prior consultation with TII and compliance with all relevant requirements set out in TII Publications available (www.tiipublications.ie). TII advises that these statutory planning guidelines and TII standards have implications for any proposals and objectives associated with the N/M11, particularly outside urban speed limits.

TII's review of the draft LAP observes dedicated *Transportation Objectives* contained in draft LAP *Chapter 9 Infrastructure* that have direct regard to draft LAP Appendix 1 the *Wicklow Town and Rathnew Local Area Plan – Transport Assessment* which will be part of the "on-going" delivery schedule of the draft LAP at Appendix 3 *Infrastructure Delivery Schedule and Implementation*. Land use objectives are primarily depicted on draft LAP *Map 1 Land Use Zoning Objectives* and transportation objectives appear to be indicated on Map 5 of the draft LAP is the *Transport Strategy Map* which in turn, appears to be a repeat of the *Wicklow Town – Rathnew Road Strategy Map* in Section 3 (pg. 82) of the *Transport Assessment* at Appendix 1.

Chief Executive Response

Noted

Item 2 Draft LAP, Appendix 1 draft Wicklow Town and Rathnew Local Area Plan – 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 specifically including Wicklow-Rathnew. RPO 8.6 is amongst those repeated in the *GDA Transport Strategy* that as part of the Strategy holds *MEASURE PLAN17 – Local Transport Plans* to be based on the ABTA methodology as part of the statutory plan-making process. County Plan *Sustainable Transport Objectives* at Chapter 12 include *Sustainable Mobility Objectives* where CPO 12.3 is 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 Wicklow- Rathnew.

As at the TII submission to the pre-draft stage of the LAP, it remains the Authority's opinion that the Council should have considered undertaking appropriate Area Based Transport Assessment (ABTA) to support the preparation of the draft LAP, particularly in relation to areas of planned development which have an interface with the national road network. Section 1.4 of the NRA/TII Traffic and Transport Assessment Guidelines (2014) refers. In addition, guidance is also available in TII Publications PE-PDV-02046 Area Based Transport Assessment (ABTA) Guidance Notes, jointly prepared by TII and the NTA. Furthermore, having regard to TII ABTA Guidance, it was requested that TII be formally engaged in any ABTA process to be undertaken to inform the Draft LAP.

TII has undertaken a review of the "Transport Assessment" elements of the LAP and has identified "recommendations" related to the national road network or regional roads (R772 and R752) that directly interact with the national road network. The following issues occur:

- TII continues to advocate an evidence-based approach to planning policy to ensure an integrated approach to the design of development areas that includes a set of principles and criteria designed to ensure a high standard of access by public transport, foot, and private car. Notwithstanding that the draft LAP Appendix 1 *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, and that draft LAP Appendix 3 *Infrastructure Delivery Schedule and Implementation* includes the statement to "implement measures identified" in the *Transport Assessment*, 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 Wicklow Town – Rathnew that reflects RSES RPO 8.6 .
- TII advises that having regard to proposed active travel and public transport "recommendations" that potential interactions with the national road network including its interchanges and ancillary infrastructure such as structures and drainage will also occur but have not been addressed which is a concern.

Having regard to the draft LAP's location adjacent to the N/M11 and the transport assessment and recommendations that will directly and indirectly impact the national road network, TII recommendations for an ABTA process to inform a draft LAP for Wicklow Town – Rathnew include that any measures identified that interact with the national road network are required to :-

- observe national roads policy set out in *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012).
- recognise of the existence of and compliance responsibilities for the design and delivery of projects under TII Publications; and
- has regard to the extent of the MMarC Area A with associated requirements for the management and operation of the N/M11.

Recommendation 1:

- **Provide 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 WTR 75

to WTR 80 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 TII / NTA guidance. As suggested in the submission from the NTA, 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

Include new objective in LAP

WTR - XX *In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Wicklow Town – Rathnew.*

Item 3 Draft LAP Transportation Objectives in Chapter 9 Infrastructure of the draft LAP

TII welcomes the restatement of the County Development Plan Objectives (CPOs) that relate to the national road network in the draft LAP *Transport Assessment* and objectives of the *Transport Assessment (part 3)*. Having regard to the indicated extent of land use and transportation objectives of the draft LAP that will create interactions with the N/M11 especially at junctions and / or within an area maintained and operated as part of MMarC Network Area A, 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 WTR75 to WTR80 include the objective to “*support the implementation of the recommendations of the Transport Assessment*” for new regional / distributor roads and road improvements at WTR75, road improvements including cycling and pedestrian infrastructure at WTR76, active travel and public transport at WTR77; and the upgrading of local Rocky Road at WTR80.

The implementation of all and any of these *Objectives* has the potential to interact directly and indirectly with the national road network assets, which includes its interchanges and related infrastructure such as under and overbridges that are TII Structures. TII therefore strongly advises and recommends that TII Publications (Standards and Technical) that should be recorded as they set design guidance for the national road network and associated infrastructure as echoed in section 1.3 *Application of this Manual* of DMURS. In this way, transport objectives or measures promoted in the draft LAP will have had regard to national road network requirements by assessment of options 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 3 Infrastructure Delivery Schedule and Implementation*. In this regard, 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), 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 an additional *Transportation Objective* below utilising similar form as that already presented at Draft LAP WTR78 for the NTA and Iarnród Éireann.

Recommendation 2:

- **Revision of proposed draft LAP *Transportation Objectives* to reflect official national roads policy and for the requirements of TII Publications for works potentially impacting the national road network and its associated infrastructure.**

Additional Transportation Objective no. 81 at Chapter 9 Infrastructure as follows:

“WTR 81 - To ensure that Transportation Objectives that interact with the N/M11 interchanges or mainline and associated infrastructure shall have regard to *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and be subject to compliance with the requirements of 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 not considered necessary to include the reference requested in the LAP.

Chief Executive Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 4 Draft LAP Chapter 11 Zoning and Land Use, Specific Local Objectives SLO 3 and SLO 5

TII notes that *Chapter 11 Zoning and Land Use* of the draft LAP at section 11.5 *Specific Local Objectives* states that 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 details on the development objective of these lands. As masterplan may be required to be agreed prior to the submission of a planning application."

TII observes that certain Specific Local Objectives (SLOs) are adjacent to the N/M11 and Junction 16 (Wicklow (North)); SLO 3, north of the R752 and SLO 5 is south of the R752, both immediately adjoining the N/M11 and advises as follows:

- Due to the location of draft LAP SLO3 and SLO5 lands relative the N/M11 national strategic asset with associated infrastructure, including interchanges, there is potential for impacts and interactions between this section of the national road network.
- TII reminds the Council of the requirements of Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) 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 such 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.

It would be expected that the above would be addressed as part of the "transport assessment" associated with the draft local area plan. TII issues of concern with the existing "transport assessment" has already been raised in this submission.

In addition, and related to the above matters, future potential development physical interactions with national roads infrastructure will need to demonstrate compliance with TII Publications (for any work that may impact the national road pavement, structures and infrastructure including drainage). However, TII are not convinced that the planning authority has considered nor addressed the N/M11 and all associated infrastructure assets including lighting, gantries, signage, substations, boundary treatments and drainage arrangements. TII would highlight that future proposed development will be required to demonstrate mitigation of impact on the safe and efficient operation of the national roads network in accordance with Chapter 3 of *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and delivery of adequate levels of future land use amenity

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 lack of transport assessment, consideration of Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and in turn addressing the protection of national roads physical assets. TII are therefore of opinion that taking account of the contents of location and proposed development profile of SLOs 3 and 5 that these objectives and concept plans are premature and require revision prior to adoption of the Draft Local Area Plan.

Recommendation 3:

Review and revision of SLOs 3 and 5 to take account of Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and the protection of national roads physical assets in accordance with TII Publications.

Chief Executive Response
<p>The lands that are described as SLO3 and SLO5 in the draft LAP are currently zoned in the existing town plan and in fact have been zoned since 2001. These lands are served by the local road network and their development could result in impacts on the national road inasmuch as the development of any lands in the plan area, the entire plan area being bounded to the north, east and south-east by the national road, which connects into the local road network via Junctions 16, 17 and 18.</p> <p>Were any application for permission to come forward on foot of the zonings in the draft LAP, including SLOs 3 and 5, these will be evaluated in accordance with the policy, objectives and standards of the County Development Plan (as detailed previously) which would entail, as appropriate, as assessment of impacts on the national road.</p> <p>In these regards, it is therefore considered that no further assessment or revisions are required to SLO3 and SLO5.</p>
Chief Executive Recommendation
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 5	Conclusion
	<p>TII has identified potential significant interaction of the draft LAP with the national road network including carriageways, interchanges and structures and associated under and over ground services. There is a critical need to manage and protect the national road network and associated junctions, including the N/M11.</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 <i>Wicklow Town and Rathnew Local Area Plan – Transport Assessment</i> in Appendix 1 of the draft LAP that includes recommendations likely to directly or indirectly impact the N/M11.</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> <p>Having regard to the TII submission to the Pre-Draft stage of the LAP (TII ref. TII23-123774), TII/NTA Area Based Transport Assessment (ABTA) Guidance, and the contents of this submission, TII is available to meet the executives of the County Council alongside the NTA to discuss any issues arising in the foregoing.</p>
Chief Executive Response	
Noted	

4.1.5 DEPARTMENT OF EDUCATION

Item 1 Population and school place projections

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 Wicklow Town 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 Wicklow-Rathnew as a "Key Town" with a projected population of 18,515 by 2028. Therefore, the department made its submissions to the draft CDP regarding Wicklow-Rathnew on the basis of the potential population growth within the town and its environs between 2022 and 2031.

In terms of future population growth in Wicklow-Rathnew, the department notes the reference to the 18,515 population figure for 2028 and the 19,400 population figure for 2031 in Table 2.1 of the draft LAP. The department also notes in Table 2.1 of the draft LAP the reference to the potential development of 1,619 residential units within the town and its environs between 2022 and 2031. Recent CSO data on new dwelling completions show that the number of units completed in Wicklow and Rathnew for 2023 and as far quarter 3, 2024 was 274 units. This would leave a remaining target of 1,345 for potential completion by 2031. Allowing for the Census 2022 average of 2.84 persons per household in Wicklow, a development of 1,345 units could result in an additional c. 3,820 people for Wicklow Town - Rathnew in the future. If this growth materialises, it will result in an additional requirement for school provision in Wicklow Town - Rathnew. Furthermore, the department has used this particular scenario in making its assessment of future school place requirements within the LAP area. 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 4,598.

With regard to the above criteria, the department is equally mindful of its current school place capacity within the LAP area. Currently, there are 10 schools (6 primary and 4 post-primary schools) located within the Wicklow - Rathnew 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.

Chief Executive Response

1. Future needs

The Department's acknowledgement of future school place expansion as the settlement grows is noted and welcomed.

2. Zoning around existing schools

Wherever feasible given adjoining land uses, this LAP makes provision for CE zoned land surrounding existing schools to allow for possible expansion. However, school development is allowed in all zones, so this is not an 'essential' policy provision needed to support possible school expansion.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031 -2031.

Item 2**Sites for future schools**

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, the Department would like to highlight the following points.

1. 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 to be complimentary to each other for the benefit of the whole community.
2. Sites for future 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.

In this regard, the Department notes the list of Community & Education zoned lands outlined in the "Education" section of Chapter 7 Community Development. With specific regard to Rathnew, the Department notes that there are two sites designated for future school provision, of which one is designated for future post-primary school provision.

Currently, there is only one primary school in Rathnew (St Coen's NS). Having assessed the information in Table 2.1 of the draft LAP and its own current capacity in existing schools, the Department has identified a potential future requirement for at least one additional primary school in Wicklow - Rathnew, subject to projected population figures materialising, the age profile of that future population and other factors which influence school accommodation needs. The Department is mindful of the proposed intensive development of the Tinakilly area (SLO2) where over 700+ houses are planned. Having regard to what has been said at points 1 and 2 above, the department considers it appropriate to locate a site for a future primary school within the heart of the Tinakilly area and requests the Council to identify, reserve and appropriately zone a site to be included in the LAP. The size and location of this site can be agreed with the department in future engagements.

In respect of post primary provision, the Department is planning to locate and develop a new 600 pupil post primary school on the site of the former Abbey Community College. This will be the permanent site for Wicklow ETSS. It is expected that the capacity of this school and the current capacity of the other existing post primary schools will be able to cater for future potential needs resulting from planned future population growth as identified in Table 2.1. However, the department is also mindful of potential population growth beyond 2031 and will continue to assess its requirements on an ongoing basis.

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 Councils if and when additional SEN accommodation or sites for future special schools are required within specific locations.

The department welcomes the reference within the draft LAP to ensuring that both existing and proposed schools are as accessible as possible and that the requisite walking and cycling infrastructure is in place to encourage people to travel to school by sustainable modes of transport.

The department further welcomes the reference in Community Development Strategy for Wicklow Town-Rathnew that the Council will facilitate the development of a range of high quality community, educational, open space and recreational facilities that meet the needs of the local population and that these will be developed in tandem with new housing.

The department notes Cycling & Walking Objectives CPO 12.13 where the Council will facilitate the development of pedestrian and cycle linkages through and between new and existing developments to improve permeability and provide shorter, more direct routes to schools and CPO 12.14 where the Council will support the Green School Travel and Safe Routes to School Programs and any other sustainable transport initiative developed by schools. The department supports the development of sustainable travel links between schools and residential areas.

The department notes in section 2.2 Education and Training that it is stated that the analysis of current and projected education needs is based on the following assumptions:

- 12% of the population at any given time is of primary school going age.
- 8.5% of the population at any given time is of secondary school going age.

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.

Chief Executive Response

The CE welcomes all of the inputs and suggestions of the Department.

With respect to the Rathnew – Tinakilly area, the draft plan has made provision for two CE zoned areas in close proximity to same – in SLO8 and adjacent to the cemetery, both of which would be suitable in size for potential future primary school development. In addition, as detailed above, school provision would be considered consistent with a range of additional zoning categories, including residential and employment zones and the Wicklow County Campus zone.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

4.1.6 DEPARTMENT OF THE ENVIRONMENT, CLIMATE AND COMMUNICATIONS

Item 1 Preamble

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).

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.

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.

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.

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.

The Department asks that you take the material outlined in the following sections into consideration when finalising the Draft Wicklow Town-Rathnew 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.

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.

Chief Executive Response

Noted

Item 2	Wicklow County Development Plan
<p>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.</p>	
Chief Executive Response	
<p>As set out in the introduction to the draft LAP, <i>'the majority of policies, objectives and development standards that will apply in the Wicklow Town and Rathnew 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, unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the area....In particular, development standards, retail strategies, housing strategies etc that are included in the County Development Plan shall not be repeated. 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.</i></p> <p><i>Furthermore, 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'.</i></p> <p>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.</p>	
Chief Executive Recommendation	
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031	

Item 3	Climate Action
<p>The <u>Climate Action Plan 2024 (CAP24)</u> is the third annual update to Ireland’s Climate Action Plan. 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).</p>	
<p>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). <u>National Adaptation Framework</u> -The Department notes the new National Adaptation Framework (NAF) was approved by Government on the 5th of June 2024.</p>	
<p>Recommendation 2: The Department recommends that an objective and /or policy is included in the LAP to support the implementation of the NAF. <u>Local Authority Climate Action Plan</u> - 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.</p>	
<p>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.</p>	
<p>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.</p>	
Chief Executive Response	
<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> ▪ <i>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.</i> ▪ <i>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.</i> 	

- *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*
- *Facilitate the planning and delivery of the Dart Plus Scheme, whilst advocating and exerting influence to ensure the scheme and any associated development and activities promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.*
- *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.*

Chief Executive Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 4 Renewable Energy

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.

Offshore Renewable Energy

The development of significant Offshore Renewable Energy (ORE) is required over the coming decade to meet the ambitious goal of delivering at least 5GW by 2030, 20GW by 2040 and 37 GW by 2050. The Department notes and supports the Waterfront Zoning Objectives of the draft LAP which deems on-shore infrastructure and support services associated with the offshore renewable energy sector is a priority use.

Policy/objectives of the draft LAP should have regard to the objective of the National Marine Planning Framework, Accelerating Ireland's Offshore Energy Programme: Policy Statement on the Framework for Offshore Wind (2023) and the Future Framework for Offshore Renewable Energy Policy Statement (2024).

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 Wicklow Town and Rathnew 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.

2. With respect to the support for the off-shore renewable energy sector, it is considered that both the Wicklow County Development Plan and the draft LAP provide for necessary policy support for the implementation of the National Marine Planning Framework, *Accelerating Ireland's Offshore Energy Programme: Policy Statement on the Framework for Offshore Wind (2023)* and the *Future Framework for Offshore Renewable Energy Policy Statement (2024)*. No particular aspect of the draft plan has been identified in this submission as being deficient in this regard and therefore no changes are necessitated in light of the issue raised.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

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 retro fitting 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 5:

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 6:

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 Wicklow Town and Rathnew 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 e 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.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

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 7:

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 Wicklow Town and Rathnew 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.
- 4.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

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>Recommendation 8: 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.</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 Wicklow Town and Rathnew 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> <p>CPO 16.35 <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></p> <p>CPO 16.36 <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></p> <p>CPO 16.37 <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></p> <p>CPO 16.38 <i>Facilitate and support the development of public Wi-Fi zones at appropriate public spaces where possible.</i></p> <p>CPO 16.39 <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></p>	
Chief Executive’s Recommendation	
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031</p>	

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 www.airquality.ie. 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 Wicklow Town and Rathnew 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>	
CPO 15.9	<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>
CPO 15.10	<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>
CPO 15.11	<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's Recommendation	
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031	

4.1.7 DEPARTMENT OF HOUSING, LOCAL GOVERNMENT AND HERITAGE – HERITAGE RELATED

Item 1 Nature Conservation

The following observations are made by the Department in its role as the authority with overarching responsibility for nature conservation and the nature Directives (i.e. the EU Birds and Habitats Directives) and as an environmental authority under SEA legislation. The observations are not exhaustive and are offered to assist Wicklow County Council in meeting its obligations in relation to nature conservation, European sites, biodiversity and environmental protection in the preparation of the Draft Wicklow Town - Rathnew Local Area Plan 2025.

SLO4 – Bollarney North

The Department is concerned at the zoning of SLO4 at Bollarney North for New Residential (RN-Priority 2), Open Space (OS1), Public Utility (PU) and Community/Education (CE) for the following reasons:

Potential Impacts to the Murrough Special Protection Area (SPA) Site Code 004186

The zoning lies within 75 metres of the Murrough Special Protection Area 004186 and the Broad Lough wetland. The SPA is designated for a number of over-wintering waterbird Special Conservation Interest (SCI) species which are found within the Broad Lough area. Additionally, Little Egret is known to breed in this area. The SCI species are sensitive to recreational disturbance and Conservation Objectives for a number of them deal with the issue of disturbance.

Disturbance relates to any activity that results in a waterbird being displaced from an area. Moving in response to disturbance, especially if frequent, can exert pressures upon a waterbird's foraging success as well as exerting an energetic cost due to flying to an alternative foraging area. Disturbance can also act upon roosting habitat thereby increasing a bird's energy expenditure in the same way.

It is noted that there is access to the SPA at the opposite side of Broad Lough, past the wastewater treatment plant, and that this area of the SPA is heavily used by dog walkers, bird watchers and others for recreation. The Department is concerned that short-term displacement of birds due to disturbance on this side may be more significant if the birds have reduced similar habitat to move to due to existing disturbance issues.

The proposed linear green route for walking and cycling (minimum width of 8 metres) is mapped as running parallel with the SPA, along the length of SLO4 at its closest point to the SPA. This may introduce disturbance such as noise, lighting etc. Furthermore, it should be borne in mind that Section 68(1) of the Roads Act, 1993 (as amended) states that a "cycleway" means a public road or proposed public road reserved for the exclusive use of pedal cyclists or pedal cyclists and pedestrians and therefore any cycleway should be considered a new public road. Road construction activities in the vicinity of watercourses are potential sources of sediment input, which may originate from the associated earthworks, exposed soil banks resulting from excavations or vegetation removal, soil storage areas or the construction of road crossings. Surface water run-off may increase the likelihood of pollutant mobilisation during storm events and reduce the buffering provided by vegetated land adjacent to the SAC/SPA by replacing it with hard infrastructure.

The proposed residential development and proposed 50 space car park may lead to increased use of the Broad Lough by walkers. It has been shown repeatedly across studies that dogs on and off lead, and people walking are found to elicit the highest levels of response behaviour from waterbirds. Additionally, the carpark is considered to be a medium risk pollution hazard development. Urban carparks represent a major source of storm water pollutants such as Total Suspended Solids (TSS), heavy metals (e.g. Zn, Cu and Pb), anthropogenic organic compounds such as hydrocarbons, nutrients and pathogens. Runoff from carparks is therefore considered to be a significant source of pollutants to local receiving waterways affecting aquatic life.

The wintering populations of some Special Conservation Interest bird species in the SPA can make extensive

use of suitable habitats in important areas outside the SPA for foraging and roosting. The extent, availability and quality of these supporting habitats may be of importance for the resilience of the SPA population. A Conservation Objective target for the SPA is to have sufficient area of utilisable habitat available in ecologically important sites outside the SPA. It is not known whether zoning this land will lead to loss of such supporting habitat and thereby undermine the conservation objectives for the SPA.

Potential Impacts to the Murrough Wetlands Special Area of Conservation (SAC) Site Code 002249

The zoning lies within 75 metres of the Murrough SAC and the Broad Lough wetland. This area of Broad Lough contains two Qualifying Interest (QI) habitats for which the SAC is designated; 1410 Mediterranean salt meadows (*Juncetalia maritime*) and 1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*).

The proposed SLO4 zoning raises concerns due to a potential risk of trampling (increased visitor pressure) and other impacts such as on water quality during construction and operation on these sensitive coastal habitats. Damage to the Qualifying Interest habitats due to drainage impacting on hydrology and construction of a track for a tracked vehicle at Broad Lough was noted during a 2019 site survey and therefore these cumulative impacts must be included in the Appropriate Assessment⁵.

Conclusion

In the absence of an objective assessment of the impact of the zoning of SLO4 at this location, the Department considers that it cannot be concluded that there is no risk of adverse effects on the integrity of the European sites for the reasons outlined above. Whilst development within and close to European sites is not precluded, in order for the proposed zoning to be deemed acceptable, any likely significant effects of the proposed objective would need to be fully assessed and addressed by means of site-specific mitigation measures. High-level mitigation measures proposed in the draft Natura Impact Report are not deemed appropriate to deal with the impacts of zoning SLO4 for development.

The conclusions in the Natura Impact Report (NIR) that it demonstrates that, *'upon inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site'* is therefore not supported by evidence that adverse effects will be avoided. This conclusion is not a complete, precise or definitive finding and conclusion, and reasonable scientific doubt remains as to the adverse effects of the zoning of SLO4 for development on the European sites in question.

Chief Executive Response

Please see Section 5 of this report which addresses all Appropriate Assessment related matters.

With regard to SLO4 in particular, it is recommended that an amendment to the objectives for these lands would allow these lands to be suitably developed without causing adverse impacts on the European site adjacent.

Chief Executive's Recommendation

Amend SLO4 text as follows:

This SLO is located in the townland of Bollarney North. The SLO comprises New Residential (RN – Priority 2), Open Space (OS1), Public Utility (PU) and Community/ Education (CE). Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- *To provide a new car park with access onto the Port Access Road for a minimum of 50 cars, with cycle parking facilities on lands zoned PU.*
- *A minimum of 1.2ha on lands zoned CE shall be provided for community uses. Generally, this shall comprise a community / sports/ recreation type development of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed*

and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and agreement with the Planning Authority.

- *The design and height of any development shall pay particular regard to the height of immediately adjoining (mostly 1 - 2-storey) residences and the visual impact of the proposed development on the Murrough Wetlands / coastline.*
- *To provide a linear green route for walking and cycling, with a minimum width of 8 metres, on the lands zoned OS1 with pedestrian / cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly (indicative route shown with purple arrow.)*
- *To provide a recreational open space park on the lands zoned OS1, to the east (lands closet to the Murrough Bridge) of a minimum of 2 hectares contiguous to the linear green route.*
- *The overall site layout design shall locate the main public open space element/s of the residential development adjoining the OS1 green route/park (on the lands closed to the Murrough).*
- *All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects. In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans.*

4.1.8 DEPARTMENT OF TRANSPORT

Item 1 Sustainable Mobility

The National Sustainable Mobility Policy (SMP) was published in April 2022 with a target of delivering at least 500,000 additional daily active travel and public transport journeys, and a 10% reduction in kilometres driven by fossil-fuelled cars, by 2030. The Climate Action Plan 2023 (CAP23) updated these targets to a 50% increase in daily active travel journeys, a 130% increase in daily public transport journeys, and a 20% reduction in total vehicle kilometres travelled by 2030. In line with the principles of the SMP, these targets are to be met by delivering on the following goals, set out in the SMP Action Plan 2022-2025

PRINCIPLES	GOALS
Safe and Green Mobility	<ol style="list-style-type: none"> 1. Improve mobility safety. 2. Decarbonise public transport. 3. Expand availability of sustainable mobility in metropolitan areas. 4. Expand availability of sustainable mobility in regional and rural areas. 5. Encourage people to choose sustainable mobility over the private car.
People Focused Mobility	<ol style="list-style-type: none"> 6. Take a whole of journey approach to mobility, promoting inclusive access for all. 7. Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model. 8. Promote sustainable mobility through research and citizen engagement.
Better Integrated Mobility	<ol style="list-style-type: none"> 9. Better integrate land use and transport planning at all levels. 10. Promote smart and integrated mobility through innovative technologies and development of appropriate regulation.

To this end, Wicklow County Council should seek to ensure that the Draft Wicklow Town - Rathnew Local Area Plan 2025, fully reflects these goals, principles, and objectives to ensure the maximum possible alignment with national efforts to achieve Ireland's climate action targets.

It should be noted that future iterations of the Climate Action Plan or SMP Action Plan may further amend these targets, and Wicklow County Council should endeavour to take account of any such amendments insofar as possible.

Chief Executive Response

The CE is conscious of the Council's climate action and sustainable mobility obligations under national policy and is satisfied that the draft plan sets out a land-use framework and development obligations that will contribute to the achievement of these objectives.

No particular aspect of the draft plan has been identified in this submission as being deficient in this regard and therefore no changes are necessitated in light of the issue raised.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031 -2031.

Item 2	Systems Change in Transport
<p>As per a commitment in the Climate Action Plan 2023 (CAP23) to develop a national demand management strategy for transport, the Department held a public consultation process on a draft Strategy, <i>'Moving together - A Strategic Approach to Improving the Efficiency of Ireland's Transport System'</i>, between April and August 2024. Submissions to the consultation reinforced the need for collective action across Government and society not only to help reduce carbon emissions from transport over the medium to long term but to address more immediate issues of congestion, road safety and air quality.</p> <p>By taking a 'people-centred' approach to the transport system with the aim of improving the efficiency, equity, and well-being of public space, particularly the use of road and street spaces, and by creating conditions that are more amenable and attractive to daily life, active travel, shared mobility and public transport services, local authorities are keenly placed to support a reduction in emissions, with significant co-benefits for Irish society in terms of road safety, air quality, health, and community life as well as assisting in objectives to revitalise urban centres in line with Town Centre First and to improve air quality in line with the Clean Air Strategy.</p>	
Chief Executive Response	
<p>Noted. No particular aspect of the draft plan has been identified in this submission as being deficient in this regard and therefore no changes are necessitated in light of the issue raised.</p>	
Chief Executive Recommendation	
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031</p>	

Item 3	Air Quality
<p>The negative health effects of air pollution at a localised level, particularly in city centres, are well known. In Ireland, the primary source of localised air pollution is derived from solid fuel burning and traffic congestion. Earlier this year, to address the damaging environmental and public health issues associated with air pollution, the Government approved a new Clean Air Strategy for Ireland - published by the Department of the Environment, Climate and Communications. The Clean Air Strategy seeks to enhance and protect the quality of air that we breathe through a comprehensive suite of cross-Government policies and measures that targets all sources of air pollution, including those from the transport, agriculture and residential sectors. Amongst its key commitments is an ambition to meet the World Health Organisation (WHO) target values by 2040. The WHO guideline values are set for the protection of health and are generally stricter than the current comparable EU standards.</p> <p>To address air quality issues arising from the transport sector, the Department of Transport co-chairs the Urban Transport Related Air Pollution Working Group with the Department of Energy, Climate and Communications. This Group published an updated assessment of urban transport-related air pollution issues, as well as the measures being taken to address them, in February 2023.</p> <p>As above, while pollutants originate from several sources, the transport sector accounts for more than 35% of Nitrogen oxides (NOx) and 10% of fine particulate matter (PM2.5).</p> <p>Existing policy measures will go a long way towards reducing transport's contribution to these pollutants, but further action may be needed at national and local level to comply with the timeframes for implementation of the WHO targets, as envisaged within the Clean Air Strategy.</p>	
Chief Executive Response	
<p>Noted. No particular aspect of the draft plan has been identified in this submission as being deficient in this regard and therefore no changes are necessitated in light of the issue raised.</p>	
Chief Executive's Recommendation	
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031</p>	

<p>Item 4 LA Climate Action Plans</p>
<p>These observations should be read in conjunction with the letter which issued on Friday, 20 October 2023 from DoT's Climate Engagement and Governance Division, headed '<i>Consultation on draft Local Authority Climate Action Plan</i>'.</p> <p>That letter contained extensive recommendations in relation to drafting of Local Authority Climate Action Plans and offers further guidance re: issues to consider in ensuring that the Draft Wicklow Town - Rathnew Local Area Plan 2025 reflects the necessary policy imperatives required to deliver on Ireland's climate action objectives.</p> <p>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.</p>
<p>Chief Executive Response</p>
<p>The Department's submission to the Council's Climate Action Plan was fully considered and recommendations integrated as appropriate. The Council's CAP has informed the preparation of the Wicklow Town – Rathnew LAP. No particular aspect of the draft plan has been identified in this submission as being deficient in this regard and therefore no changes are necessitated in light of the issue raised.</p>
<p>Chief Executive Recommendation</p>
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031</p>

Item 5 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 (UNCRPD) 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. The DoT welcomes the text (Page 15, Section 2.9 Infrastructure and Services of Written Statement), ‘Ensure the pedestrian environment can be used by all people, regardless of their age, size, disability or ability’.
- 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 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.

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 point 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 to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

4.1.9 LAND DEVELOPMENT AGENCY

Item 1 Preamble

The LDA is a commercial, state-sponsored, body set up by the Government with two main functions:

- To coordinate appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery; and
- To drive strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilise land values and deliver increased affordability.

The enactment of the Land Development Agency Act 2021, which established the LDA, marked a historic move to identify and use certain relevant public lands to provide for housing and affordability needs into the future. It is imperative that the ability of state lands to deliver residential development forms part of policy in County Development Plans, as supported by Local Area Plans, and that role and mandate of the LDA is recognised as a key part of this delivery.

The primary function of the LDA is to progress the development and regeneration of large-scale, strategic sites to increase the supply of housing in the State, particularly affordable and social housing. It is considered that a significant amount new development in the coming years in our cities and towns will be large-scale regenerative projects. As part of this regeneration, the LDA is committed to the delivery of quality cost rental homes, at scale.

Cost rental is a new rental tenure product for Ireland that is supported by the Department of Housing, Local Government, and Heritage and the Affordable Housing Act 2021. As an emerging rental option, it is noted that cost rental is not widely understood as a tenure type by decision-makers or the public. Cost rental housing provides affordable rented accommodation to people on middle incomes (net household income below €66,000 per annum for Dublin and €59,000 for everywhere else in the country). It is aimed at people who are above the threshold for social housing but have difficulty affording private rented accommodation or purchasing a home.

With cost rental, rent covers the cost of the construction, management, and maintenance of the new home, with rents to be set at least 25% below regular market rents. Cost rental offers a long-term, secure tenancy that is more affordable. Over the period up to 2026, Housing for All commits to the delivery of 10,000 cost-rental homes in urban centres by local authorities, Approved Housing Bodies (AHBs), and the LDA.

Chief Executive Response

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 2 Register of Relevant Lands and Report on Relevant Public Land

It is noted that Wicklow Town is classified as a census town and is therefore being reviewed as part of the LDA's ongoing work assessing relevant public lands for development potential. The Register of Relevant Lands and Report on Relevant Public Land facilitate the identification and assessment of the potential of relevant public land to provide affordable housing both now and in the future. As part of the first round of assessment in 2023, Wicklow Town was identified as a census town. Wicklow Town will be assessed for the potential delivery of housing on relevant public lands as part of the second round of assessment, a report on which will be published early in 2025. The Register of Relevant Lands Map is publicly available online, and the LDA encourage Wicklow County Council to refer to this map to ensure that lands identified are subject to appropriate zoning objectives that would facilitate future residential development.

Chief Executive Response

Noted

Item 3 Residential Development

In keeping with the overarching principles of the National Planning Framework (currently under review), the Eastern and Midland Regional Assembly's Regional Spatial and Economic Strategy (RSES) (which recognises Wicklow as a Key Town within the Gateway Region), the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) and other relevant policy documents and Section 28 Guidelines, the LDA is committed to the concept of compact growth and brownfield development. In this regard, the LDA welcome Objectives within the Draft Plan which seek to consolidate the town centre, in particular the stated lack of quantitative restrictions on unit numbers to be delivered on town/village centre zoned lands. This eases the delivery of appropriate unit numbers and densities at the most suitable locations.

As a state-sponsored house builder, the LDA can assist Wicklow County Council in achieving the Residential Objectives set out in Chapter 3 of the Draft Plan. It is respectfully suggested that reference to the LDA in Chapter 3 would assist in informing the public about the LDA's role and remit, as well as providing a strengthened position for the LDA's work within the policy framework of Wicklow County. The following wording is recommended:

The Land Development Agency (LDA), a commercial, state-sponsored, body established following the enactment of the Land Development Agency Act 2021, has two main functions:

- *To coordinate appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery; and*
- *To drive strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilise land values and deliver increased affordability.*

The LDA are primarily involved in the delivery of affordable and cost-rental residential development. Wicklow County Council will work collaboratively with the LDA to support and facilitate the consolidation and development of strategically located land banks, particularly publicly owned lands, to unlock housing and regeneration opportunities.

Supplementary to the above, it is considered that inclusion of an objective under the Residential Development Strategy, contained at Section 2.4, promoting the delivery of a range of housing types and tenures, would assist in providing a broader range of residential development types in Wicklow Town – Rathnew, in support of the varying needs of the area's residents, addressing issues of affordability. Wording to the effect of the following is suggested:

To promote and facilitate the development of a range of residential development types, tenures and sizes, including affordable and cost-rental properties, in order to cater for the varying housing needs and economic circumstances of the town's population.

Furthermore, it is respectfully suggested that a Residential Objective supporting the work of the LDA should be included, to provide a policy basis for any future development that the LDA may bring forward in the town. An objective could make reference to the delivery of affordable and cost-rental housing types, which can be delivered by the LDA and other relevant housing stakeholders, such as Approved Housing Bodies (ABH's). The below wording is recommended:

WTR6: *Wicklow County Council shall work with The Land Development Agency, and other relevant stakeholders, to deliver a range of residential tenures to meet the requirements of the population. Wicklow County Council will support the delivery of affordable and cost-rental housing types on appropriate lands, subject to compliance with the policies and objectives of the LAP, the Development Plan and other relevant national and regional policies and guidelines.*

The LDA wishes to state support for the overall objective of the residential development strategy of the Draft LAP, in prioritising the development of appropriate central sites, and edge of centre locations, above out of centre sites which would promote the sprawl of the settlement area. In further support of compact settlement,

it is suggested that reference to the appropriate density ranges, as specified in the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) may be useful to inform developers and the public of acceptable ranges for different areas within the relevant settlement boundary.

The LDA is committed to delivering developments that are designed to encourage a more sustainable form of living, creating new communities in tandem with the delivery or enhancement of existing services and amenities, in a manner which promotes sustainability and a transition away from a reliance on private vehicles. The National Planning Framework, National Development Plan, S28 Guidelines for Planning Authorities, and Regional Spatial and Economic Strategies, share the objective of facilitating and promoting more sustainable transport. In addition, the Climate Action Plan is also seeking to reduce transport carbon emissions by 20% which will include reductions in travel demand and journeys by private car. The LDA notes objective WTR2 and supports the prioritisation of development along public transport routes that will assist in achieving the ambitions of these policies and guidelines.

The LDA notes the recent, ongoing, consultation with regard to Revision 1 of the National Planning Framework (NPF) and acknowledges the LAP's drafting so as not to require future amendments on foot of forthcoming population and housing targets.

Chief Executive Response

1. It is not considered the role of a LAP to describe the role and function of any particular state agency and therefore it is not considered necessary or appropriate to include a paragraph on the LDA.
2. With respect to the request for policy support of various tenure types, and support for the work of the LDA, there is no difficulty with this being included in the LAP.
3. With respect to density, as set out in the draft LAP *'In addition to the objectives of the County Development Plan and the 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 accessibility 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'*.

It is therefore considered that this matter is addressed in the draft plan and further details of current density standards (which may change) are not necessary to include in the plan

Chief Executive's Recommendation

Add new objective:

WTR – XX: *To promote and facilitate the development of a range of residential development types, tenures and sizes, including affordable and cost-rental properties, in order to cater for the varying housing needs and economic circumstances of the town's population. In particular, Wicklow County Council shall work with the Land Development Agency, and other relevant stakeholders, to deliver a range of residential tenures to meet the requirements of the population including (but not limited to) affordable and cost-rental housing types on appropriate lands, subject to compliance with the policies and objectives of the LAP, the Development Plan and other relevant national and regional policies and guidelines.*

Item 4	Conclusion
<p>The LDA supports Wicklow County Council in the progression and ultimate implementation of a Local Area Plan for the Wicklow Town – Rathnew area. The LDA requests that this submission is taken into consideration, and, where appropriate, amendments are made to the text and objectives of the LAP to further strengthen the policy framework for the sustainable development of Wicklow Town – Rathnew, and the delivery of affordable housing opportunities at appropriate sites.</p>	
Chief Executive Response	
Noted	

4.1.10 ENVIRONMENTAL PROTECTION AGENCY

Item 1 Preamble

The EPA is one of the statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via the attached guidance document '[SEA of Local Authority Land Use Plans – EPA Recommendations and Resources](#)'.

This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. We suggest that you take this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the Plan.

Wicklow County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy

Chief Executive Response

Noted

Item 2 Content of the Environmental Report

The SEA Regulations set out the information to be contained in an Environmental Report.

Assessment of Alternatives

You should describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative. You should assess the alternatives against the 'Strategic Environmental Objectives' identified in the SEA ER.

Assessment of Environmental Effects

You should assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.

Mitigation Measures

Where you have identified the potential for likely significant effects, you should provide appropriate mitigation measures to avoid or minimise these. You should ensure that the Plan includes clear commitments to implement the mitigation measures.

Monitoring

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.

If the monitoring identifies adverse impacts during the implementation of the Plan, Wicklow County Council should ensure that suitable and effective remedial action is taken.

Guidance on SEA-related monitoring is available on the EPA website at <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>

Ireland's State of the Environment Report 2024

In October 2024, the EPA published the latest iteration of our 4-yearly State of the Environment Report. This report should be considered and integrated as appropriate, in implementing the plan or programme over its lifetime. It is available at: <https://www.epa.ie/our-services/monitoring--assessment/assessment/state-of-environment-report/>.

Chief Executive Response

Please see Section 5 of this report, which addresses all SEA related submissions.

Item 3 Future Amendments to the Plan

You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.

Chief Executive Response

Noted

Item 4 SEA Statement – "Information on the Decision"

Once the Plan is adopted, you should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>.

Chief Executive Response

Noted. Please see Section 5 of this report, which addresses all SEA related submissions.

Item 5 Environmental Authorities

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Environment, Climate and Communications; and
- Minister for Agriculture, Food and the Marine.
- Any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan

Chief Executive Response

Noted

4.1.11 OFFICE OF PUBLIC WORKS

Item 1 Flood Zone mapping

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.

Chief Executive Response

Additional map can be provided for clarity

Chief Executive's Recommendation

Insert in SFRA

- Map 1 Flood Risk Zones
- Map 2 Future Climate Change Scenario Flood Risk Zones
- Map 3 Overlay of Flood Maps with Zoning Map

Item 2 Flood Risk Assessment Stages

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.

Chief Executive Response

All watercourses are shown on all maps associated with the LAP and SFRA. However, if additional highlighting of certain features would assist, this can be done. The only existing flood management measure in the plan area (which is described in the SFRA) which is the rock armour along the coast, can be shown on improved maps.

Chief Executive Recommendation

Enhance SFRA Map 1 to highlight watercourses and flood management infrastructure.

Item 3	Flooding Datasets
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Section 2.4 of the SFRA notes that, as part of the preparation of the SFRA for the Wicklow County Development Plan 2022-2028, countywide flood zone mapping was developed, and that this mapping will be utilised as flood mapping for the SFRA of the Wicklow Town- Rathnew Local Area Plan. This section sets out the sources of information included in this assessment, with coastal datasets listed including the following:

- Irish Coastal Protection Strategy Study (ICPSS)
- Catchment Flood Risk Assessment and Management (CFRAM)

The national scale coastal flood hazard maps from the ICPSS project that were published by the OPW in 2012 are now superseded by the outputs of the National Coastal Flood Hazard Mapping (NCFHM) project, which was completed in 2021, and was not available for inclusion in the Wicklow County Development Plan. These coastal flood hazard maps, for both extent and depth have been produced for a range of annual exceedance probabilities, for the present day, as well as for multiple future scenarios. These maps do not take account of flood defences potentially protecting the coastal floodplain and so are in line with the definition of Flood Zones as set out in the Guidelines.

CFRAM mapping is based on more detailed modelling of the propagation of floodwaters inland over time in a coastal flood event than NCFHM mapping, which assumes a horizontal inland projection of peak levels. However, NCFHM mapping is based on more up to date estimates of extreme coastal levels than those that were used for CFRAM coastal mapping which was based on ICPSS data. As such, NCFHM and CFRAM mapping should be considered alongside each other, taking account of the presence of defences and the extent of the coastal flood plain with regard to the definition of coastal flood zones.

It is noted that there are locations in the plan area, some examples of which are provided below, where NCFHM extents differ to extents indicated by Flood Zone mapping. Wicklow County Council might include text in the SFRA to justify the decision to disregard risk indicated by NCFHM mapping.

Chief Executive Response

The NCFHM 'future scenarios' mapping has been considered in the preparation of the flood risk maps associated with this plan and shown on the maps combined with the CFRAM future scenarios as 'area of potential future flood risk'.

With respect to the areas identified in the NCFHM as 'present day' flood risk additional assessment is required, and this is presented in the Addendum I to the SFRA appended to this report. This additional assessment has identified that any area proposed to be zoned that may be at risk of flooding as shown in the NCFHM maps passes the zoning 'Justification Test'.

Chief Executive's Recommendation

See SFRA Addendum I

Item 4	Construction, Replacement or Alteration of Bridges and Culverts over Watercourses
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SLO2 and SLO3 reference a new road, the Rathnew Inner Relief Road, which will cross the Rathnew Stream and Cronroe watercourses. These Specific Local Objectives have been described in the SFRA as not having satisfied criteria of the Plan Making Justification Test, but have retained their status on the basis of there being no alternative route in the case of SLO2, and no alternative route at lower risk of flooding in the case of SLO3.

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.

Chief Executive Response

Noted

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 5	Sustainable Drainage Systems (SuDS)
<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 and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.</p>	
Chief Executive Response	
<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>CPO 14.13 <i>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. It is not considered necessary to re-state or insert the entire SuDS document into the SFRA or the LAP in this regard.</p>	
Chief Executive's Recommendation	
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031	

Item 6	Justification Tests
<p>The OPW welcomes the provision 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.</p>	
Chief Executive Response	
<p>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.</p>	
Chief Executive Recommendation	
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031	

Item 7	Wicklow County Campus
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It is noted in the conclusion to the Plan Making Justification Test for lands zoned Wicklow County Campus that the test has not been satisfied. The recommendation however states that as significant areas within this site are already developed, it is considered appropriate to retain the Wicklow County Campus zoning objective. It is also noted that the zone is sufficiently large to provide for the development of desired uses while avoiding development in areas identified as being at risk of flooding.

In certain cases where lands are already developed, it may be appropriate to retain a zoning to reflect existing usage, even though not all criteria of the Justification Test have been satisfied. In such cases, it may be appropriate to attach an objective to the zoning, to ensure no further infill development in flood risk areas. Where undeveloped lands on which flood risk has been identified have not satisfied all criteria of the test, the sequential approach as set out in the Guidelines should be followed, and development of such lands should be avoided, or a usage appropriate to the level of flood risk should be substituted.

Chief Executive Response

The approach to 'infill' development in area at risk of flooding is already addressed in both the County Development Plan and the Flood Risk Management Guidelines:

CPO 14.09 *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 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 Guidelines.*
- *Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines and the SFRA.*

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 8	Waterfront Zoned Lands
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The recommendation attached to the Plan Making Justification Test for Waterfront zoned lands notes that uses permitted in Area 1 and 2 are generally water compatible, apart from Aires sites which are noted to be less vulnerable. It is specified in the Guidelines that land and buildings used for holiday or short-let caravans and camping can be considered less vulnerable only when subject to specific warning and evacuation plans.

Chief Executive Response

Noted

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

4.1.12 INLAND FISHERIES IRELAND

Item 1 Introduction

Inland Fisheries Ireland (IFI) is a Statutory Body whose principal function is the protection, management, and conservation of the inland fisheries resource. Protection of the aquatic environment and habitat is a vitally essential element of IFI's work. In the context of the Wicklow Town - Rathnew Local Area Plan, the issues of water quality, fisheries habitat and the necessary wastewater and drainage infrastructure required to protect them should be given due priority.

"Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas wherein fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish stocks.

Chief Executive Response

Noted

Item 2 Chapter 2 Overall vision and Strategy

"The key parameters for the future physical development of Wicklow Town - Rathnew are based around protection of the environment, sustainability,"

"To ensure sufficient zoned and serviced land is available at appropriate locations capable of meeting the housing needs of the targeted population of the settlement over the plan period in a sustainable manner."

IFI welcomes the Compact Growth Settlement strategy for the future physical development of Wicklow Town – Rathnew with the key parameters based around protection of the environment which includes the European Sites of the Murrough Wetlands SAC, Murrough SPA and the watercourses within the LAP area. In recognising the physical and infrastructural limitations including water services infrastructure etc, development must be carefully controlled in order to safeguard these legally protected sites.

"Having regard to the characteristics of these protected sites, it is important to ensure that the lands surrounding these sites are protected from new development and to limit the extension of existing development in this area."

"To ensure that the lands surrounding the European Sites of the Murrough Wetlands SAC and the Murrough SPA are protected from adverse impacts arising from new development and to carefully manage and control the extension of existing development in proximity to these areas."

IFI would respectfully recommend that the above referenced strategies are extended to not only include those proposed development areas in close proximity to protected sites but also to lands adjacent to rivers and streams within the LAP area.

Development outside of lands immediately surrounding the European sites has equal potential to adversely impact these sites through the connectivity of the rivers and streams which discharge into them, conveying potential pollutants from the drainage and foul infrastructure. Because of the connectivity of the drainage network to rivers and streams and to the protected sites, it is recommended that the LAP recognises the importance for the maintenance of all existing and future drainage infrastructure.

IFI are aware that the above referenced strategies, will be difficult to realise in their entirety and in a sustainable manner due to a number of factors, including:

- Inadequate wastewater infrastructure, in particular the conveyance pipe network and pumping stations currently servicing the needs of the existing built environment both residential and commercial.
- Required maintenance of the existing drainage network, including all agreed SuDS measures in the new and existing built environment for which the Local Authority do have limited resources to maintain.
- Some of the existing and proposed zoned residential lands within the LAP - RN1 & RN2 will require the installation of sewage pumping stations to facilitate the conveyance of sewage into a network that appears to be already hydraulically overloaded. IFI are increasingly concerned about the rising frequency of incidents within the sewage network, which have led to surcharging. These surcharging events have resulted in the release of harmful substances into the aquatic environment. IFI would contend that while there may be adequate capacity within the Wicklow Town Wastewater Treatment Facility, there is inadequate capacity in the conveyance network, which has the potential to increase the number of overflow events into our rivers.
- All of the collected wastewater from within the Wicklow, Rathnew, Ashford agglomeration converges to central pumping station on the Murrough where there have been ongoing operational difficulties resulting in numerous complaints to the Local Authority and to the licencing authority, the EPA.

It is important to note that Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water.

The concerns outlined above are challenging for the Local Authority and Uisce Éireann to address, but they must be considered and corrected when identified, to comply with statutory obligations to protect the aquatic environment and to allow for sustainable development to take place.

It is recommended that before considering future development within the LAP, Uisce Éireann should confirm that there is sufficient hydraulic capacity within the sewage conveyance network and pumping stations servicing the Wicklow, Rathnew areas, to convey foul waste to the Wastewater Treatment Plant without risk to the aquatic environment.

Where it is identified that the wastewater infrastructure does not have sufficient capacity, the planning authority should be notified to ensure that no additional loading is added to this infrastructure until the necessary upgrades or remediation works have been completed.

It is further recommended that the Local Authority conduct an audit of all the drainage assets in their charge, to ensure operational status, maintenance and repair requirements before considering any future development within these areas.

Chief Executive Response

1. Protect of lands adjacent to rivers and streams in the LAP area

All watercourses in the plan area are protected via the application of a wide range of policies and objectives set out in the Wicklow County Development Plan, including (but not limited to): CPO 13.1, 13.2, 13.3, 13.5, 13.6, 13.7, 13.16, 13.17, 13.18, 13.20, 13.21, 13.22, 17.14, 17.15, 17.24, 17.25, 17.26.

These provisions will apply directly in the LAP area, and are therefore not considered necessary to repeat in this LAP.

2. Wastewater network

The concerns raised are noted, and no doubt have been raised already with both Uisce Éireann and the EPA. The Council will continue to cooperate with these agencies in addressing any deficiencies in systems and networks and ensuring that capacity is available in systems before considering consenting new development.

3. Surface water management

The Council is conscious of its obligations with respect to surface water management and protection of water quality. The Council will continue to implement its SuDS goals and objectives, as set out in County Policy

Objectives 13.20, 13.21 and 13.22. In this regard, the Council's new SuDS policy and guidelines are due to formal adoption in January 2025.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 3 Built Heritage and Natural Environment

The key heritage and environmental factors that have influenced the shape of this plan include:

- *Protection and enhancement (where possible) of European Sites (the Murrough SPA, the Murrough Wetlands SAC, and Wicklow Head SAC), including lands adjacent to and linked to these sites.*
- *Identification of rivers and watercourses and their associated green corridors, and the recognition of same as a 'Green Infrastructure' resource.*

There are two proposed zonings within the LAP, one of which is RN1- Existing Residential (Ref SLO2) and the other RN2- New Residential Priority 2 (Ref SLO4), both of which are located in high risk / sensitive areas in respect of environmental receptors.

Given the risk of sewage infrastructure failure and potential discharge into waterbodies connected to the "Murrough Wetlands SAC," it would be very difficult to rule out a significant impact on these Special Areas of Conservation (SAC), either alone or in combination with other nearby developments, and for this reason, IFI recommends that the Local Authority should reconsider the designation of SLO4 as potential development lands.

Chief Executive Response

Please see Section 5 of this report which addresses all Appropriate Assessment related matters.

With regard to SLO4 in particular, it is recommended that an amendment to the objectives for these land would allow these lands to be suitably development without causing adverse impacts on the European site adjacent.

Chief Executive Recommendation

Amend SLO4 text as follows:

This SLO is located in the townland of Bollarney North. The SLO comprises New Residential (RN – Priority 2), Open Space (OS1), Public Utility (PU) and Community/ Education (CE). Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- *To provide a new car park with access onto the Port Access Road for a minimum of 50 cars, with cycle parking facilities on lands zoned PU.*
- *A minimum of 1.2ha on lands zoned CE shall be provided for community uses. Generally, this shall comprise a community / sports/ recreation type development of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and agreement with the Planning Authority.*
- *The design and height of any development shall pay particular regard to the height of immediately adjoining (mostly 1 - 2-storey) residences and the visual impact of the proposed development on the Murrough Wetlands / coastline.*
- *To provide a linear green route for walking and cycling, with a minimum width of 8 metres, on the lands zoned*

OS1 with pedestrian / cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly (indicative route shown with purple arrow.)

- *To provide a recreational open space park on the lands zoned OS1, to the east (lands closet to the Murrough Bridge) of a minimum of 2 hectares contiguous to the linear green route.*
- *The overall site layout design shall locate the main public open space element/s of the residential development adjoining the OS1 green route/park (on the lands closed to the Murrough).*
- *All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects. In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans.*

Item 4	Chapter 9 Infrastructure
<p>IFI wish to highlight the following objectives in relation to Water Quality, Water Supply, Waste Water and Storm & Surface Water Infrastructure as set out in the Wicklow County Development Plan 2022-2028 (CPO13.1, CPO13, CPO13.3, CPO13.4, CPO 13.6, CPO 13.8, CPO 13.9, CPO 13.10, CPO 13.11, CPO 13.12, CPO 13.13, CPO 13.15, CPO 13.17, CPO 13.18, CPO 13.20, CPO 13.21, CPO 13.22).</p>	
<p>These objectives are very positive in their aims to protect and improve water quality within both surface and groundwater sources and to protect the aquatic environment and its riparian zones.</p>	
<p>It also highlights the complexity and interconnections between, wastewater, surface water/drainage and drinking water infrastructure and the need to approach all future development in a joined-up manner, ensuring that all three components have sufficient capacity and are fit for purpose to facilitate sustainable development in the Wicklow Rathnew LAP.</p>	
<p>IFI are concerned that the current waste water infrastructure in the area does not have capacity to support any further growth within the Wicklow – Rathnew & Ashford area at this time. It is recommended, as previously stated, that an audit of the waste infrastructure within the LAP (to include the Ashford agglomeration, as it is part of the same wastewater infrastructure) be undertaken by the relevant authority, and where issues such as conveyance capacity limitations are identified, remedial actions are undertaken. This will help to ensure sustainable development occurs in accordance with the objectives set out in the County Development Plan (CDP) and LAP.</p>	
<p>IFI recommends that adequate resources are assigned to maintain and service the drainage network and associated infrastructure to protect the aquatic environment and prevent or minimise future flooding events.</p>	
<p>Chief Executive Response</p>	
<p>The issue raised appears to be more a matter for Uisce Éireann than this LAP. The Council will continue to cooperate with UE in addressing any deficiencies in systems and networks and ensuring that capacity is available in systems before considering consenting new development.</p>	
<p>Chief Executive’s Recommendation</p>	
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031</p>	

Item 5 Chapter 10 Heritage, Biodiversity & green Infrastructure

There are a number of very positive objectives proposed within this section, and it is important that the Fisheries Service are consulted at as early a stage as possible where development plans are being considered to facilitate these objectives. It is recommended that the following guidance documents are referenced when considering development strategies and policy.

- IFI Guidelines - "Planning for Watercourses in the Urban Environment"
- Department of Housing Local Government and Heritage Strategy and guidance documents
 1. Nature Based Management of Urban Rainwater and Urban Surface Water Discharges A National Strategy.
 2. Rainwater Management Plans Guidance for Local Authorities.

There is a zone of influence associated with Greenways/Blueways which must be considered and planned for within some of these objectives of the LAP.

A wildlife corridor system that protects regional diversity should be at the forefront of the Greenway/Blueway planning processes. Riparian areas play a disproportionately large role in filtering out pollutants and sediment from overland surface runoff, flood defence, maintaining biodiversity and for these reasons greenways must not impinge on or degrade the riparian zones. In considering wildlife, focus should not be solely on the width of the path of the greenway, consider the wider area it may influence.

IFI are aware of incidents of considerable damage to biodiversity resulting from the construction of greenways and amenity walks where there has been an over engineering of the pathways and cycleways in terms of the widths and finishes used, which has resulted in a degradation of the natural environment.

Careful consideration should be given at the design stage and a balance should be struck in relation to moving access away from the riparian corridor along rivers and streams and sensitive areas of conservation to provide refuge for the flora and fauna within these areas.

Chief Executive Response

The concerns raised with respect to greenways and blueway are noted; it is considered that these matters are addressed through the application of the following objectives of the County Development Plan:

CPO 18.3 *New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment.*

CPO 18.4 *To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, European sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.5 *To identify and facilitate the provision of linkages along and between green / river corridors within the county and adjoining counties to create inter connected routes and develop riverside parks and create linkages between them to form 'necklace' effect routes including development of walkways, cycleways, bridleways and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

- CPO 18.6** *To promote and facilitate the development of coastal trails linking up with existing recreational trails, creating new linkages between coastal sites and inward linkages to settlements and green spaces in built up areas and extensions to existing facilities where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*
- CPO 18.7** *To facilitate the development of green bridges / wildlife crossings over existing physical transport barriers to repair fragmentation of the Green Infrastructure network caused by such grey infrastructure developments.*
- CPO 18.11** *To support the development of greenways, blueways and other access routes along natural corridors while ensuring that there is no adverse impact on the flora and fauna, biodiversity or water quality of natural assets. Wicklow County Council prioritises environmental protection in our design and construction of routes and surface selection.*
- CPO 18.13** *To facilitate greater public recreational access to the Wicklow coast and improved linkages between the coast and the coast road, subject to full ecological and heritage impact assessment and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*
- CPO 18.16** *To protect the quality of bathing waters and to endeavour to ensure that bathing waters achieve "sufficient or better status" and increase the number of bathing waters classified as "good" or "excellent", in accordance with the Bathing Water Directive (Directive 2006/7/EC).*
- CPO 18.17** *Where projects for significant green infrastructure identified in this chapter are not already provided for by existing plans / programmes or are not already permitted, then the feasibility of progressing these projects shall be examined, taking into account planning need, environmental sensitivities as identified in the SEA Environmental Report and the objectives of the plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new green infrastructure in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection.*
- CPO 18.18** *Where relevant, the Council and those receiving permission for development under the plan, shall manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant environmental effects, including loss of habitat and disturbance. Management measures may include ensuring that new projects and activities are a suitable distance from ecological sensitivities; visitor/habitat management plans will be required for proposed projects as relevant and appropriate.
Potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.*

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

4.1.13 ELECTRICITY SUPPLY BOARD	
Item 1	Preamble
<p>ESB is a landowner and employer in Wicklow with property and infrastructural assets throughout the County serving Wicklow Town – Rathnew area and its hinterland.</p> <p>ESB acknowledges the aim of the Draft Plan to set out an outline for the spatial planning framework for the Wicklow Town - Rathnew area with planning policies directed at informing the private and public development sectors in line with established sustainable development guidelines from the Wicklow County Development Plan 2022-2028. We recognise that the Draft Plan incorporates a framework for guiding the future development of a climate resilient town.</p>	
Chief Executive Response	
Noted	
Item 2	Wicklow Town Port/Waterfront area
<p>ESB notes the ambition of Wicklow County Council to facilitate the growth of the Wicklow Town Port/Waterfront area to a centre of excellence for the offshore renewable energy sector, among other activities. Employment Objective WTR13 as set out in Chapter 4 of the Draft Plan supports the development of the Wicklow County Campus and adjacent employment zoned lands for employment types such as renewable energy.</p> <p>In regard to the above, ESB wish to highlight the significant opportunity available to Wicklow County Council through the review of the Wicklow Town - Rathnew LAP to favourably consider a significant landbank for the development of a Renewable Energy Hub. The hub could potentially cater for a range of renewable energy projects, including, onshore & offshore support activities, battery storage solutions, renewables enabling dispatchable plant, anaerobic digestion and hydrogen fuel production.</p>	
Chief Executive Response	
<p>The provisions of the Wicklow County Development Plan and the draft LAP would support the development of Renewable Energy Hubs. It is not considered appropriate however to identify and reserve particular lands for such a use within this LAP area without study and assessment of the nature and space needs of a such a hub; however, adequate lands are zoned both around the port area and throughout the settlement for both 'Mixed Use' and 'Employment' which would likely facilitate such development.</p>	
Chief Executive's Recommendation	
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031	
Item 3	Energy Transition
<p>ESB is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. In this regard, we support the ambition of the Draft Plan to deliver an overarching land use strategy for the proper planning and sustainable development of the Wicklow Town - Rathnew area.</p>	
Chief Executive Response	
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031	

4.1.14 EIRGRID

Item 1 EirGrid's "Powering Up Wicklow"

This is a request to include a policy in the LAP, consistent with the provisions of the Wicklow County Development Plan, and our submission made in respect of the Delgany-Greystones LAP, to support the provision of new and/or upgraded electricity infrastructure provision in the area of the LAP. Specifically, requesting a policy of the LAP to support the implementation of EirGrid's "Powering Up Wicklow" programme.

"Powering Up Wicklow" is a critical programme that will strengthen key electricity infrastructure in Wicklow and the surrounding areas, helping to make Ireland 'renewable ready'. This programme will help deliver a consistent and reliable supply of electricity for Wicklow. "Powering Up Wicklow" includes the installation of a transmission substation in Ballybeg, Rathnew, adjacent to an existing substation. This also includes the upgrading of the existing Arklow-Carrickmines 220kV circuit, which extends generally in parallel to the M11 motorway, including in the area of the LAP.

This proposed enhancement of electricity grid infrastructure in Wicklow in general, and the LAP area in particular, will support:

- Residential housing and commercial developments
- Demand growth due to electrification of heat and transport
- Improve security of supply in Rathnew and Wicklow Town Centres
- Bringing renewable energy on to the grid

EirGrid has surveyed the surrounding area adjacent to the existing Ballybeg substation to identify suitable sites for this substation replacement to reinforce the electricity grid in Wicklow. The current project development process will ultimately comprise an application for statutory consent to the relevant consenting authority (either Wicklow County Council or An Bord Pleanála - this has yet to be determined by ABP). A strong policy context for such critical development is essential, hence the request for inclusion of such policy in the forthcoming LAP.

Chief Executive Response

The County Development Plan policies, objectives and standards will all apply directly in the LAP area, and care has been taken in the crafting of the LAP to ensure unnecessary repetition and that the LAPO includes restatement / elaboration of the County Development Plan objectives only where the local context requires same. In this regard, the County Development Plan already provides for the following objectives:

Transmission & Distribution Objectives

- CPO 16.18** *To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required.*
- CPO 16.19** *To facilitate planned growth and transmission / distribution of a renewable energy focused electricity generation across the main demand centres.*
- CPO 16.20** *To support roll-out of the Smart Grids and Smart Cities Actions enabling new connections, grid balancing, energy management and micro grid development.*
- CPO 16.21** *To facilitate high energy demand development only at appropriate locations, most accessible to the National Grid.*
- CPO 16.22** *To suitably manage development within 35m of existing 110KV/220kV transmission lines.*
- CPO 16.23** *To support and facilitate the development of landing locations for off shore generated wind energy and for any cross channel power interconnectors.*

It is considered that these County objectives would provide strong policy support for the "Powering Up

Wicklow" programme.

With respect to the Ballybeg substation, this is located outside of the LAP boundary, and therefore it would not be appropriate to include an objective in this LAP in relation to same.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

4.1.15 UISCE ÉIREANN

Item 1 Services Status

The following information is provided in this submission with respect to the servicing status of various parcels of land:

Local Objective	Area	Zoning	Comment
SLO 1	Marlton Park / Ballynerrin	New Residential Priority 1	Serviceable
SLO 2	Tinakelly / Newrath	New Residential Priority 1	Currently no sewer network. Site to the south under construction. New network will be developer led.
SLO 3	Tighe Avenue	Employment Lands & New Residential - P2	Currently not serviced. However, services run through Rathnew Business Park to the east
SLO 4	Bollorney North / Knockrobin	New Residential Priority 2	Not currently serviced. Watermain to the southern boundary of the site. Extensions to the public network would be developer led.
SLO 5	Ballybeg	New Residential P2 & Community	Serviceable
SLO 6	Ballynerrin	New Residential P1 & P2	Serviceable
SLO 7	Rosanna Lower	New Residential P2	Not currently Serviced by public sewer network. There are watermains in the surrounding roads.
SLO 8	Rosanna Lower	New Residential P1 & P2 & Community	Not currently serviced by public sewer network. There is a watermain in the R761
	Broomhall	New Residential P2	Serviceable - Services to the north
	Hawkstown Lower	New Residential P2	No currently serviced by public sewer. Sewer to the East of Ashtown Lane
	Ballynerrin Upper	New Residential P1	Not serviced – Services in estate to the East
	Marlton Stud	New Residential P1	A sewer and watermain runs along Marlton Rd
	Ballyguile Beg	New Residential P2	Serviceable
	Ballyguile Mor	New Residential P2	Not currently serviced. Services to the north in Mariners Point / Carrig view
	Greenhill Road / Greenhill Reservoir	New Residential P1	Watermains traverse the sight and will need to be protected / diverted.

Chief Executive Response

This data confirms that all lands proposed for residential zoning in this draft LAP are either serviced or serviceable with water infrastructure. All of this information will be utilised in the enhanced infrastructure appendix recommended on foot of the submission from the OPR.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

Item 2 Connection to UE Network

Some areas in the plan are not served by the public sewer network. Connection to the network will depend on the gradient of the various sites. Depending on the size and type of development proposed, local capacity constraints in the network may require local up sizing, or extensions of network, to the existing wastewater network.

UÉ can work with developers to determine the best solution going forward. This process is outlined on the Connections and Developer Services section of UE's website. <https://www.water.ie/connections/developer-services/>

Connections to Uisce Éireann networks are subject to our Connections Charging Policy. Further information on this process is available at: <https://www.water.ie/connections/developer-services/>

Spatial Extent of Networks - The spatial extent of Uisce Éireann's networks is accessible through Uisce Éireann's ArcGIS Online web viewer at: <https://irishwater.maps.arcgis.com/home/index.html>, which provides information on the position of its underground network as a general guide only, on the strict understanding that it is based on the best available information.

Chief Executive Response

Noted

4.1.16 MEATH COUNTY COUNCIL

Meath County Council has no comments to make.

Chief Executive Response

Noted

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031 -2031.

4.1.17 HEALTH AND SAFETY AUTHORITY HSA	
Item 1	Introduction
<p>The Health & Safety Authority (the Authority) is an Authority prescribed under Article 13 of the Planning & Development Regulations 2001-2015 and as such is required to be consulted in relation to Development Plans under sections 11-13 & 24 of the Act.</p> <p>The approach of the Health and Safety Authority (the Authority) to Land-use Planning is set out in the document 'Guidance on technical land-use planning advice'. It is available from our website at: https://www.hsa.ie/eng/Your Industry/Chemicals/Legislation Enforcement/COMAH/Land Use Planning/</p>	
Chief Executive Response	
Noted	
Item 2	Major Accident Sites
<p>The Authority would expect the planning guidelines to contain:</p> <ol style="list-style-type: none"> 1. An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU. 2. The consultation distances and generic advice, where applicable, supplied by the Authority to Wicklow County Council in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority. 3. A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments. 4. While not within the scope, please note the following notified establishments located in Co. Wicklow: <ul style="list-style-type: none"> A. Zoetis Belgium S.A. Ireland Branch B. Sigma Aldrich Ireland Ltd 	
Chief Executive Response	
<p>As noted by the HAS there are no notified establishments within 'scope' for this LAP. The County Development Plan set out the following objective which will apply directly in the plan area:</p> <p>CPO 15.8 <i>In relation to the Prevention of Major Accidents (Control of Major Accident Hazards Involving Dangerous Substances) legislation, it is an objective to:</i></p> <ul style="list-style-type: none"> ▪ <i>comply with the Seveso III Directive in reducing the risk and limiting the potential consequences of major industrial accidents;</i> ▪ <i>where proposals are being considered for the following: (i) new establishments at risk of causing major accidents, (ii) the expansion of existing establishments designated under the Directive, and (iii) other developments proposed near to existing establishments; the Council will require that applicants must demonstrate that the following considerations are taken into account: (i) prevention of major accidents involving dangerous substances, (ii) public health and safeguarding of public health, and (iii) protection of the environment;</i> ▪ <i>ensure that land use objectives must take account of the need to maintain appropriate distances between future major accident hazard establishments and residential areas, areas of substantial public use and areas of particular natural sensitivity or interest; and</i> ▪ <i>have regard to the advice of the Health and Safety Authority when dealing with proposals relating to Seveso sites and land use plans in the vicinity of such sites.</i> <p>This objective is considered to address the issues raised by the HSA.</p>	
Chief Executive's Recommendation	
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031	

Section 4.2
Submissions from Elected Representatives

No.	Name	Issues Raised
157	Cllr John Snell Ref 221347	The Village of Rathnew and surrounding areas is under resourced in sporting, community & voluntary facilities to address this shortfall this plan must have provisions in place to ensure the future for our Youths.

Opinion of the Chief Executive

Sport Facilities

With regard to the development of Active Open Space (AOS), it should be noted that the purchase of lands and provision / development of sports facilities by the Local Authority is outside the remit of the LAP.

The draft LAP, in combination with the Social Infrastructure Audit appendix of the LAP has carried out a full audit of sports and recreation future land use needs within the settlement. The draft LAP has zoned the required amount of land for Active Open Space (AOS) and Community (CE), which allows for sports facilities to be developed, for the future needs of the population of the settlement and its catchment.

In this regard in accordance with WCC's Active Open Space Policy, active open space shall be provided at a rate of 2.4ha per 1,000 population divided into:

- 1.6ha outdoor play space (pitches, courts, sports grounds)
- 0.6ha casual play spaces (parks)
- 0.2ha equipped play space (playgrounds and MUGAs)

Based on the above rates, considering the 2031 population target of 19,400 persons for Wicklow Town - Rathnew, the following areas of active open space are required at a minimum:

46.4ha overall needed for the plan area comprising of:

- 31ha outdoor play space
- 11.6ha casual play spaces
- 3.8ha equipped play space
-

However, the sports and recreational facilities in the settlement cater for the population within the settlement as well as the population of the surrounding rural areas. The projected 2031 population of the settlement and catchment is c.27,900 persons. The following areas of active open space are therefore required at a minimum:

66.8ha overall needed for the plan area and catchment area comprising of:

- 44.6ha outdoor play space
- 16.7ha casual play spaces
- 5.5ha equipped play space

In addition, it was identified through the pre-draft plan public consultation that there are additional / specific needs as follows:

- Athletics club grounds / running track
- Sports and community centre
- Indoor amenity facilities
- Indoor sports facilities
- Walking and cycling trails

With respect to organised sports grounds, outdoor / casual play spaces and equipped play spaces, there is currently a total of c.45ha in open space use in the settlement excluding Wicklow Golf Club.

Therefore at a minimum there appears to be a **need to zone a total of c.66.8ha** of active open space in the settlement to cater for the settlement and its catchment. The Draft LAP therefore proposes to zone an additional 30.6ha of AOS in addition to the existing c.45.7ha of AOS in the settlement **giving a total of**

76.3ha zoned AOS in the settlement.

In addition to considering the quantum of open space that is required, there is a need to ensure a suitable spatial distribution of spaces, so that all developed areas, particularly residential areas (existing and planned) can access amenity and sports grounds by active and sustainable means (walking / cycling/ public transport). Having considered the catchment of existing sports clubs, there are clearly existing areas where there are deficiencies. In this regard n undeveloped AOS lands are proposed at the following locations:

Zoned Undeveloped Land		
Location	Zoning	Area (ha)
Hawkstown Road	Active Open Space	4.7
Rocky Road	Active Open Space	5.6
Brides Head	Active Open Space	4
Ashtown Lane	Active Open Space	7
Tinakilly	Active Open Space	2.45
Ballynabarney	Active Open Space	3.7
Bollarney	Open Space	3
	Total new open space lands	30.6 hectares

These active open space areas are to serve the overall settlement of Wicklow Town and Rathnew as well as the catchment of the settlement, however 3.7ha of AOS is zoned at Ballynabarney.

With regard to the AOS in Tinakilly, the 2.45ha zoned AOS under the current plan is permitted to be developed as a recreational parkland with an area reserved/levelled for the possible future development of a playing pitch and associated car park when funding allows. The OS1 Open Space (c.6ha) on either side of the AOS in Tinakilly is permitted to be developed as a recreational parkland with walking routes, native woodland planting and wildflower planting linking back up to Tinakilly Avenue close to Tinakilly House. While this is not the level of AOS envisaged under the 2013 LAP, the future development of this permitted public amenity is considered to be positive addition for both existing and future residents in this area.

In 2025, as part of the National Sports Policy, the Wicklow County Council will be developing a **Local Sports Plan** for the County, which will identify infrastructure needs as well as a project delivery programme for new facilities.

This project includes for the development of a sports and recreational park on lands adjacent to the Hawkstown Road and Ashtown Lane. WCC has developed draft Sports & Recreation plan for the Hawkstown Road site and it is intended this will be developed as a multisport facility ideally including an indoor facility however this plan is still at draft stage and funding has yet to be secured.

All of the submissions made with respect to sports infrastructure to this LAP will be considered in the preparation of the Local Sports Plan.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031

No.	Name	Issues Raised
157	Cllr John Snell Ref 221347	The spiraling population figures show that Rathnew is in need of a purpose built Community centre in the newly built up residential areas of the Village.
Opinion of the Chief Executive		
<p>Community Centre Provision</p> <p>The draft LAP, in combination with the Social Infrastructure Audit appendix of the LAP has carried out a full audit of recreation and sports facilities in the settlement of Wicklow-Rathnew. The Social Infrastructure Audit identified St. Brigid's Community Hall in Rathnew as a multi –purposes Community Resource Centre serving the settlement. Wicklow Town is identified as having the Assembly Hall and Parochial Hall as Multi Purposes Community Resource Centres. The Social Infrastructure Audit did not identify the need for a new facility to serve the settlement of Rathnew however such a facility could be developed on lands zoned Village Centre, Community and Educational, and/or Residential.</p> <p>With regard to the development of such a facility,it should be noted that the purchase of lands and provision / development of such a facility by the Local Authority is outside the remit of the LAP.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031		

No.		Issues Raised
159	Cllr John Snell Ref 222407	<ul style="list-style-type: none"> ▪ Built heritage should be protected in the Wicklow/Rathnew area ▪ The Old school formerly known as St Joseph's Girls National school and now a Democrat school is a building of local importance for its historical value to the people of Rathnew and must be protected ▪ Tinakilly Avenue is a vital and historical access route for the people of Rathnew and beyond, this Avenue known locally as Halpins Avenue must be retained as a route for vehicular and pedestrians alike.

Opinion of the Chief Executive

Built Heritage

The Planning and Development Act 2000 confers a number of responsibilities on Local Authorities with regard to built heritage. The County Development Plan 2022-2028 Architectural Heritage Objectives (CPO 8.10-8.12) are to protect, conserve and manage built heritage, encourage sensitive and sustainable development and to have regard to the 'Architectural Heritage Protection: Guidelines for Planning Authorities'. While protecting assets is important, there must be a balance between safeguarding and providing for development needs.

St. Joseph's NS

Adding, deleting or amending structures on the record of protected structures RPS is carried out through a specific processes of the Planning Act, the RPS is reviewed every few years, with the council hiring a conservation architect to review any structures proposed for addition of built heritage is typically managed through the CDP. While no review is currently underway, this structure will be added to the list for future consideration.

Tinakilly Avenue

With regard to Tinakilly Avenue, the LAP does not seek to close access to Tinakilly Avenue to the public. The LAP seeks that once the RIRR is complete and operational, the entire length of the Avenue will be accessible to pedestrians and cyclists while vehicular access to Tinakilly Lane will be retained on the eastern section of the Avenue with the option of turning left or right onto the RIRR depending on where individuals are travelling to in their vehicle.

The LAP seeks that the entrance onto the R750 remains open for pedestrian and cycle access providing a convenient, safer and more direct connection for walkers and cyclist to the Village Centre from Tinakilly Lane, the existing and future residential development in this area and the existing glamping site at Tinakilly House.

It is noted that the junction on the R750 from Tinakilly Avenue is currently difficult to egress from for vehicles, especially if turning right towards Rathnew Village. The future arrangement along the Avenue coupled with the RIRR and other planned road interventions in the area, including the upgrade works to the Rocky Road, will reduce pressure on the roundabout in Rathnew Village Centre and remove this vehicular egress from Tinakilly Avenue onto the R750. It should be noted that one road intervention/improvement alone will not accommodate the volume of current and future traffic movements in the area and that the RIRR is part of a suite of road interventions required to accommodate future traffic movements along with improving and promoting walking and cycling routes.

With a reduction in through traffic in Rathnew Village and creating cycle and pedestrian links from existing and new residential development in the area, it is envisaged that the village centre will become a more pleasant environment for pedestrians, therefore increasing footfall in the village which would be beneficial to existing businesses and encourage the rejuvenation and regeneration of the village over time. The future regeneration of the Village is supported by specific objectives CPO 5.1 – CPO 5.24 under Chapter 5 Town and Village Centres - Placemaking and Regeneration of the 2022-2028 Wicklow County Development Plan.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
163	Cllr John Snell Ref 223713	<p>The phased building proposal of this plan in prioritising some residential zoned lands will only increase the value of the houses as the market will be unbalanced with no competition to the so called priority one sites which currently show lands with the least community amenities. The amount of residential units currently built in the Rathnew area in particular has put the local infrastructure under pressure.</p> <p>Schools, Sports club, community groups, road networks are all in need of immediate action to stem the tide of over population and poor infrastructure, facilities and amenities.</p> <p>The plan of building in the region 700 hundred units in Tinakilly Rathnew without provision of on site crèche facilities, recreation amenities, playing pitches, playgrounds, doctor's surgery, pharmacy, shops is definitely not in keeping in good planning.</p> <p>It is time to stop major developments without the above facilities and consider allowing the communities infrastructure catch up to service the residential homes that have already been built.</p>

Opinion of the Chief Executive

Residential Development in Rathnew/Tinakilly

The residential zoning provisions of the draft LAP have been carefully calibrated to ensure compliance with the NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the population and housing targets of the Core Strategy, as set out in the County Development Plan.

The development of phase 2 'RN2' lands is not solely linked to the full / majority development of RN1 lands; the key factor affecting the developability of RN2 lands is consistency with the housing targets of the Wicklow Core Strategy, which at this time are met. Increasing the amount of lands zoned New Residential – Priority 1 (RN1) as suggested in this submission would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

Wicklow Town – Rathnew is designated as a Key Growth Town and it is prioritised to accommodate a significant amount of population growth that requires housing, employment, social infrastructure, schools, etc. It is necessary to zone an appropriate amount of land for development to cater for this growth. The draft LAP has included the relevant objectives and land use zonings to facilitate the delivery of the necessary infrastructure and amenities however the actual delivery of such uses is outside the remit of the LAP.

In order to ensure key infrastructure, like roads and schools, are delivered in tandem with residential development, the delivery of such infrastructure is tied into a 'Specific Local Objectives' SLO, that require the delivery of the key infrastructure alongside the delivery of housing. In this regard as part of the development of the RN1 lands in SLO2 Tinakilly-Newrath, the Draft LAP requires that the development of these lands includes the provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities.

In terms of the existing residential development in Tinakilly, a childcare facility was constructed offsite at Broomhall. This facility is within a 15 minute walk of the permitted dwellings in Tinakilly and is beside 2 primary schools making it convenient for parents with multiple drop offs. The purpose-built dedicated crèche permitted under PRR19/853 provides co-located childcare services to serve the residential development at Tinakilly and Burkeen Hall (circa 500 units). This childcare facility is now operating as Little Harvard Broomhall.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025-2031

Section 4.3 General Submissions

4.3.1 Chapter 2 - Overall Vision and Strategy

4.3.1.1 Issue 1: General

No.	Name	Issues Raised
28	Wicklow Planning Alliance Ref 202425	In general terms Wicklow Planning Alliance (WPA) would support the general direction of the zoning and phasing in the draft Local Area Plan.
148	Clouddale Ltd. Ref 182429	<ul style="list-style-type: none"> ▪ The submission welcome this statement that acknowledges the LAP needs to be flexible to deal with changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or changes to planning legislation. ▪ The submission welcomes the LAPs overall approach to Future Compact Growth of the Settlement.
Chief Executive Response		
<p>The CE welcomes the submissions and their support in general of the direction of the zoning and phasing in the draft LAP.</p> <p>On foot of these submissions, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025-2031		

4.3.1.2 Issue 2: Vision

No.	Name	Issues Raised
84	Sean Doherty Ref 225718	The proposed LAP lacks strategic vision where a progressive change can be made to the towns of Wicklow and Rathnew over a longer period of time. A longer-term view should be developed and worked towards. The short(er) term planning process seems to ignore this fact and makes planning and proposals based on the short(er) term. A 20 year strategic plan should be developed that gives greater structure to the short(er) term planning process.
98	Vincent Collard Ref 231629	More time is needed and more diverse input to give a comprehensive vision. The people who are affected by the LAP should have more say. They are the ones who have invested time and money in the area.
148	Clouddale Ltd. Ref 182429	The draft LAP is prepared against a context of unprecedented residential demand in the country, with the NPF now recognising a need to construct 50,000 dwellings per annum. The draft LAP acknowledges that the plan preparation is set against a dynamic context of population forecasts and strategic policy evolution. It is acknowledged that Wicklow County Council's strategy is clearly intended to incorporate a degree of flexibility. However it is submitted that the Draft LAP does not sufficiently reflect the town's role as a 'Core Region Key Town' within the Dublin Region. The submission notes that the LAP vision highlights qualitative goals for the improvement of the settlements. However, the statement does not fully reflect its enhanced status under the RSES, as it is only one of three Key Towns within the Core Region area that should be reflected in a more expansive and proactive vision statement.

Chief Executive Response

Wicklow Town – Rathnew is a Key Town in the region, the role and function of a Key Town in general and specifically for Wicklow Town – Rathnew is clearly set out in the Regional Spatial and Economic Strategy. This is enhanced further with a clearly defined role and function for Wicklow Town – Rathnew in the settlement strategy of the Wicklow County Development Plan 2022 - 2028.

The timeframe of a Local Area Plan, including consultation stages, is set out in the Planning and Development Act 2000 (as amended), with a LAP generally in place for 6 years with the provisions in the Act to extend this to 10 years. The draft LAP is also framed in accordance with the development horizon set out in the 2022 County Development Plan. The draft LAP legally has to align with the timeframes of the Planning Act and the County Development Plan.

The National Planning Framework and Regional Spatial and Economic Strategies have longer term horizons with the County Development Plan and the Local Area Plan aligning with these longer term Frameworks/Strategies.

WCC carried out additional pre-draft public consultation for this draft LAP above the requirements of the legislation. The pre-draft and draft consultations were extremely successful with high numbers of submissions and well attended public open days. All of these consultations, including submissions made, have been considered in the crafting of this draft LAP.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.1.3 Issue 3: Economic Development and Employment

No.	Name	Issues Raised
28	Wicklow Planning Alliance Ref 202425	The rationale for the zoning for employment uses is unclear and does not conform to recently published Office of the Planning Regulator’s (OPR) Practice Notes which recommend much more data led analysis of need and clearly identified sectoral demand to justify the chosen size and location.
Chief Executive Response		
<p>The CE is satisfied that the draft LAP provides for an appropriate amount of employment zoned land. The OPR Practice Notes provide information and guidance about specific areas of the planning system and in this case, guidance on ‘The Development Plan and Employment Lands’. They are non-statutory. In crafting the employment strategy of the draft LAP careful consideration was given to the policies and recommendations of the National Planning Framework and the Regional Spatial and Economic Strategy as well as the Economic Development Chapter of the County Development Plan, which includes detailed principles around the zoning of employment land. These principles, while prepared in advance of the OPR guidance note, are generally consistent with same.</p> <p>In response to the submission from the OPR, more detail and rationale has been provided for the employment zoning provision set out in the draft LAP (please see Section 4.1 of this Report).</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive’s Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.1.4 Issue 4: Removal of Strategic Land Bank

No.	Name	Issues Raised
146	Lusra Teo Ref 182907	The focus of this submission is with regard to a parcel of land at Ballinabarney, that is zoned Strategic Land Bank 'SLB' in the Wicklow – Rathnew Town Development Plan 2013 -2019 and these lands are in the open countryside, outside the draft plan boundary. With regard to the overall vision and strategy, there is no explanation for the removal of the SLB or the adjustment of the LAP boundary to exclude these lands from the draft LAP, nor is there a solution set out in the draft LAP. The draft LAP does not appear to have any longer-term perspective to cater for employment expansion.
154	Ronan O'Caoimh Ref 194856	Lands formally within the Strategic Land Bank are no rezoned. Submitted these should be rezoned.
155	Ronan O'Caoimh Ref 220916	
156	Ronan O'Caoimh Ref 221123	
Chief Executive Response		
<p>These lands were zoned Strategic Land Bank in the 2013 plan on order '<i>to provide a land bank for future development of the settlement after the lifetime of this plan</i>'. Having regard to the changes in planning strategy and policy since 2013, in particular the adoption of the NPF, the RSES and the Wicklow County Development Plan 2022 – 2028 (and its associated Core Strategy), it has been determined that these former SLB lands are not needed to be zoned at this time in order for the LAP to fulfil the growth and development objectives of these higher order strategies.</p> <p>The Development Plan Guidelines of June 2022 advise that where there is an excess of zoned lands that the following applies -</p> <ul style="list-style-type: none"> - Prioritising / phasing of development, - Alternative Objectives /alternative appropriate uses , or - Discontinuing the Objective: by deletion of the zoning objective and related lands from the written statement and maps of the development plan. <p>In addition, it is also important to note that these lands are not serviced. In accordance with the NPF 'Tiered Approach' to zoning and NPO72c, where land is not serviced, and not likely to be serviced within the lifetime of the plan, they should not be zoned.</p> <p>The majority of the former Strategic Land Bank zone was discontinued in the draft LAP.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.1.5 Issue 5: Overdevelopment of the area

No.	Name	Issues Raised
160	Mark Mcgettigan Ref 223707	Rathnew has become overdeveloped, it has lost its unique character and is turning into a soulless commuter town; the people of Rathnew were not consulted or considered in these developments; our young people are now being out priced by people who in turn have been out priced in Dublin. It is time to halt further developments as there are not going to be enough school places and further facilities for this increased population.
Chief Executive Response		
<p>'Wicklow Town - Rathnew' is the one settlement for the purposes of land use planning. The draft LAP recognises Rathnew unique character and has included a strategy for Rathnew Village to ensure its unique character is maintained and reinforced in any future development.</p> <p>The CE is committed to ensuring that new development occurs in the most optimal and sustainable locations in accordance with the policies and objectives set out in the National Planning Framework, the Regional Economic and Spatial Plan for the Eastern and Midlands Region and the Wicklow County Development Plan and the guidance set out in Ministerial Guidelines including 'Development Plans – Guidelines for Planning Authorities' (2022)</p> <p>In this regard, Wicklow Town – Rathnew, following detailed assessment of role and capacity via the RSES and CDP process, has been designated as a 'Key Town' in the region and county, and is identified for growth in housing, employment and community services. The rate and quantum of housing growth that has and is occurring in Wicklow Town – Rathnew is in accordance with these higher order strategies and the residential zoning provision of the draft LAP similarly accord with same.</p> <p>The Council is committed, through the objectives of the Wicklow County Development Plan and this LAP to ensuring that new development, particularly housing, occurs in tandem with necessary services and infrastructure including transport, community / social facilities, open space etc. The Council will continue to support, through plans and through its operations, and through cooperation with the Department of Education, the delivery of new schools.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.2 Chapter 3 - Residential Development

Numerous submissions raised the issue of 'residential development' in many forms. This section deals with the residential development issues raised in relation to the content of the residential development Chapter 3 of the draft LAP. Submissions that are seeking their land zoned to a form of residential development are dealt with under Chapter 11 Section 4.3.10.1 of this report. Submissions that are dealing with residential development in a Specific Local Objective (SLO) are dealt with under Chapter 11 Section 4.3.10.2 of this report.

4.3.2.1 Issue 1: Residential Zoning and Phasing

No.	Name	Issues Raised
10	Knockrobbin Developments Limited Ref 103018	<p>There are eight sites zoned New Residential – Priority 1 (RN1), of which four are owned by the Council. Four of these sites also have planning in place or part of the site is under construction. This is an insufficient number of different landowners to create a functioning housing market in the town.</p> <p>The 11ha of RN1 lands at Tinakilly Park equates to 33% of the total RN1 lands in the Draft LAP, so as long as that land remains undeveloped, the 75% threshold per objective WTR4 in the Draft LAP cannot be exceeded. Therefore as a result all of the RN2 lands will remain undeveloped. In this regard, it is requested that RN2 lands detailed in this submission are redesignated RN1.</p>
38	Mary Byrne, Liz Byrne, Carmel Whelan Ref 131457	Changed OS1 zoned lands back to residential use with RN1 zoning.
43	Durkan Group Ref 164446	<p>Increase the population and housing targets for the settlement. Actual population growth since 2016 has been outpacing the targeted population growth by 14%. This growth, and that identified by the ESRI and The Housing Commission warrant an increase in the housing targets for the settlement and the zoning of additional RN1-zoned land by extension. Insufficient RN1 lands have been zoned to deliver the housing target for the settlement given the achievable densities would be less than the average implied by area zoned and housing target set. Therefore, additional RN1 lands will be required to deliver the housing target.</p> <p>The Draft LAP appears to have double counted the 'Hawkstown Road' site in its Table 3.1 as an RN1 site, whereas it is actually listed and mapped as an RN2 site. Therefore, there will be a need to zone additional, sustainably located and accessed sites as RN1.</p> <p>The wording of Objective WTR4 needs to be reconsidered due to:</p> <ul style="list-style-type: none"> ▪ The onerous threshold set before RN2 lands can come forward. A bar of 75% of lands requiring Planning Permission and development commencement is considerable due to the limited number of RN1 sites, high fall-off rates between consent and commencement, and the size of the Tinakilly Park site (33% of RN1 lands), which can only be unlocked once the Rathnew Inner Relief Road is designed and consent secured. It is contended that the bar should be pragmatically set to 50% of RN1 lands requiring Planning Permission only. ▪ Inappropriate emphasis placed on not significantly breaching core strategy targets. Emphasis should, instead, be placed on prospective Applicants demonstrating that (1) hard and soft infrastructure have adequate capacity to accommodate the development and (2) ecological and environmental impacts can be ruled out.

70	Rathnew Partnership Ref 145913	<p>It is requested that lands of c. 8.3ha at Ballybeg, zoned CE 'Community & Education' and RN2 'New Residential – Priority 2', be zoned RN1 'New Residential'. The draft LAP states that permission for RN2 land will not be considered if housing generated significantly breaches core strategy targets. The development of both sites would yield approximately 150 dwellings, which is not considered a significant impact on Core Strategy targets.</p>
107	Ardale Property Group Ref 092310	<p>Review the housing yield allocations for Wicklow Town – Rathnew and ensure that the analysis is accurate and evidence based in accordance with the latest population growth and housing yield projections of the RSES, NPF and ESRI. Zone sufficient lands to deliver on housing projection forecasts for Wicklow Town and Rathnew.</p>
114	Glenveagh Homes Ltd Ref 112102	<p>The household target of 1,619 households should be revised upwards to account for the existing pent-up demand, artificially greater household sizes and increased population growth.</p> <p>Plan for Higher Population Growth: prudent to plan for an evidence based higher population target so as to not unintentionally restrict or cap the supply of critical homes through the under provision of zoned lands which are serviced lands capable of delivering homes.</p> <p>Pent-up demand: The Housing Commission estimates “pent up” demand of between 212,500 and 256,000 with a 235,000 midpoint for the Country. It is important that the final LAP takes cognisance of the recent under-provision of zoned land and include suitably serviced ‘tier 1’ lands such as our clients’ identified in map 1 (submission includes a concept diagram on map 2) which can contribute to the future much needed housing requirements.</p> <p>Household Size: It is noted that the 2016-2022 County Development Plan set out a target population for 2022 of 158,000 and target housing stock of 69,822 (source: Housing Strategy 2022 CDP - which implies an average household size of 2.26 used at the time). Census 2022 indicates a population of 155,851 and 59,629 no. households for County Wicklow (2.6 persons per household). Using 2.7 persons per household is a significant issue for a well-functioning economy which needs a range of housing typologies and sizes to cater for the existing population (to allow for mobility between households) as well as providing much needed housing typologies for employees. Increasingly a key concern for inward investment is the availability of suitable housing. Using the higher 2.7 figure in the Wicklow Rathnew LAP will reinforce the issues relating to “crowding” outlined above and also have the potential to reduce investment in employment opportunities in the key town of Wicklow.</p> <p>The use of an average household size of 2.7 people for future housing targets results in a failure to adequately provide for the actual housing needs of the county up to 2028 and beyond & therefore does not account for existing significant shortfall for the existing population.</p> <p>Population Projections – Minimum Targets: The final LAP should explicitly state that the population projections are not a cap. Demographic projection not translating into caps should become policy and core strategies should not be treated as caps in the interim as existing development plans underestimate population growth and housing need.</p>

115	<p>Broomhall Estates Limited Ref 115224</p>	<p>The Planning and Development Act 2024 has been approved by the Oireachtas and signed into law by the President. One of the key changes to be implemented in the new Planning Bill is for longer term, more strategic, ten-year plans for Local Authorities.</p> <p>The WRLAP sets out to plan to the 2031 population projection, however, it should make population expansion provisions for a longer strategic perspective so that there is no repeat of the stop-start micro-management of the expansion of the Key County town to allow it to prosper at the highest level of the urban hierarchy in the Core Region Area. More ambitious population and housing targets should be considered for the WRLAP.</p> <p>Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. The Compact Settlement Guidelines were introduced in January 2024 and therefore are not included in the Wicklow County Development Plan, which was implemented in 2022. The Compact Settlement Guidelines focus on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth. The Guidelines support the logical expansion of towns and settlements, which is applicable to the subject lands referred to in this submission.</p>
136	<p>Anne Car Ref 161906</p>	<p>It is requested that lands of c. 0.2ha at Ballynerrin, zoned RN2 'New Residential Priority 2', be zoned RN1 'New Residential – Priority 1.</p>
141	<p>The Clarke Family & Rycroft RW Ltd. Ref 165650</p>	<p>Requested that land holding be changed from RN2 to Rn1 to achieve population targets of the core strategy.</p>
142	<p>The Delahunt Family Ref 133706</p>	<p>The 2022 Core Strategy considered there was an oversupply of residential zoned lands relative to the housing targets in the Wicklow Rathnew Area and proposed that the 'remaining surplus' would be addressed in next LAP. Since the adoption of the Plan, it is widely agreed that the population projections and housing targets nationally and locally are at odds with the Census data and housing needs.</p>
145	<p>Cairn Homes Properties Ltd Ref 180639</p>	<p>This submission sets focuses on the strategic issues of zoning provision and the phased approach to 'Priority 1' and 'Priority 2' Residential Zonings proposed in the Draft LAP.</p> <p>The Draft LAP advocates a significant quantum of de-zoning of residential lands contrary to National Planning Policy, the Development Plan Guidelines and Housing for All.</p> <p>The proposed re-prioritisation of zoned land and rezoning to non-residential uses will actually compound the difficulties in the delivery of housing. It is respectfully submitted that while the Draft LAP seeks to incorporate a flexible approach, it does not respond to the current housing need and demand or the strategic role of Wicklow as a Key Town in the Dublin Metropolitan Region.</p> <p>In the preparation of the Core Strategy, the Council, did not consider the results of the most recent census, Census 2022 which shows that the population of County Wicklow has grown.</p> <p>The New Draft LAP zones substantially less land for "New Residential" than the previous plan. This potentially means that there will be shortfall of new homes. The projections do not have regard to actual or likely land activation and housing completion rates.</p>

		<p>The wording of WTR4, residential and phasing policies contradicts and undermines the Draft LAPs overall approach to Priority zoning, and the need to ensure an adequate future supply of housing lands, should the need arise for their development having regard to any changes to housing targets and should be amended as follows –</p> <p><i>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 residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Development on foot of Permission will not be considered initiated during the lifetime of this plan for RN2 lands unless the following conditions are satisfied:</i></p> <p><i>50% 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated or it is demonstrated that RN1 sites cannot not be implemented in the short term as Priority 1 and should be assessed as Priority 2 lands;</i></p> <p><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 and that the RN2 lands will deliver residential output in lieu of non-delivery of Priority 1 lands.</i></p> <p>WTR4 Notwithstanding the zoning / designation of land for new residential development (RN), <i>development on foot of permission will not be considered initiated for RN2 Priority 2 lands unless the following conditions are satisfied: - 50% 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated or it is demonstrated that RN1 sites will not be implemented in Phase1 and should be assessed as Phase 2 lands); - 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></p> <p>▪ RN2: New residential Priority 2: <i>To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement after the activation of Priority 1 lands (as assessed in accordance with Policy WTR4).</i></p>
147	Lusra Teo Ref 183127	<p>Seeks to change 4.26ha of lands zoned for Employment Use to RN1. It is submitted that this change will not require alterations to the core strategy.</p>
148	Clouddale Ltd Ref 182429	<p>The submission welcomes the LAPs overall approach to Priority zoning, which acknowledges the likely scenario where adequate future supply of housing lands are provided should the need arise for their development having regard to any changes to housing targets. However, there is considerable concern over the manner that this flexibility to proposed to be monitored and managed by the planning authority. The clause that 'New Residential Priority 2' shall only be considered for consent suggests that the planning authority will not entertain planning applications for Priority 2 lands prior to activation of Priority 1. This presents an unwelcome scenario of un-commenced planning permissions in Priority 1 preventing new planning applications even entering the system.</p> <p>The LAP's phasing strategy does not account for unforeseen impediments and could rule out significant areas from development. Section 3.5 of the Wicklow County Development Plan already incorporates 4 principles for zoning and</p>

		sequential development which is sufficiently robust without an additional layer of tests.
154	Ronan O’Caoimh Ref 194856	Much has been made of the outdated population targets on which Wicklow Town’s housing targets are based, and it seems inexplicably short-sighted not to take the opportunity to include more residentially zoned land, when we know anecdotally and statistically that the current projections do not reflect the reality on the ground. Acknowledging that the pent up demand for housing will be the hallmark of housing policy until at least 2050. We need more houses, we can only commit to meeting that need and under this proposed plan, we will fail in the duty to do so in the timeframe needed.
155	Ronan O’Caoimh Ref 221123	
156	Ronan O’Caoimh Ref 221123	

Chief Executive Response

The residential zoning provisions of the draft LAP have been carefully calibrated to ensure compliance with the NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the population and housing targets of the Core Strategy, as set out in the County Development Plan.

The development of phase 2 ‘RN2’ lands is not solely linked to the full / majority development of RN1 lands; the key factor affecting the developability of RN2 lands is consistency with the housing targets of the Wicklow Core Strategy, which at this time are met. Increasing the amount of lands zoned New Residential – Priority 1 (RN1) as suggested in this submission would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistency with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

Land ownership is not considered in the zoning of lands.

Table 3.1 New Residential Zonings has included the Hawkstown Road (5.5ha) in error. It is recommended to correct this.

Submission No. 136 requested a parcel of land within the built up area to the east of the Hawkstown Road be changed from RN2 to RN1. Given the small, infill nature of these lands in the built up part of the settlement, it is not considered that a material breach of the Core Strategy would arise from this change.

Chief Executive’s Recommendation

Chapter 3
Amend Table 3.1 ‘New Residential Zoning’

Location	Area (ha)	Status (Q3 2024)	Zoning /Priority
Hawkstown Road	5.5ha	Permission granted on part of the site.	RN1
Marlton (N of Marlton Stream/ Marlton Link Road)	4.6ha	Permission granted on part of the site.	RN1
Marlton (S of Marlton Stream)	5.9ha	Current planning application on site.	RN1
West of Hawkstown Park	1.6ha	Local Authority Scheme	RN1
Hillview	0.9ha	Local Authority Scheme	RN1
Greenhills Road	1.2ha	Local Authority Scheme	RN1
Rathnew village	0.1ha	Local Authority Scheme	RN1
Rosanna Lower (Hunters Road)	2.5ha	Permission granted	RN1
Tinakilly Park	11ha	Linked to essential infrastructure	RN1

4.3.2.2 Issue 2: Impact of Residential Zoning on nature / biodiversity

No.	Name	Issues Raised
20	Darren Fitzgerald Ref 095418	Protect lands around Tinakilly for Biodiversity.
41	Amy McNabb Ref 152435	The lands adjoining the submitters home is zoned New Residential – Priority 2 (RN2). It is put forward that <ul style="list-style-type: none"> ▪ developing the RN2 zoned lands will destroy her home, as she will no longer have any privacy and it will destroy her view. ▪ there are no jobs for all the new houses being built and everyone has to commute to Dublin for work ▪ there are numerous animals in these zoned lands that will be disrupted if these lands are developed. ▪ Her aunt owns the field beside her and is forced to sell it now.
81	Bill Clare Ref 191200	Houses been built on every green field available. Wildlife is being pushed out of the community and not been considered in any of this planning.
87	Claire McGettigan Ref 203844	Residential development resulting in the destruction of green areas around Rathnew.
Chief Executive Response		
<p>Wicklow Town – Rathnew is designated as a Key Growth Town and it is prioritised to accommodate a significant amount of population growth that requires housing, employment, schools, etc. It is necessary to zone greenfield land for development to cater for this growth.</p> <p>Concerns regarding the impact on views, wildlife and the environment are noted. The plan has been subject to numerous environmental assessments including Strategic Environmental Assessment and Appropriate Assessment, to ensure that significant adverse impacts can be identified and avoided in the crafting of the plan. Every effort is made through the application of sound planning and environmental protection principles to (i) minimise the amount of ‘greenfield’ land designated for new housing and (ii) to assess and put in place design and management measures when new development is allowed to occur to ensure the impact is minimal and can be absorbed by the receiving environment.</p> <p>It is not clear in submission 41 which field is referred to; therefore it is not possible to provide an opinion on this issue.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive’s Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.2.3 Issue 3: Housing Scale & Delivery

No.	Name	Issues Raised
60	Peter Dignam Ref 121504	At this point, we don't need more houses.
71	Carolyn Flynn Ref 163207	Building more and more housing in Rathnew and surrounding areas is only adding to the problems - making both traffic volumes and lack of amenities more critical.
72	Anna Pocock Ref 163511	Additional development must be halted until infrastructure in Wicklow Town and its surrounding communities— Rathnew, Ashford, and Glenealy—is upgraded to support the growing population. Without these necessary improvements, continued development will only exacerbate existing problems and compromise the region's long-term viability.
75	Mairead Coffey Ref 175829	Stop granting planning permission for housing developments when we don't have the means to facilitate all these extra people.
81	Bill Clare Ref 191200	Around the village of Rathnew and Wicklow town we have houses been built on every green field available with no infrastructure in place to accommodate this.
82	Fiona Clarke Ref 200028	There are too many houses being built and the infrastructure is not there to support it.
84	Sean Doherty Ref 225718	The growth of residential development has not been matched by similar if not greater growth of employment in the same zones. Whilst we have seen a greater increase in residential we have not seen the equal improvement and provision of facilities for local clubs, like GAA. Whilst greenfield space might well be provided in local residential developments the development levy contribution or planning approvals can condition development to provide sports fields for local communities. The elected members and council, as a planning authority, should be using their powers and knowledge to ensure useful spaces are provided in residential zones.
87	Claire McGettigan Ref 203844	Recent objection by ABP recently stated that the local area of Rathnew is over zoned and that there is sufficient housing for the area. It seems ridiculous that you see fit to include 4 story apartment blocks and more and more houses. What we don't have is sufficient services to meet the demand of the rising number of houses being built in the area
88	Deirdre Moore Ref 205344	No more housing estates should be built in or around the town, as there will be way too much traffic to contend with and massive pressure on schools, sewage outlets and medical facilities i.e. doctors.
90	Louiaw McNabb Ref 202834	Rathnew and Wicklow has blown out of proportion with housing in recent years that can't be kept up with by the facilities such as schools and public transport or even decent road networks
92	Richie Dignam Ref 211333	Rathnew is over developed and losing its heritage and identity through bad planning and lack of care for historic resident feelings.
95	McGetti Ref 215343	Rathnew is over zoned for housing. There are enough houses in the area. Before any further development occurs let's get the infrastructure right first.
96	James O'Neill Ref 230742	Wicklow is currently over capacity with residential housing with not enough resources to cope with demand. Priority should be on providing resources to existing houses as well as amenities such as the Murrough etc.
98	Vincent Collard Ref-231629	We need to slow down building large scale developments. Let's improve services, infrastructure and the quality of life of the local population.
100	Lisa McGettigan Ref 234627	In recent years, there has been a significant increase in new residential developments in Rathnew, Ashford, and Wicklow. However, infrastructure has not kept pace with this growth.

112	Cormac Byrne and Emmett O' Byrne	There is a huge imbalance between the ongoing and proposed residential development and the infrastructure and services available in the Wicklow – Rathnew area.
Chief Executive Response		
<p>Wicklow Town – Rathnew is designated as a Key Growth Town and it is prioritised to accommodate a significant amount of population growth that requires housing, employment, social infrastructure, schools, etc. It is necessary to zone an appropriate amount of land for development to cater for this growth. The draft LAP has included the relevant objectives and land use zonings to facilitate the delivery of the necessary infrastructure and amenities alongside new residential development.</p> <p>In order to ensure key infrastructure, like roads and schools, are delivered in tandem with residential development, the delivery of such infrastructure is tied into a 'Specific Local Objectives' SLO, that require the delivery of the key infrastructure alongside the delivery of housing.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.2.4 Issue 4: Density at Transport Nodes

No.	Name	Issues Raised
84	Sean Doherty Ref 225718	There is significant available land around both transport nodes in Wicklow Town (bus and rail) that could see significant density improvements, especially around the rail station. The continuous development of low-rise and low-density urban sprawl, that has continued to happen in both Wicklow Town and Rathnew - away from public transport nodes, has only added to a greater transportation problem
Chief Executive Response		
<p>With regard to densities, any proposed development shall be expected to aim for the highest density appropriate as stated in Chapter 3 of the draft LAP and objective WTR5.</p> <p>Development Potential and Density</p> <p><i>In addition to the objectives of the County Development Plan and the 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 accessibility 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.</i></p> <p>WTR5</p> <p><i>In order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density appropriate given the site's location and access to services. The Council reserves the right to refuse permission for any development that is not consistent with this principle.</i></p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.3 Chapter 4- Economic Development

4.3.3.1 Issue 1: General

No.	Name	Issues Raised
11	Jackson Dsouza Ref 114733	Support for Local Businesses: Create initiatives that support local entrepreneurship through grants, mentorship programs, and low-interest loans. Promote local markets and festivals to encourage community engagement and shopping locally. Business Incubation Spaces: Develop co-working spaces or business incubation centers that provide resources and support for startups and small businesses. This can stimulate innovation and create job opportunities.
28	Wicklow Planning Alliance Ref 202425	It is highly unlikely that zoning itself will draw in high paying jobs. Claremont Hub for film industry unlikely to provide stable, full time jobs. Generally in support of the general direction of the zoning and phasing in the Draft Local Area Plan. Rationale for zoning of employment uses does not conform to OPR Practice Notes which recommend data led analysis of need to justify the chosen size and location.
29	Group Wicklow Town Team	Submitted that the zoning for Wicklow Tennis Club, Wicklow Rovers and Wicklow Town Soccer Clubs should be zoned as they were in the 2013/2019 Wicklow/Rathnew Development Plan (mixed use) and not as Active Open Spaces under the current draft development plan. The re-zoning of these lands for Active Open Space, forms a significant portion of the 30.4ha of additional land proposed to be zoned Open Active Space under the current draft plan. We would strongly recommend that the St Patrick's GAA Club site at Dunbur Road be zoned for mixed use. While acknowledging that the LAPs role is limited to land use and development, we feel that a number of small and large existing businesses along the North and South Quays in the town are either under-utilising their premises or are at capacity and which could relocate to sites on the outskirts of the town. This would provide opportunities for the redevelopment of these sites for more suitable town centre uses, e.g. Commercial/Residential/Tourism/Parking. There does not appear to be a clear strategy in the LAP to facilitate businesses that are expanding in this area, which aren't port related to expand elsewhere
75	Mairead Coffey Ref 175829	Need more employment opportunities. Too much housing.
83	Mia Merrigan Ref 202755	Economic development is very aspirational, when council doesn't look after roads etc to these areas to make them attractive.
84	Sean Doherty Ref 225718	<ul style="list-style-type: none"> ▪ Residential growth not matched by employment growth. ▪ The scale, type and quantum of development is not attracting customers into the town. ▪ More needs to be done to attract people and business into and around the town. The IDA, lobbied by the Council, needs to do more to attract entities to the county town. Higher densities of employment are required to sustain the town in the long-term.
97	Andrew Malone Ref 212613	Lack of available light industrial units in the area is causing small businesses to locate themselves elsewhere, leading to more unnecessary traffic on the roads. Availability would create or relocate local jobs
109	Melissa McNabb Ref 093952	No big employers in the town meaning a lot of people commute to Dublin daily. There is a huge workforce in Wicklow and Rathnew as well as surrounding areas such as Glenealy, Ashford and Rathdrum which would all benefit from larger employers in the town.

110	Silviu Ref 093814	<ul style="list-style-type: none"> ▪ Attracting opportunities for small businesses ▪ Creating more jobs opportunities
134	Lyndsay Martin Ref 161122	<p>Reliance on Dublin for employment resulting in long commutes for residents undermines economic sustainability of Wicklow and Rathnew.</p> <p>This trend not only burdens the N11 and public transport systems but also undermines the economic sustainability of Wicklow and Rathnew.</p> <p>The focus should shift toward creating local employment opportunities, particularly in areas south of Wicklow, to reduce dependency on Dublin and the associated transport challenges.</p>

Chief Executive Response

Submissions which refer specifically to the rezoning or de-zoning of employment lands are addressed under Chapter 11 Section 4.3.10.1 of this report.

While a land-use plan has no direct role in creating jobs or bringing new employers to the County, the plan can ensure that sufficient zoned land is available for employment uses and can set out objectives to facilitate this aim.

In this regard an established measure of the employment ‘health’ of a settlement is a measure called the ‘jobs ratio’. This is the relationship between the resident workers and the number of jobs in any defined area. At the time of the 2022 Census Wicklow Town had a jobs ratio of 0.7 while Rathnew Village had a jobs ratio of 0.56. Therefore, there is still room for improvement in Wicklow Town in terms of jobs creation and a clear need to provide for significantly more job opportunities in and close to the settlement of Rathnew. This requirement is reflected in the greenfield employment land use zonings in the settlement in particular at Charvey Lane/Milltown North SLO3 (7ha) which forms a logical extension of the existing Charvey Lane business park and Ballynabarney east of the R772 (6.4ha). To the north of the settlement Rathnew there is a second significant area of greenfield employment zoning located at Newrath (north of Wicklow County Campus).

The extent and various locations of employment zoned lands throughout the settlement presents opportunities for various formats of employment generating development to locate or expand within the settlement.

The lands zoned at Wicklow County Campus have an Objective *“To provide for educational facilities, research and development (R&D), and enterprise development uses”*. The Draft LAP notes that Wicklow County Campus is a unique asset with the potential to re-invigorate employment in the whole County, by combining third level education with a research and development hub with associate spin off businesses. It is considered a ‘County’ facility, with a regional draw. The Draft LAP also supports the development of adjacent employment zoned lands for higher order employment types.

Objective WTR13 seeks *“To support the development of Wicklow County Campus; to support the development of adjacent employment zoned lands for higher order employment types such as film / food / renewable energy”*. Noting the level of provision of greenfield employment zoned lands included in the Draft LAP, the unique character and history of Clermont and its grounds and its use as firstly a residential home and later as an education facility, it is considered that its use as an education, R&D and enterprise facility with associated spin off business is appropriate to this location in particular noting the emerging film and indigenous food industry in Co. Wicklow.

The future development of employment zoned lands is further supported in Chapter 4 Economic Development of the Draft LAP. Chapter 9 of the Wicklow County Development Plan 2022-2028 further supports further development of employment opportunities in Wicklow–Rathnew noting that the RSES identifies the settlement as a key town in the region. The following objectives in the 2022-2028 Wicklow County Development Plan specifically support the further development of employment in Wicklow-Rathnew:

RPO 4.54

“Support an enhanced role and function of Wicklow-Rathnew as the County Town, particularly as a hub for

employment, training and education”.

RPO 4.55

“Support Wicklow-Rathnew’s role in the provision of third level education at the Wicklow County Campus Rathnew (in association with Institute of Technology Carlow) and in particular, to support the development of the campus as a hub for the Film Industry and Screen Content Creation Sector”.

The draft LAP as a land use plan also acknowledges that there is potential for Wicklow and Rathnew Town/Village Centres to strengthen and promote economic development associated with retail and commerce and that there is huge potential to develop the settlement as a recreation and tourism hub, exploiting the settlements assets.

In addition the Economic Development and Employment Strategy for Wicklow Town-Rathnew further supports fostering entrepreneurial activity by promoting and supporting opportunities for training and education, and business start-up and incubator facilities.

The draft LAP as a land use plan also acknowledges that there is potential for Wicklow and Rathnew Town Centres to strengthen and promote economic development associated with retail and commerce and that there is huge potential to develop the settlement as a recreation and tourism hub, exploiting the settlements assets.

With regard to the quantum and location of lands zoned for employment, the CE is satisfied that the draft LAP provides for an appropriate amount of employment zoned land. The OPR Practice Notes provide information and guidance about specific areas of the planning system and in this case, guidance on ‘The Development Plan and Employment Lands’. They are non-statutory. In crafting the employment strategy of the draft LAP careful consideration was given to the policies and recommendations of the National Planning Framework and the Regional Spatial and Economic Strategy as well as the Economic Development Chapter of the County Development Plan, which includes details principles around the zoning of employment land. These principles, while prepared in advance of the OPR guidance note, are generally consistent with same.

With regard to reverting the zoning of the grounds of Wicklow Tennis Club, Wicklow Rovers and Wicklow Town Soccer Clubs and St. Patrick’s GAA club back to mixed use from the currently proposed AOS zoning, it is noted that the current active use on these lands is AOS. If and when these sports clubs choose to or have the opportunity to relocate, the land use zoning of these sites may be reconsidered.

Chief Executive’s Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.4 Chapter 5- Key Regeneration Areas

Topic: Wicklow Town Centre Strategy

4.3.4.1 Issue 1: Improvements to Wicklow Town Centre

No.	Name	Issues Raised
109	Melissa McNabb Ref 093952	Town losing character.
84	Sean Doherty Ref 225718	<ul style="list-style-type: none"> ▪ Town is unattractive to customers and the eye. ▪ The town requires a longer term strategic plan that makes it attractive to business, investors, customers and local inhabitants. Currently it fails to meet the majority of expectations
76	Lauryn Ref 180641	Major improvements needed in Wicklow town
6	Marian Nelligan Ref 170415	Vacant and Derelict sites should be used for retail at ground floor and residential at first floor. Council should put claiming order on premises where ownership cannot be location after a reasonable time period.

Chief Executive Response

It is acknowledged that some buildings and the public realm are in need of improvement in Wicklow town centre. It is a priority of the Planning Authority, through the County Development plan and the draft LAP, to facilitate development that would contribute to the improvement of the overall appearance and aesthetic appeal of the streetscape, including for example shopfront improvements, regeneration of vacant sites and public realm improvement schemes. A draft LAP is a plan that facilitates land use development and does not implement any of the actions/objectives of the plan.

Chapter 5 of the County Development Plan 2022-2028 refers to Town and Village Centres – Placemaking and Regeneration. Section 5.6, Town and Villages Centre Objectives (CPO 5.1-5.5) relate to targeting the reversal of declines in towns and villages, increasing the quality, vibrancy and vitality of our town and village centres and controlling uses that may have a detrimental impact on the vitality of the streetscape and the public realm. Objective CPO 5.3 specifically refers to promoting and facilitating residential development in town and village centres including promoting the concept of living over the shop in centres by considering a relaxation in density, car parking and open space standards where the proposal meets a very high quality of design and accommodation for residents.

CPO 5.6 relates to Regeneration and Renewal and includes specific objectives for the Regeneration and Renewal of Wicklow Town Centre and Rathnew Village Centre with a focus on the regeneration of the harbour, quays and the Murrough Coastal Area to facilitate a mix of uses and promoting regeneration proposals which will be heritage led reflecting Wicklow Town's historic town centre, including the restoration of the Abbey Grounds which is currently underway and the promotion of the Wicklow heritage trail and associated signage and lighting of key buildings.

In accordance with the Urban Regeneration & Housing Act 2015, the Planning Authority maintains a vacant site register and implements the vacant site levy. CPO 5.13 of the County Development Plan specifically relates to sites which are considered to be vacant or derelict. These areas which include Wicklow Town and Rathnew Village will be examined in detail to determine if there are sites where the Vacant Site Levy should be applied.

The Town and Village Renewal Scheme 2024, funded under Project Ireland 2040 focuses on objectives such as tackling vacancy and dereliction in towns and villages, regeneration projects that support active and vibrant town or village centres, town or village centre markets, upgrading shopfronts and street facades, projects on Irelands inhabited offshore islands, and green spaces and parks, etc. Funding of up to €50,000 has been made available for renewal projects. An expression of interest was made available for community groups to put forward their suggestions/submissions for utilising the grant.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.4.2 Issue 2: Retail, Entertainment and Leisure Facilities in the Town Centre

No.	Name	Issues Raised
109	Melissa McNabb Ref 093952	More facilities and shops needed. Comparisons made with retail offer Arklow, Gorey and Carlow
49	Rosaleen and Martin McNabb Ref 210520	Not enough shopping facilities to accommodate the new homes already built. Need to travel to Arklow, Bray or Dublin to purchase basic clothing and household items
48	Eileen Howell	Are there plans to development a broader retail and entertainment range in Wicklow Rathnew. Current LAP does not appear to make such provisions
63	Luciana Queiroz Rufino Ref 114036	More variety of shops for clothes with affordable prices. Have a cinema as well for leisure.
84	Sean Doherty Ref 225718	More needs to be done to attract people and business into and around the town. The IDA, lobbied by the Council, needs to do more to attract entities to the county town. Higher densities of employment are required to sustain the town in the long-term.
110	Silviu Ref 093814	Cinema, more coffee shops in the area
150	Helen Fitzsimons Ref 200032	There isn't much social infrastructure, The library tries hard and does a great job, but we are a growing town and we have no cinema or theatre.
Chief Executive Response		
<p>Chapter 10 of the County Development Plan 2022-2028 refers to Retail with Section 10.3 outlining the Retail Objectives. Objectives CPO 10.1 and 10.8-10.10 relate to Town Centres, which highlight the aim of planning policy is to ensure the continued vibrancy and vitality of town and village centres, to direct new development and investment into towns and villages in the first instance and to particularly prioritise actions that enhance business, retail, leisure, entertainment and cultural uses. The CDP acknowledges the need for significant enhancement and expansion of retail floor space and town centre activities to provide for the needs of the resident and working population in the town and surrounding catchment. The Retail Planning Guidelines aim to ensure planning plays a role in supporting competitiveness and choice in the retail sector.</p> <p>The CE is committed to the improvement of town centres to attract businesses. It is stipulated in the draft plan that the redevelopment and enhancement of retail uses in Wicklow Town and Rathnew Village Centres are supported. The draft plan facilitates more intense economic activity and job creation in the existing town and village centres in retail and retail services which can be referred to in the Centre and Retail Strategy, Chapter 2, Section 2.6., Employment Objective WTR11 - <i>'To support and facilitate all forms of employment development in Wicklow Town Centre and Rathnew Village Centre, particularly retail and retail services uses'</i>.</p> <p>The development plan does not dictate what development <i>will</i> happen, but puts in place the framework to facilitate and promote the development of these core areas as the focus of the settlement.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.3 Issue 3: One Way System

No.	Name	Issues Raised
152	Stephen and Nicola Mac Manus Ref 212550	Revert back to the two way system. Current one way system takes away from the natural flow of the town
104	Louise Rutledge Ref 070955	Reassess one way system, difficult to get through the town without delays. The small amount of extra street parking spaces made available through the one way system does not justify keeping it in place
98	Vincent Collard Ref 231629	One way system needs tweaking it has killed off shopping in the town
25	Thomas O Sullivan Ref 162950	One way system impacting on the number of vacant units in Town Centre.
84	Sean Doherty Ref 225718	<ul style="list-style-type: none"> ▪ One-way system might have brought some benefits in terms of traffic flow but has redirected traffic onto residential streets. Creates turning movements at Market Square for buses that have to cross the white line to make turning movements ▪ The one-way southbound system through the town will be the cause of unnecessary fatalities due to emergency services not being able to get through the town with a single lane of traffic.
100	Lisa McGettigan Ref 234627	Inefficient one way traffic system disrupting the town
75	Coffey Ref 175829	Inefficient one way system. It was supposed to be a trial, it's not working
24	Henry and Aoife Clarke, Seamus and Evelyn Ryan, David and Caroline O Neill Ref 185913	One way system should be maintained

Chief Executive Response

The Local Authority is committed to addressing local transportation issues and following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will evaluate and address all the issues detailed above.

Please also refer to Part XX of this report with respect to 'local roads / traffic management'.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.4.4 Issue 4: Car Parking and Accessibility

No.	Name	Issues Raised
84	Sean Doherty Ref 225718	Town suffering from parking shortages
28	Group Wicklow Planning Alliance Ref 202425	There is inadequate car parking in the town. Consideration should be given to building a multi-story car park at the existing Council car park behind the AIB (subject to appropriate sensitive design) and another at the eastern end of the town, perhaps behind the Gaol.
24	Henry and Aoife Clarke, Seamus and Evelyn Ryan, David and Caroline O Neill Ref 185913	Parking on the main street should be reserved for disabled, child, family and age friendly parking only and more charging stations.
1	David Czerniak Ref 203246	Poor accessibility for people with limited mobility. Wicklow town lacks appropriate wheelchair accessibility and limited resources for wheelchair users.
Chief Executive Response		
<p>The suggestion regarding possible accessibility improvements are noted and welcomed; the provisions of the CDP would fully support such enhancements; the delivery of such would however be an operational and funding matter. The CDP states that <i>'The Council will actively pursue public realm improvements and the provision of amenities that create more attractive places and encourage healthier lifestyles for people of all ages and abilities'</i>.</p> <p>Chapter 5, CPO 5.16 Placemaking objective states that public realm improvements that encourage healthier lifestyles for all ages and abilities are being actively pursued. CPO 5.23 Design objective requires new town centre developments; particularly public realm improvement works to incorporate the principles of universal design to create an accessible, usable, convenient and pleasurable environment for all users.</p> <p>In relation to perceived parking shortages, there are over 1,000 paid parking spaces available in and around the town centre of Wicklow at reasonable rates, which has been highlighted in the draft plan. These car parks are well located and convenient to the main town centre area and its side roads. Parking is purposely managed to make public transport, walking and cycling a more attractive option for availing of town centre services. Commercial needs are met by public car parking areas in the settlement.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p> <p>The Local Authority is committed to addressing local transportation issues and following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will evaluate and address all the issues detailed above.</p> <p>Please also refer to Part XX of this report with respect to car parking / car charging and accessibility & safety.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.5 Issue 5: Traffic Volumes, Vehicular, Pedestrian and Cyclist Movement

No.	Name	Issues Raised
100	Lisa McGettigan Ref 234627	Decline in quality of life due to high traffic volumes
84	Sean Doherty Ref 225718	Parking shortages, traffic routing, lack of quality pedestrian walkways of sufficient width and lack of cycle facilities.
28	Wicklow Planning Alliance Ref 202425	<ul style="list-style-type: none"> ▪ A reduction in traffic would improve the town centre experience ▪ May not be possible to remove cars from the main street but should be made clear that pedestrians have priority. ▪ Speed limit in the town centre should be reduced to 20kph

Chief Executive Response

With regard to overall movement, the Centres and Retail Strategy for Wicklow Town-Rathnew objectives focus on improving walking, cycling, and public transport infrastructure in both town centres to promote pedestrian movement and reduce traffic congestion. Many car parks are centrally located, contributing to traffic in the town centre. There is potential to alleviate this by better utilizing existing public car parks within in the settlement.

Additionally, the one-way system in the Town Centre Strategy offers an opportunity to improve the public realm, making it more attractive and accessible for pedestrians. The draft plan acknowledges and supports the improvement of both pedestrian and cycle infrastructure within the town centre.

The importance of better public transport is acknowledged and the draft plan includes objective to support this. However, the delivery of public transport is not a function of the development plan. Wicklow County Council will continue to actively engage with the National Transport Authority (NTA) regarding the roll out of the Connecting Ireland Rural Mobility Plan.

The Local Authority is committed to addressing local transportation issues and following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will evaluate and address all the issues detailed above.

Please also refer to Chapter 9, Topic 2: Transportation of this report.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.4.6 Issue 6: Big Belly Bins

No.	Name	Issues Raised
9	Darren Fitzgerald Ref 145647	<ul style="list-style-type: none">▪ More big belly bins▪ Greystones seafront has loads of them
Chief Executive Response		
<p>It is not within the remit of the draft LAP to deliver such infrastructure, this is the responsibility of Wicklow's Municipal District. This request will be brought to the attention of the Municipal District team.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

Topic: Rathnew Village Centre Strategy

4.3.4.7 Issue 1: Public Realm, Retail and Business Opportunities.

No.	Name	Issues Raised
76	Lauryn Ref 180641	Major improvements needed on Rathnew village
48	Eileen Howell	Are there plans to development a broader retail and entertainment range in Wicklow Rathnew. Current LAP does not appear to make such provisions
110	Silviu Ref 093814	Small business opportunities
83	Mia Merrigan Ref 202755	<ul style="list-style-type: none"> ▪ Council don't look after roads etc to make these areas attractive. ▪ Rathnew Village Centre Strategy is relying on private property to be the focus or green link for the village even though access can be removed at any given time e.g. Ashford playground. ▪ Part of strategy to not be absorbed as suburb of Wicklow town is not being maintained.
Chief Executive Response		
<p>It is acknowledged that the public realm is in need of improvement in Rathnew Village centre. It is a priority of the Planning Authority, through the County Development plan and the draft LAP, to facilitate development that would contribute to the improvement of the overall appearance and aesthetic appeal of the village streetscape, including for example shopfront improvements, regeneration of underutilised sites and public realm improvement schemes. A draft LAP is a plan that facilitates land use development and does not implement any of the actions/objectives.</p> <p>Chapter 5 of the County Development Plan 2022-2028 refers to Town and Village Centres – Placemaking and Regeneration. Section 5.6, Town and Villages Centre Objectives (CPO 5.1-5.5) relate to targeting the reversal of declines in to towns and villages, increasing the quality, vibrancy and vitality of our town and village centres and to control uses that may have a detrimental impact on the vitality of the streetscape and the public realm. Objective CPO 5.3 specifically refers to promoting and facilitating residential development in town and village centres including promoting the concept of living over the shop in centres by considering a relaxation in density, car parking and open space standards where the proposal meets a very high quality of design and accommodation for residents.</p> <p>CPO 5.6 relates to Regeneration and Renewal and includes specific objectives for the Regeneration and Renewal of Wicklow Town Centre and Rathnew Village Centre with a focus on strengthening and revitalising the urban structure of Rathnew to provide a stronger streetscape and enhanced public realm, capitalising on the potential to deliver compact growth and mixed use development on underutilised sites.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.8 Issue 2: Amenities and Residential Development

No.	Name	Issues Raised
71	Carolyn Flynn Ref 163207	Lack of amenities in Rathnew village need to be reviewed ahead of proposed residential development
95	F McGetti Ref 215343	Rathnew over zoned for housing. Need infrastructure before development
24	Henry and Aoife Clarke, Seamus and Evelyn Ryan, David and Caroline O Neill Ref 185913	Lower density zoning is requested around the village of Rathnew
Chief Executive Response		
<p>Wicklow Town – Rathnew is designated as a Key Growth Town and it is prioritised to accommodate a significant amount of population growth that requires housing, employment, social infrastructure, schools, etc. It is necessary to zone an appropriate amount of land for development to cater for this growth. The draft LAP has included the relevant objectives and land use zonings to facilitate the delivery of the necessary infrastructure and amenities alongside new residential development.</p> <p>In order to ensure key infrastructure, like roads and schools, are delivered in tandem with residential development, the delivery of such infrastructure is tied into a 'Specific Local Objectives' SLO, that require the delivery of the key infrastructure alongside the delivery of housing.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.9 Issue 3: Biodiversity and Ecology

No.	Name	Issues Raised
24	Henry and Aoife Clarke, Seamus and Evelyn Ryan, David and Caroline O Neill Ref 185913	Ecological Protection for the Murrough SAC and Broadlough SPA from high density housing developments, detailed plans for drainage and pollution from must be provided
81	Bill Clare Ref 191200	Loss of biodiversity and wildlife by allowing more housing to be built on greenfield sites in Tinakilly.
87	Claire McGettigan Ref 203844	Environmental and cultural importance of Tinakilly avenue being destroyed by housing developments. Foresight to turn this green space into national park geared towards tourism not housing.
Chief Executive Response		
<p>Ecological protection of these sites is a priority. Development plans must comply with relevant EU Environment Directives and applicable National Legislations, Policies, Plans and Guidelines, listed under CPO 14.4, Section 17.4 Natural Heritage and Biodiversity Objectives of the County Development Plan 2022-2028. In line with these statutory biodiversity objectives development proposals must contribute to the protection and, where possible, enhancement of the ecological coherence of the European Site network. The conservation value of proposed and future Natural Heritage Areas (NHAs), as well as other designated ecological sites, must be maintained and protected. Ecological impact assessments are required for developments likely to affect NHAs, proposed NHAs, Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or legally protected species and their habitats, with appropriate avoidance and mitigation measures integrated into proposals.</p> <p>As CPO 9.44 of the County Development Plan states, the council will only permit development that does not cause pollution or degradation of wildlife habitats, natural waters or areas of ecological importance.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.10 Issue 4: Parks and Open Space

No.	Name	Issues Raised
24	Henry and Aoife Clarke, Seamus and Evelyn Ryan, David and Caroline O Neill Ref 185913	Lack of usable green open space in Rathnew.
27	Amanda Cummins Ref 151653	Not enough green space to serve the level of residential development.
100	Lisa McGettigan Ref 234627	Need to respect existing built fabric and residential amenities, maintaining existing parks and other open areas within the settlement.
Chief Executive Response		
<p>The development and design standards required for open space are set out in Section 8, Appendix 1 of the County Development Plan 2022-2028, including open space, parks, equipped play spaces, residential open space and private open space.</p> <p>A Social Infrastructure Audit is conducted prior to the development of a local area plan to evaluate whether the provisions of open space are met and to identify and address where there are shortfalls (if any).</p> <p>The draft plan recognises the importance of accessible open space and recreational facilities for quality of life and has highlighted a shortfall of Active Open Space. Chapter 2 outlines some of the key objectives in relation to open space under the community development strategy section:</p> <ul style="list-style-type: none"> ▪ To facilitate the development of a range of high quality community, educational, open space and recreational facilities that meet the needs of the local population. ▪ To require new community, open space and recreational facilities be developed in tandem with new housing. ▪ To facilitate healthy place-making with a well-designed public realm which includes public spaces, parks, playgrounds and safe streets with access for all <p>Having regard to the needs identified through the Social Infrastructure Audit and from public consultation, this plan zones 30.4ha of additional undeveloped lands, or future open space development.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.11 Issue 5: Heritage

No.	Name	Issues Raised
92	Richie Dignam Ref 211333	Overdevelopment in Rathnew, loss of heritage and lack of care for historic residents' feelings. Rathnew losing its heritage and identity.
98	Vincent Collard Ref 231629	Funding for unique projects in Rathnew, Rebuilding the Coach House as a local hub/arts/historical venue
160	Mark McGettigan Ref 223707	Rathnew has lost its unique character
Chief Executive Response		
<p>The heritage strategy of the draft LAP for Wicklow Town/Rathnew includes protecting natural, architectural, archaeological and maritime heritage and promoting greater appreciation of, and access to, local heritage assets.</p> <p>Rathnew Village Centre Strategy Objectives WTR40 & WTR45 relate to the enhancement and improvement of local heritage assets in Rathnew.</p> <p>The draft plan acknowledges Rathnew's unique built heritage and recognises the preservation of its architectural legacy relies on identifying the most valuable structures and carefully redeveloping surrounding sites and properties.</p> <p>Funding for individual projects is outside the remit of a local development plan, however, the objectives are established to encourage and enable the growth of heritage-led regeneration initiatives.</p> <p>Funding for such a project may be applied for via community funding schemes such as the Town and Village Renewal Scheme.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

Waterfront Zone Strategy (incl. Murrough South, Harbour & Port)

4.3.4.12 Issue 1: Protection of Coastline

No.	Name	Issues Raised
6	Marian Nelligan Ref 170415	Provision of engineered coastal erosion solution and provision of hard core path from railway entry to the Murrough towards Killoughter
29	Wicklow Town Team	Protection of coastline and Dublin to Rosslare railway line.
83	Mia Merrigan Ref 202755	Unsuitable stone barriers making it more difficult to walk as exacerbated erosion in the area where it stops
88	Deirdre Moore Ref 205344	Murrough needs to be protected urgently
Chief Executive Response		
<p>The County Development Plan 2022-2028 contains marine objectives facilitating an integrated coastal management approach to ensure conservation, management and protection of natural resources of the coastal zone. The provisions of the Draft Plan fully support the protection and enhancement of natural coastal defences (CPOs 14.04, 19.5, 19.7, 19.9, 19.12, 19.15 refer). Chapter 19, Cell 7 highlights a study carried out in 2007 on Coastal Protection of the Murrough which indicated despite significant coastal erosion, limited intervention was recommended in light of the environmental impacts of coastal protection works.</p> <p>Rock armour and breakwaters were previously put in place to minimize the threat of coastal erosion however to address further erosion Irish Rail are undertaking the East Coast Railway Infrastructure Protection Projects (ECRIPP) to protect the coast and rail line from erosion. While the slow pace of the process is appreciated, design development must adhere to protocol and satisfy legislative requirements for Environmental Impact Assessments, Appropriate Assessments and public consultation before progressing. Ultimately, the project relies on securing planning permission and exchequer funding to go ahead.</p> <p>Coastal Erosion Management Objectives (WTR81-WTR81) of the draft LAP address coastal defences and flood defence management.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.13 Issue 2: Toilets, Showers and Locker Facilities at the Harbour

No.	Name	Issues Raised
6	Marian Nelligan Ref 170415	To have serviced public toilet facilities at the port and harbour that are available throughout the day
66	Paula Humby Ref 141200	Provision of toilets, showers and shelter to leave bags
83	Mia Merrigan Ref 202755	Murrough not been protected by the plan, there are provisions made for public toilets or facilities to be introduced
Chief Executive Response		
<p>Waterfront Regeneration Objective WTR55 references the facilitation of amenity areas along the Murrough including toilet buildings. While cognisance must be given to the protection of the environment as part of any proposals to facilitate development in the Murrough area, the draft plan does facilitate the development and enhancement of the area while respecting its unique historical, maritime, environmental and visual amenity. However, it is not within the remit of the draft LAP to deliver such services/infrastructure; this is the responsibility of Wicklow's Municipal District. This request will be brought to the attention of the Municipal District team.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.14 Issue 3: Tourist and Recreation Facilities

No.	Name	Issues Raised
84	Sean Doherty Ref 225718	The opportunity should be used to offset levies for provision of community facilities associated with water based activities – boating, swimming, fishing etc.
110	Silviu Ref 093814	Creating more sports/water activities

Chief Executive Response

The County Development Plan 2022-2028 states while the ecological protection of the Murrough SAC/SPA is a priority, there is a potential to expand the range of recreational and tourist facilities associated with its coastal location. The strategy for the waterfront includes significantly enhancing the recreational and leisure amenity potential of the harbour beach and Murrough park area. Waterfront Regeneration Objective WTR51 of the draft LAP promotes the use of the harbour, waterside, and landside for water-based leisure and recreational activities, where appropriate, provided it does not interfere with the port's commercial operations or compromise the environmental quality of the surrounding area.

The RSES emphasises the importance of retaining and reinforcing the North Quays commercial function to ensure it does not become targeted for residential/leisure activities as it would undermine the important asset that the deep water berth provides. While leisure activities are welcomed at the pleasure harbour these activities/structures must be appropriately controlled and designed to ensure it does not affect the commercial port. However, it is not within the remit of the draft LAP to deliver such services/infrastructure.

On foot of this submission, no amendments to the LAP are deemed necessary.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.4.15 Issue 4: Redevelopment and Regeneration of the Murrough, Harbour and Port Area

No.	Name	Issues Raised
84	Sean Doherty Ref 225718	There is significant opportunity to develop a game changing environment on the Murrough, harbour and port that could include increases in residential density, recreation and business usage. Density of development and connectivity will be paramount and both sides of the Murrough should be considered to create a more appealing space.
110	Silviu Ref 093814	Redeveloping the Murrough
83	Mia Merrigan Ref 202755	Inappropriate unsightly businesses given permission to locate in the area (metal transfer station, old corn company), waste left behind
Chief Executive Response		
<p>The County Development Plan and the draft Local Area Plan recognises the redevelopment potential of the Murrough and both of the plans facilitates the regeneration of the Murrough area.</p> <p>CPO 5.6 of the County Development Plan 2022-2028 emphasizes the regeneration of the harbour, quays, and the Murrough coastal area as a key priority. It highlights the potential to foster a mix of uses in the area, promoting economic development, enabling compact growth, and enhancing amenities.</p> <p>The draft LAP recognises the huge potential for regeneration and compact growth at the waterfront. Employment Objective WTR10 'To support and facilitate existing and future commercial port activities, in line with the Waterfront strategy (Chapter 5) and to resist developments that would undermine the commercial potential of the port area'. As the draft plan stipulates, enhancing the public realm, creating connectivity and linkages is vital to the success of the areas future development. It also acknowledges its potential to become a vibrant high density mixed use area, capable of providing the residential and employment demands for compact growth of the town.</p> <p>Please also refer to Chapter 8 Tourism, Issue 2: The Murrough.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.4.16 Issue 5: Facilitate onshore Infrastructure/buildings to serve Offshore Renewables

No.	Name	Issues Raised
132	Codling Wind Park Ref 153852	<p>Welcomes the inclusion of onshore infrastructure/buildings associated with offshore renewable energy activities and maritime infrastructure in the list of priority uses within Area 1, Wicklow Port.</p> <p>For clarity, it is assumed that the statement relating to proposed warehousing (pages 35 and 64 of the written statement), does not apply to CWP Project OMB facilities. Areas of storage will form part of the proposed OMB facility but would not be considered as warehousing. A statement making this distinction clear would be welcomed.</p>
Chief Executive Response		
<p>The draft LAP includes the following statement <i>"Large scale storage / warehousing, even where associated with maritime operations, will not be considered suitable in the WZ zone due to its high land take compared to the small area of the WZ zone; adequate alternative areas of zoned land are available within the settlement that would be suitable for such use."</i></p> <p>The 'warehousing' referred to here is considered to be a large building where raw materials or manufactured goods may be stored prior to their distribution. Storing small spare parts and consumables required for maintaining the wind farm in a unit associated with the O&M of the windfarm is open for consideration in Area 1.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.5 Chapter 6 Retail and Opportunity Sites

4.3.5.1 Issue 1: Retail Offer

No.	Name	Issues Raised
109	Melissa McNabb Ref 093952	Need more retail. Comparisons made with retail offer in Arklow, Gorey and Carlow
49	Rosaleen and Martin McNabb Ref 210520	Not enough shopping facilities to accommodate the new homes already built. Need to travel to Arklow, Bray or Dublin to purchase basic clothing and household items
63	Luciana Queiroz Rufino Ref 114036	More variety of shops for clothes with affordable prices.
110	Silviu Ref 093814	<ul style="list-style-type: none"> ▪ Around the Murrough warehouses, have a small shopping centre. ▪ more coffee shops in the area ▪ Small business opportunities
Chief Executive Response		
<p>The provisions of the County Development Plan 2022-2028 support the enhancement of retail within the town, and ample lands are zoned Town Centre that would be suitable for development. The plan stipulates that retail development should be facilitated and encouraged in town / village centres. The objectives of the CDP aim to reduce leakage of retail expenditure from county Wicklow to other counties, and to meet the needs of existing and future residents up to 2031. The need for significant enhancement in retail offerings is recognised within the plan, and the provisions in the draft local area plan facilitate this as much as possible. However, this is the extent of the role of a local development plan and whether developments materialise is subject to funding and individual land owners coming forward, through the planning application process, with such proposals.</p> <p>It is vital that any new retail development is located within the Town Centre as rural towns have struggled to retain vibrancy with the development of out of town shopping centres. CPO 10.20 states there shall be a general presumption against large out of town retail centres. Therefore, such development will not be considered to address the retail deficiencies.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.5.2 Issue 2: Use of Vacant and Derelict Sites in Town Centre for Retail

No.	Name	Issues Raised
6	Marian Nelligan Ref 170415	Vacant and Derelict sites should be used for retail at ground floor and residential at first floor. Council should put claiming order on premises where ownership cannot be located after a reasonable time period.
Chief Executive Response		
<p>The CDP has policies and objectives that outline and support the need for regeneration and renewal in the face of closures and dereliction especially in the built up areas of our towns. Chapter 5, Section 5.4, of the CDP, outlines the priorities/goals of the CDP when it comes to issues of vacancy, regeneration and brown field development.</p> <p>In accordance with the Urban Regeneration & Housing Act 2015, the Planning Authority maintains a vacant site register and implements the vacant site levy. CPO 5.13 of the County Development Plan specifically relates to sites which are considered to be vacant, it sets out the criteria, in line with the legislation, to assess potential vacant sites. These areas which include town centre / mixed use zones in Wicklow Town and Rathnew Village will be examined in detail to determine if there are sites where the Vacant Site Levy should be applied.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.5.3 Issue 3: Provision of a Cinema

No.	Name	Issues Raised
63	Luciana Queiroz Rufino Ref 114036	Need a cinema for leisure
110	Silviu Ref 093814	A cinema is needed in the town for the kids
150	Helen Fitzsimons Ref 200032	We have no cinema or theatre
75	Mairead Coffey Ref 175829	Cinema needed
Chief Executive Response		
<p>Planning policy acknowledges the contribution of leisure/recreation facilities to quality of life for all, and objectives within the draft plan facilitate the development of a range of recreational facilities that meet the needs of the local population. However, due to the pandemic alongside the volume of at home streaming services available, cinemas have experienced a huge decline in demand. Therefore, while zoning facilitates the development of a cinema, the delivery is not within the remit of the Council or a Local Area Plan.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p> <p>Please also refer to Appendix 2, Social Infrastructure Audit, Issue 2: Provision of Community, Leisure and Entertainment Facilities.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.6 Chapter 7 Community Development

4.3.6.1 Issue 1: Schools, Childcare/Crèches and Services in particular Healthcare

No.	Name	Summary of issues raised
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O Neill. Ref 185913	Need more schools and childcare facilities.
25	Thomas O Sullivan Ref 162950	Insufficient schools and doctors to cater for the level of new residential development.
26	Emer Cashman Ref 105147	The rate of residential development in Wicklow town/Rathnew is causing extreme pressure on essential services such as GP, dental services and school places.. All children living in the local area deserve school places.
27	Amanda Cummins Ref 151653	There are insufficient, schools and doctors to cater for the level of new residential development.
60	Peter Dignam Ref 121504	There are insufficient, schools and doctors to cater for the level of new residential development.
65	Niamh Breslin Ref 135501	Not enough schools and doctors.
66	Paula Humby Ref 141200	Need more schools and sports facilities to cope with growing population.
71	Carolyn Flynn Ref 163207	Need to review the lack of amenities in and around Rathnew village before proposing more residential building. There is a shortage of school places, parks, youth amenities.
72	Anna Pocock Ref 163511	Not enough schools. Doctor and dental appointments are difficult to access.
75	Mairead Coffey Ref 175829	Too much housing and not enough services.
76	Lauryn Ref 180641	Lack of school places in schools/crèches.
87	Claire McGettigan Ref 203844	There is a lack of school places. All the local schools have waiting lists. Not enough GPs, dentists etc.
88	Deirdre Moore Ref 205344	Too much pressure on schools and medical facilities
89	Sinéad Ryan Ref 211109	Not enough school places. Parents of children in the new housing estates in Rathnew/Wicklow are having to travel further afield as they cannot secure places in the local schools. People should be able to be educated in schools near to where they live, which can have a positive impact on our carbon footprint. Crèches are at capacity causing undue stress for parents. Lack of GP capacity. Doctors are not accepting new patients.
90	Louiaw McNabb Ref 202834	Lack of school facilities.
95	F Mc Ref 215343	The intention of this plan is to build thousands of more houses with no provision for schools, playing pitches, doctors, running track, internet access, Garda station etc.
96	James O'Neill Ref 230742	Wicklow is currently over capacity with residential housing with not enough resources to cope with demand.

97	Andrew Malone Ref 212613	Not enough school places. GP services cannot cope with the increase in population.
100	Lisa McGettigan Ref 234627	WTR6 states: Housing development shall be managed and phased to ensure that infrastructure and in particular, community infrastructure is provided to match the need of new residents. Infrastructure has not kept pace with residential development. There is a shortage of essential services such as GPs, dentists, and schools, which are now reaching capacity and have waiting lists.
101	Ann O Sullivan Ref 060729	Not enough doctors dentist childcare school places
112	Cormac Byrne and Emmett O'Byrne	Not enough school places, crèche places, GP's etc Where is the inbuilt capacity in this draft plan to cope with the needs of the population?
117	Helen Doyle Ref 120257	Schools are over capacity and it is difficult to get a doctor's appointment.
134	Lyndsay Martin Ref 161122	Population of Rathnew has grown, more than doubling in the last few years. Infrastructure/services have not increased at the same rate. Healthcare is lacking.
140	Beata Farcas Ref 164606	Need more schools.
160	Mark Mcgettigan Ref 223707	Stop further development. There are not going to be enough school places and further facilities for this increased population.
165	Clare McEvoy Ref 234603	More schools need to be built immediately for the new residential zoning, and for the recently built housing. I see land has been zoned CE - but this needs to be prioritised to be built now.

Chief Executive Response

Primary and Secondary School Provision

The draft LAP, in combination with the Social Infrastructure Audit appendix of the LAP has carried out a full audit of primary and secondary school capacity in the settlement of Wicklow-Rathnew. The Social Infrastructure Audit identified that there may be a need for additional primary and secondary school places in the settlement by 2031 to cope with the growth in demand within the settlement itself and the rural catchment it serves.

The draft LAP has zoned the required amount of land for Community (CE), which allows for schools to be developed for the future needs of the population of the settlement and its catchment based on the findings of the accompanying Social Infrastructure Report.

The LAP as a land use plan, can facilitate the provision of new schools through appropriate land use zoning however, it should be noted that the purchase of lands and provision / development of schools is outside the remit of the LAP and the Local Authority. The provision of primary and secondary school facilities in Ireland is determined on an area specific basis by the DoEd, having regard to available school capacity, demographic projections, an analysis of child benefit records, and local travel pattern modelling.

The DoEd is monitoring the demand for and provision of schools in the LAP area on an ongoing basis and WCC will continue to consult and liaise with the DoEd in this regard.

In accordance with objectives CPO 7.10, CPO 7.11 and CPO 7.12 of the County Development Plan, the Local Area Plan has zoned a number of sites within the plan area for 'Community and Education' that have the potential for the future provision of primary and post primary schools.

The following undeveloped / brownfield lands have been zoned Community and Education (CE) for the potential development of new schools within the settlement in the future, and should be specifically reserved in the plan for school development only.

These 3 sites have been selected following a detailed Transport Assessment and where it was clear that there was a gap in primary/secondary school provision within 15 minute walk of existing and proposed residential communities in these areas. From this assessment it is clear that there is a need for a primary school site to the north east of Rathnew village (Rosanna) and to the south west of Wicklow Town (Ballynerrin).

With regard to secondary schools it is clear that there is a need for a site in Rathnew, hence the lands at Ballybeg have been zoned for a secondary school site.

Zoned Undeveloped Land for a School		
Location	Zoning	Area (ha)
Marlton Road, Ballynerrin Lower	Community & Education	3.5
Ballybeg, Rathnew	Community & Education	5
Rosanna Lower	Community & Education	2

It is considered that these undeveloped/brownfield sites could be developed to provide for new schools in the area when the DoEd deem there is sufficient demand and funds available to facilitate the development of new schools in the area. The sites are located so that they are sufficiently distanced away from existing primary and secondary schools so that they will cater for the existing and future residential development within a 15 minute walk of the chosen site location.

In terms of primary and secondary school provision no amendments to the LAP are recommended.

Childcare/Crèches

The draft LAP, in combination with the Social Infrastructure Audit appendix of the LAP has carried out a full audit of childcare/crèche capacity in the settlement of Wicklow-Rathnew. The Social Infrastructure Audit identified that Childcare facilities in Wicklow Town - Rathnew are at capacity with many operating waiting lists.

In line with objective CPO 7.5 of the CDP a Social Infrastructure Audit has to be carried out alongside any planning application for a new housing development of a significant number of units, to determine the need / capacity of a childcare facility.

In addition Objective CPO 7.29 of the CDP requires that *“where considered necessary by the Planning Authority, to require the provision of childcare facilities in all residential developments comprising 75 houses or more (including local authority and social housing schemes). In accordance with Department of Environment, Heritage & Local Government guidelines, childcare places shall be provided at a ratio of 20 places per 75 residential units, having regard to cumulative effects of permitted development, (unless it can be demonstrated that having regard to the existing geographic distribution of childcare facilities and the emerging demographic profile of the area that this level of childcare facilities is not required). Without substantial cause, it is the policy of the Planning Authority not to allow a change of use of these premises within five years”.*

It should be noted the Local Authority cannot control the type of childcare spaces (baby, toddler, pre-school) to be provided in each facility. This is determined in terms of viability of a business for the end user. With respect to who is generally responsible for delivering childcare facilities, this is very much so

developer led.

In terms of the residential development in Tinakilly, a childcare facility was constructed offsite at Broomhall. This facility is within a 15 minute walk of the permitted dwellings in Tinakilly and is beside 2 primary schools making it convenient for parents with multiple drop offs. The purpose-built dedicated crèche permitted under PRR19/853 provides co-located childcare services to serve the residential development at Tinakilly and Burkeen Hall (circa 500 units). This childcare facility is now operating as Little Harvard Broomhall.

Having regard to the projected growth in the settlement, the capacity and number of childcare facilities needs to be increased to meet demand. The location of these facilities should follow in new residential areas or at appropriate locations near schools.

It is noted that the Zoning Matrix childcare/crèches can be developed on the following land use zonings in the LAP area -Residential (RN/RE), Wicklow County Campus (CC) and Waterfront (WZ) however childcare/crèche facilities are also open for consideration on other land use zonings. It is recognised that this may not be clear in the draft LAP. It is therefore recommended that the text in the zoning matrix be amended to include childcare/crèche under the following land use zonings: Residential (RN/RE), Town and Village Centres (TC/VC), Neighbourhood Centres (NC), Wicklow County Campus (cc), Employment (E), Waterfront Zone(WZ) and Community and Educational (CE) as follows:

Community Uses are listed in RN, RE, TC/VC, NC, LSS, WCC, E, WZ, CE

Healthcare

There are no national standards for health provision in Ireland relating to the provision of primary care facilities, residential care facilities or the number GPs practising per head of population.

The Health Service Executive (HSE) estimates that a typical primary care centre can serve a population of between 10,000– 20,000. Wicklow Primary Care facility is located on the Drumkay Road, with the Wicklow HSE Local Health Office located on Glenside Road, both in Wicklow Town. Provision of health facilities and GP surgeries are a matter for the Health Service Executive (HSE), however the LAP endeavours to facilitate the provision of such facilities through flexible zoning provisions and development objectives / standards; in particular the development of new health care facilities that is supported in a wide range of land use zone categories

See also Section 4.3.11, Appendix 2 Social Infrastructure Audit of this report.

Chief Executive's Recommendations

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 with regard to CE zoning/provision of schools.

Amend uses generally permitted under Residential (RN/RE), Town and Village Centres (TC/VC), Neighbourhood Centres (NC), Wicklow County Campus (CC), Employment (E), Waterfront Zone (WZ) and Community and Educational (CE) to include childcare/crèche

4.3.6.2 Issue 2: Provision of Active Open Space, Sports Facilities and Public Parks

No.	Name	Issues Raised
11	Jackson Dsouza Ref 114733	Need to invest in the creation and maintenance of public parks and recreational facilities to enhance community well-being and provide spaces for social interaction.
22	Inbhear Dee Athletic Club Ref 130259	<ul style="list-style-type: none"> ▪ Allocation of AOS done in an ad hoc manner with residential first and then AOS allocated. ▪ Numerous plots all over the town. Government strategy is clearly encouraging clubs to share spaces. The LAP seems to counter that strategy. ▪ Would like to see SLO6 residential changed to AOS, which would see the larger area running from Hawkstown road to Rocky road becoming one large block allocated for formal sports facilities. This would compensate for the fact that none of the AOS from the last LAP actually became AOS, so there is shortfall in space allocated for clubs to grow. ▪ Currently 450 juveniles on waiting lists in Wicklow town area. A large sports hub, which would have multiple entry points from both the Rocky Road, and Hawkstown road, will give the community a focus, it will suit parents/guardians as they may be dropping multiple kids to various sports, it keeps traffic through the town clearer. ▪ It has the potential space to develop playgrounds and rent out space to commercial Fun Zone/Gyms etc, to help cover the running costs. For Inbhear Dee a running/walking trail could be put around the perimeter with solar lights which would take our athletes off the road in winter
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O Neill. Ref 185913	Need more AOS around Tinakilly/Rathnew as current open space areas flood or are wetlands. Lack of AOS in Rathnew noting level of development.
28	Wicklow Planning Alliance Ref 202425	Lack of provision of sporting activities close to the heart of the town. Larger sites need to be identified to provide shared facilities.
29	Wicklow Town Team	Deficit in Sports and Recreation facilities when compared with Greystones. AOS zoning in the plan is insufficient.
30	Stephanie Gavin Ref 110933	Lands around Wicklow Educate Together National School zoned for sports and for priority 2 housing. Priority 2 housing should also change to sport and community too. Current provision of AOS insufficient.
31	Andrew Sullivan Ref 115529	Residential zoning at SLO6 should change to AOS. This will compensate for the 37 acres in Tinakilly that were never developed and allow for a large sports facility.
32	Shane Cowell Ref 120640	Land along Hawkstown Road should be used for sports and recreation use. Lack of facilities on this side of the town.
33	Orla Malone Ref 122859	Submission 33-35 inclusive have been grouped together noting that these submissions had similar wording: <ul style="list-style-type: none"> ▪ Residential zoning at SLO6 should change to AOS. This will compensate for the 37 acres in Tinakilly that were never developed and allow for a large sports facility.
34	Robert Byrne Ref 123040	
35	Deirdre Malone Ref 123205	

36	Caoimh Bruton Ref 124533	The residential zoning at SLO6 should change to AOS.
39	Catherine Ryan Ref 134204	The Residential zoning at SLO6 should change to AOS. This will compensate for the 37 acres in Tinakilly that were never developed and allow for a large sports facility.
42	Siobhan Connery Ref 155959	Change the Residential zoning at SLO6 to AOS. This will compensate for the 37 acres in Tinakilly that were never developed and allow for a large sports facility with the potential for a 2km running track for local athletic club Inbhear Dee.
44	Fiona Fitzsimons Ref 164436	Change the Residential zoning at SLO6 to AOS. This will compensate for the 37 acres in Tinakilly that were never developed and would provide facilities for a number of local sports clubs.
56	Lynda Bremner Ref 111936	The existing clubs have become oversubscribed and severely lacking safe space and access to even basic amenities. It would be prudent to allow as many of these organisations share a common site, benefiting from the facilities as a destination for sport and recreation together. The Residential zoning at SLO6 change to AOS to allow a greater integrated piece of land be dedicated solely for the sports and recreational needs of this growing community.
61	Wicklow Tennis Club Ref 121422	Wicklow Tennis Club needs to expand racket sports in Wicklow. In need of covered tennis courts and development of new padel courts and Pickleball courts. Due to expanding population of Wicklow Town and not having room at our present location we submitter deems it essential for the improvement of racket sports in Wicklow to be able to expand.
64	Wicklow Squash Club Ref 122833	The submitter wishes to establish Wicklow Squash Club comprising of 3 indoor courts, shared locker rooms, showers, and communal area with other clubs , for example local boxing club, athletics club and basketball club. The Residential zoning at SLO6 should change to AOS and would in some way compensate for the 37 acres in Tinakilly that were never developed as AOS. This would also have huge potential to develop multiple sporting facilities for our future generations. The location would allow the possibility for teenagers / children to walk from local schools while also allowing traveling teams to Wicklow for matches have easy access.
66	Paula Humby Ref 141200	Need more schools and sports facilities to cope with growing population.
68	Anne Marie Kelly Ref 150042	Need sports facilities that are well-lit, safe ground with easy access for all is required. The town has grown but the facilities have not.
79	Jenny Keogh Ref 184601	We need more green spaces.
80	Catherine Clare Ref 184937	Need more amenities in the area.
83	Mia Merrigan Ref 202755	There are no parks, play areas, walks in the area that provide a walk into nature for both young and old where they are not beside a busy road or by a private housing estate.

84	Sean Doherty Ref 225718	Provision of sports facilities has not grown with residential development. Need more AOS. The elected members and council, as a planning authority, should be using their powers and knowledge to ensure useful spaces are provided in residential zones.
90	Louiaw McNabb Ref 202834	Lack of green spaces and Active Open Space.
95	F McGetti Ref 215343	The intention of this plan is to build thousands of more houses with no provision for schools, playing pitches, doctors, running track, internet access, Garda station etc.
96	James O'Neill Ref 230742	Wicklow is currently over capacity with residential housing with not enough resources to cope with demand
97	Andrew Malone Ref 212613	Local sports clubs are under resourced and many require development of current facilities/ completely new facilities to deal with the influx of new members. Public recreation areas are few, and far between and the ones we have are threatened by developments.
98	Vincent Collard Ref 231629	A running track in the area and facilities for other track and field sports would be nice. Green Infrastructure must be welcomed.
100	Lisa McGettigan Ref 234627	Currently sports clubs are already struggling, 450 kids (and growing) on waiting lists and this new development plan will mean no new facilities until 2029.
103	Louise Rutledge Ref 065711	Change the Residential zoning at SLO6 to AOS. Rezoning this land will enable much needed sports and active facilities to be developed for the residents in the town.
109	Melissa McNabb Ref 093952	The towns sporting facilities is also at breaking point. Wicklow town as the county town has 1 full sized GAA pitch, with thousands of potential members this is not good enough. More thought and development should be put into sporting facilities so that there is sufficient space provided. Even the area at SLO4 could be used as ground for sporting facility as it is in the middle of Wicklow and Rathnew. Inbhear Dee Athletic club has been advocating for a Sports facility for decades. As mentioned, some of the SLO areas should be reconsidered for sporting areas.
110	Silviu Ref 093814	Improve Coral leisure, extending the facilities like the gym, saunas, refurbishment needed. More pitches for Football, Tennis etc.
112	Cormac Byrne and Emmett O'Byrne	Not enough sporting facilities. Where is the inbuilt capacity in this draft plan to cope with the needs of the population?
116	Noreen O'Reilly Ref 111620	There is a lack of sports facilities in particular athletics. Nowhere to train. Tinakilly, which was a designated active leisure area is now history as with no parking and no lighting, it is unsuitable. The Residential zoning at SLO6 should change to AOS to provide for sporting needs of all sporting communities. If the entire section from the Carraig Beag housing estate to Ashtown roundabout were developed as a centre for sport, there would be room for a Sport Centre, all weather surface pitch, a running trail, bowling, squash. With proper consultation with locals, the immediate needs of all groups could be met. This is the final opportunity to serve the future generations of Wicklow Children.

121	Anja Karamalis Ref 142758	<p>Submissions 121-124 inclusive have been grouped together noting that these submissions had similar wording:</p> <ul style="list-style-type: none"> ▪ A lot of housing located in this area with no playgrounds, greenspaces or sports facility. Would be good for mental health. ▪ Change the residential zoning on SLO6 to AOS. Sports facilities could be grouped on these lands.
122	Colm Ó Broin Ref 142644	
123	The Meadows Estate Residents Association Ref 143928	
124	Epi Karamalis Ref 144557	
130	Rathnew Boxing Club	This facility needs its own premises. Not shared. Would require 2 to 3 rings, minimum of 20 bags, and changing facilities for both male and female. Usually a space of 500sqm covers this. Overall Rathnew needs more AOS. Lacking at the moment.
134	Lyndsay Martin Ref 161122	Population of Rathnew has grown, more than doubling in the last few years. Infrastructure/services have not increased at the same rate. Recreation facilities are lacking.
137	Anne Dowling Ref 155101	Residential zoning at SLO6 needs to change to AOS to provide for sporting needs of all sporting communities. Lack of sports facilities in this area –astro pitches, running tracks, playing pitches.
138	Caroline Cullen Ref 163112	<ul style="list-style-type: none"> ▪ SLO6 - Residential zoning at SLO6 change to AOS to provide for sporting needs of all sporting communities. ▪ Lack of sports facilities in this area –astro pitches, running tracks, playing pitches. <p>Lack of quality green spaces and play areas. Playground badly needed in this area.</p>
140	Beata Farcas Ref 164606	Need more sports facilities and schools.
150	Helen Fitzsimons Ref 200032	Reserve SLO6 for sports fields and amenity. Requested to consider allotments in this area noting the small size of rear gardens in new estates and lack of outdoor space for apartments. Currently, there are no allotments in Wicklow town. Location within walking distance for many estates.
151	Aoife Kirwan Ref 211650	The land between Rocky Road and the roundabout at the top of Marlton Road should be used for sports facilities. We have no local playground or play areas for kids. Need more green spaces and parks. Too much housing. Requested to consider allotments on SLO6 noting the small size of rear gardens in new estates and lack of outdoor space for apartments. Currently there are no allotments in Wicklow town. Location within walking distance for many estates.
152	Stephen and Nicola Mac Manus Ref 212550	Community sports centre badly needed for the area. Even with the current population there is a severe lack of shared facilities for the general public e.g. Outdoor/Indoor basketball, Squash, Running Tracks, Badminton etc. Coupled with the above there is a severe lack of amenities for teenagers.
153	Rathnew FC Ref 215121	There is a lack of recreation space for the Local sports clubs, the clubs are at full capacity and are in desperate need of extra green fields and community centres.
161	Wicklow Basketball Club Ref 225317	<p>In the past 30 years there hasn't been sufficient allocation of sports and recreation resources to accompany the growing population of the Wicklow/Rathnew area.</p> <p>The Hawkstown Road & Rocky Road sites should become a</p>

		Sports Hub. It doesn't make sense to insert a residential development between the two. Combining these three sites into one, will future proof the needs of generations to come and can be developed over a period, as and when funding becomes available. As the local clubs will be the end users, collaboration with them is essential in how this site will be developed to ensure that we get it right.
164	Leonie Quinn Ref 231637	Need recreational space at the south west end of Wicklow. Marlton area full of housing estates but there are no real green spaces, walks, playgrounds. The area south of the Educate Together primary school on the west side of the Hawkstown road would be an ideal area to develop sports facilities and a playground for all the young children in the area in particular. Also as a member of a group trying to set up a volleyball club, it would be great to have a communal space that could facilitate that. There are no halls for rent in Wicklow town big and especially tall enough to allow many indoor sports
166	Rathnew GAA	There has been no investment in the community/village of Rathnew. Levies from residential development in the area should be reinvested into the area. This has not been done. Rezoning industrial zoned land for recreation use which is private ownership will not work. Council do not know what they are doing. Owners have said they will leave it ploughed rather than give it/sell it to the community. The only developer who has supported the community is Broomhall Development and Maurice Sheehy who gave us our second pitch, I know he also did the same for Rathnew Soccer. You have removed his status and prioritised land which has planning issues with An Board Pleanála. The treatment of the only developer who has supported the village needs to be reviewed. Need a football pitch in Rathnew to cover the ridiculous number of houses built in the village; with money you have collected for these purposes.

Chief Executive Response

With regard to the development of Active Open Space (AOS), it should be noted that the purchase of lands and provision / development of sports facilities by the Local Authority is outside the remit of the LAP.

The draft LAP, in combination with the Social Infrastructure Audit appendix of the LAP has carried out a full audit of sports and recreation future land use needs within the settlement. The draft LAP has zoned the required amount of land for Active Open Space (AOS) and Community (CE), which allows for sports facilities to be developed, for the future needs of the population of the settlement and its catchment.

In this regard in accordance with WCC's Active Open Space Policy, active open space shall be provided at a rate of 2.4ha per 1,000 population divided into:

- 1.6ha outdoor play space (pitches, courts, sports grounds)
- 0.6ha casual play spaces (parks)
- 0.2ha equipped play space (playgrounds and MUGAs)

Based on the above rates, considering the 2031 population target of 19,400 persons for Wicklow Town - Rathnew, the following areas of active open space are required at a minimum:

46.4ha overall needed for the plan area comprising of:

- 31ha outdoor play space
- 11.6ha casual play spaces
- 3.8ha equipped play space

However, the sports and recreational facilities in the settlement cater for the population within the settlement as well as the population of the surrounding rural areas. The projected 2031 population of the settlement and catchment is c.27,900 persons. The following areas of active open space are therefore required at a minimum:

66.8ha overall needed for the plan area and catchment area comprising of:

- 44.6ha outdoor play space
- 16.7ha casual play spaces
- 5.5ha equipped play space

In addition, it was identified through the pre draft plan public consultation that there are additional / specific needs as follows:

- Athletics club grounds / running track
- Sports and community centre
- Indoor amenity facilities
- Indoor sports facilities
- Walking and cycling trails

With respect to organised sports grounds, outdoor / casual play spaces and equipped play spaces, there is currently a total of c.45ha in open space use in the settlement excluding Wicklow Golf Club.

Therefore at a minimum there appears to be a **need to zone a total of c.66.8ha** of active open space in the settlement to cater for the settlement and its catchment.

The Draft LAP therefore proposes to zone an additional 30.6ha of AOS in addition to the existing c. 45.7ha of AOS in the settlement **giving a total of 76.3ha zoned AOS in the settlement.**

In addition to considering the quantum of open space that is required, there is a need to ensure a suitable spatial distribution of spaces, so that all developed areas, particularly residential areas (existing and planned) can access amenity and sports grounds by active and sustainable means (walking / cycling / public transport). Having considered the catchment of existing sports clubs, there are clearly existing areas where there are deficiencies. In this regard n undeveloped AOS lands are proposed at the following locations:

Zoned Undeveloped Land		
Location	Zoning	Area (ha)
Hawkstown Road	Active Open Space	4.7
Rocky Road	Active Open Space	5.6
Brides Head	Active Open Space	4
Ashtown Lane	Active Open Space	7
Tinakilly	Active Open Space	2.45
Ballynabarney	Active Open Space	3.7
Bollarney	Open Space	3
	Total new open space lands	30.6 hectares

It is noted that there are a number of sporting facilities in the close to the heart of Wicklow Town including Wicklow Tennis Club, Wicklow Hockey Club, Wicklow Town AFC, however it is also noted that space is tight close to the town centre for the development and/or expansion of sports clubs in or near the town centre. The sites identified above are close to existing and future residential areas and are large enough to host a range of sporting activities.

If all sports clubs in Wicklow Town and Rathnew were to be clustered together on one single large site,

this would likely lead to traffic issues in the immediate locality, however clustering similar type sport together, for example racket sports or field sports, would be ideal.

In terms of the comparisons made with the facilities in Greystones, it should be noted that the population of Greystones is c.40% greater than Wicklow Town and therefore has a lot more sports facilities noting this larger population/critical mass.

With regard to the refurbishment of Coral Leisure in Wicklow Town, funding of €1.7million has been secured in 2024 to carry out refurbishment and modernisation works to the pool and gym including improved accessibility. A Local Authority Part 8 proposal, PRR24/252, was passed by the elected members in July 2024 approving the proposed works to the leisure centre.

With regard to the AOS in Tinakilly, the 2.45ha zoned AOS under the current plan is permitted to be developed as a recreational parkland with an area reserved/levelled for the possible future development of a playing pitch and associated car park when funding allows. The OS1 Open Space (c.6ha) on either side of the AOS in Tinakilly is permitted to be developed as a recreational parkland with walking routes, native woodland planting and wildflower planting linking back up to Tinakilly Avenue close to Tinakilly House. While this is not the level of AOS envisaged under the 2013 LAP, the future development of this permitted public amenity is considered to be positive addition for both existing and future residents in this area.

The issues raised with respect to sports facilities are noted; the draft LAP, on foot of the Social Infrastructure Audit carried out, identifies that provision needs to be made (in terms of land zoning and policy support) in the plan to facilitate future sports development.

In 2025, as part of the National Sports Policy, the Wicklow County Council will be developing a **Local Sports Plan** for the County, which will identify infrastructure needs as well as a project delivery programme for new facilities.

This project includes for the development of a sports and recreational park on lands adjacent to the Hawkstown Road and Ashtown Lane. WCC has developed draft Sports & Recreation plan for the Hawkstown Road site and it is intended this will be developed as a multisport facility ideally including an indoor facility however this plan is still at draft stage and funding has yet to be secured.

All of the submissions made with respect to sports infrastructure to this LAP will be considered in the preparation of the Local Sports Plan.

With regard to the development of allotments the benefits of such as use in villages, towns and cities are acknowledged in particular with regard to mental health, general wellbeing and community building. It is considered that such a use would be more suited to Land Use Zoning OS1 rather than AOS. In this regard it is recommended that uses generally permitted on OS1 lands as outlined under Chapter 11, Section 11.1 of the Draft LAP be amended to include allotments

The zoning request with regard to SLO 6 is addressed under Chapter 11, Section 4.3.10.1, of this report.

See also Section 4.3.11, Appendix 2 Social Infrastructure Audit of this report.

Chief Executive's Recommendations

Amend uses generally permitted on OS1 lands as outlined under Chapter 11, Section 11.1 of the Draft LAP be amended to include allotments as follows:

Uses appropriate for open space (OS1) zoned land are recreational uses such as formal / informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, Mixed Use Games Areas, ~~and~~ outdoor gyms ~~and~~ allotments.

4.3.6.3 Issue 3: Provision of playgrounds

No.	Name	Issues Raised
34	Stephanie Gavin Ref 110933	No playground facility or sports facility for teenagers serving residential development along the Hawkstown Road side of the town.
72	Anna Pocock Ref 163511	Not enough playgrounds.
83	Mia Merrigan Ref 202755	There are no parks, play areas, walks in the area that provide a walk into nature for both young and old where they are not beside a busy road or by a private housing estate.
94	Róisín McCullagh Ref 201848	Proposed locations for playgrounds at Marlton. Should be council policy to not allow the building of any new estates without adding a small playground alongside a common grassland for bigger kids.
109	Melissa McNabb Ref 093952	More parks are needed.
110	Silviu Ref 093814	Only 2 playgrounds in the Town. More needed especially at Marlton road area.
112	Cormac Byrne and Emmett O'Byrne	Not enough playgrounds.
121	Anja Karamalis Ref 142758	The whole area between Marlton Road and Hawkstown road has housing and housing is still being built without a single playground, adequate green area.
122	Colm Ó Broin Ref 142644	A lot of housing located in this area with no playgrounds, greenspaces or sports facility. Would be good for mental health.
123	The Meadows Estate Residents Association Ref 143928	Playground needed in this area.
124	Epi Karamalis Ref 144557	Playground needed in Marlton Road/Rocky Road Area.
137	Anne Dowling Ref 155101	Playground needed and space for kids to play on.
138	Caroline Cullen Ref 163112	Lack of quality green spaces and play areas. Playground badly needed in this area.
150	Helen Fitzsimons Ref 200032	Playground needed in Hawkstown Road Area.
164	Leonie Quinn Ref 231637	Need recreational space at the south west end of Wicklow. Marlton area full of housing estates but there are no real green spaces, walks, playgrounds

Chief Executive Response

The draft LAP, in combination with the Social Infrastructure Audit Appendix 2 of the LAP has carried out a full audit of recreation and sports facilities including equipped play spaces in the settlement of Wicklow-Rathnew. The Social Infrastructure Audit identified that there are currently 2.2ha of equipped play spaces in the settlement including 3 playgrounds:

- Ballynerrin Playground -0.9ha
- Rathnew Playground -0.4ha
- Murrough Playground and Skatepark -0.6ha

Considering the 2031 population of the settlement and catchment at c.27,900 persons, the Social

Infrastructure Audit identifies a minimum requirement of 5.5ha of equipped play space to be provided throughout the settlement over the next 6 years. This is reflected in the quantum of AOS (overall total 75.6ha) zoned throughout the plan area at various locations throughout the settlement,

There are a number of plan and projects at design stage in the Wicklow Town – Rathnew area to deliver recreational and sport facilities. Some of the larger projects are detailed here:

Hawkstown Road Project

This project provides for the development of a sports and recreational park on lands adjacent to the Hawkstown Road and Ashtown Lane. WCC has developed draft Sports & Recreation plans for the Hawkstown Road site and it is intended this will be developed as a multisport facility ideally including an indoor facility however this plan is still at draft stage and funding has yet to be secured.

Murrough Masterplan

This plan provides for the development of a recreational park, incorporating the exiting playground, skatepark, proposed pump track, etc on the Murrough open space area. It is currently being prepared with a Part 8 to be lodged soon. WCC are responsible for this project.

Brides Head Recreation Amenity Site Project

This project provides for the development of a recreational park on lands adjacent to the R750 on Brides Head. It is currently being prepared with a Part 8 to be lodged soon. WCC are responsible for this project.

See also Section 4.3.11 Appendix 2 Social Infrastructure Audit of this report.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 with regard to AOS Zoning and the projected minimum requirement of 5.5ha of equipped play space to be provided throughout the settlement over the next 6 years.

4.3.7 Chapter 8 Tourism

4.3.7.1 Issue 1: Provision of a Greenway

No.	Name	Issues Raised
1	David Czerniak Ref 203246	Include a greenway for Wicklow
26	Emer Cashman Ref 105147	A greenway between Wicklow Town, Kilcoole and Greystones should be established.
84	Sean Doherty Ref 225718	Development of greenway and coastal walk cycle route that starts/ends in town
152	Stephen and Nicola Mac Manus Ref 212550	The Murrough could be used as a greenway to attract further tourism
Chief Executive Response		
<p>The County Development Plan 2022-2028 strongly supports the development of greenways and acknowledges their potential to drive growth in the region. NPO objective 22 focuses on promoting tourism development, in particular National Greenways.</p> <p>Chapter 10 of the draft LAP contains Heritage, Biodiversity and Green Infrastructure Objective WTR91 – <i>To promote and support the development of enhanced or new greenways including Wicklow to Greystones coastal greenway.</i></p> <p>WCC have been advancing the development of the ‘Wicklow to Greystones Greenway’ project, which is currently at the ‘Options Selection Stage’ (Stage 2). This is a separate project to the draft LAP, with its own process. The feedback gathered during the public consultation stage of the Greenway project in April 2024 will continue to guide the ongoing development of the project. For more information on the Greenway project - Visit the Wicklow to Greystones Greenway website</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive’s Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.7.2 Issue 2: The Murrough

No.	Name	Issues Raised
48	Eileen Howell	Happy to see that an area zoned for tourism in a flood zone area has been removed.
98	Vincent Collard Ref 231629	More could be done to highlight local historical sites to attract tourists.
83	Mia Merrigan Ref 202755	<ul style="list-style-type: none"> ▪ Murrough not being protected by the plan. ▪ Unsightly stone barriers from railway line make it more difficult to walk ▪ There are provisions made for public toilets or facilities to be introduced
Chief Executive Response		
<p>Submission no. 48, acknowledging the change in the tourism zoning, is noted.</p> <p>The draft LAP is a land use plan, the promotion of historical sites for tourism is not within the remit of a LAP. This is a matter for a Tourism / Marketing plan under Wicklow Tourism.</p> <p>The County Development Plan 2022-2028 Environmental Protection Objectives (CPO 11.50-11.52) consider the potential environmental effects with regard to tourism related traffic and feasibility of tourism projects, taking into account impacts on biodiversity including disturbance and loss of habitat.</p> <p>The Murrough SAC/SPA is a designated European site and Natural Heritage Area (NHA), therefore, it is not heavily utilised from a tourist perspective as the use of it must be managed in an appropriate manner. CPO 19.21. states <i>no development will be permitted that has an adverse impact on the environmental and ecological quality of the Murrough SAC, including development that is not within a designated area but which is likely to have an effect thereon.</i></p> <p>Key Regeneration Opportunity Sites in the draft LAP include the development of the Murrough south area including the port and harbour area, subject to the protection of the Murrough. It is also an objective <i>To consider the feasibility of the preparation of a Wicklow Waterfront Masterplan, to facilitate the continued development of the Port, Quays and Harbour.</i></p> <p>The rock armour at the Murrough is a coastal erosion protection measure and is dealt with further in Chapter 5- Key Regeneration Areas, Waterfront Zone Strategy (incl. Murrough South, Harbour & Port) Issue 1: Protection of Coastline and Issue 4: Redevelopment and Regeneration of the Murrough, Harbour and Port Area.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.7.3 Issue 3: Tourism Accommodation

No.	Name	Issues Raised
1	David Czerniak Ref 203246	Provision of Tourist Accommodation/hotel
26	Emer Cashman Ref 105147	Hotel needed in Wicklow Town.
75	Mairead Coffey Ref 175829	Need a hotel
84	Sean Doherty Ref 225718	Hospitality facilities
97	Andrew Malone Ref 212613	Tourism limited by lack of hotels in the area
98	Vincent Collard Ref 231629	The return of the Grand Hotel to a fully functioning hotel. A new hotel along the old Veba site. Needed to facilitate tourists to the area
110	Silviu Ref 093814	Need the Grand hotel back. Nowhere in Town to host visitors.
152	Stephen and Nicola Mac Manus Ref 212550	No functioning hotel in the town
Chief Executive Response		
<p>The County Development Plan 2022-2028 highlights the importance of facilitating an adequate range of tourist accommodation options including hotels. Tourism and recreation Objective CPO 11.11 states, <i>the CDP positively considers the development of a new hotel in all parts of the county</i>. The draft LAP concurs that tourism facilities such as a hotel would greatly enhance the amenity potential of the area and there is ample zoning within the Wicklow/Rathnew settlement that facilitates this type of development. However, it is not within the remit of the Local Authority for the delivery of this amenity.</p> <p>Chapter 5 of the CDP, Section 5.6, CPO 5.6 Town and Village Regeneration & Rejuvenation Priorities specifically outlines that the redevelopment of lands and vacant warehousing and commercial premises between the railway bridge and the Parnell Bridge will be considered to provide a mix of uses including a hotel. The draft LAP acknowledges that in the Murrough south area, <i>Tourism facilities such as a hotel and a tourism information centre would greatly enhance the amenity potential of the area</i>.</p> <p>Objectives WTR71 and WTR 72 of the draft LAP also facilitate the development of a Hotel.</p> <p>WTR71 <i>To positively consider the development of a) new hotels in Wicklow Town – Rathnew; b) the development of touring caravan (Aires park) and camping sites (not static mobile home parks) having due regard to surrounding land uses and proper planning and development of the area; c) the development of hostels along established walking routes and adjacent to existing tourism facilities; d) the improvement of, and extension to, existing tourist accommodation related developments, subject to the proper planning and sustainable development of the area.</i></p> <p>WTR72 <i>To encourage and facilitate tourism and leisure related uses in the Mixed Use Regeneration Area of the Waterfront zone including hotel / accommodation facilities and leisure uses to complement the marina and associated boating uses and activities.</i></p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.7.4 Issue 4: Tourism Potential of Tinakilly Avenue

No.	Name	Issues Raised
83	Mia Merrigan Ref 202755	<ul style="list-style-type: none"> ▪ Plan to run a road through Tinakilly Avenue goes against the natural environment, access, biodiversity and protecting amenities for tourism/recreation use which Tinakilly avenue and Broadlough lake provides for the community ▪ Tourism potential has not been exploited to its full as it is part of Tinakilly House Entrance.
Chief Executive Response		
<p>The County Development Plan 2022-2028 prioritises environmental sustainability as one of its key strategic principles. All relevant environmental reports and appropriate assessments were undertaken prior to the grant/commencement of any development. CPO 12.53 in the County Development Plan 2022-2028 states '<i>Where a proposed development is adjoining future development lands or provides the only possible access route to other lands, new roads will be required to be designed by the developer to ensure future access to other lands can be facilitated</i>'.</p> <p>Reference is made to Tinakilly Avenue not having exploited its full tourism potential as part of the Tinakilly House entrance, the former home of Robert Halpin. In this regard it is noted that Tinakilly House itself is in private ownership and currently in use as a hotel/wedding venue. Only part of the Avenue is currently in the ownership of the hotel. The hotel and its grounds are zoned for Tourism under the current draft LAP. The Hotel is also a protected structure.</p> <p>The Avenue itself is zoned OS1 (Open Space). The section east of the crossing point of the RIRR will retain vehicular access to the hotel and the properties along Tinakilly Lane, while the section west of the RIRR crossing will be kept as a pedestrian/cycle route with the removal of cars making it a safer environment for walkers and cyclists using this route.</p> <p>With regard to the RIRR crossing and the trees along the Avenue, from a review of the tree survey submitted as part of PRR23/60219, 4 no. trees were proposed to be removed from the Avenue to facilitate the RIRR crossing comprising of 1 No. Category U tree, 2 no. Category C trees and 1 No. Category A tree. There were no proposals to remove other trees along the avenue.</p> <p>On foot of this submission, no amendments to the LAP are recommended. Please also refer to Chapter 11 Zoning and Land Use, Specific Local Objectives (SLO), SLO 2 Tinakilly / Newrath.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.8 Chapter 9 Infrastructure

Topic 1: Utilities

4.3.8.1 Issue 1 Electricity Supply, Water and Sewerage Infrastructure

No.	Name	Issues Raised
60	Peter Dignam Ref 121504	Electrical outages are becoming more frequent due to the increasing demand. Our water and sewage infrastructure is already at capacity, struggling to cope with the current population.
65	Niamh Breslin Ref 135501	There is an increase in electrical outages due to the extra demand. Our water and sewage service not able to cope as it has previously reached capacity.
72	Anna Pocock Ref 163511	Increasing electrical outages, overwhelmed water and sewage systems, and heightened risks of flooding and ecological damage to local rivers, lakes, and the sea further compound the area's challenges.
79	Jenny Keogh DWTRLAP-184601	Need to work on better water and sewerage and electrical infrastructure before any more houses are built.
88	Deirdre Moore Ref 205344	No more housing estates should be built in or around the town, as there will be way too much traffic to contend with and massive pressure on schools, sewage outlets and medical facilities i.e. doctors.
97	Andrew Malone Ref 212613	The state of the waste water system is unacceptable. To have raw sewage running into the port any time there's much rain seems medieval. The extra pressure being put on the already stretched system, by building houses on top of houses is lunacy. This is without considering the ground water capacity.
114	Glenveagh Homes Ref 112102	The preparation of the LAP should require an assessment of infrastructure capacity and a cost analysis of the different options and strategies for zoning.

Chief Executive Response

Electricity Supply

Submission No. 139 received from Eirgrid outlines the following plans with regard to existing and future electricity supply to the settlement of Wicklow-Rathnew:

"Powering Up Wicklow" is a critical programme that will strengthen key electricity infrastructure in Wicklow and the surrounding areas, helping to make Ireland 'renewable ready'.

This programme will help deliver a consistent and reliable supply of electricity for Wicklow. Powering Up Wicklow includes:

- the installation of a transmission substation in Ballybeg, Rathnew, adjacent to an existing substation.
- This also includes the upgrading of the existing Arklow Carrickmines 220kV circuit, which extends generally in parallel to the M11 motorway, including in the area of the LAP.

This proposed enhancement of electricity grid infrastructure in Wicklow in general, and the LAP area in particular, will support:

- Residential housing and commercial developments
- Demand growth due to electrification of heat and transport
- Improve security of supply in Rathnew and Wicklow Town Centres
- Bringing renewable energy on to the grid.

EirGrid has surveyed the surrounding area adjacent to the existing Ballybeg substation to identify suitable sites for this substation replacement to reinforce the electricity grid in Wicklow.

The current project development process will ultimately comprise an application for Statutory consent to the relevant consenting authority (either Wicklow County Council or An Bord Pleanála (ABP) - this has yet to be determined by ABP).

Water Supply and Sewerage Network

The integration and implementation of water and wastewater projects and infrastructural improvements are the responsibility of Uisce Éireann (UE) Wicklow County Council works closely with UE to ensure that the County Development Plan and the LAP continue to align with both national, regional and local planning policy and that the provision of water/wastewater services will not be a limiting factor in terms of targeted growth.

The plan area is serviced by the Vartry Water Supply with adequate capacity currently available to accommodate the level of growth envisaged by the Core Strategy of the 2022-2028 Wicklow County Development Plan. This supplies water to the Cronroe Reservoir which currently serves the majority of the plan area by gravity, including supplying the Broomhall Reservoir and its supply area. In the southern area of the town water is pumped to a number of storage tanks that service a limited amount of lands. As capacity is constrained in these smaller reservoirs, further development is not appropriate for these areas and this is reflected in the draft LAP.

Waste Water Treatment

With regards to wastewater, the majority of the plan area is served by the Wicklow Wastewater Treatment Plant, which opened in 2010. This treatment plant has a design capacity of 34,000 population equivalent (this plant also serves the settlement of Ashford), and is thus operating with no capacity issues.

Reference is made to raw sewerage running into the port in one of the submissions however no context or timeline has been given with regard to this incident. While such an event would not be acceptable at any time it is noted that this can be an issue during very heavy rainfall events. WCC constantly liaise with Uisce Éireann with regard to the maintenance and running of the sewage network and sewerage treatment plants in the County and in particular with regard to investigating why such an event happens and looking at remediation works that might prevent such an event from happening again in the future.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

Topic 2: Transportation

4.3.8.2 Issue 1: General

No.	Name	Issues Raised
1	David Czerniak Ref 203246	<p>These submissions raise some or all of the following issues:</p> <ul style="list-style-type: none"> ▪ New development in the area needs to be matched with corresponding investment in transport, such as <ul style="list-style-type: none"> • Improvements to the M/N11; • Improvements to existing and new local roads; • Improvement to public transport, including bus and train services, such as extending the DART line to Wicklow Town; • Traffic management measures on local roads to address congestion; • Alternative routes around the area, particularly to access the M/N11; • Additional park-and-rides; ▪ New housing development in the area should be halted / slowed down until adequate transport infrastructure is in place. ▪ The low density pattern and sprawl that has been permitted in the area, and the lack of employment development commensurate with the growth in housing, is contributing to the transportation problems. Higher density development should be considered around transport nodes, such as the train station. ▪ Inadequate plans are in place to address carrying capacity and congestion northbound on the M/N11; extra lanes needed.
25	Thomas O'Sullivan Ref 162950	
27	Amanda Cummins Ref 151653	
45	Amy McNabb Ref 165943	
59	Fiona Weldon Ref 120112	
60	Peter Dignam Ref 121504	
65	Niamh Breslin Ref 135501	
72	Anna Pocock Ref 163511	
75	Mairead Coffey Ref 175829	
76	Lauryn Ref 180641	
79	Jenny Keogh Ref 184601	
80	Catherine Clare Ref 184937	
82	Fiona Clarke Ref 200028	
83	Mia Merrigan Ref 202755	
84	Sean Doherty Ref 225718	
88	Deirdre Moore Ref 205344	
93	Cormac Byrne Ref 220805	
95	F McGetti Ref 215343	
98	Vincent Collard Ref 231629	
100	Lisa McGettigan Ref 234627	
110	Silviu Ref 093814	
112	Cormac Byrne and Emmett O'Byrne	
126	Isabel Hughes Ref 150631	
134	Lyndsay Martin Ref 161122	

152	Stephen and Nicola McManus Ref 212550	
160	Mark McGettigan Ref 223707	
165	Clare McEvoy Ref 234603	
Chief Executive Response		
<p>The CE is committed to ensuring that new development occurs in the most optimal and sustainable locations in accordance with the policies and objectives set out in the National Planning Framework, the Regional Economic and Spatial Plan for the Eastern and Midlands Region and the Wicklow County Development Plan and the guidance set out in Ministerial Guidelines including <i>'Development Plans – Guidelines for Planning Authorities'</i> (2022)</p> <p>In this regard, Wicklow Town – Rathnew, following detailed assessment of role and capacity via the RSES and CDP process, has been designated as a 'Key Town' in the region and county, and is identified for growth in housing, employment and community services. The rate and quantum of housing growth that has and is occurring in Wicklow Town – Rathnew is in accordance with these higher order strategies and the residential zoning provision of the draft LAP similarly accord with same.</p> <p>It is accepted that new development requires essential services and in order to prepare Wicklow Town – Rathnew for growth, the State and the Local Authority has invested significantly in new transportation infrastructure over the last 25 years, including (but not limited to)</p> <ul style="list-style-type: none"> ▪ The M11 Ashford – Rathnew bypass, ▪ The M11 Rathnew – Arklow improvement, ▪ The construction of the Port Access Road and the Hawkestown Road, ▪ Major improvements in local bus services, ▪ New or improved footpath, cycleways and public realm improvements; including 'pathfinder projects' and 'safe routes to schools, ▪ Traffic management programmes. <p>The Local Authority is committed to delivering the following new projects and continuing to work with the various transport agencies to progress additional projects in the short - medium term including:</p> <ul style="list-style-type: none"> ▪ M/N11 improvements including Junction 4 to Junction 14 Improvement Scheme and the Interim bus priority scheme ▪ Bus based park-and-ride at Junction 16 ▪ DART extension to Wicklow Town ▪ New train station drop off and bus car park on the PAR ▪ To significantly improve all regional and distributor roads within the settlement, with a priority on pedestrian cycling and public transport facilities. ▪ To reduce pressure on Junction 16 to aim to: <ul style="list-style-type: none"> • Improve road connections between the Wicklow Town – Rathnew and M11 Junctions 17 and 18, namely the L-1099 and R751; • Provide for land use and development patterns that favour use of Junctions 17 and 18; • Complete the Rathnew Inner Relief Road including reconfiguration of road network between Junction 16 and Rathnew Village to re-direct Wicklow Town-bound flows away from the Aldi-Tinakilly traffic lights and the village centre and reconfiguration of the Hawkestown Road – R750 – RIRR junction at Merrymeeting – Tinakelly to ensure traffic that is not bound for Rathnew centre is directed on to the RIRR. • To develop a new link road between Tighe's Avenue and the R752 for Glenealy – Rathdrum bound traffic. ▪ Public realm Improvements in Wicklow Town centre and Rathnew Village centre 		

- To significantly improve pedestrian infrastructure along all roads within Wicklow Town and Rathnew prioritising all locations within 15 minutes' walk times of school and public transport services, particularly but not limited to rail services.
- To significantly improve cycling infrastructure along all main routes (regional roads, primary local roads and other distributor roads) within the Wicklow Town and Rathnew area, including linking to Wicklow train station and the future park and ride at Ashford.

This draft LAP also includes objectives that would support the delivery of the following projects in the longer term:

- Further DART extension with additional train stations in Merrymeeting and / or Rathnew
- Greystones – Wicklow Town greenway

Following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will further detail an overall strategy and programme for addressing any existing transportation issues and supporting further development with appropriate infrastructure.

With respect to the development pattern, the Local Authority is conscious of the need to consolidate development in order to make public transport in particular more effective, and in this regard, no expansion of the town boundary is proposed as part of this draft LAP and only lands already serviced or serviced by public transport is identified for immediate term development.

Chief Executive's Recommendation

Include new objective in LAP

WTR - XX

In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Wicklow Town – Rathnew.

4.3.8.3 Issue 2: Bus / Train services

No.	Name	Issues Raised	
4	Galal Aly Ref 021526	<p>These submissions raise similar issues with respect to bus services as follows:</p> <ul style="list-style-type: none"> ▪ There are inadequate bus services in the town and linking the town towards Bray and Dublin City; this is contributing to N/M11 congestion; ▪ More frequent bus services required to accommodate work schedules ▪ Bus services are impeded by existing traffic – bus lanes needed; ▪ Bus stops are not well positioned with respect to housing areas ▪ Bus services are unreliable due to existing traffic bottlenecks; ▪ New roads should provide pull in stops so that buses do not impede other traffic ▪ A 'hop-on hop-off' local town bus service needed around the town to serve housing estates / residential areas on the outskirts of Wicklow Town, that connects to the town centre, the train station and recreational area ▪ Bus route needed connecting Wicklow Town to Rathnew via Broomhall ▪ The Local Link is unreliable making it unusable for workers to use to allow them to switch from cars to public transport. ▪ An airport coach service is required ▪ A park-and-ride bus services and dedicated bus lane are essential but unlikely to significantly reduce commuter traffic 	
6	Wicklow Active Retirement Ref 170415		
11	Jackson Dsouza Ref 114733		
28	Wicklow Planning Alliance Ref 202425		
59	Fiona Weldon Ref 120112		
76	Lauryn Ref 180641		
79	Jenny Keogh Ref 184601		
83	Mia Merrigan Ref 202755		
94	Roisin McCullagh Ref 201848		
110	Silviu Ref 093814		
134	Lyndsay Martin Ref 161122		
165	Clare McEvoy Ref 234603		
26	Emer Cashman Ref 105147		<p>These submissions raise similar issues with respect to train services as follows:</p> <ul style="list-style-type: none"> ▪ There are inadequate train services serving the town; this is contributing to N/M11 congestion; ▪ More investment in train services required; current level of service is insufficient ▪ More frequent train services required to accommodate work schedules ▪ Improved infrastructure is required at the train station including service information displays, more information / announcements etc ▪ The train line is at risk of coastal erosion and needs protecting; alternatively it may need to be relocated ▪ The single line will affect DART expansion to the town ▪ The justification for much of the high density housing is access to the railway station however the likelihood of a usable service is far off in the future.
11	Jackson Dsouza Ref 114733		
28	Wicklow Planning Alliance Ref 202425		
45	Amy McNabb Ref 165943		
59	Fiona Weldon Ref 120112		
63	Luciana Queiroz Rufino Ref 114036		
72	Anna Pocock Ref 163511		
75	Mairead Coffey Ref 175829		
76	Lauryn Ref 180641		
79	Jenny Keogh		

	Ref 184601	
82	Fiona Clarke Ref 200028	
83	Mia Merrigan Ref 202755	
88	Deirdre M Ref 205344	
94	Roisin McCullagh Ref 201848	
98	Vincent Collard Ref 231629	
110	Silviu Ref 093814	
134	Lyndsay Martin Ref 161122	
152	Stephen and Nicola McManus Ref 212550	
165	Clare McEvoy Ref 234603	
Chief Executive Response		
The Local Authority is committed to continuing to deliver all services / infrastructure within its remit to support the provision of improved public transport services in Wicklow Town – Rathnew and to work with the various transport agencies to progress improvement projects in the short - medium term as detailed previously in this section of the report.		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.8.4 Issue 3: Rathnew Inner Relief Road

No.	Name	Issues Raised
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O'Neill Ref 185913	<p>These submissions raise similar issues as follows:</p> <ul style="list-style-type: none"> ▪ The RIRR is not suitable to accommodate all traffic flows from the whole settlement to and from the M/N11; ▪ The RIRR is not suitable for the volume of traffic that is proposed to use it, and Tinakilly residents will have to navigate and extremely busy road to access Rathnew village centre; which will result in less likelihood of use by pedestrian and cyclists; ▪ The RIRR will not provide meaningful relief to the traffic issue in Rathnew and surrounding area; ▪ More suitable routes from the settlement to the M/N11 are the Rocky Road and R751 (to the Beehive) ▪ The RIRR will add to congestion at the Aldi roundabout, the adjacent junction on the R750 and on the M/N11 interchange; this congestion may result in more traffic in Rathnew Village Centre and on the Coast Road to Ashford / Kilcoole; ▪ The design of the RIRR north of Rathnew will cause issues for Rathnew residents accessing the M11 at Junction 16; ▪ The design route of the road would destroy the amenity of Tinakilly Avenue; ▪ The route passes over a flood risk zone; ▪ More detail is required with regard to the road design and completion schedule; ▪ Just because the road had been in the plan for some time and has been started doesn't mean it cannot be changed now.
27	Amanda Cummins Ref 151653	
48	Eileen Howell	
72	Anna Pocock Ref 163511	
83	Mia Merrigan Ref 202755	
87	Claire McGettigan Ref 203844	
89	Sinéad Ryan Ref 211109	
95	F McGetti Ref 215343	
97	Andrew Malone Ref 212613	
100	Lisa McGettigan Ref 234627	
112	Cormac Byrne and Emmett O'Byrne	
160	Mark Mcgettigan Ref 223707	
165	Clare McEvoy Ref 234603	

Chief Executive Response

As set out above, the Local Authority is committed to addressing local transportation issues and a key element of its strategy is to address the congestion between Wicklow Town and Rathnew, and onwards between Rathnew and Junction 16, via a suite of interventions including (but not limited to) the completion of the RIRR including reconfiguration of road network between Junction 16 and Rathnew Village to re-direct Wicklow Town-bound flows away from the Aldi-Tinakilly traffic lights and the village centre, and reconfiguration of the Hawkestown Road – R750 – RIRR junction at Merrymeeing – Tinakilly to ensure traffic that is not bound for Rathnew centre is directed on to the RIRR.

Additional elements of this strategy include:

- Improve road connections between the Wicklow Town – Rathnew and M11 Junctions 17 and 18, namely the L-1099 and R751;
- Provide for land use and development patterns that favour use of Junctions 17 and 18;
- To develop a new link road between Tighe's Avenue and the R752 for Glenealy – Rathdrum bound traffic.

Following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will further detail an overall strategy and programme for addressing any existing transportation issues and supporting further development with appropriate infrastructure.

This LPT will provide for a programme for the finalisation of the optimal route and design for the completion of the RIRR, as well as a delivery and funding programme.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.8.5 Issue 4: Road objective from Tighe's Avenue to R752

No.	Name	Issues Raised
38	Mary Byrne, Liz Byrne and Carmel Whelan Ref 131457	<p>This submission raises issues with the changes to this road objective compared to the previous plan. It is put forward that the previous plan did not require the development of this road by the landowners along it but rather only required the 'facilitation' of the road in the future and / or reservation of lands along the road for future development. It is put forward that the function of the road has changed from opening up development lands and ensuring development along the route would not congest Rathnew village centre to become a Rathnew village centre 'by-pass' regional road. It is also put forward that these changes would put an undue financial burden on the landowners along the road and the cost should be borne by the Local Authority through the development levy scheme, given the purpose of the road.</p> <p>Questions are raised about who would design this route and if it was left to developers, how difficult it would likely be to secure agreement. It is suggested that such a requirement would result in sterilising lands while there is uncertainty about design and funding.</p> <p>Attention is drawn to a conflict between the LA and the Local Transportations Assessment, which indicates that this road should be built in phases.</p> <p>It is requested that the LAP objective for SLO3 be amended as follows: <i>This SLO is located in the townlands of Milltown North and Ballybeg. The SLO comprises Employment (E), New Residential (RN –Priority 2) and Natural Areas (OS2) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:</i></p> <ul style="list-style-type: none"> ▪ <i>A new link road is to be provided that connects Tighe's Avenue to the R752 to be developed in phases along with the development of the zoned lands it passed through.</i> ▪ <i>No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752 unless it can be demonstrated in an application that sufficient land will be left undeveloped to enable a satisfactory route to be designed.</i> ▪ <i>Any development on these lands shall take into account the N11 set back distances as specified for different development types in the County Development Plan.</i>
Chief Executive Response		
<p>As set out above, the Local Authority is committed to addressing local transportation issues and a key element of its strategy is to address the congestion between Wicklow Town and Rathnew, and onwards between Rathnew and Junction 16, via a suite of interventions including (but not limited to) the development of a new link road between Tighe's Avenue and the R752 for Glenealy – Rathdrum bound traffic.</p>		
<p>Following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will further detail an overall strategy and programme for addressing any existing transportation issues and supporting further development with appropriate infrastructure.</p>		
<p>This LPT will provide for a programme for the finalisation of the optimal route and design for this new route, as well as a delivery and funding programme. This will address any phasing programme required, and therefore it</p>		

is considered it would be premature at this time to make the change to the draft LAP is suggested.

It should be noted that this road is already included in the Development Levy Scheme.

Chief Executive's Recommendation

Amend SLO3 as follows:

This SLO is located in the townlands of Milltown North and Ballybeg. The SLO comprises Employment (E), New Residential (RN –Priority 2) and Natural Areas (OS2) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- A new link road is to be provided that connects Tighe's Avenue to the R752, **to be developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;**
- No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752
- Any development on these lands shall take into account the N11 set back distances as specified for different development types in the County Development Plan.

4.3.8.6 Issue 5: Local roads / traffic management

No.	Name	Issues Raised
23	Alex Ward Ref 145947	Safety and congestion issues at the R750 / Hawkestown Road / Tinnakilly Park junction raised. Suggestion of a roundabout.
72	Anna Pocock Ref 163511	
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O'Neill Ref 185913	The one-way system in place in Wicklow town should be retained.
28	Wicklow Planning Alliance Ref 202425	<ul style="list-style-type: none"> ▪ Traffic should be slowed down through the town centre to 20kph, and this should be an objective of the plan. ▪ A speed limit of 30kph should be put on all approach roads to the town. ▪ These changes would improve the pedestrian experience
49	Rosaleen and Martin McNabb Ref 210520	Congestion on R750 Rathnew to Wicklow Town road and in Rathnew village centre raised as concerns. Suggest that traffic needs to be diverted away from Rathnew and Junction 16 to Junction 17 via Rocky Road.
72	Anna Pocock Ref 163511	
80	Catherine Clare Ref 184937	
97	Andrew Malone Ref 212613	
134	Lyndsay Martin Ref 161122	
75	Mairead Coffey Ref 175829	The one-way system in the town centre is not working; it was supposed to be a trail and the Council are not listening to feedback.
84	Sean Doherty Ref 225718	Although the one-way system has brought benefits, it has redirected traffic onto residential streets and creates turning movements at market square for buses that have to cross the white line. It is not a long term solution. The one-way system southbound through the town will impede emergency services.
98	Vincent Collard Ref 231629	One-way system needs adjustment as it is has damaged shopping in the town.
100	Lisa McGettigan Ref 234627	The one-way system is inefficient and is disrupting Wicklow Town.
104	Louise Ruttledge Ref 070955	The one way system in Wicklow town needs to be reassessed; it has made it difficult to get through the town without delays. Parking cars creates blockages, without a lane to overtake. The small amount of extra street parking spaces made available through the one-way system does not justify keeping it in place. Blocking access up Church Hill has created a bottleneck coming into the town throughout the day.

152	Stephen and Nicola McManus Ref 212550	Request reverting to two-way system in town centre.
Chief Executive Response		
<p>As detailed above, the Local Authority is committed to addressing local transportation issues and following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will evaluate and address all the issues detailed above, in particular:</p> <ul style="list-style-type: none"> ▪ The congestion between Wicklow Town and Rathnew, and onwards between Rathnew and Junction 16 ▪ The traffic management in Wicklow town centre including one-way options, speed limits, on street car parking etc ▪ Enhancement of facilities and routes for pedestrian and cyclists across the entire settlement. <p>Please also refer to Chapter 5- Key Regeneration Areas, Topic Wicklow Town Centre Strategy, Issue 3: One Way System.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.8.7 Issue 6: Footpaths and cycleways

No.	Name	Issues Raised
6	Wicklow Active Retirement Ref 170415	A hard surfaced footpath from the railway entry to the Murrough towards Killoughter is needed
84	Sean Doherty Ref 225718	There is a lack of quality pedestrian walkways of sufficient width and cycleways in Wicklow town centre.
94	Roisin McCullagh Ref 201848	<p>Detailed submission outlining proposals and ideas for better integrating cycling facilities into the town centre, and on routes to schools / playgrounds / recreational amenities etc, including contra-lanes for cyclists, the changing of the town centre to a 'low speed zone', changes to pavement heights to slow traffic, changes to existing one-way streets, removal of ramps and replacement with chicanes.</p> <p>Suggestions are also made with respect to the design of new housing areas to ensure cycling connectivity so that cyclist can take the shortest route from one estate to the next.</p> <p>With respect to access from the PAR to the train station, it is suggested that an existing derelict bridge c. 260m west of the train station could be utilised for cyclists.</p> <p>Concerns are raised with respect to the quality, completeness and maintenance of cycle lanes.</p>
Chief Executive Response		
As detailed above, the Local Authority is committed to addressing local transportation issues and following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will evaluate and address all the issues detailed above.		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.8.8 Issue 7: Car Parking / Car charging

No.	Name	Issues Raised
11	Jackson Dsouza Ref 114733	Free car parking should be provided at the train station
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O'Neill Ref 185913	Parking along Main Street Wicklow should be for disabled, child, family, and age friendly parking only. More on street EV charging stations should be provided.
28	Wicklow Planning Alliance Ref 202425	There is inadequate car parking in the town. Consideration should be given to building a multi-story car park at the existing Council car park behind the AIB (subject to appropriate sensitive design) and another at the eastern end of the town, perhaps behind the Gaol.
84	Sean Doherty Ref 225718	Wicklow Town suffers from parking shortages
165	Clare McEvoy Ref 234603	Car parking should be free at the train station
Chief Executive Response		
<p>As detailed above, the Local Authority is committed to addressing local transportation issues and following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will evaluate and address all the issues detailed above.</p> <p>Please also refer to Chapter 5- Key Regeneration Areas, Topic Wicklow Town Centre Strategy, Issue 4: Car Parking and Accessibility.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.8.9 Issue 8: Accessibility & Safety

No.	Name	Issues Raised
1	David Czerniak Ref 203246	The plan does not address accessibility for people with limited mobility specifically wheelchair users
75	Mairead Coffey Ref 175829	There is a need for more street lights and hand rails to help the elderly, in areas such as Green Hill which can have hazardous conditions in bad weather. Gritters only serve the bus routes notwithstanding the hilly nature of the town, which can leave people stranded.
152	Stephen and Nicola McManus Ref 212550	<ul style="list-style-type: none"> ▪ Concerns raised with respect to the safety of the pedestrian crossing in Rathnew across from St. Coens / Gaelscoil. ▪ Additional ramps are required in residential areas.
Chief Executive Response		
<p>As detailed above, the Local Authority is committed to addressing local transportation issues and following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will evaluate and address all the issues detailed above.</p> <p>Please also refer to Chapter 5- Key Regeneration Areas, Topic Wicklow Town Centre Strategy, Issue 4: Car Parking and Accessibility.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.9 Chapter 10 Heritage/Biodiversity/Heritage Maps

4.3.9.1 Issue 1: Natural Heritage (Murrough, Biodiversity, Wildlife)

No.	Name	Issues Raised
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O Neill Ref 185913	Strong protections for the Murrough SAC and Broadlough SPA are vital to prevent ecological harm from higher-density housing developments.
25	Thomas O Sullivan Ref 162950	Construction of houses on a floodplain has disturbed the environment.
41	Amy McNabb Ref 152435	Remove RN2 Zoning from this site for residential amenity and biodiversity reasons. Animals disrupted.
49	Rosaleen and Martin McNabb Ref 210520	Opposed to SLO4 on biodiversity grounds, in particular birds and wildlife
51	Stephen Reynolds Ref 081816	<ul style="list-style-type: none"> ▪ Opposed to RN(2) SL04, concerns about the environmental impact on local wildlife including small animals and birds ▪ Rezoning would effectively destroy the decade long natural return of indigenous species and local flora
72	Anna Pocock Ref 163511	Heightened risk of flooding and ecological damage to local rivers, lakes, and the sea
81	Bill Clare Ref 191200	Wildlife being pushed out
83	Mia Merrigan Ref 202755	Tinakilly Avenue – plans go against the natural environment and biodiversity. Murrough not been protected by the plan (metal transfer station)
88	Deirdre Moore Ref 205344	Murrough needs to be repaired and saved for environmental reasons, the railway line, and for locals who use this area for exercise daily
98	Vincent Collard Ref 231629	<ul style="list-style-type: none"> ▪ Need to really up our game to protect the wonderful nature reserve at Broadlough and Murrough. ▪ Need to protect the salmonid rivers that flow into the Broadlough. Green corridor should be applied around the area to protect it from future development
99	Stan Breathnach Ref 000330	Protection of The Murrough Wetlands. EIA may be required before zoning the land.
109	Melissa McNabb Ref 093952	Proposed rezoning in SL04 will destroy wildlife.
119	Kyran and Maeve O'Grady Ref 131316	<ul style="list-style-type: none"> ▪ Concerns regarding the impact this zoning will have on the SAC/SPA ▪ Impact on biodiversity and wildlife. Contravening compliance with Habitats directive
127	Garrett Kennedy Ref 150541	Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and disruption of wildlife
129	G Kennedy Ref 152438	Concerns regarding the impact SLO4 zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats directive
134	Lyndsay Martin Ref 161122	<ul style="list-style-type: none"> ▪ Concerns regarding the impact SLO4 zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. ▪ Loss of greenbelt would fragment wildlife corridor and environmental character
150	Helen Fitzsimons Ref 200032	There needs to be an active biodiversity plan for areas which are to be left to 'rewild'

Chief Executive Response

For specific issues to do with SLO 2 Tinakilly Newrath and SLO 4 Bollarney North please see Chapter 11 Zoning and Land Use, Specific Local Objectives (SLO), SLO 2 Tinakilly Newrath and SLO 4 Bollarney North.

Chapter 17 of the County Development Plan 2022-2028 sets out in detail the strategies and objectives regarding natural heritage and biodiversity. The conservation and management of the natural environment is seen as crucial in the long term economic and social development of Wicklow.

The Murrough is highly protected under European designated Special Protection Areas (SPA), Special Area of Conservation (SAC) and Natural Heritage Areas (NHA). The state is required to take appropriate measures to protect such sites and prevent pollution, deterioration or excessive disturbance that adversely affect them.

Concerns regarding the impact on wildlife and the environment are noted. The plan has been subject to numerous environmental assessments including Strategic Environmental Assessment and Appropriate Assessment, to ensure that significant adverse impacts can be identified and avoided in the crafting of the plan. Every effort is made through the application of sound planning and environmental protection principles to (i) minimise the amount of 'greenfield' land designated for new housing and (ii) to assess and put in place design and management measures when new development is allowed to occur to ensure the impact is minimal and can be absorbed by the receiving environment.

There is an existing Wicklow County Council Biodiversity Action Plan, that is currently under review with a new plan currently being drafted to be in place for 2025 – 2030. The new Wicklow Biodiversity Action Plan will outline actions to protect and enhance Wicklow's natural heritage, in line with Ireland's 4th National Biodiversity Action Plan. It will also aim to support local initiatives and solutions, ensuring we contribute meaningfully to halting biodiversity loss at both county and national levels.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.9.2 Issue 2: Light pollution

No.	Name	Issues Raised
158	Dark Sky Ireland Ref 221749	<ul style="list-style-type: none"> ▪ The development plans for urban areas, particularly with the requirement for more housing and associated development, requires that lighting be explicitly incorporated in planning across Wicklow so that its impact on biodiversity and the environment can be mitigated. ▪ Light pollution impacts flora and fauna and should be considered when lighting areas adjacent to residential, especially sensitive areas. ▪ Recommendations on light types and light levels to reduce impact on nature/environment
Chief Executive Response		
<p>The issue of light pollution is addressed in the County Development Plan in Chapter 15, Waste & Environmental Emissions. The strategies, objectives and standards set out in the Wicklow County Development Plan apply directly in this settlement and shall be complied with throughout the implementation of this Local Area Plan. There are a number of objective in the CDP on light pollution –</p> <p>CPO 15.17 <i>To ensure that all external lighting whether free standing or attached to a building shall be designed and constructed so as not to cause excessive light spillage, glare, or dazzle motorists, and thereby limiting light pollution into the surrounding environment and protecting the amenities of nearby properties, traffic and wildlife.</i></p> <p>CPO 15.18 <i>To require proposals for new developments with the potential to create light pollution or light impacts on adjacent residences to mitigate impacts, in accordance with the Development & Design Standards set out in this plan.</i></p> <p>CPO 15.19 <i>To promote the use of low energy LED (or equivalent) lighting.</i></p> <p>CPO 15.20 <i>To require the design and implementation of a hierarchy of light intensity zones in development schemes to ensure that environmental impact is minimised as far as possible particularly in areas proximate to ecological corridors.</i></p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.9.3 Issue 3: Trees

No.	Name	Issues Raised
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O Neill Ref 185913	Mature trees along Tinakilly Avenue should be protected through tree preservation orders due to their age and ecological importance.
25	Thomas O Sullivan Ref 162950	Heritage trees vulnerable if road is built
46	Susan Gavin Ref 170719	Protect the trees along Tinakilly Avenue
48	Eileen Howell	Trees lining the avenue are 100s of years old and deserve to be maintained and preserved
83	Mia Merrigan Ref 202755	Propose to destroy a historic tree line avenue
150	Helen Fitzsimons Ref 200032	Too many Trees felled in the town in the last 10 years
162	Albert Morley Ref 224844	<ul style="list-style-type: none"> ▪ Request to include a provision requiring planning submissions on zoned lands to accommodate the mature trees please ▪ Protect existing trees and hedgerows and incorporate into proposed development
Chief Executive Response		
<p>Submissions which raised concerns with regard to the cultural and historical significance of the trees along Tinakilly Avenue, Tinakilly Avenue itself and Tinakilly House area addressed under Chapter 11 Zoning and Land Use, Specific Local Objectives (SLO), SLO 2 Tinakilly Newrath</p> <p>The issue of trees is addressed under section 17.2.2 of the County Development Plan in Chapter 17. The strategies, objectives and standards set out in the Wicklow County Development Plan apply directly in this settlement and shall be complied with throughout the implementation of this Local Area Plan. The Council aims to protect individual trees, groups of trees and woodlands which are of environmental and/or amenity value. There are a number of objectives in the CDP on Woodlands, Trees and Hedgerows, Objective 17.18, Objective 17.19, Objective 17.20, Objective 17.21, Objective 17.22 and Objective 17.23.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.9.4 Issue 4: Fairy tree at SLO 2 Tinakilly

No.	Name	Issues Raised
20	Darren Fitzgerald Ref 095418	Protect the Fairy Tree and lands around Tinakilly for the sake of biodiversity
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O Neill Ref 185913	Preservation of the fairy tree in its original location through a tree preservation order reflects community cultural values and the responsiveness of the planning authority.
162	Albert Morley Ref 224844	Thank you for sparing the Fairy Tree and recognising its cultural significance to the area. It thankfully remains as a reminder to our ancient tradition of storytelling
Chief Executive Response		
Please refer to Chapter 11 Zoning and Land Use, Specific Local Objectives (SLO), SLO 2 Tinakilly Newrath of this report.		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.9.5 Issue 5: Coastal Protection

No.	Name	Issues Raised
7	Darren Fitzgerald Ref 185841	Protect the east coast and make part of the sea a marine protected area for conservation and stop over fishing.
9	Darren Fitzgerald Ref 145647	Increase protection of the coastal area – not just the Murrough and Brittas Bay.
72	Anna Pocock Ref 163511	The single train line is at risk of being lost to coastal erosion within a year or two
79	Jenny Keogh Ref 184601	<ul style="list-style-type: none"> ▪ Protect the waterways ▪ Need to secure the coast and relocate the railway line
117	Helen Doyle Ref 120257	Protect the Murrough from coastal erosion and development. Something should have been done 20 years ago.
99	Stan Breathnach Ref 000330	<ul style="list-style-type: none"> ▪ Concerned impacts climate change will have on flooding in coastal areas and near floodplains. ▪ Concerns regarding the erosion of the Murrough and impact on SLO4 in the future.
109	Melissa McNabb Ref 093952	Murrough should be protected from further erosion
Chief Executive Response		
<p>For all issues dealing with flooding, please refer to Appendix 4 Strategic Flood Risk Assessment of this report.</p> <p>In alignment with the National, Regional, and County Objectives outlined in Chapter 2 of the County Development Plan 2022-2028, the protection and sustainable development of our coastal and marine environments focuses on enhancing resilience to extreme weather, rising sea levels, coastal erosion, and the mitigation and management of coastal flood risks. Refer to The National Marine Planning Framework (NMPPF) which sets out Ireland’s intentions to use and protect our seas.</p> <p>The Office of Public Works (OPW) is the state agency responsible for both coastal erosion and flood risk management. As stated in the CDP, the council will continue to work with the OPW and all other relevant agencies, to ensure that risk posed by coastal erosion are carefully managed.</p>		
Chief Executive’s Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.9.6 Issue 6: Natural and Built Heritage at Tinakilly

No.	Name	Issues Raised
24	Henry and Aoife Clarke Seamus and Evelyn Ryan David and Caroline O Neill Ref 185913	Impact on historical landmarks such as Tinakilly House and Halpin's Avenue (Tinakilly Avenue).
25	Thomas O Sullivan Ref 162950	Historical landmarks such as Tinakilly House and Halpin's Avenue destroyed
81	Bill Clare Ref 191200	Tinakilly the last place people from the community have to enjoy nature
87	Claire McGettigan Ref 203844	Destruction of Tinakilly Avenue and green areas around Rathnew
95	F Mc Getti Ref 215343	Worried that under this plan access to Broadlough via Tinakilly avenue will be denied to locals. This is a traditional right of way to the wetlands and area of conservation.
100	Lisa McGettigan Ref 234627	Why are we constructing a main road through the picturesque Tinakilly Avenue
160	Mark McGettigan Ref 223707	The new proposed road through Tinakilly will destroy one of the last green /nature areas
165	Clare McEvoy Ref 234603	SLO2 zoning dependent on the Inner Relief Road for access - this road will damage the natural character of Tinakilly Avenue and the mature trees
Chief Executive Response		
Please refer to Chapter 11 Zoning and Land Use, Specific Local Objectives (SLO), SLO 2 Tinakilly Newrath of this report.		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.9.7 Issue 7: Built Heritage and Character

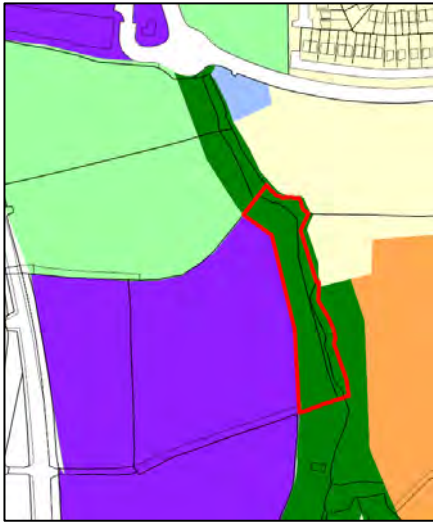
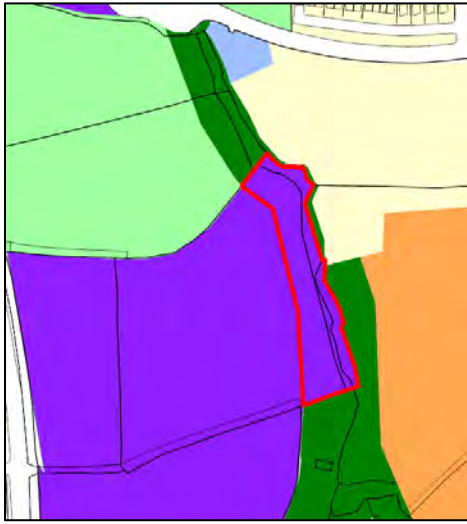
No.	Name	Issues Raised
100	Lisa McGettigan Ref 234627	Cognisance must be taken of the need to respect the existing built fabric, residential amenities enjoyed by residents and maintaining existing parks and other open areas
Chief Executive Response		
The Planning and Development Act 2000 confers a number of responsibilities on Local Authorities with regard to built heritage. The County Development Plan 2022-2028 Architectural Heritage Objectives (CPO 8.10-8.12) are to protect, conserve and manage built heritage, encourage sensitive and sustainable development and to have regard to the 'Architectural Heritage Protection: Guidelines for Planning Authorities'. While protecting assets is important, there must be a balance between safeguarding and providing for development needs.		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		


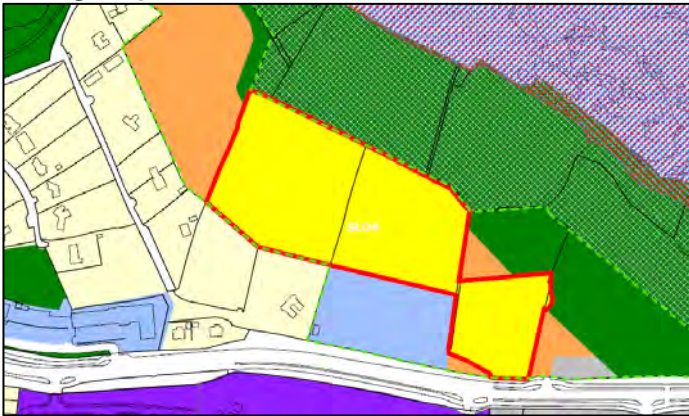
4.3.9.8 Issue 8: Funding

No.	Name	Issues Raised
98	Vincent Collard Ref 231629	Funding for unique projects. Rebuilding Coach House, could be used as a local hub/arts/historical venue
Chief Executive Response		
While this is not within the remit of a local area plan, there are built heritage funding grant schemes available. Owners of eligible buildings are invited to apply for grants under two schemes – the Historic Structures Fund (HSF) and Built Heritage Investment Scheme 2025 (BHIS).		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.10 Chapter 11 - Zoning and Land Use

4.3.10.1 Requested changes to Land Use Map Zoning

No.	Name	Issues Raised
5	Wicklow Enterprise Park Ref 152831	<p>It is requested that c. 0.65ha of land at Ballynabarny zoned OS 'Open Space' in the Draft LAP be zoned E 'Employment'. In support of this rezoning the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The land was zoned E 'Employment' in the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ The land was zoned E 'Employment' when Wicklow Enterprise Park and Wicklow County Council jointly purchased these lands. <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>Draft Zoning:</p>  </div> <div style="text-align: center;"> <p>Zoning Request:</p>  </div> </div>
Chief Executive Response		
<p>County Policy Objective 17.26 of the Wicklow County Development Plan 2022-2028 states the following:</p> <p><i>'Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.'</i></p> <p>As the objectives of the Wicklow County Development Plan 2022-2028 apply within the area of the Draft Wicklow Town-Rathnew Local Area Plan 2025, the land corresponding to the 'Open Space' zoning would require to be maintained as a riparian buffer zone and therefore OS zoning is most applicable. On this basis, it is appropriate to retain the OS zoning objective.</p> <p>Therefore the CE does not recommend the zoning of these lands for E 'Employment' development.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

No.	Name	Issues Raised
10	Knockrobbin Developments Ltd. Ref 103018	<p>It is requested that c. 4.55ha of land at Bollarney North zoned RN2 'New Residential – Priority 1' and OS1 'Open Space' in the Draft LAP be zoned RN1 'New Residential - Priority 1'. In support of this rezoning the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Pre-application consultations ongoing on the lands. ▪ Other lands zoned RN1 restrict development to a limited number of landholders, with Tinakilly Park equating to c. 33% of RN1 lands. ▪ Lands within SLO4 are fully serviced. ▪ Land was ceded for the Port Access Road to provide for residential development. ▪ Wicklow Train Station is less than 300m from the lands. ▪ The quantum of land previously zoned R2 in the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ Planning history of permitted residential development of 315 No. units on the lands. <p>Draft Zoning:</p>  <p>Zoning Request:</p>  <p>It is further requested that the following text be omitted from SLO4, on the grounds of a preference to provide educational uses as 'normally allowed' under this zoning, without preventing the possibility of a community/sports/recreation type development: <i>-'A minimum of 1.2ha on lands zoned CE shall be provided for community uses. Generally, this shall comprise a community / sports/ recreation type development</i></p>

	<p><i>of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and agreement with the Planning Authority.'</i></p> <p>It is further requested that additional text within SLO4 is altered as follows, on the grounds that the provision of such active travel infrastructure within residential open space, as opposed to within OS1 lands, would be supported:</p> <p><i>'To provide a linear green route for walking and cycling, with a minimum width of 8 metres and a maximum width of 10 metres within the public open spaces lands, on the lands zoned RN1OS1 with pedestrian / cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly. (indicative route shown with purple arrow.)'</i></p>
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Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with the NPF, Ministerial Guidelines (including the 'Development Plans – Guidelines for Planning Authorities' (2022), RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy.

An essential component of the residential zoning strategy is to provide for adequate lands to meet current and future needs, in a clearly articulated and justified phased manner, in accordance with Core Strategy targets. The residential lands needed to meet said targets during the lifetime of the LAP are identified as RN1. The development of phase 2 'RN2' lands is not solely linked to the full / majority development of RN1 lands; the key factor affecting the developability of RN2 lands is consistency with the housing targets of the Wicklow Core Strategy.

Increasing the amount of lands zoned New Residential – Priority 1 (RN1) as suggested in this submission would exceed Core Strategy requirements and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

In addition, the proposed change in zoning requested in this submission would result in a reduction in OS1 'Open Space' zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and to ensure maximum protection of the environment particularly in sensitive area such as these close to the Broadlough, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

Therefore the CE does not recommend the zoning of these lands for 'New Residential – Priority 1' development.

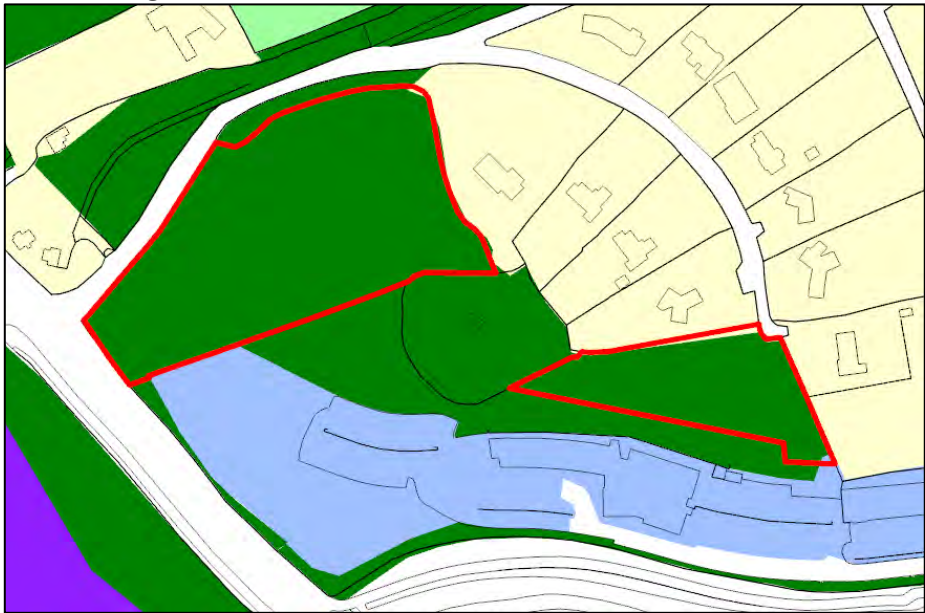
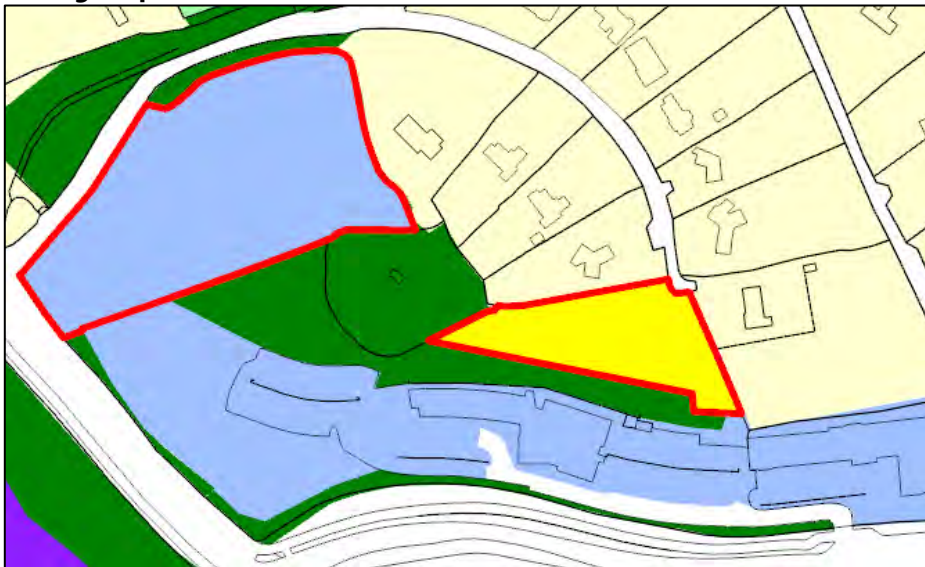
With respect to the request regarding the green route, it is deemed most appropriately located in the OS lands.

No amendments to the LAP are recommended.

Please note that a significant number of additional submissions from parties other than the landowner have been made with respect to SLO4 Bollarney North – please see Chapter 11, Section 4.3.10.2 , SLO 4 Bollarney North and Section 5 SEA / AA of this report.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
14	JEN Properties Ltd. Ref 100325	<p>It is requested that c 1.9ha of land at Knockrobin/Glebe zoned OS2 'Natural Area' in the Draft LAP be zoned for Health Care/Residential (Plot A) and for infill residential development (Plot B). In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Plot A ideally located for a step-down hospital with associated residential units, and provides a 'gateway'/corner building opportunity. ▪ Plot B is ideally located for infill development, located at the end of the Knockrobin estate cul-de-sac. ▪ The subject lands are considered 'Tier 1' serviced and outside of any flood risk zone. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

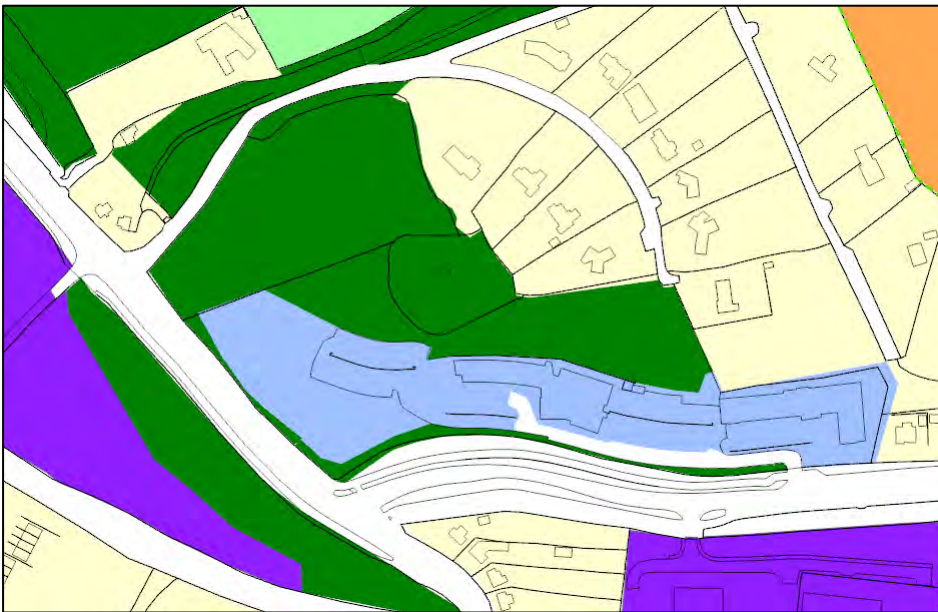
With respect to the request to change part of the lands from OS1 to CE, having regard to the existing community uses adjacent this is considered a reasonable proposal to consider changing part of the lands from OS1 to CE subject to (a) all mature trees on the lands being retained and protected and (b) a public amenity park area being provided as part of any development, that allows for public access to the trees

With respect to the request for a change from OS1 to RN1, the CE does not support this request; the lands that are proposed for residential zoning appear abundant in vegetation and natural biodiversity and therefore it is considered it would undermine the nature protection objectives of the County Development Plan and this LAP to consider allowing residential development which would clearly require significant site clearance.

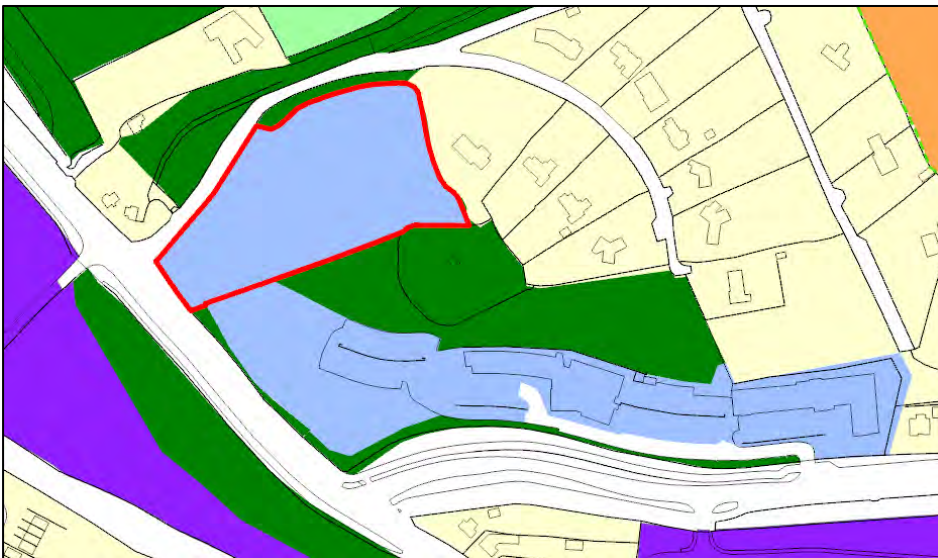
Chief Executive’s Recommendation

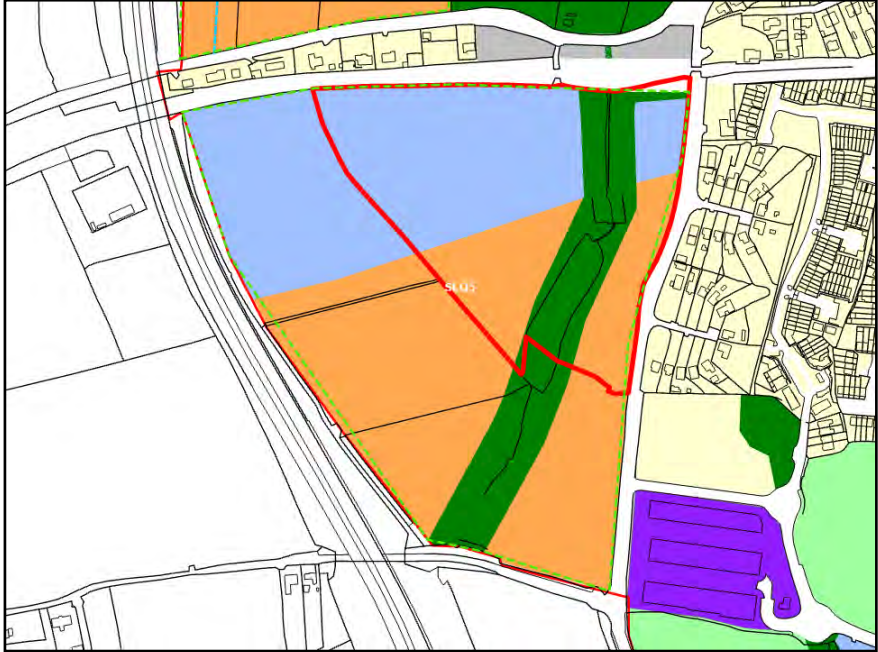
Amend zoning of lands from ‘OS1 – Open Space’ to ‘CE – Community & Education’ as illustrated below:

Change from:

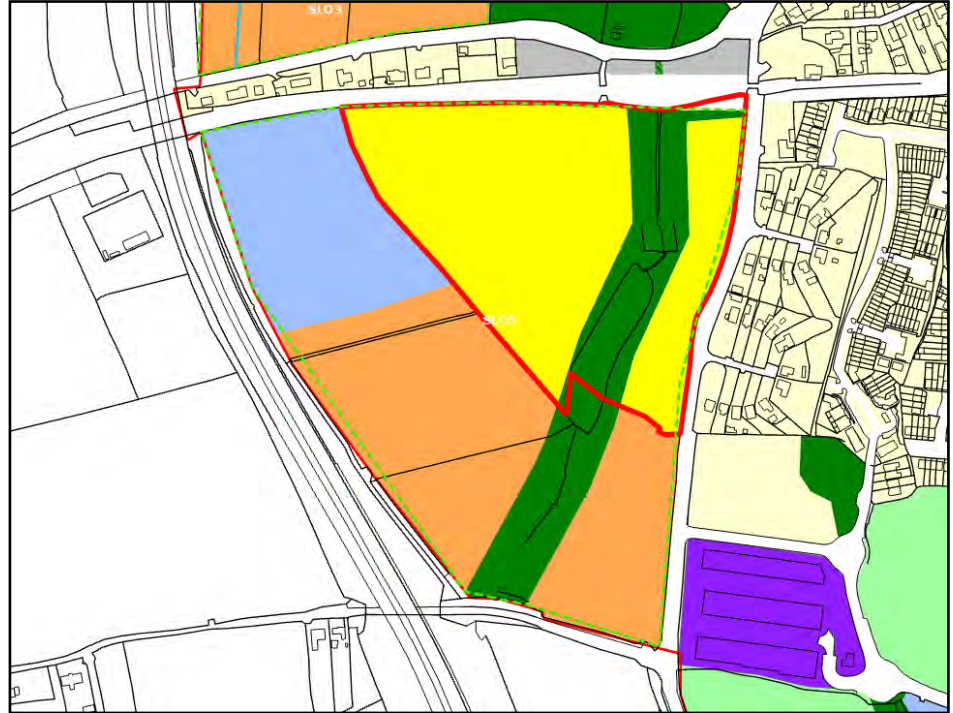


Change to:



No.	Name	Issues Raised
15	Eugene Stephens By Post	<p>It is requested that c. 8.6ha of land at Ballybeg, Rathnew zoned CE 'Community Education', RN2 'New Residential Priority 2' and OS1 'Open Space' Areas' in the Draft LAP be zoned RN1 'New Residential Priority 1' and Open Space as per the previous Wicklow LAP. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The lands are located on western edge of the local area boundary and would therefore not be suitable for any school or community facility as the lands are located more than 15 minute walk time from existing village facilities or educational buildings. ▪ The land is serviceable due to the main sewer and watermain availability on Ballinabarney Hill and the good road and public transport network servicing the land. ▪ The 25m green strip either side of the stream appears slightly excessive. ▪ The development of this land for residential will serve the area with easy access due to its proximity to the nearby exist/off the M11 Motorway. ▪ Housing development at this area will also allow pedestrian access through the existing single underpass of the railway line, to the proposed land zoned Public Utility to the north of the site and railway line which is earmarked for railway platform. This will make easy access to the Dublin Wexford train and ideal location for regular commuters to Dublin for work. ▪ There is no direct access to residential development showing on the concept plan. ▪ There appears to be ample land zoned community/ education at locations which are more easily accessed by the general public within the LAP area particularly the massive area occupied by the county campus, which will cater for community/ education needs into the lifespan of this LAP. <p>Draft Zoning:</p> 

Zoning Request:



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with the NPF, Ministerial Guidelines (including the 'Development Plans – Guidelines for Planning Authorities' (2022), RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy. In these regards, the request for the zoning of additional land for residential use as detailed in this submission would exceed Core Strategy requirements and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

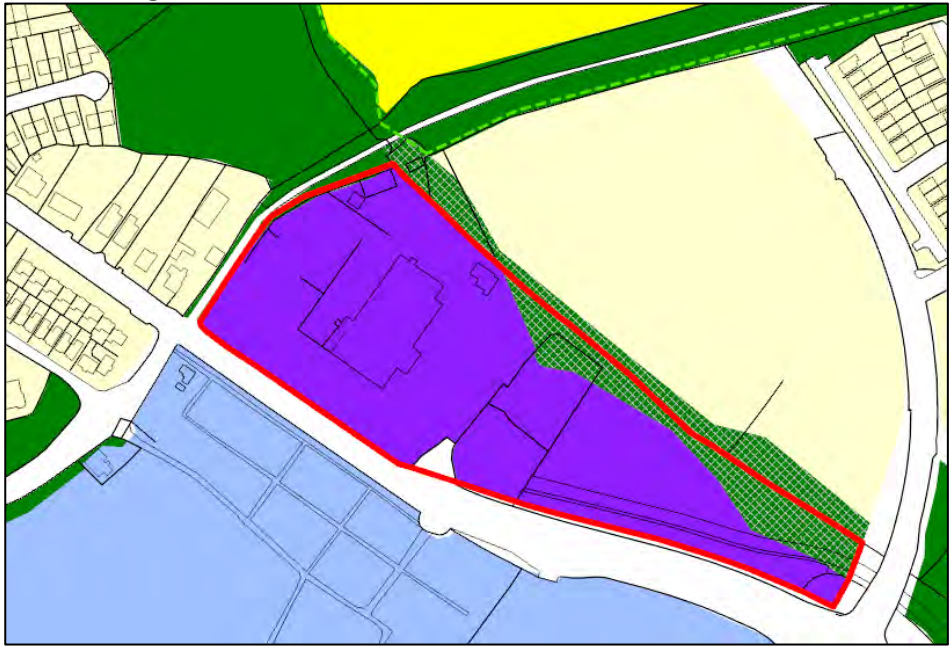
The proposed change in zoning requested in this submission would result in a reduction in CE 'Community & Education' zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

In particular, these lands have been identified as optimally located for the development of a future secondary school in the Rathnew area, following detailed assessment set on the Local Transportation Study and the Social Infrastructure Audit that accompany the plan. These clearly identified that nearly all residential area in Rathnew village and lands surrounding same to the north are not within walking distance of a secondary school. A school at this location would result in nearly all residential areas in the northern part of the plan being within walking distance. This site is also optimal having regard to its location on regional roads connecting to locations within and surrounding the settlement.

With respect to the green corridor along the watercourse, this has been carefully identified to ensure protection of the watercourse and trees and compliance with County Development Plan objectives. The concept plan is purely indicative and does not purport to identify or fix possible access points into the lands. The CE is satisfied that all lands zonings shown in the draft LAP could be accessed and would be of adequate size / width to support development, even with the central green corridor reserved.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
16	Stafford Family Partnership Ref 152725	<p>It is requested that c. 3.8ha of land at Merrymeeting zoned E 'Employment' and OS in the Draft LAP be zoned MU 'Mixed Use' and optionally brought within the boundary of SLO2.</p> <p>It is unclear if the lands zoned OS are directly requested to be rezoned as this is not explicitly stated, however the submitted site boundary (Fig. 1) would include the OS lands. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The site is no longer in active uses and expressions of interest have not been forthcoming. ▪ There is a need for housing in the Wicklow-Rathnew area. ▪ That the E 'Employment' zoning of the lands is unrealistic and unachievable within the lifetime of the LAP/CDP due to its location and historic vacancy, with reference made to the Development [Plan] Guidelines 2022 – including in terms of employment zonings having a credible rationale and the 'SMART' approach to development plan objectives. ▪ That the E 'Employment' zoning of the lands is not realistic in relation to Section 2.3.2 of the Wicklow County Development Plan 2022-2028 – in terms of the CDP's function in supporting the specific and achievable goals of the LECP and economic development generally. ▪ That the Draft LAP written statement states that objectives should be achievable, and may make specific reference to the site as a brownfield opportunity site. ▪ The submission includes a report from Lavelle Commercial Property stating that it is very difficult to see the subject site being developed for employment purposes on a viable basis during the life of the draft plan arising from a variety of factors including demand, construction cost and adjacent residential areas. <p>Draft Zoning:</p> 

Zoning Request (including SLO2 boundary change):



Chief Executive Response

The zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The zoning of brownfield opportunity sites for land uses other than residential, including the zoning of land for employment purposes, would be consistent with the strategy of providing for a mixture of uses and the efficient use of land to reduce the need to travel.

The proposed change in zoning requested in this submission would result in a reduction in employment zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has similarly been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

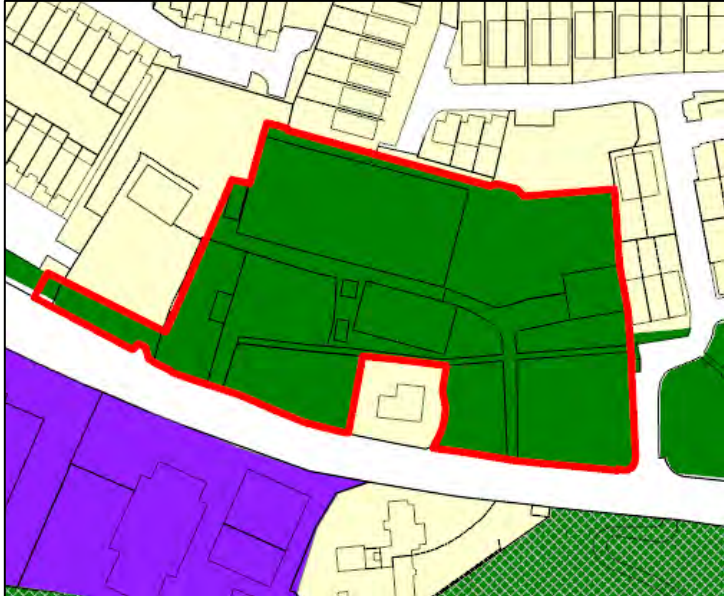
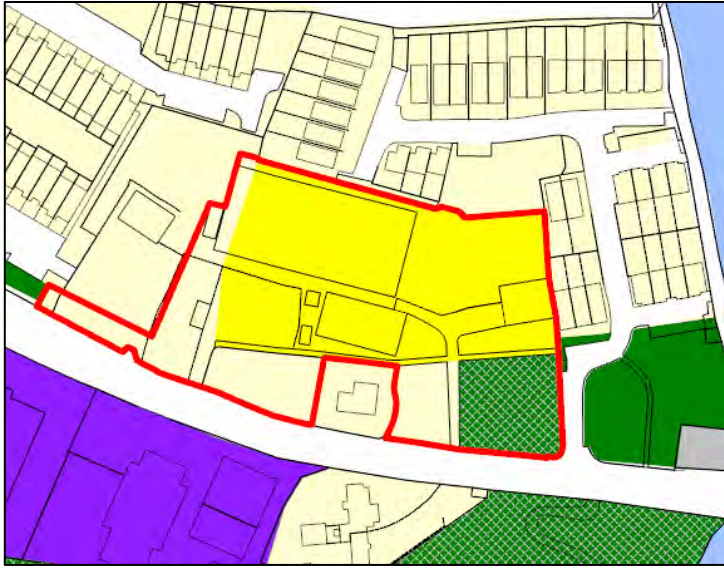
Finally, the OS zoning provisions are justified in order to address areas on the landholding that are identified as at risk of flooding.

These lands are not needed to achieve the objectives of SLO2 therefore, any change to the boundary of SLO2 is considered warranted.

Therefore the CE does not recommend the zoning of these lands for MU 'Mixed Use' or residential development. On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
19	<p>Woodroofe Family & William Parle Ref 095152</p>	<p>It is requested that lands of c. 1.03ha in Bollarney North zoned OS1 'Open Space' in the Draft LAP be zoned RN1 'New Residential - Priority 1', RE 'Existing Residential', and OS2 'Natural Areas' [Note that the submission refers to POS 'Passive Open Space', which in the draft LAP is now referred to as OS2 'Natural Areas']. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The residential (or part residential) zoning of the lands under the Wicklow Town-Rathnew Development Plan 2013-2019 and the Wicklow Town Development Plan 2007 ▪ The location of the subject lands surrounded by residential development, with walking distance of a train station, community facilities, and town centre facilities. ▪ The servicing status of the lands as 'Tier 1 Serviced Zoned Land' <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

The key basis for the change in zoning of these lands from part OS - part residential from the previous plan was additional assessment of risk of flooding, which shows slightly more extensive risk of flooding compared to the previous assessment pre 2013 which was based on less accurate data, as well the County Development Plan objective to maintain a 25m riparian corridor along watercourses.

There are also some areas within this parcel that are not identified as at risk of flooding presently, but have been identified by the OPW as being at risk in future scenarios.

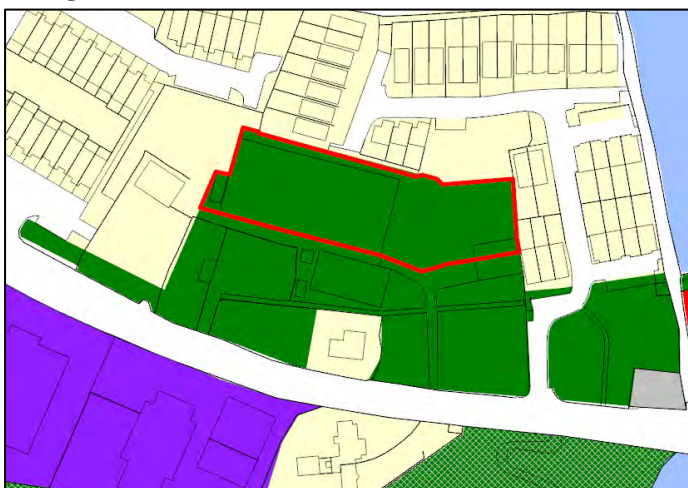
Therefore it is considered that part of the lands may be considered for a zoning change. Given the small, infill nature of these lands in the built up part of the settlement, it is not considered that a breach of the Core Strategy would arise from a small quantum of residential zoning at this location.

The remaining OS would still cross the entire roadside frontage of the lands where a watercourse and flood risk is present, and development of any residential lands to the north would require carefully calibrated solution to cross the flood risk zone without impeding water flows or resulting in flooding elsewhere.

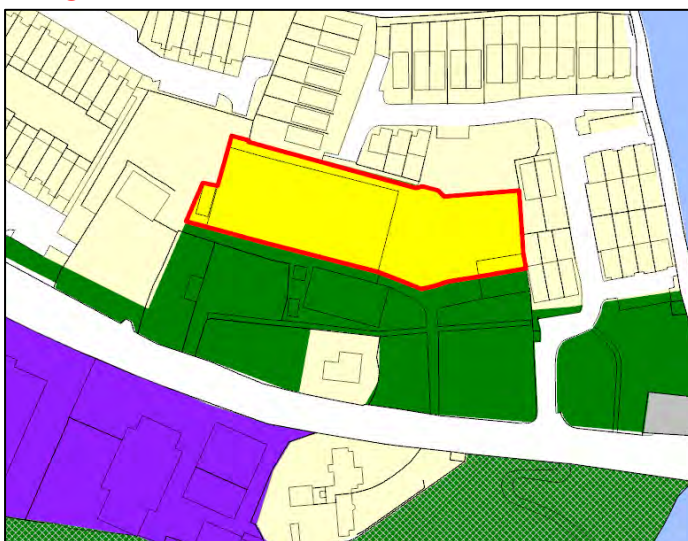
Chief Executive's Recommendation

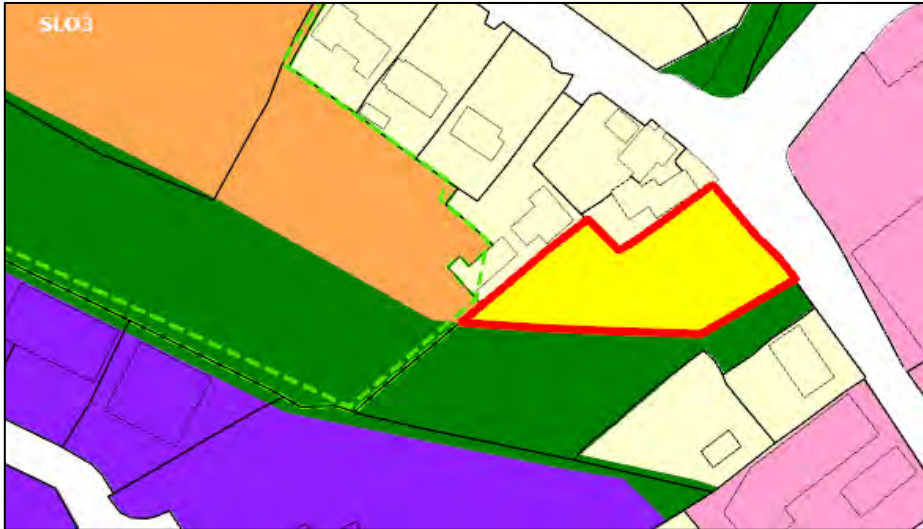

Amend zoning of lands from 'OS1 - Open Space' to 'RN1 - New Residential' as illustrated below:

Change from:



Change to:



No.	Name	Issues Raised
21	Siofra Quigley Ref 104402	<p>It is requested that lands of c. 0.2ha at Milltown North zoned RN1 'New Residential – Priority 1' in the Draft LAP be zoned OS1 'Open Space'. In support of this rezoning, the following grounds are put forward:</p> <p>The area is adjacent to lands zoned as a green link between the N11 and Tinakilly.</p> <p>The biodiversity value of the lands as a naturally regenerating immature woodland with scrub understory, with a range of wild species observed utilising the site as a natural corridor, in the context of a climate and biodiversity crisis.</p> <p>That it is a small constrained site that may be difficult to access at the traffic lights on the R772.</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 
Chief Executive Response		
<p>The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with</p> <ul style="list-style-type: none"> ▪ The NPF, RSES and Wicklow County Development Plan requirements and objectives; ▪ Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022) <p>The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with</p>		

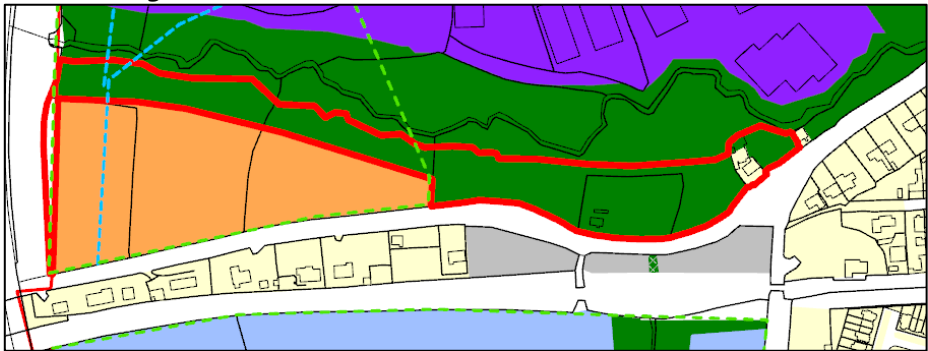
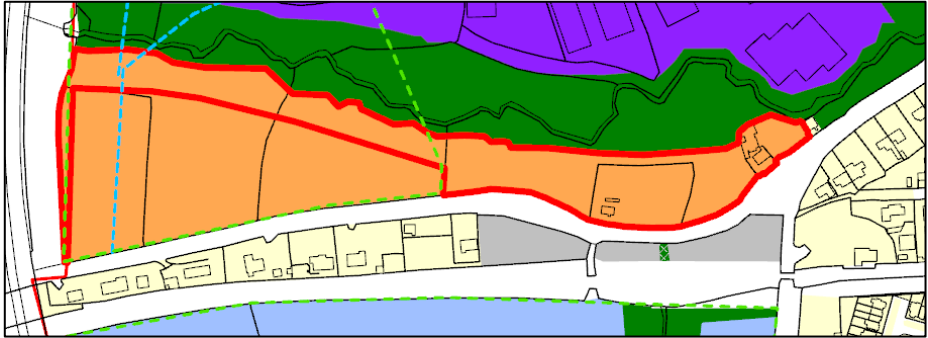
undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, these lands are considered suitable for residential development, being located in the core of Rathnew Village. It should be noted that under the previous plan, most of the lands now proposed to be zoned OS adjoining the RN1 lands to the west were also zoned for new residential development; having given careful consideration to the biodiversity of the area, including along the watercourse which separates these lands from the employment lands to the west, more than 50% of this parcel has now been proposed to be changed to OS. Therefore it is very evident that nature and biodiversity considerations have been fully integrated into the zoning strategy for this small area.

Therefore the CE does not recommend the zoning of these lands for OS1 'Open Space' development.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
38	Mary Byrne, Liz Byrne, Carmel Whelan Ref 131457	<p>A range of issues and requests are set out in this submission; the assessment below addresses the request for changes in zoning.</p> <p>This submission also raises issues with respect to the Tighe's Avenue to R752 link road objective, which are addressed in Chapter 9, Topic 2: Transportation of this report; and with respect to flood risk and OS2 zoning interpretation, which are addressed in Section 6 of this report. .</p> <p>It is requested that c. 2.12ha of lands at Ballybeg, zoned OS1, be zoned for residential use. In support of this rezoning, the following grounds are set out:</p> <ul style="list-style-type: none"> ▪ The residential zoning of part of the lands under the Wicklow Town-Rathnew Development Plan 2013-2019 [A request to reinstate the residential zoning of these lands only, of c. 0.33ha, is also stated separately]. ▪ The lack of justification for the removal of zoning in the Draft LAP. ▪ New or better flood information shows a significantly reduced zone A and B on the lands. ▪ The 2013 plan process zoned land in flood zones for residential use on the basis of a submitted site specific flood risk assessment. <p>Draft Zoning:</p>  <p>Zoning Request:</p>  <p>[Issues in relation to phasing were not raised, therefore the above mapping assumes the requested zoning as RN2 'New Residential – Priority 2' in line with the adjacent lands]</p>
Chief Executive Response		
<p>Under the previous development plan, these lands were zone part residential / part OS. This submission is seeking not only to re-instate of some lands that have been proposed to change from R to OS but also that lands that were zoned in the previous development plan as OS should now be zoned for R use.</p> <p>The key basis for the change in zoning, which has resulted in a very small reduction in the residential element</p>		

(from 2.65ha to 2.33ha) and extension of the OS zoning, was additional assessment of risk of flooding, which shows more extensive risk of flooding compared to the previous assessment pre 2013 which was based on less accurate data, as well as the application of the new provisions of the 2022 County Development Plan which now requires the maintenance of a 25m riparian corridor along watercourses. There are also some areas within this parcel that are not identified as at risk of flooding presently, but have been identified by the OPW as being at risk in future scenarios.

The CE is satisfied in these regards that the OS zoning is fully justified and necessary in order to ensure no risk of flooding would arise for occupants of any future homes and to ensure maximum protection of nature and biodiversity.

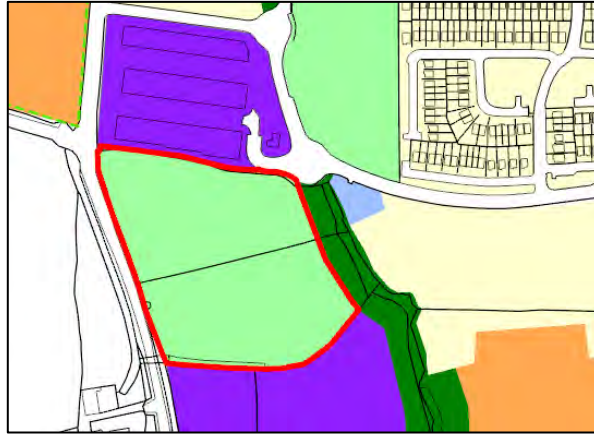
On foot of this therefore submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

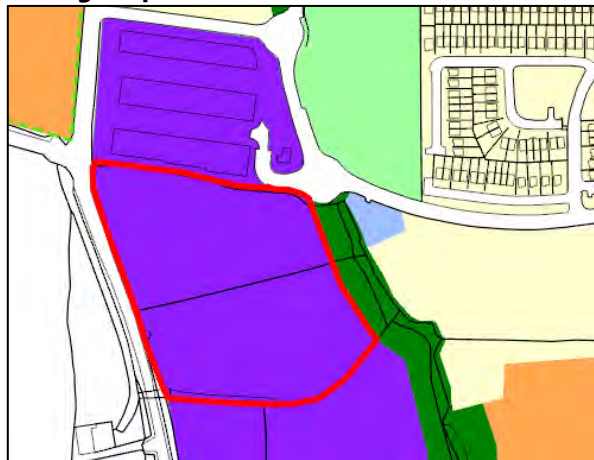
No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
40	Cyril McGuire of VC Land Investments Limited Ref 143107	<p>It is requested that lands of c. 4.1ha at Broomhall zoned AOS 'Active Open Space' in the Draft LAP be zoned E2 'Enterprise & Employment' or be zoned for residential development (Note: it is not requested to rezone lands within the subject site zoned OS1 'Open Space' in the Draft LAP).</p> <p>In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The track record of the landowner in developing largescale commercial developments. ▪ That no other pre-draft submissions identified this site as being suitable for active open space. ▪ The pattern of land use zoning in the surrounding area and the site's accessibility to the national road network. ▪ The planning history of the site, which includes permissions for largescale commercial development ▪ The zoning of the lands under the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ The incorrect exclusion of Wicklow Golf Club in the calculation of existing active open space on the basis that it is for fee-paying members only, as its website states that 'pay as you go' use is possible, and other fee paying clubs exist within the plan area; the lack of stated area for Wicklow Town Beaches in the accompanying Social Infrastructure Audit; the exclusion of Marlton Equestrian Centre in calculating existing active open space; the exclusion of open space within housing developments in calculating active open space, e.g. Brookfield Park. ▪ That there is 75.6ha of existing and undeveloped of active open space, 8.8ha greater than the 66.8ha required as per the accompanying Social Infrastructure Audit. ▪ That the accompanying Social Infrastructure Audit did not account for existing and planned active open space within the catchment area but outside the LAP boundary, e.g. Ashford GAA club, permitted Glenealy GAA club. ▪ That the area of active open space under development under WCC Reg. Ref. 22/837 is 8.8ha, which exceeds the 2.45ha stated in the accompanying Social Infrastructure Audit. ▪ That land previously zoned AOS 'active open space' which have been rezoned 'Open Space' in the Draft LAP have not been reflected in the calculation of active open space. ▪ That the calculation of active open space has not had regard to the future provision of active open space as part of a new education facility within the SLO5 area. ▪ That the subject lands are one of the best served in the LAP with regard to open space, with a lack of active open space in the north of Rathnew. ▪ That there are 121.09ha of land zoned OS1 'Open Space' and 117.48ha of land zoned OS2 'Natural Areas', to a total of 324.32ha of AOS/OS1/OS2 in the Draft LAP. ▪ That the subject site is an outlier in lacking a clear rationale for identification as active open space.

Draft Zoning:



Zoning Request:



[It is noted that the submission requests E2 'Enterprise & Employment' zoning, the above mapping shows the requested zoning as the amalgamated E 'Employment' zoning as provided for in the Draft LAP.]

Or



[Noting that the submission requests 'residential' zoning without reference to phasing, the above mapping shows the requested zoning as RN1 'New Residential - Priority 1'. The CE response will respond to this request on the basis of the subject lands being zoned either RN1 'New Residential - Priority 1' or RN2 'New Residential - Priority 2'.

Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the zoning of additional land for residential use (RN1 'New Residential – Priority 1 or RN2 'New Residential – Priority 2') as detailed in this submission would:

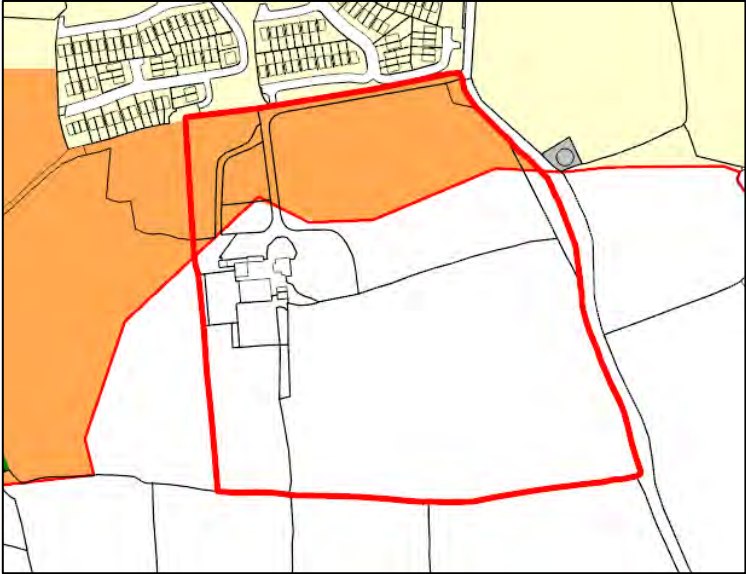
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended);
- Result in the excessive spatial expansion of the settlement and would comprise an unsustainable and unacceptable development location for new residential development, would be inconsistent with sequential development patterns, with Town Centre First principles, proximity to services and facilities, and the need to reduce carbon emissions.

The CE is satisfied that these lands are highly suitable for AOS development, having regard to their location vis-a-vis existing sports club and residential areas surrounding. In addition, the CE is satisfied that more than adequate provision has been made in the draft plan for new employment development, including in this immediate area, and therefore does not support the request to change from AOS to 'E'.

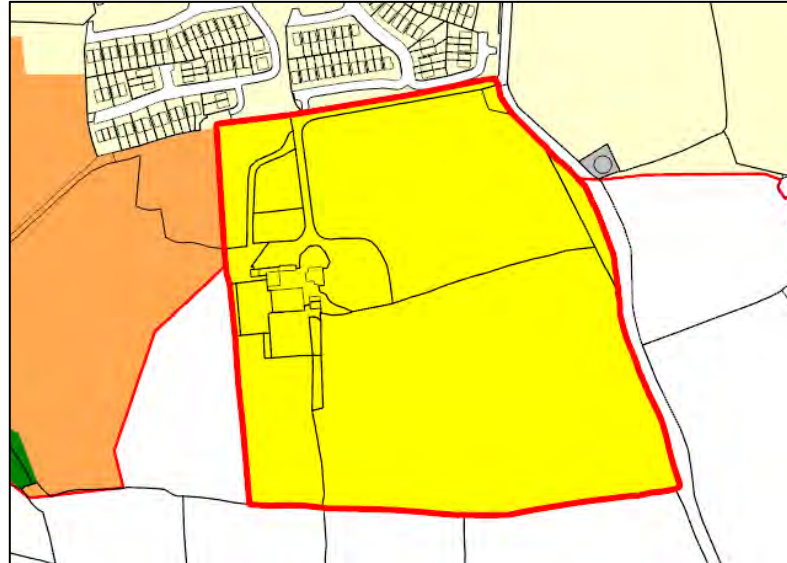
On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
43	Durkan Group Ref 164446	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which is also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>It is requested that c. 11.3ha of lands at Broomhall, partially zoned RN2 'New Residential – Priority 2' and partially outside of the settlement boundary with no specific land use zoning, be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Insufficient RN1 lands have been zoned to deliver the housing target for the settlement given the achievable densities compared with the implied densities of 48.6 dph (gross) and 57.2 dph (net). ▪ The subject lands are fourth best of 25 No. sites in relation to proximity to town/village centres and a range of services/amenities. The subject lands scored better in this regard than 21.5ha proposed to be zoned RN1 'New Residential – Priority 1', with sites between the centres between Wicklow town and Rathnew being more likely to be closer to services. ▪ The development of the subject lands would represent coherent and integrated infill development, towards the formal amalgamation of Wicklow Town and Rathnew Village, as opposed to the blanket continuance of radiating outwards from the 2 No. centres in a 'dumbbell' like shape. Flood risk and existing/emerging development constrain such infill in the north-east of the plan area, whereas the subject lands would be classified as 'Tier 1'. ▪ The local activity and intention for delivery by Durkan Group. ▪ Key water services and road infrastructure are being delivered to the boundary of the site, including 'distributor grade' road infrastructure. <p>Draft Zoning:</p> 

Zoning Request (incl. settlement boundary change):



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

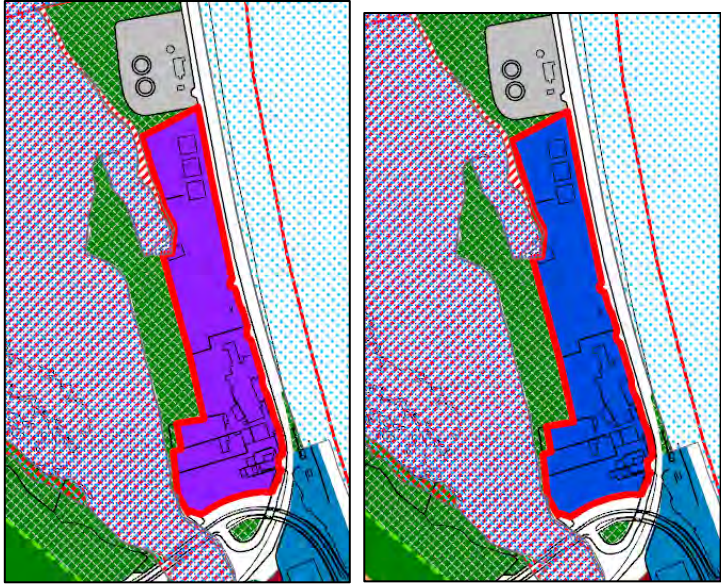
In these regards, the request for the zoning of additional land for residential use, and the alteration of the phasing of residential land from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1', as detailed in this submission would

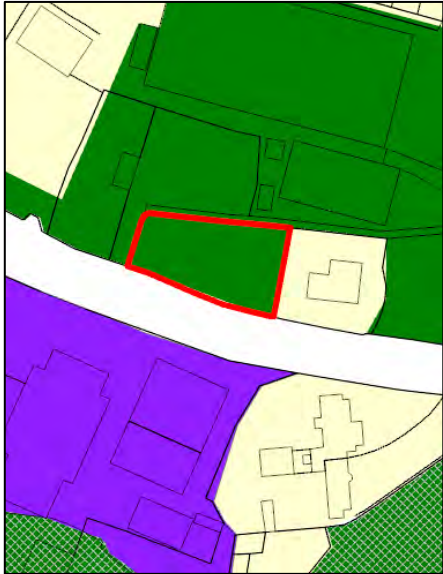
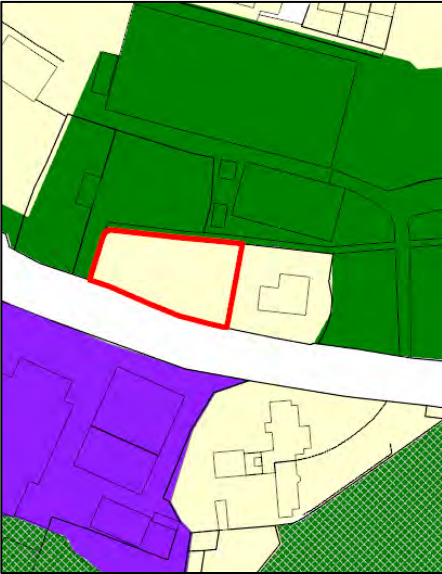
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Exceed the 80m contour in this area, which has been established in the previous plan and continued in this draft plan as the upper limit for new development having regard to visual amenity and servicing considerations. Having regard to the availability of significant lands in and surrounding the settlement at less sensitive and more easily serviced lower elevations, these lands are not considered an optimal location for the expansion of the settlement.

Therefore, the CE does not recommend the zoning of these lands for residential development.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
	<p>Susan Gavin Ref 171625</p>	<p>Requested that lands of c. 8.3ha at Bollarney Murrough/Corporation Murrough, zoned E 'Employment', be zoned T 'Tourism'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ It is one of the most beautiful areas in the whole county, possibly East Coast. ▪ Area of employment is unsightly ▪ Businesses could be relocated to a more suitable site and this area re naturalised or used for tourism as an amenity for locals and visitors alike. <p>Draft Zoning: Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>While the points raised in this submission are noted, the lands in question are already developed for employment use and therefore it would not be logical to amend the zoning as suggested. However, it should be noted that in light of the sensitivities of the area, the draft LAP has (a) reduced the extent of the employment zoning in the area and (b) set out development objectives to manage further development in the area as follows:</p> <p><i>On lands zoned for employment on the 'Murrough North', it is the objective of the Council to:</i></p> <ul style="list-style-type: none"> ▪ <i>To facilitate the continued operation of established / permitted existing business / commercial activities subject to ensuring they operate in a manner which is respectful of the local environment, use environmentally friendly / innovative technologies and improve the visual amenity of the area;</i> ▪ <i>To resist further expansion / intensification of the existing industries / businesses and consideration will only be given to development that enhances nature conservation;</i> ▪ <i>To ensure that no development is permitted which would give rise to significant adverse impacts upon the conservation objectives of European sites.</i> ▪ <i>To encourage site operators to improve the overall visual amenity of the area including the provision of additional landscaping using native species appropriate to this natural coastal setting.</i> <p><i>While the Council acknowledges that these industries are established, permitted and operating businesses / commercial activities, it is important to have regard to (a) the need to ensure no significant adverse impacts on the European Sites arise from the intensification or change of use of this area for industry / employment and (b) the nature restoration goals of the Council and (c) the available of significant areas of zoned employment land within the settlement away from the coast and other environmentally sensitive locations.</i></p>		
<p>On foot of this submission, no amendments to the LAP are recommended.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025</p>		

No.	Name	Issues Raised
50	William Parle Ref 082014	<p>It is requested that land of c. 0.15ha at Bollarney North, zoned OS1, be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The planning history of the site, with 4 No. units permitted under Ref. 16/1149. ▪ The servicing of the site by sewers, watermains, footpaths and sufficient sightlines. ▪ That a full flood report will accompany any future planning application as the lands are partially in flood zone A. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

The lands in question are zoned for OS use having regard to the flood risk identified on the lands. As part of the development plan making process, in accordance with the Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009), it is necessary to carry out Strategic Flood Risk Assessment of the plan provisions, including zoning, and only zone lands that are free from flood risk or pass the plan-making 'Justification Test'.



These lands do not fulfil these criteria, would not pass the plan-making Justification test for residential zoning; it is not possible to zone the land for residential development on the basis that a site specific flood risk report can be submitted at planning application stage.

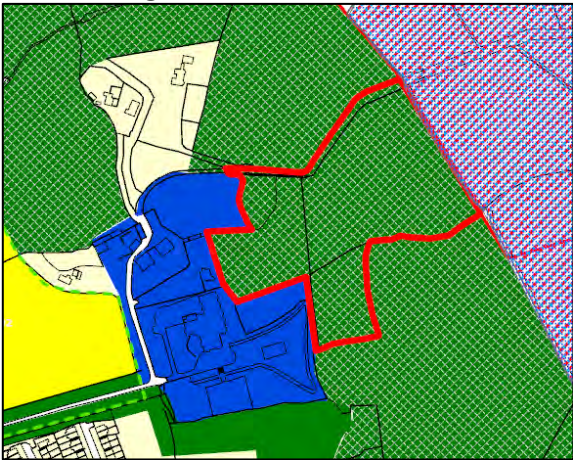
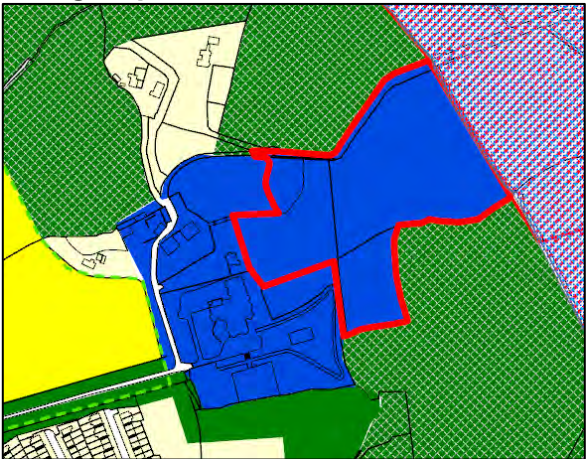
Therefore, the CE does not recommend the zoning of these lands for residential development.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
52	David O'Rorke Ref 093521	<p>It is requested that c. 0.28ha of land at Knockrobin, zoned RN2 'New Residential – Priority 2', be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Permission previously granted Ref. 16/552 for a 3-bedroom family dwelling with a garage. ▪ The inability to return from Australia in late 2019 to enact the permission due to COVID-19, and the intention to return in the coming months. ▪ The intention to submit a new planning application on the lands. ▪ The legal ownership of the lands corresponding to the zoning request, and the ownership by family of the surrounding Knockrobin Farm. The subject lands are accessed by a right of way. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>The zoning of the subject lands as RE 'Existing Residential' would not be consistent with the objective of that zoning, in that no existing residences are present on the subject lands. The draft RN2 'New Residential – Priority 2' zoning allows for residential development in line with all prevailing development objectives and standards.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025</p>		

No.	Name	Issues Raised
54	Mezen Consultancy Services Ltd. Ref 100103	<p>It is requested that lands of c. 5.1ha at Knockrobin, zoned OS2, be zoned T 'Tourism'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ There is an existing glamping facility of c. 0.97ha partially within and adjacent to OS2 lands, as permitted under Refs. 19/208, 24/60333, 24/60345, which has been a great success. ▪ There is a concern that the proposed zoning of lands as OS2 'Natural Area' will have an adverse and detrimental restriction to the potential to further expand the business. ▪ There is considerable potential for expansion, including the development of walkways and other outdoor amenities which would enhance the existing development. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

The lands in question are zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and

Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.



The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
58	Wicklow Town & District Chamber of Commerce Ref 120652	<p>It is requested that c. 1ha of lands at Bollarney Murrough, zoned OS2 'Natural Area', be zoned E 'Employment'. This submission does not map the lands but rather supports Submission No. 67 in their request. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The land is essential to the operation of R.F. Conway & Conway Limited, one of Wicklow Town's prominent employers and the largest imported timber terminal in the state. ▪ The terminal is key to enabling the Government's housing targets and is at capacity. ▪ This zoning issue could be a key focal point of negative local and national headlines, would negatively affect Wicklow's local economy, and would impact the long term sustainability of Wicklow Port. ▪ The rezoning of c. 1ha would reflect a cooperative approach to achieving both economic and environmental objectives.
Chief Executive Response		
<p>The lands in question are zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.</p> <p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

No.	Name	Issues Raised
62	Dominican Convent Wicklow Ref 125947	<p>It is requested that lands of c. 0.08ha at Corporation Lands, zoned RE 'Existing Residential', be zoned CE 'Community & Education'. In support of this rezoning, it is put forward that It is not wished that this area is zoned for residential use as it forms the access to the community farmlands, zoned CE 'Community & Education', adjoining this area.</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

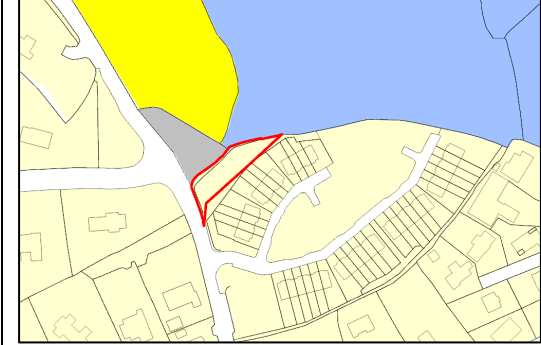
Chief Executive Response

The requested zoning amendment is considered acceptable and does not give rise to adverse impacts.

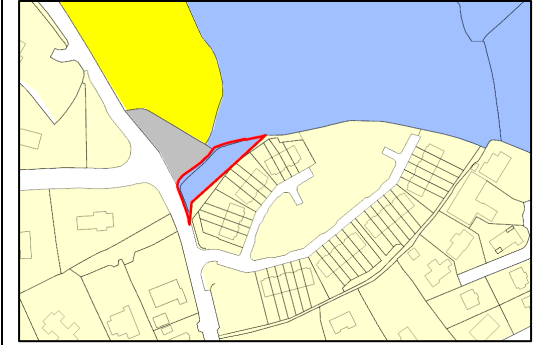
Chief Executive's Recommendation

Amend land-use zoning map as follows:

Change from:



Change to:

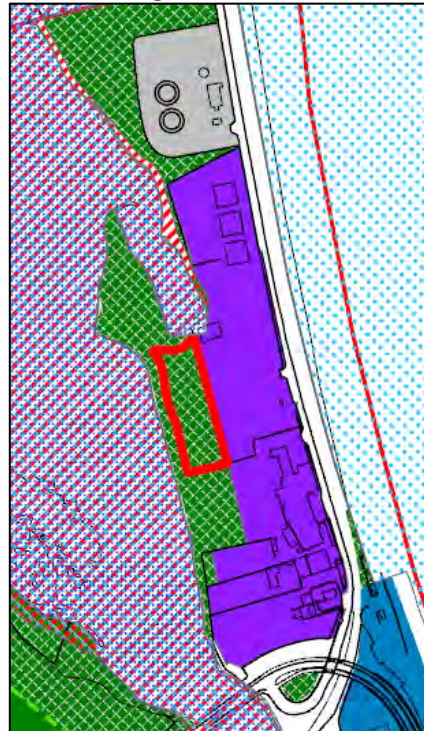


No.	Name	Issues Raised
67	R.F. Conway & Company Ltd. Ref 142720	<p>It is requested that c. 1ha of lands at Bollarney Murrough, zoned OS2 'Natural Areas', be zoned E 'Employment'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ R.F. Conway & Company Ltd. is multi-generational highly reputable shipping and logistics enterprise based in Wicklow Town, directly employing 20 individuals and supports hundreds of additional jobs across the nation while contributing directly to Ireland's national objectives for addressing housing needs. ▪ Wicklow Port was designated a Port of Regional Significance, as recognised in the Wicklow County Development Plan 2022-2028, with the port managed by Wicklow County Council. ▪ Engaging local businesses and stakeholders should be a priority in the local area plan process. ▪ The lands are strategically located with access to the port access road, delivered by Wicklow County Council, and Wicklow Port. ▪ Previous objectives in the Wicklow Town-Rathnew Development Plan 2013-2019 had the objective: <i>'Facilitate the continued operation of established / permitted existing business / commercial activities and the development of new employment facilities in this area'</i>. ▪ A single shipment of imported timber nearly fills the port to capacity. The existing storage facilities prevent congestion by transporting cargo out of the port before the next vessel arrives, with logistics not easily replicated at other ports. R.F. Conway & Company is completely reliant on maintaining and enhancing operations north of the Port Access Road bridge, and the OS2 'Natural Areas' zoning of the lands has not adequately considered the significant impacts on the viability of business operations the viability of Wicklow Port. ▪ Housing targets in 'Housing for All', the promotion of Modern Methods of Construction (MMC), and the increasing role of 'offsite manufacture' in housing delivery require sawn packaged timber. Large storage facilities allow a 'just-in-time' model for procuring timber. Retaining employment zoning on the subject lands will facilitate increased volumes of packaged timber products imported through Wicklow Port and contribute to addressing the national housing crisis. ▪ The sewage treatment plan establishes a clear boundary to the Special Area of Conservation. A balanced approach is sought that aligns environmental protection with sustainable business operations. The existing landscape is brownfield scrub vegetation, with a chemical works and the Dublin and Wicklow Manure Company factory having been in use on the lands for multiple decades. Retaining the employment zoning will not result in any direct loss or alteration of the existing SAC habitat. Environmental sensitivity mapping in the SEA Environmental Report shows the subject lands in light green/blue, the lowest level of sensitivity. ▪ The zoning of c. 1ha for E 'Employment' uses would result in: 1.8ha of previous employment land being zoned OS2 'Natural Area' (along with the entire peninsula area); a 20m buffer zone along the Broadlough; additional mitigation proposed by the business (landscaping, berming, perimeter fencing, advanced lighting solutions). ▪ Risks: impacts on commercial viability, growth, future investment, job losses, and revenue. ▪ Advantages: Proven results of business operator, future rail opportunities,

Irish forestry interests.

- The submission includes a report from Environmental & Efficiency Consultants (Ireland) Ltd., which states that the subject lands have the lowest environmental sensitivity, that a storage area includes no major developments of the lands that would be likely to impact environmental objectives, is not within an SAC/SPA/pNHA or likely to contain Annex I habitats, and refers to EIA screening assessment and Natura Impact Statement for a neighbouring waste facility in 2019, which was found to not adversely impact European sites by a planning inspector.

Draft Zoning:



Zoning Request:



Chief Executive Response

The lands in question are zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

It is noted that as of December 2024, there is a live application for the development of these lands (on time extension following recommendation for refusal). This application is recommended for refusal for the following reasons:

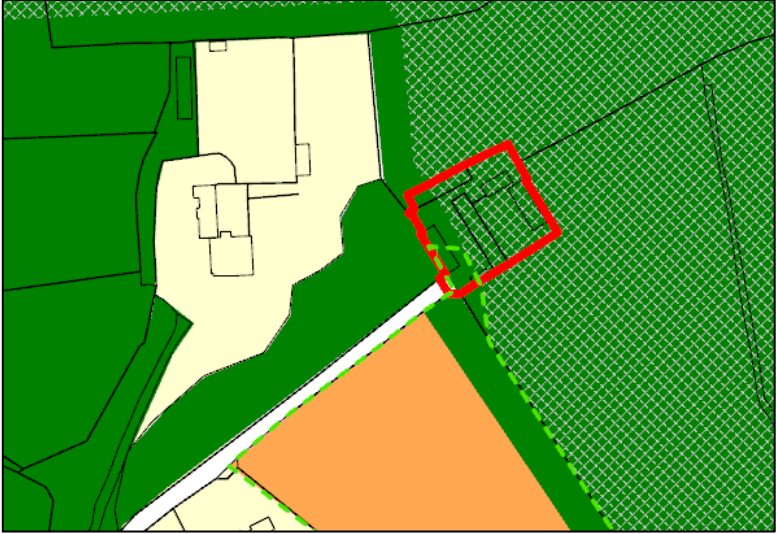
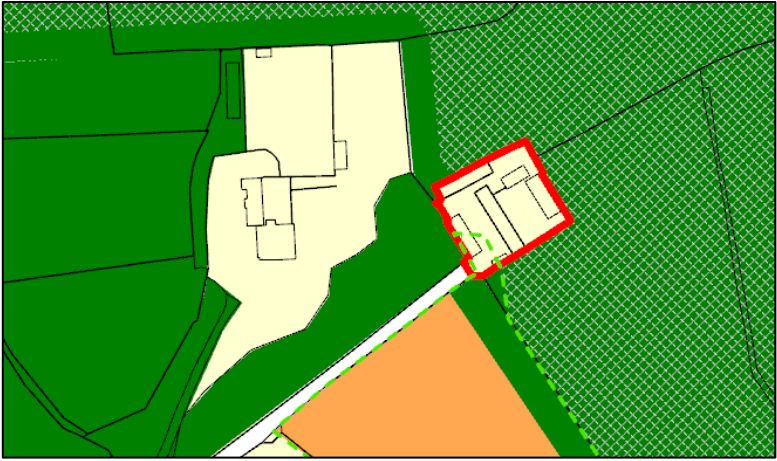
1. *Having regard to the location of the development in proximity to the Murrough SPA, and the Murrough Wetlands SAC, the location of part of the works in Flood Zone A and Flood Zone B, the qualifying interests of these Natura 2000 sites and their conservation objectives, the direct / indirect pathways to these Natura 2000 sites, the absence of sufficient details in respect to the nature and scale of the construction works and ongoing operations the lack of information on the subterranean conditions, the Planning Authority cannot be satisfied beyond reasonable scientific doubt, that the proposed development would not have significant effects on these Natura 2000 sites, and therefore the development would require Appropriate Assessment. Therefore, to permit the proposed development would be contrary to the Habitats Directive, the Objectives of the County Development Plan 2022-2028, the Wicklow Town Rathnew Development Plan 2013, and proper planning and sustainable development.*
2. *Having regard to*
 - *Lack of details in respect to construction/ operation*
 - *Lack of details in respect to the subsoil composition.*
 - *Partial location within a Flood Zone A and Flood Zone B*
 - *The provisions 'The Planning System and Flood Risk Management' Guidelines for Planning Authorities Nov 2009.*
 - *Lack of justification demonstrating the development is necessary on grounds of wider sustainability through the Justification Test outlined in section 3.9 of the guidelines,*

It is considered that the proposed development would contravene objectives CPO 14.26 and Objective CPO 17.26 of the County Development Plan 2022-2028, and the provisions of the Wicklow Town –Rathnew Development Plan 2013, is contrary to the "The Planning System and Flood Risk Management, Guidelines", would set an undesirable precedent for similar types of development on floodplains, would be prejudicial to public health, and would be contrary to the proper planning and sustainable development of the area.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
69	Therese O'Rorke Ref 150417	<p>It is requested that c. 0.2ha of lands, zoned OS1 'Open Space' and OS2 'Natural Areas', be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ A farmyard and outbuildings are evident on historical mapping as far back as 1840. ▪ The zoning of the lands as OS1/OS2 is contrary to CPO8.18 of the Wicklow County Development Plan 2022-2028, that <i>"seeks (through the development management process) the retention, conservation, appropriate repair and reuse of vernacular buildings and features such as traditional dwellings and outbuildings"</i>. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>The lands in question are predominantly zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.</p> <p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and</p>		

Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.


The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
70	Rathnew Partnership Ref 145913	<p>It is requested that lands of c. 8.3ha at Ballybeg, zoned CE 'Community & Education' and RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The table on p. 49 states that the school site to be reserved is 5ha in area, however the area identified in the SLO and also coloured blue on the proposed land use zoning map is 7.7ha and is too expansive. ▪ Lands to the east of site 2 (northern site) are the better location for a school, with direct access to the R772, within walking distance of Rathnew Village, best suited to serve the rural hinterland of the town. ▪ Department of Education considers the demand for secondary school places is generated by 8.5% of the overall population of a catchment area. 2031 target population of 19,400 would need to provide for c.1,650 pupils, current enrolment 2,067 therefore it is assumed that the additional demand (417 places) is created by the population of the rural hinterland, i.e. a demand of 5% created by the hinterland population of c. 8,447. If 1,500 places are needed to cater for the future demand from the hinterland, would be generated by a population of 17,647. A doubling of hinterland population would not be sustainable or acceptable. If current hinterland demand, of 5% of overall population, continues, the 1,500 places would require a population of 30,000. This scenario will never exist. ▪ It is concluded that the proposed zoning of the northern site for CE 'Community & Education' is not necessary. ▪ The draft LAP states that permission for RN2 land will not be considered if housing generated significantly breaches core strategy targets. The development of both sites would yield approximately 150 dwellings, which is not considered a significant impact on Core Strategy targets. ▪ Planning applications have been lodged, with employment uses on the southern site, and residential on the northern site. <p>Draft Zoning:</p> 

Zoning Request:



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In these regards, the request for the alteration of the phasing of residential land from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1', as detailed in this submission would exceed Core Strategy requirements and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

With respect to the extent of the CE zoning and the issues raised with respect to site size requirements for new secondary schools, it is considered that the CE zone may be reduced to c. 5ha, and an additional area of c. 2ha devoted to future residential use RN2. This would not be considered a material breach of the Core Strategy having regard to the controls built into the RN2 objective.

In relation to the area zoned OS1 'Open Space' in the Draft LAP, this zoning is necessitated to fulfil CPO 17.26 of the Wicklow County Development Plan 2022-2028 which states the following:

'Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.'

Therefore no changes to the OS zone are recommended.

Chief Executive's Recommendation

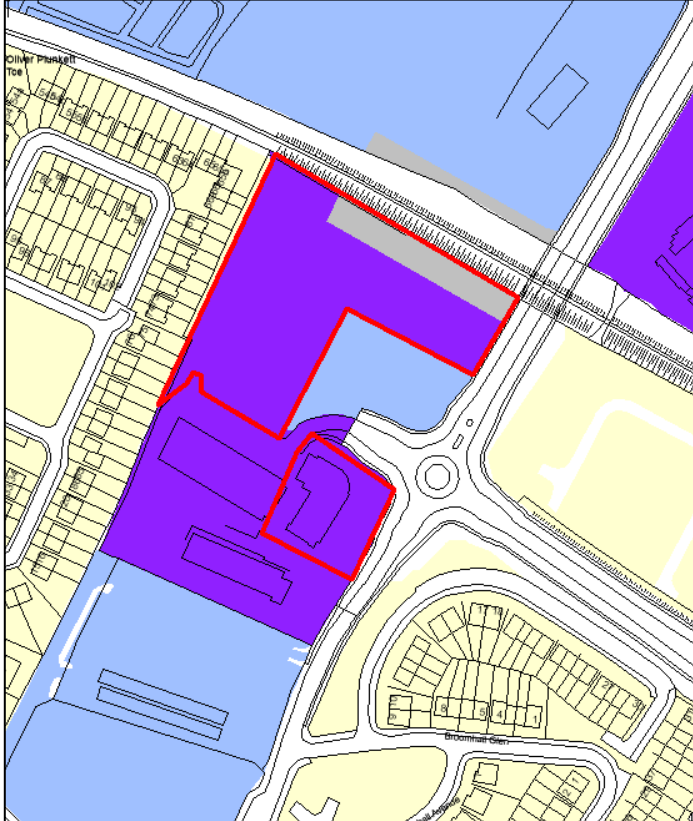
Amend land-use zoning map as follows:

Change from:

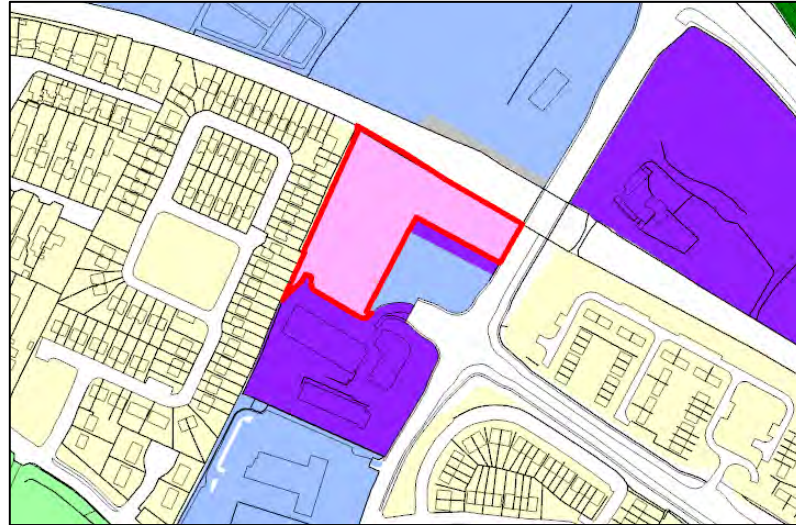


Change to:



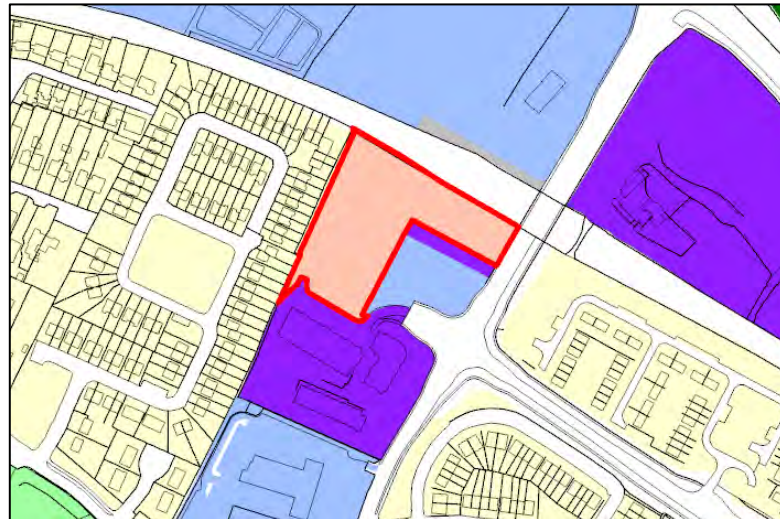
No.	Name	Issues Raised
73	HK Partnership Ref 175606	<p>This submission relates to 2 parcels of lands at Merrymeeting (as show below) It is requested that the northern parcel of c. 1.05ha , zoned E 'Employment' and PU 'Public Utility', be zoned either LSS 'Local Shops & Services' or NC 'Neighbourhood Centre'.</p> <p>It is further requested that the southern parcel of c. 0.24ha, zoned E 'Employment', maintain that zoning and the current range of typical uses open for consideration on such lands.</p> <p>In support of the rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The uses and objectives associated with the LSS 'Local Shops & Services' or NC 'Neighbourhood Centre' zonings are broad enough to provide ample and appropriate development options, especially given the limited development and occupation interest in E-zoned sites at this location. ▪ The site is in a highly mixed-use location. The LSS or NC zoning will bolster and complement these uses, creating a cluster of different uses as advocated for in policy as it (1) encourages active modes of transport and (2) aligns with the principle of the '15-minute city'. This has the potential to deliver a localised offering of retail spaces, personal and professional services units, housing and community/recreational uses. ▪ Little expansion of mixed use zoning designations to the south-east of Rathnew village centre despite strong residential and community use growth. ▪ The entrances to Brookfield Park, Saunders Lane, Kirvin Hill, and Sea Scape are beyond 15-minutes' walk to Aldi in Rathnew village. <p>Draft Zoning:</p> 

Zoning Request:



LSS 'Local Shops & Services'

or



NC 'Neighbourhood Centre'


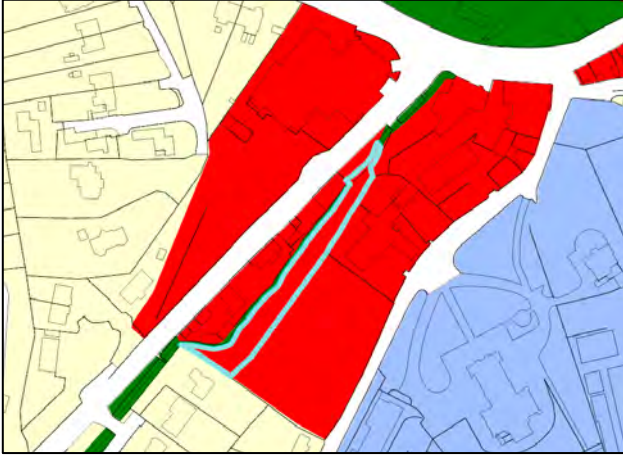
Chief Executive Response

Having regard to the location of these lands vis-a-vis the existing town / village centres of Wicklow Town and Rathnew and the existing neighbourhood centre at Broomhall (less than 300m from these lands), these lands are not considered optimal or necessary for such use. In particular, the development of the suggested retail / retail services type development at locations outside of the historic centres risks diminishing the viability and vitality of these centres, by drawing trade and activity away from them. The development of these lands for other employment related mixed uses, such as offices, professional services etc, as well as community uses, is already facilitated by the E zoning.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
74	HK Partnership Ref 175917	<p>It is requested that c. 0.14ha of lands at Wicklow/Ballynerrin Lower, zoned OS1 'Open Space', be zoned TC 'Town Centre'. It is further requested that the adjacent lands, zoned TC 'Town Centre' in the Draft LAP, retain that zoning. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ A planning application is intended to be lodged in the coming weeks, with pre-planning consultation feedback received on 1st July 2024. ▪ Access to the overall lands of c. 0.77ha is required from both sides – Marlton Road and St. Patrick's Road – due to the site's topography and the position of existing site services. ▪ The zoning of the north-western strip of the site as OS1 'Open Space' risks sterilising its development potential, thereby making it undevelopable. ▪ It will be necessary to traverse the watercourse to the site's west and provide shared surface infrastructure parallel to the watercourse at the location of the proposed OS-zoned area. ▪ Riparian protection benefits (ecology, water quality, flood mitigation, etc.) that the OS1 zoning would provide are acknowledged, however it is contended that many of these can still be secured by way of carefully considered design, landscaping and site management. ▪ Field surveys did not reveal any species or habitats of note or requiring statutory protection. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

	<p>It is further requested that the typical appropriate uses for open space zonings (incl. OS1, OS2, AOS) be amended to include the following: <i>"Additionally, consideration will be given to appropriate 'ancillary urban and residential development', such as site accesses and roads (including vehicular, cyclist and pedestrian infrastructure) and utilities."</i></p> <p>In support of this change, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Consideration must be given to facilitating ancillary urban and residential development on open space zoned lands where such development is necessary to serve or unlock other sites which may otherwise be landlocked by way of the zoning of lands, topography or the existing provision of services. ▪ The Meath County Development Plan 2021-2027 includes 'utilities' as a permitted use and 'vehicular/cyclist/pedestrian access to zoned lands where appropriate' as being open for consideration in its 'F1 – Open Space' zoning.
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Chief Executive Response

CPO 17.26 of the Wicklow County Development Plan 2022-2028 states the following:

'Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.'

In order to give effect to this objective, the zoning provisions of the draft LAP have endeavoured to integrate such riparian buffers / corridors wherever feasible. In this case, a buffer along the south side of the watercourse, where the land is undeveloped, of only 10m is identified, in recognition of the town centre, built up nature of lands surrounding it. This is not considered an excessively onerous requirement.

This objective would allow for the crossing of the watercourse riparian zone, subject to any such crossing being of suitable design.

Therefore the CE does not recommend the zoning of these lands for TC 'Town Centre' development.

Open Space Zoning – appropriate uses

It is considerable reasonable to amend the text to allow for essential service infrastructure, such as road / footpaths / cycleways etc to be open for consideration in OS1, OS2 and AOS zones, subject to such infrastructure not undermining the objective of these open space zonings.

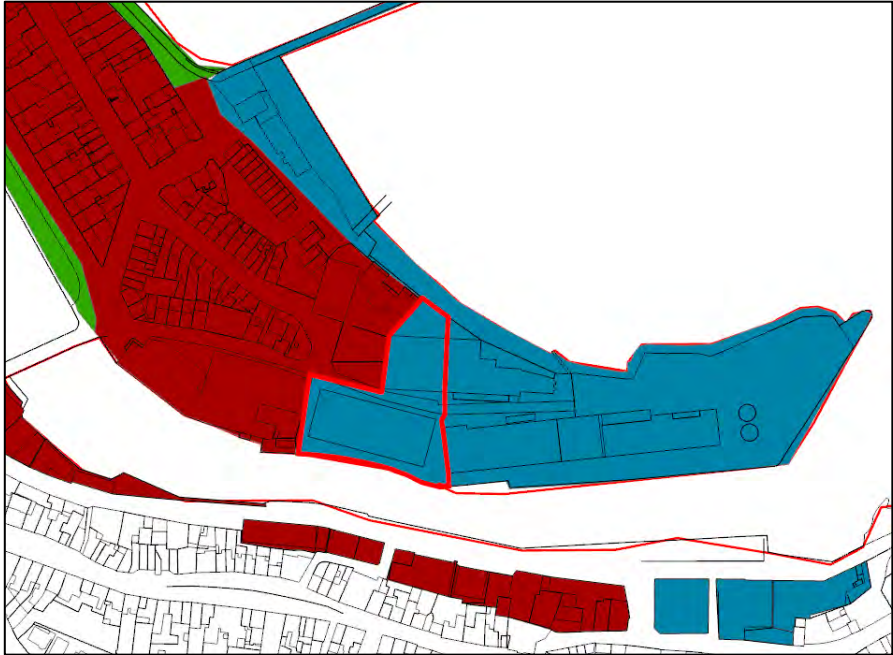
Chief Executive's Recommendation

Amend CHAPTER 11 ZONING AND LAND USE as follows:

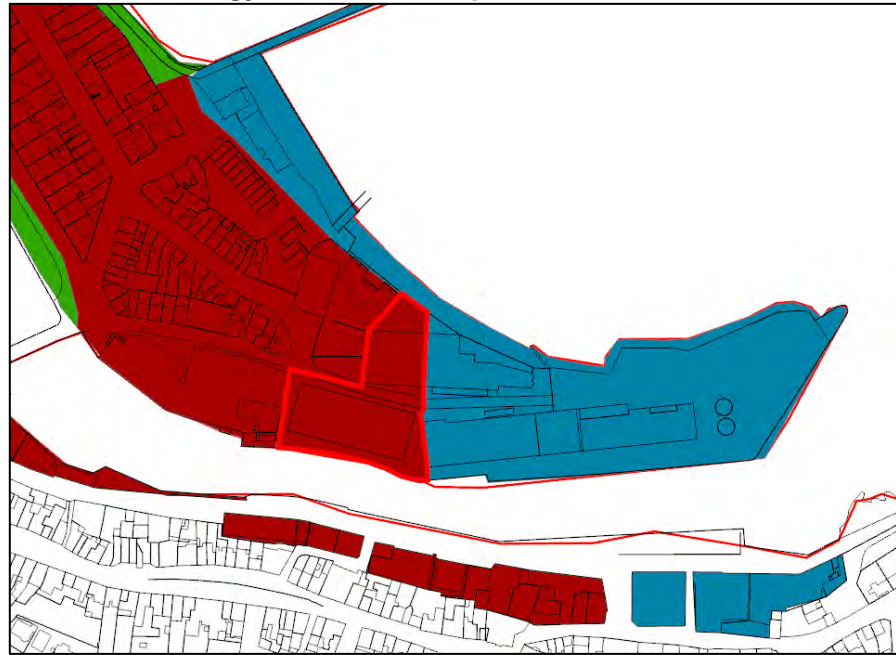
11.1 Zoning Objectives

Insert new sentence at end:

Essential infrastructure, including roads / footpaths / cycleways and utilities that are necessary to support development lands, are generally permissible in all zones. Where such infrastructure would be required in OS1 or OS2 zones, and no other routes are viable, such infrastructure shall only be considered where it is shown it will not undermine the purpose of this zoning or give rise to adverse environmental impacts.

No.	Name	Issues Raised
77	John P. Hopkins and Sons Ltd Ref 181735	<p>It is requested that the Waterfront Zone Strategy Map is amended such that c. 0.5ha of lands at Corporation Murrrough, in Waterfront Area 1 (Wicklow Port), be designated within Waterfront Area 3 (Mixed Use Regeneration Area) – or otherwise remove the distinction between areas in the waterfront zone. In support of this change, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Hopkins Warehouse has not been used for port related activities since it was purchased in 1998. ▪ The port related use zoning has acted as a barrier to the redevelopment of the site. The proposed waterfront zoning is an improvement allowing for greater flexibility in the permitted uses. ▪ The port tonnage is stagnant since 2013 and is of no significance in the national context and is only of regional importance. ▪ The subject site should be included in the mixed use regeneration area as it does not and has not contributed to the port activities nor has it even been sought for that purpose. ▪ The linkages map on p.37 indicates a new connection between the north and south quays to the west of the site, it makes little sense for such a link to be into a working port. The bridge should be at the boundary between the port and mixed/leisure uses and create potential for a south facing public space where the bridge lands on the north bank of the river. <p>Draft Waterfront Strategy Map:</p> 

Waterfront Strategy Amendment Request:



It is further requested that planning policy wording should be adjusted to 'resist development that would undermine the existing port uses'.

Chief Executive Response


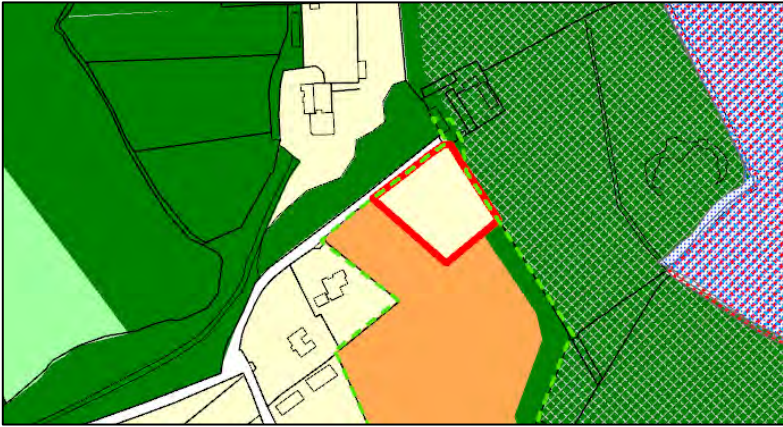
The CE does not support the zoning change requested on the grounds that it is essential for the future commercial development of the port area that a sufficient land bank, designated for port development use, is maintained. The CE is satisfied that there is more than adequate land identified for 'regeneration' in the Waterfront Zone to ensure that this area can be revitalised with a wider range of uses.



It is also important to note that the Area 1 (Wicklow Port) designation does provide flexibility to consider other non-port related uses where it can be demonstrated that uses of any site for these non-port / maritime uses would not:

- undermine the role of this area to support and provide services to maritime activity
- prejudice this area remaining and being developed further for maritime activities
- interfere with or remove maritime infrastructure such as quay space for docking

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

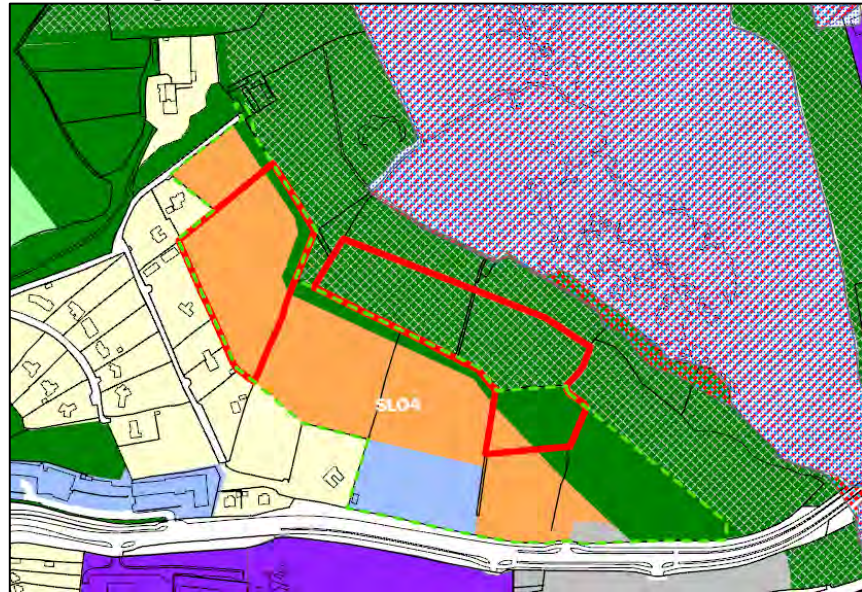
No.	Name	Issues Raised
78	<p>Therese O' Rorke Ref 183214</p>	<p>It is requested that c. 0.367ha of land at Knockrobin, zoned RN2 'New Residential – Priority 2' and OS1 'Open Space', be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The owner of Knockrobin Farm, including the farmyard and outbuildings, seeks to retain the proposed development site for her personal use. ▪ The site is accessed via a private avenue with gated entry within her ownership. ▪ The submitter does not have a house of her own. ▪ The submitter's three sons have established homes in the area or have previously obtained planning permission for such. ▪ The site would complete a cohesive rural cluster for the O'Rorke family at Knockrobin reinforcing lifelong connection to the farm land and ensuring its continued use as a family homestead. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>The zoning of the subject lands as RE 'Existing Residential' would not be consistent with the objective of that zoning, in that no existing residences are present on the subject lands. The draft RN2 'New Residential – Priority 2' zoning allows for residential development in line with all prevailing development objectives and standards.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025</p>		

No.	Name	Issues Raised
85	John and Julie Fitzgerald Ref 210037	<p>It is requested that c. 0.1ha of land at Ballyguile Beg, currently outside of the settlement boundary and without a specific land use zoning, be zoned for residential use within the settlement boundary. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ This area was zoned residential in the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ No stated reason or explanation has been given for the removal of this zoning. ▪ Considerable expense has been invested in anticipation of lodging a planning application, following consultation with Wicklow County Council planning department. ▪ Reducing the development area is inconsistent with the Council's stated objective of providing for the housing needs of a growing policy and with national policy. <p>Draft Zoning:</p>  <p>Zoning Request (incl. boundary change):</p>  <p>[Note that a specific residential land use zoning was not specified in the submission, it is assumed that RE 'Existing Residential' zoning is requested on the basis of the surrounding land use zoning.]</p>
<p>Chief Executive Response</p>		
<p>It appears that the inclusion of this small plot in the plan boundary and RE zone in the previous plan is a mapping irregularity as the boundary surrounding this site follows the rear boundaries of existing properties. There have been no applications made for the development of these lands on foot of the 2013 plan (last application on these lands was in 2005, which was refused), and no pre-planning request made since 2013.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025</p>		

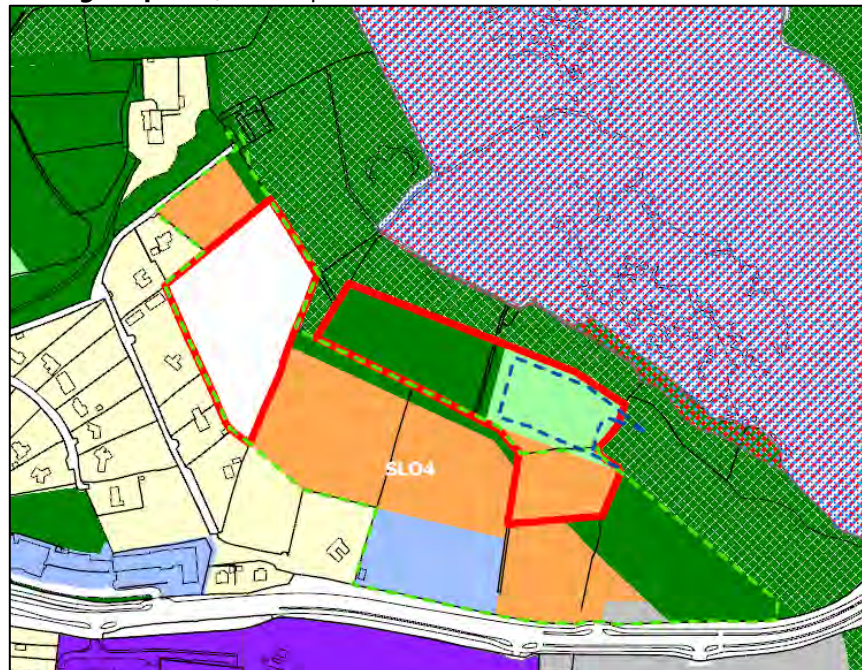
No.	Name	Issues Raised
86	Therese O'Rorke Ref 205842	<p>[The submission makes reference to zoning requests as set out in other submissions made to the Draft Wicklow Town-Rathnew LAP 2025, including Nos. 52 (DWTRLAP-093521), 69 (DWTRLAP-150417), and 78 (DWTRLAP-183214) in the same ownership, and No. 91 (DWTRLAP-210849) in separate ownership. These requests are assessed separately in this report.]</p> <p>This submission relates to two plots of land in Knockrobin – Bollarney North as outlined in red on the map below related to SLO4. The following is requested:</p> <ul style="list-style-type: none"> ▪ That zoning be completely removed from lands of c. 1.93ha zoned RN2 'New Residential – Priority 2' at Knockrobin. ▪ That zoning be completely removed from lands of c. 0.226ha zoned OS1 'Open Space' at Knockrobin. ▪ That lands of c. 1.4ha at Bollarney North, zoned OS2 'Natural Areas', be zoned OS1 'Open Space'. ▪ That lands of c. 1.07ha at Bollarney North, zoned OS2 'Natural Areas', be zoned AOS 'Active Open Space'. ▪ That lands of c. 0.63ha at Bollarney North, zoned OS1 'Open Space', be zoned RN2 'New Residential – Priority 2'. ▪ It is further requested that the objective to create a linear green route for walking and cycling be removed from SLO4, with a loop trail proposed in AOS 'Active Open Space' lands to connect to adjacent lands in separate ownership. <p>In support of these zonings, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The proposal draws direction from SLO4-Bollarney North concepts. ▪ The OS2 'Natural Areas' lands in the proposals specifically advocates to acknowledge the LAP objective for the preservation of land situated adjacent to the existing marshland, which serves as a natural boundary to the SAC-designated area. ▪ The OS1 'Open Space' lands in the proposals will serve as a public park and is naturally bounded by the mature woodland to the west, a hedgerow and trees to the east and hedgerows off the natural area adjacent to Broadlough marsh and SAC-designated area. ▪ The AOS 'Active Open Space' lands in the proposals is intended to complement the 0.79ha RN2 'New residential – Priority 2' in the same ownership and adjacent lands in separate ownership, with access route through those adjacent lands. The AOS lands include a loop trail for walking, cycling and jogging, enhancing recreational opportunities. ▪ 0.79ha of lands requested to be RN2 are within 500m of Wicklow's transportation hub, for sustainable residential development at medium to high density, promoting compact growth and enhancing connectivity. ▪ Part 8 application 24/407 for a pedestrian and cycle bridge over the railway, new car park, and separately the planned extension of the DART to Wicklow Town will significantly increase the accessibility and appeal of the area, perfectly aligning with national policies promoting sustainable and transit-oriented development. <p>In support of the removal of the linear green route from SLO4, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The proposed route traverses a gated access road, open countryside and active farmland currently used for crops and livestock, making it unsuitable.

- Wicklow County Council has not addressed who would fund the construction of an 8m wide thoroughfare, including public lighting, ongoing maintenance, and insurance for a publicly accessible route.
- Large sections of the route lack active or passive supervision, raising significant safety concerns, would likely result in anti-social behaviour and would compromise the safety of both the private dwellings it passes.
- A purpose built public footpath/2-way cycle route already exists on both sides of the public road leading to Tinakilly, this proposes linear green route is purely aspirational and unnecessary.

Draft Zoning:



Zoning Request (incl. loop trail in dashed blue):



Chief Executive Response

1. The suggested additional residential, OS1 and AOS uses would be located on lands proposed for OS1 and OS2 zoning in the draft LAP. The lands in question are predominantly zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

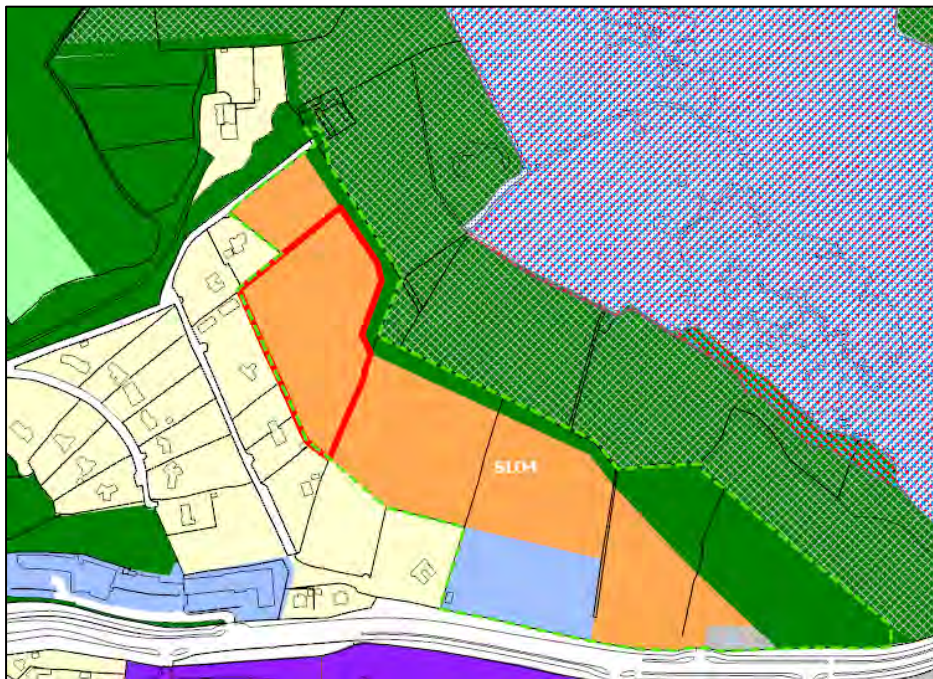
The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

2. The suggested dezoning of proposed RN2 lands is somewhat spatially illogical, given the request to maintain and expanded residential zoning either side of same. However, in light of the request, it is recommended that these lands be zoned OS1.
3. With respect to suggestion re green routes the CE is satisfied that the SLO4 objectives are optimal and reasonable and no changes are recommended.

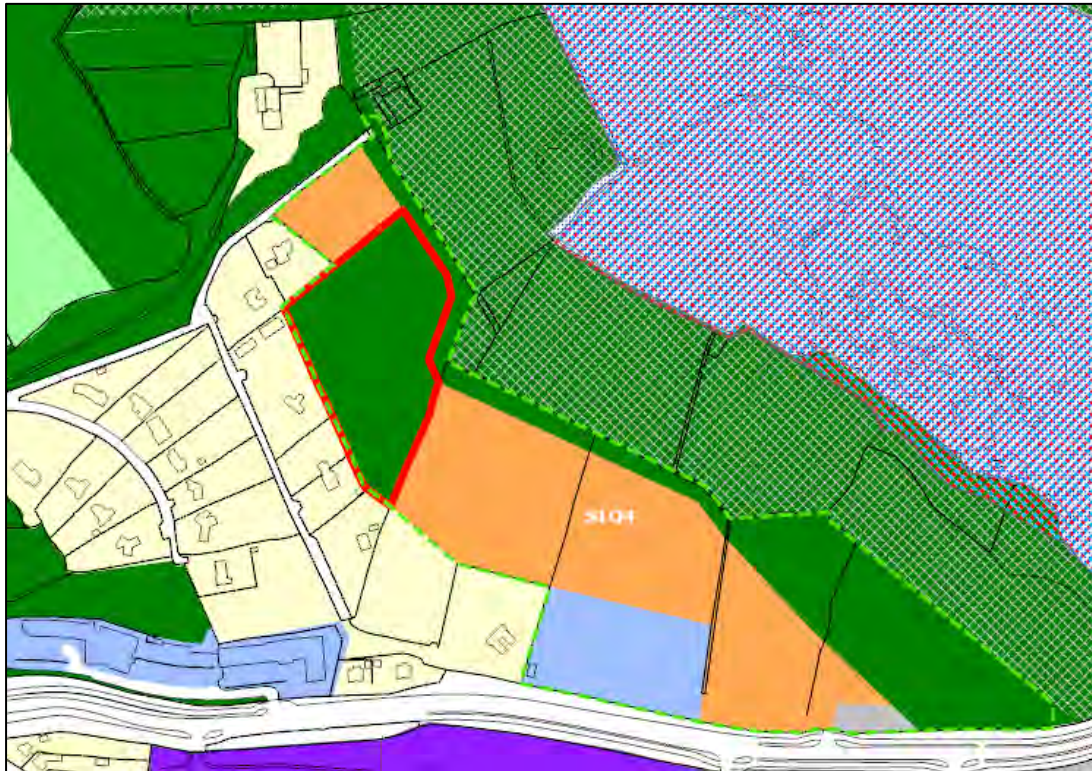
Chief Executive's Recommendation

Amend land-use zoning map and SLO4 as follows:

Draft LAP:



CE Recommendation:

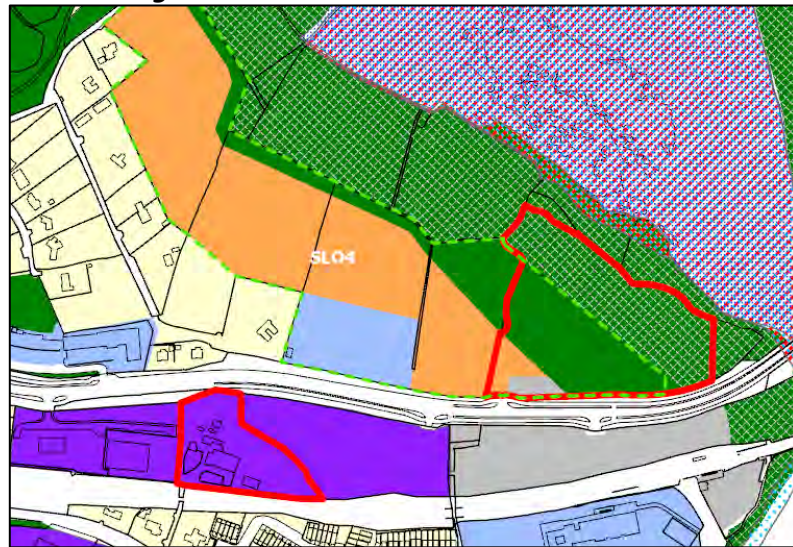


No.	Name	Issues Raised
91	<p>Noel Heatley Ref 210849</p>	<p>This submission relates to two parcels of lands either side of the Port Access Road, as outlined in red on the map to follow.</p> <p>It is requested that c. 1.2ha of lands at Bollarney North, zoned E 'Employment' on the south side of the PAR,, be zoned RE 'Existing Residential' following the 17.00 OD contour. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The lands contain the original farmhouse yard outbuilding and family home that is still in active use. ▪ The E 'Employment' zoning conflicts with CPO 8.18 of the Wicklow County Development Plan 2022-2028, to <i>"seek (through the development management process) the retention, conservation, appropriate repair, and reuse of vernacular buildings and features such as traditional dwellings and outbuildings."</i> ▪ The farmhouse is serviced and in good repair, and there is an intention to construct a meandering private driveway leading to the timber gate on the Port Road. ▪ RE 'Existing Residential' zoning of the lands aligns with objectives of the CDP, particular in preserving/reusing vernacular architecture. <p>With respect to the parcel to the north of the PAR, the following is requested:</p> <ul style="list-style-type: none"> ▪ That c. 0.65ha of lands at Bollarney North, zoned OS1 'Open Space', OS2 'Natural Areas', RN2 'New Residential – Priority 2', PU 'Public Utility', be zoned PU 'Public Utility'. ▪ That c. 1.15ha of lands at Bollarney North, zoned OS2 'Natural Areas', OS1 'Open Space', PU 'Public Utility', be zoned AOS 'Active Open Space'. ▪ That c. 2.14ha of lands at Bollarney North, zoned OS2 'Natural Areas', OS1 'Open Space', PU 'Public utility, RN2 'New Residential - Priority 2', be zoned RN2 'New Residential - Priority 2' <p>In support of these rezonings, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ SLO4 requires access, a 50 space car park and a 2ha public park on the subject lands, with no residential development feasible on the lands to fund these objectives. Therefore these objectives are aspirational. ▪ During negotiations for the port access road, assurances were made that lands north and south of the road would be designated for development. ▪ The previous mixed use zoning of the lands under the Wicklow Town Development Plan 2007-2013, with permission granted at that time. ▪ The lack of development under the E 'Employment' zoning under the Wicklow Town-Rathnew Development Plan 2013. ▪ Lands at Tinakilly represent over one-third of RN1 lands, where delays could stall development on RN2 lands alongside the Residential Zoned Land Tax payments. ▪ Lands are ideally positioned for compact growth in line with the NPF. ▪ Lands are not part of the natural landscape and are actively farmed, and are segregated from the SAC by mature trees and shrubbery. No risk of flooding. ▪ A looped greenway [as proposed in requested AOS 'Active Open Space' lands] would serve as a green natural barrier/buffer and link to adjacent lands in separate ownership. ▪ Wicklow County Council's Part 8 for a pedestrian and cyclist bridge over the

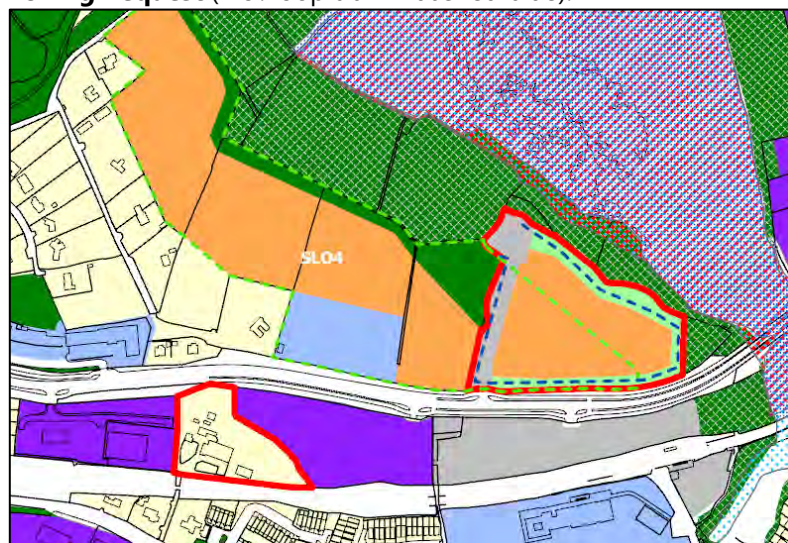
rail line will enhance the connectivity of the lands.

- The extension of the DART to Wicklow Town will allow for development in line with national policies on transit-oriented development.
- Lands requested to be PU 'Public Utility' can serve all lands north of the port access road and can include a car park of minimum 50 spaces.
- The importance of protecting areas associated with the SAC is acknowledged, the rezoning requests advocate for a balanced approach.
- The Draft LAP SEA Environmental Report indicates the requested RN2 area as being of the lowest level of environmental sensitivity.
- An adjoining landowner has made a submission requesting the removal of c. 2.45ha of RN2 –New Residential – Priority 2' lands. The additional RN2 lands requested in this submission ensures that the overall quantum of RN2 lands remains unchanged.
- The rezoning aligns with Housing for All and policy directive encouraging higher residential densities within 500m of a transport hub.

Draft Zoning:



Zoning Request (incl. loop trail in dashed blue):



Chief Executive Response

Lands south of PAR: The suggested change is not supported as the 'E' zoning would not preclude the ongoing use and development of the existing residence on the lands. Zones often contain non-conforming uses. This is explicitly addressed in the draft LAP.

On foot of this submission, no amendments to the LAP are recommended.

Lands north of PAR / SLO4

The suggested additional residential, AOS and PU uses would be located on lands proposed for OS1 and OS2 zoning in the draft LAP. The lands in question are predominantly zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.



The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
105	<p>Pathway Homes Ltd. Ref 090551</p>	<p>It is requested that c. 0.6ha of lands in the vicinity of Corporation Murrough, with no specific land use zoning, be zoned within Area 3 of the Waterfront Zone Strategy. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ It is understood that this land is within the ownership of Wicklow County Council. ▪ This land could serve an important function in terms of the future development of Area 3, specifically an area of public open space towards the end of the riverside walk, and an improved link through to the pedestrian bridge adjacent to the railway bridge, with an objective to facilitate the provision of such as part of any proposed regeneration. <p>Draft Waterfront Zone Strategy Area:</p>  <p>Waterfront Zoned Strategy Area Request:</p>  <p>It is further requested that the text of Section 11.2 of the Draft LAP written statement is amended as follows:</p>

"Within Area 3 (Mixed Use Regeneration Area) ~~the following uses are deemed 'priority uses and will be permitted in principle~~ the planning authority will encourage residential led schemes as a means of achieving regeneration of the Area 3 lands and introducing a residential community to the Waterfront. The following non-residential uses are deemed 'suitable uses and will be actively encourage to be delivered in a mixed use approach in conjunction with residential development principle:

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
- *High quality community, civic / cultural and recreation uses;*
- *High quality retail, retail services, restaurants, public house, café;*
- ~~*High density residential use where developed in conjunction with other priority uses described above.*~~

It is recognised that Area 3 comprises relatively extensive lands and regeneration is likely to be achieved by way of multiple planning applications. For clarity, each planning application will be required to make an appropriate contribution to the delivery of one or more of the above uses, however it is recognised that the preferred range and mix of uses listed above is intended be delivered across the entire of Area 3.

Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area."

In support of this text change, the following grounds are put forward:

- There is a concern that the language used in relation to priority uses may lead to an interpretation that single application within Area 3 (relating to only part of the area) would or could be required to deliver an extensive range of these uses, and perhaps therefore making a development unviable.
- Feasibility studies have indicated that a strong quantum of residential must be included in the landholding of Pathway Homes [adjacent to the lands requested for rezoning above] to make development viable.

It is further requested that Objective WTR72 of the Draft LAP written statement be amended as follows:

*"To encourage and facilitate tourism and leisure related uses in the Mixed Use Regeneration Area of the Waterfront zone ~~including hotel / accommodation facilities and leisure uses~~ to complement the marina and associated boating uses and activities. *Such uses can be in the form of complementary public open space, active routes and trails, which improve connectivity between the waterfront and the riverside.*"*

In support of this text change, the following grounds are our forward:

- Land use policy should not be so prescriptive as to the location of a particular niche use such as a hotel so as to potentially sterilise the development of a wider site.
- The primary focus of the Waterfront zoning objective in the context of the Murrough should be to facilitate regeneration of the lands. An overly

	<p>prescriptive requirement for a hotel has the real potential to sterilise mixed use regeneration on the site, market flexibility must be allowed.</p> <p>It is further requested that Objective WTR54 should be deleted: "Seek the provision of a central civic space at the Murrrough mixed use regeneration area; surrounded by retail, small enterprise and cultural or civic uses, with clear and legible connections to the surrounding development, the river edge and coast/linear public park."</p> <p>In support of this text change, the following grounds are put forward:</p> <ul style="list-style-type: none"> - To ensure that the layout and urban design of the regeneration site is not unduly influenced by the LAP without full consideration at detailed design stage of all influencing factors for the site.
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Chief Executive Response

Zoning change:

Some of the lands that are requested to be zoned 'mixed use regeneration area' are partially located in a European Site and therefore cannot be considered for zoning.

The boundary of the SAC and SPA at this location has recently been altered, and therefore there may be scope to extend the zoning.

Having considered the possible impact on any extension of zoning in this area on the adjacent European Site (The Murrrough SPA) it is considered that:

1. There are no additional sources for effects on European sites arising that have not been considered by the AA to date. Taking into account the mitigation measures that have already been integrated into the Draft Local Area Plan and the existing County Development Plan, this change would not affect the integrity of any European site.
2. The change would further contribute towards provisions related to sectors and topics that are already provided for within the Draft Local Area Plan and the existing County Development Plan. Taking into account the measures that have already been integrated into the Draft Local Area Plan and the existing County Development Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, any potential effects arising from this change would either: be present already (beneficial) and would be further contributed towards, but not to a significant extent; and/or would be mitigated so as not to be significant (adverse).

Taking this into account, this change would not be likely to result in significant environmental effects.

Text changes:

The CE does not support the majority if the text changes suggested. It is clear that the Council's goal is that residential use will only be supported where it is in conjunction tourism, employment, community, retail and other mixed uses. A range of uses, and particularly uses at the ground level that bring activity, visitors and employment to the area, are essential and a priority above residential development in this area. In addition, the Council is committed to the delivery of a hotel and other tourism accommodation in this area, and the objectives supporting same are considered reasonable.

The following amendment is however recommended in the interests of clarity:

"Within Area 3 (Mixed Use Regeneration Area) the following uses are deemed 'priority uses' and will be permitted in principle

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
- *High quality community, civic / cultural and recreation uses;*
- *High quality retail, retail services, restaurants, public house, café;*

- *High density residential use, where developed in conjunction with at least one and ideally a number of other priority uses described above.*

Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area."

Chief Executive's Recommendation

Amend land use zoning map and Waterfront Zone Strategy Map as follows:

Land Use Zoning Map

Change from:



Change to:



Waterfront Strategy Map:

Change from:



Change to:

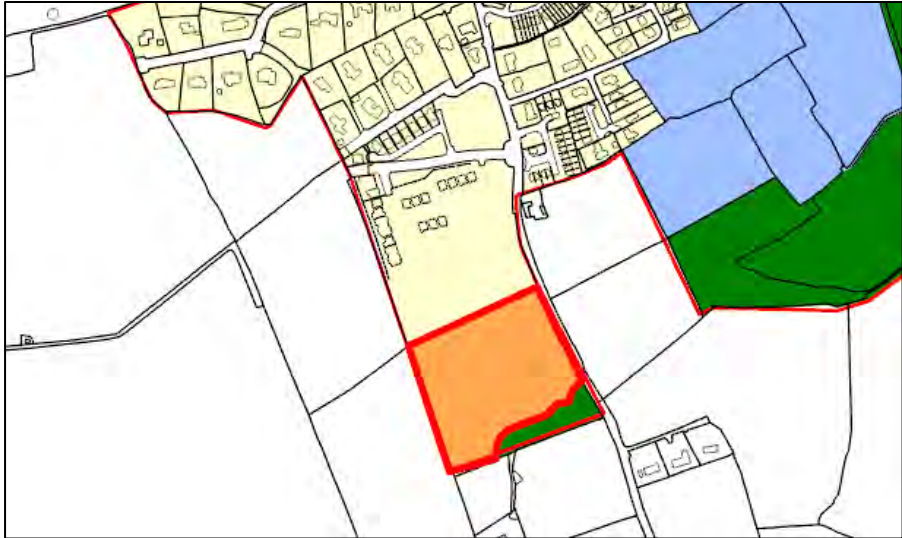


Amend WZ Zoning Objectives as follows:

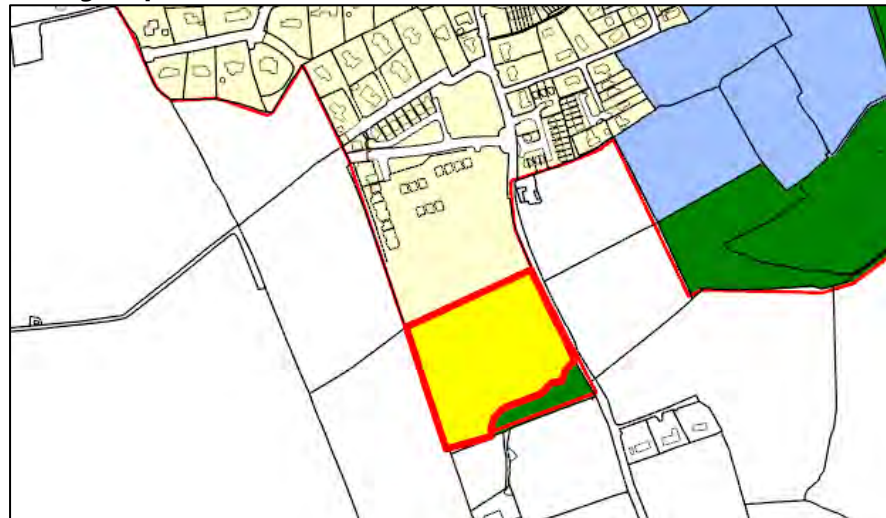
"Within Area 3 (Mixed Use Regeneration Area) the following uses are deemed 'priority uses' and will be permitted in principle

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
- *High quality community, civic / cultural and recreation uses;*
- *High quality retail, retail services, restaurants, public house, café;*
- *High density residential use, where developed in conjunction with **at least one and ideally a number of** other priority uses described above.*

Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area."

No.	Name	Issues Raised
107	Ardale Property Group Ref 092310	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>Requested that c.3ha of lands at Ballyguile More, zoned RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Previous/extant planning permissions on the site. ▪ The site is a brownfield site serviced by footpaths and roads, serviceable by water and wastewater infrastructure, with access to a variety of existing amenities. ▪ The site does not contain protected structures or is within an Architectural Conservation Area or special area of natural heritage. ▪ The previous 'R4 – Residential' zoning of the southern part of the lands under the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ The landholder has a track record of housing delivery, with a live application on the subject lands. ▪ The Ballyguile More Footpath Part 8 Scheme will form a natural extension of the settlement boundary and will bring appropriate new public infrastructure directly adjacent to the subject lands. ▪ The subject lands have been determined by WCC as fulfilling the qualifying criteria for the Residential Zoned Land Tax. <p>Draft Zoning:</p> 

Zoning Request:



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the alteration of the phasing of residential development from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1' as detailed in this submission would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
108	<p>Ardale Property Group Ref 092009</p>	<p>It is requested that the following text changes be made to Specific Local Objective 2 – Tinakilly / Newrath (SLO2), as follows:</p> <p>Change 1 <i>'Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to reduce congestion in Rathnew village centre, and to achieve good traffic circulation in the area. The RIRR shall be constructed in full by the developer from Clermont Grove to Tinakilly Park and funded in accordance with 'Appendix 3 – Infrastructure Delivery Schedule and Implementation' in full by the developer. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road. allowing for the delivery and occupation of 40% of the total residential development quantum on the zoned lands at Clermont – Tinakilly before the road is completed and operational. Any proposed development on the subject lands should be accompanied by a detailed phasing drawing and rationale to be agreed with Wicklow County Council.</i></p> <p>In support of this change, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The bypassing of Rathnew has been a primary objective of Wicklow County Council for over 30 years as far back as the 1994 Wicklow Environs Plan, but the rationale for the Road within SLO2 downplayed its strategic importance, as it is not stated that the primary purpose of the road is to alleviate congestion caused by the traffic coming from Wicklow Town, or that new road access to Wicklow County Campus lands at Clermont will be opened and development elsewhere will be facilitated. This could have a knock on impact on WCC's ability to secure 'State' funding as per Appendix 3. ▪ Developer is a noted funding source however the cost of the road should also fall on the developer of the village centre and Wicklow County Campus. It is assumed that WCC not being listed as a funding source is in error. ▪ The scale of construction both from a time and funding prospective are significant, without phasing and allowing for the occupation of some houses, the RIRR could be delayed. ▪ Phased delivery of the RIRR was agreed with WCC under Ref. 23/60219. <p>Change 2 <i>'Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and</i> <i>Due to the upfront delivery of the Broomhall Crèche covering the entire Tinakilly development, no further crèche obligations exist within SLO 2.'</i></p> <p>In support of this change, the following grounds are raised:</p> <ul style="list-style-type: none"> - A crèche facility has been recently completed at Broomhall Business Park to cater for all childcare requirements arising from Ardale's developments in the Wicklow Town area. - The crèche places provided in this facility have not been accounted for in the Social Infrastructure Audit (Table 2.11). - Under Ref. 23/60219, it was agreed with the Wicklow County Childcare Committee that this crèche facility could cater for the childcare requirements arising from the provision of 352 No. units on the subject lands, granted by WCC. Any future applications on the lands up to 352 No. units should have childcare requirements catered for off-site by Ardale at

Broomhall Business Park.

Change 3

'Retention of the 'fairy tree' at its current location (shown with green tree symbol on map SLO 2)'

In support of this change, the following grounds are put forward:

- The tree was subject to removal under Ref. 23/60219, which was accepted by Wicklow County Council.
- An assessment of this tree was conducted by The Tree File Arborists at further information stage, which stated that there is no historic or archaeological evidence to suggest that this area of planting on the proposed development site existed prior to the 20th century.
- IAC Archaeology carried out an assessment of the history of the tree at further information stage, who concluded that no record of historic references to this tree were found, the tree is not marked as a fairy tree within historic mapping, would not have been publicly accessible as part of Tinakilly House demesne, and that it is likely that the Hawthorn tree post-dates the establishment of the demesne landscape.

It is further requested that the SLO2 – Tinakilly / Newrath **Concept Plan** be amended as follows:

Removal of the marker on the Concept Plan denoting the location of the 'fairy tree', and the amendment of the Concept Plan Layout to show residential development in the area of the site currently denoted as the location of the 'fairy tree'.

It is further requested that **Section 5 Appendix 3 Infrastructure Delivery Schedule and Implementation**, specifically the transport section, be amended to include Wicklow County Council as a funding party for the Rathnew Inner Relief Road, as follows:

In support of this change, the following grounds are raised:

- This would be a significant change in approach with negative implications for the delivery of the RIRR.
- The amendment is in line with the Framework Agreement between Wicklow County Council and the Developer.

Chief Executive Response

Delivery of the RIRR

Following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will further detail an overall strategy and programme for addressing any existing transportation issues and supporting further development with appropriate infrastructure. This LPT will provide for a programme for the finalisation of the optimal route and design for the completion of the RIRR, as well as a delivery and funding programme. Wicklow County Council clearly has a role in the delivery of such important infrastructure and Appendix 3 will be amended to reflect this.

In this regard, it is recommended that the objectless of SLO2 be amended as follows:

This SLO is located in the townlands of Tinakelly and Newrath. The SLO comprises New Residential (RN1), Natural Areas (OS2) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- *Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the*

existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area and to achieve good traffic circulation in the area. The RIRR shall be ~~constructed in full by the developer from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road,~~ developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;

- Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and
- Retain the 'fairy tree' at its current location (shown with green tree symbol on map SLO 2).

Childcare

While it is noted that in the previous assessment of an application of the SLO2 lands, on-site childcare facilities were not required by the Planning Authority having regard to the new facility developed in Broomhall, this matter has been revaluated considered and it is considered that having regard to the Broomhall childcare location vis-a-vis SLO2, separated by major road infrastructure which would discourage access between the two location by active modes, that childcare facility should be located within SLO2.

On foot of this submission, no amendments to the LAP are recommended with regard to the provision of a childcare facility on SLO2.

Fairy Tree

While the issues rased in the submission are noted, the significance of this tree to the local community was brought to the attention of Wicklow County Council during the both assessment of a previous planning application lodged on the RN1 zoned lands on SLO2 and through the pre-draft plan consultation process. Noting there is no current live permission on these lands, it is considered that there is now an opportunity to ensure that this tree is retained and kept as a focal point as part of the future development of this site.

On foot of this submission, no amendments to the LAP are recommended with regard to the retention of the fairy tree at its current location on SLO2

Chief Executive's Recommendation

1. Include new objective in Chapter 11 Transportation Objectives as follows:

WTR - XX In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Wicklow Town – Rathnew.

2. Amend text of SLO2 as follows:

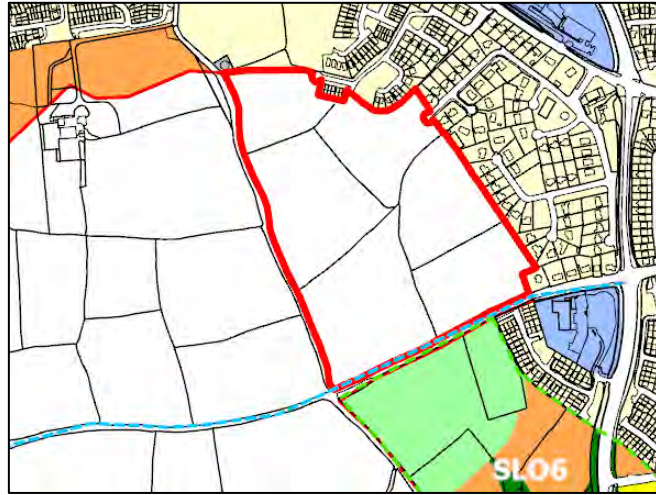
This SLO is located in the townlands of Tinakelly and Newrath. The SLO comprises New Residential (RN1), Natural Areas (OS2) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- *Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area and to achieve good traffic circulation in the area. The RIRR shall be ~~constructed in full by the developer from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road,~~ developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;*
- *Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and*
- *Retain the 'fairy tree' at its current location (shown with green tree symbol on map SLO 2).*

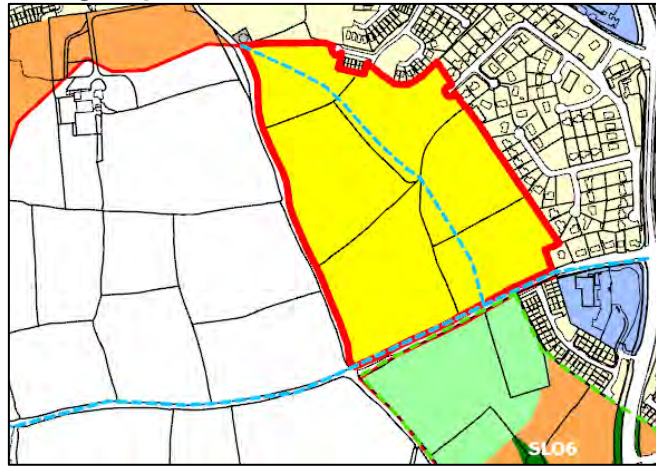
3. Amend Appendix 3 (as attached)

No.	Name	Issues Raised
114	Glenveagh Homes Ltd. Ref 112102	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>It is requested that c.15.7ha of lands at Ballynerrin, outside of the settlement boundary and with no specific land use zoning, be zoned RN1 'New Residential – Priority 1'. It is further requested that a Specific Local Objective be designated on these lands, and that a road objective through the lands be included. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The zoning of the lands would allow for sufficient flexibility in the quantum of zoned land which is sequentially located to existing development and existing services. ▪ The preparation of the LAP should require an assessment of infrastructure capacity and a cost analysis of the different options and strategies for zoning, including the identification appropriate tiers of zoned land and a sequential approach in accordance with the Development Plan Guidelines. ▪ The subject lands are an appropriate location for the consolidation of Wicklow and would avoid leapfrogging in line with Objective WTR2. ▪ The entire RN2 lands are dependent on the development of 1 No. site (Tinakilly Park). Additional residential zoning on the subject lands would allow sufficient flexibility to deliver housing. ▪ The zoning of the lands for residential use back as far as 2001, which were re-designated as Strategic Land Bank in the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ Planning history including previous extant permissions for some 481 No. dwellings. A Part 8 application provides for road widening and the provision of footpaths to the south of the lands. ▪ The subject lands are close to primary and secondary schools, convenience shopping, a permitted crèche, and 1.5km from the monument in the town centre. ▪ The strategic consolidation of urban development to the west of Wicklow Town in the first instance is sequentially preferable and in accordance with the sequential approach as per <i>Development Plans – Guidelines for Planning Authorities</i>, and is likely to be cost effective to service as existing cycling, footpath and road infrastructure is in place, as well as providing additional north south links. ▪ The effective use of existing infrastructure on serviced land in accordance with the proper planning and sustainable development of the area.

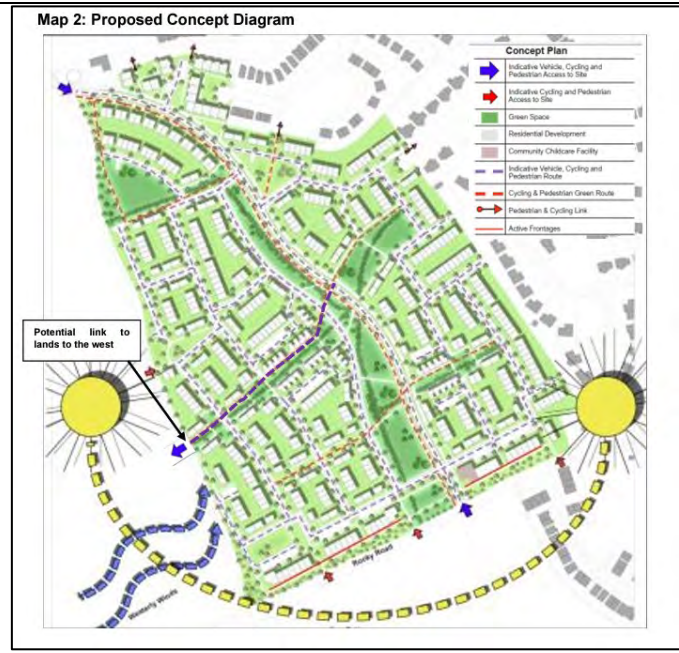
Draft Zoning:



Zoning Request:



Submitted Concept Plan for the lands:



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would

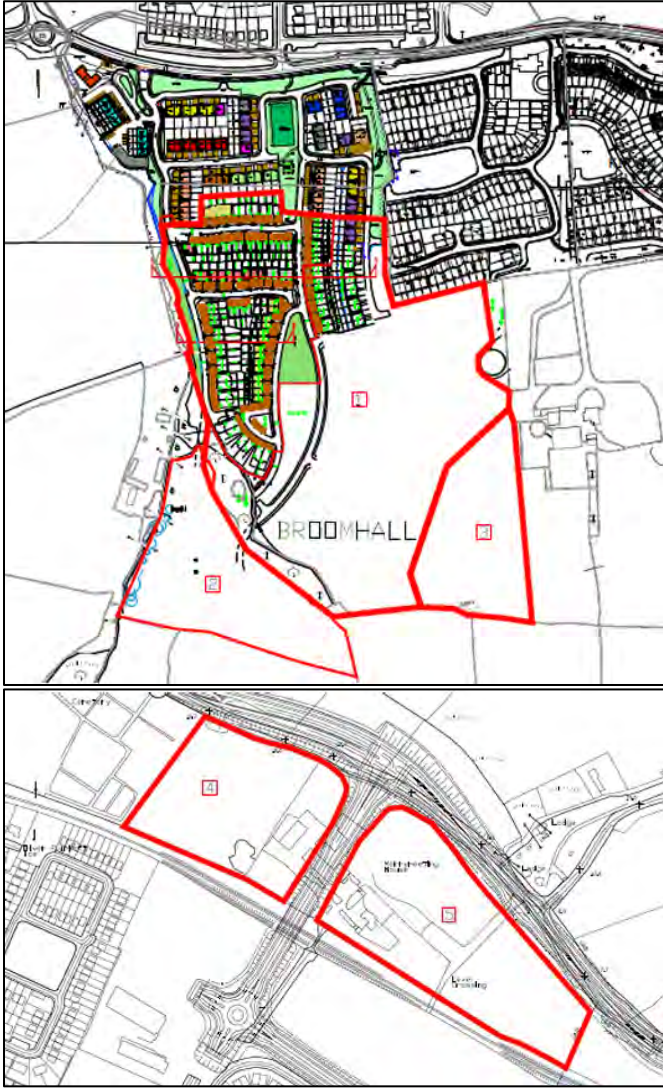
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- For the majority of the lands exceed the 80m contour in this area, which has been established in the previous plan and continued in this draft plan as the upper limit for new development having regard to visual amenity and servicing considerations. Having regard to the availability of significant lands in and surrounding the settlement at less sensitive and more easily serviced lower elevations, these lands are not considered an optimal location for the expansion of the settlement.

Therefore, the CE does not recommend the zoning of these lands for residential development.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

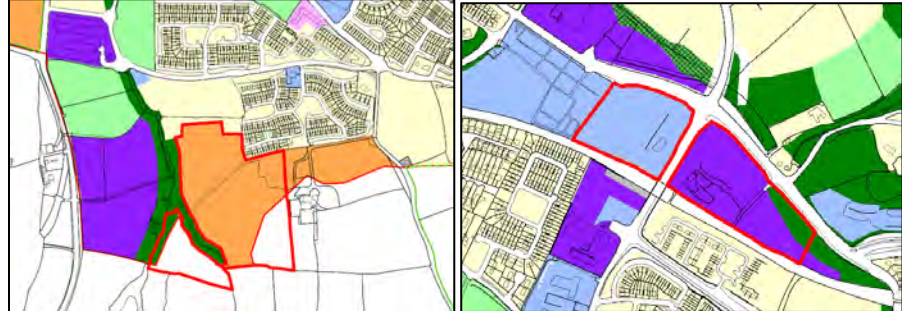
No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
115	Broomhall Estates Limited Ref 115224	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>It is requested that c. 10.9ha of land at Broomhall, partially zoned RN2 'New Residential – Priority 2', OS1 'Open Space', and partially outside the settlement boundary with no specific land use zoning, be zoned RN1 'New Residential – Priority 1'.</p> <p>It is further requested that lands of c. 6.6ha at Merrymeeting, zoned CE 'Community & Education', E 'Employment', and OS1 'Open Space', be zoned RN1 'New Residential – Priority 1'.</p> <p>The sites have been labelled 1-5 as follows:</p> 

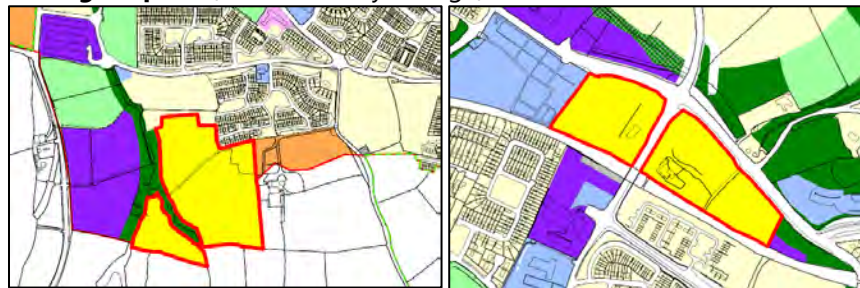
	<p>In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The Compact Settlement Guidelines support the logical expansion of towns and settlements. ▪ Wicklow-Rathnew is an example of a polycentric town based on the 15-minute neighbourhood concept in an urban area with a linear form provides strong policy justification to provide neighbourhood centres with critical mass for viability of services and sustainable active movement, where appropriate infrastructure has already been provided. ▪ Site 1 was previously zoned R2 'Medium Density, up to 28 units per hectare'. The RN2 'New Residential - Priority 2' zoning will only be considered after the activation of priority 1 lands and in accordance with the Core Strategy. ▪ Lands to the north of Site 1 are an active construction site of phase 1 (93 dwellings and a crèche). ▪ 12 No. dwellings are permitted by WCC on part of the lands zoned RN2 (Reg. Ref. 24/161), which should be changed to RN1 or RE to reflect the current permission. Planning applications for 97 units and a crèche have been recently submitted to WCC on the lands (reg. Ref. 24/414, 24/422). There is a significant amount of RN1 lands with no planning history or active development forthcoming. Broomhall Estates have been proactive in ensuring all of their landholding is serviced. ▪ A number of significant infrastructure elements have been provided since the initiation of Action Area 9, including the Broomhall reservoir, Wicklow Town Relief Road and Port Access Road, Broomhall Business Park, Village Mill enterprise Park (with expansion granted in 2023), Merrymeeting Neighbourhood Centre constructed by the submitter, Two 16 classroom schools constructed by the submitter. Therefore the area is already provided with good physical and socio-economic infrastructure. ▪ The lands are fully serviced and available for immediate development and therefore should not be designated as RN2 zoning, it is requested that the zoning be changed to RN1. ▪ Broomhall estates employ c. 100 workers, if development is restricted the landowners will be forced to leave the site. ▪ Site 2 was included in the Wicklow-Rathnew Development Plan 2013-2019 as Enterprise and Employment Lands. Site 3 was within the Strategic Land Bank are in that plan. The sites are logical areas for residential expansion that will not result in sprawl. Site 3 previously did not have sufficient water pressure, the provision of a water reservoir tank and water supply from the Cronroe water supply system now has enough pressure to service above the 80m contour. The area of Open Space between sites 1 and 2 will facilitate a natural amenity area for existing and future residents. No explanation is provided for the removal of the Strategic Land Bank/adjustment of LAP boundary, with Sites 1-3 located adjacent to a significant employment area at Ballinabarney. It is requested that the LAP boundary be revised to include Site 2 and 3 for residential purposes, to be consistent with Site 1. ▪ Site 4 was zoned for Enterprise and Employment in the previous LAP, and CE in the Draft Plan. There is a significant amount of community and educational facilities in the immediate proximity (350m) of the subject site. Neither draft or previous zonings are provided with justification, it is requested that the zoning be changed to residential as the lands are accessible and well serviced by social infrastructure and public transport. ▪ Site 5 was zoned Tourism/Enterprise and Employment in the previous plan, and Employment in the Draft Plan. There are lands zoned for employment
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on the western periphery easily accessible from the M11, and a parcel of Strategic Land Bank immediately inside the M11 that was removed from the Draft Plan. These alternative lands are more suitable for employment, it is requested that the subject site is zoned residential.

Draft Zoning:



Zoning Request (incl. boundary change):



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In these regards, the request for the zoning of additional land for residential use, and the requested change from RN2 to RN1 as detailed in this submission would

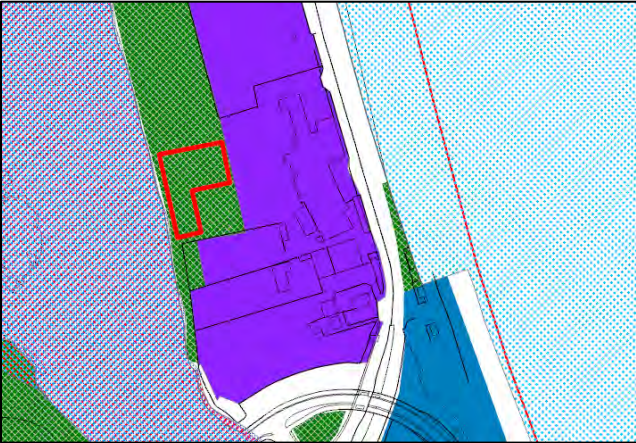
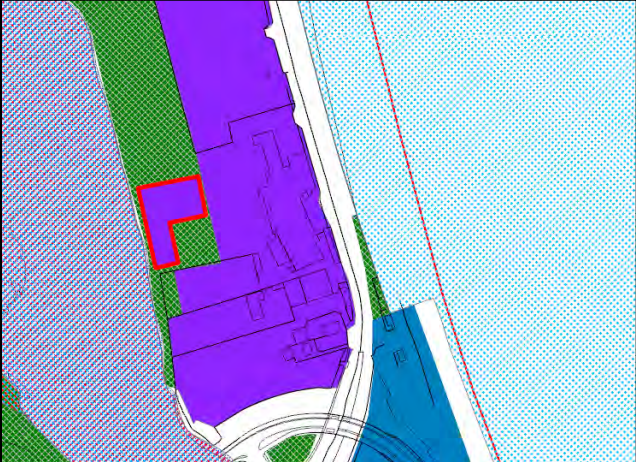
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Result in the excessive spatial expansion of the settlement and would comprise an unsustainable and unacceptable development location in respect of access to employment and public transport, consistency with sequential development patterns, consistency with Town Centre First principles, proximity to services and facilities, and the need to reduce carbon emissions.

In addition, the proposed change in zoning requested in this submission would result in a reduction in E 'Employment', CE 'Community & Education' and OS 'Open Space' zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has similarly been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

Therefore, the CE does not recommend the zoning of these lands for residential development. On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
118	Multimetals Recycling Ltd. Ref 123027	<p>It is requested that lands of c. 0.37ha at Bollarney, zoned OS2 'Natural Areas', be zoned E 'Employment'. In support of this rezoning, the following grounds are put forward</p> <ul style="list-style-type: none"> ▪ The E1 'Enterprise and Employment' zoning of the lands previously. ▪ The subject lands are intended for the future expansion of the business area as well as working operations. ▪ The site is of negligible ecological value overall. ▪ The habitats presently comprise of existing building and artificial surfaces (BL3) and area of spoil and bare ground (ED2) as per the Heritage Council's 'A Guide To Habitats in Ireland'. ▪ The habitats are currently in use and subject to a high level of disturbance/heavy vehicle traffic. ▪ No rare or protected flora species are present within the site boundary or on owned land, with the only species noted within the site being the invasive <i>Buddleja davidii</i>. ▪ The site is of negligible ecological value for local fauna species, with no trees or suitable roosting / resting places / commuting / foraging for bats/badger/otter, and low value hedgerow along the western boundary. ▪ The site consists of entirely manmade, artificial surfaces that are subject to a high level of anthropogenic disturbance. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

The lands in question are zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

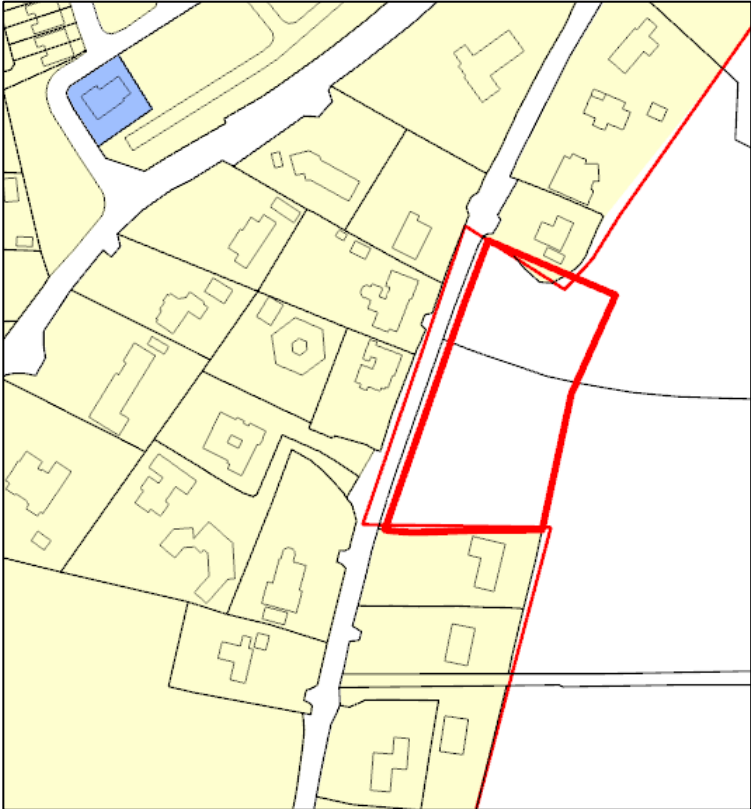
The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

With respect to the 'existing use' of the lands (yard), it should be noted that no planning permission has been granted for the current use, and has not been determined to be an 'exempted development' following a number of Section 5 requests for declaration on exemption between 2011-2016.

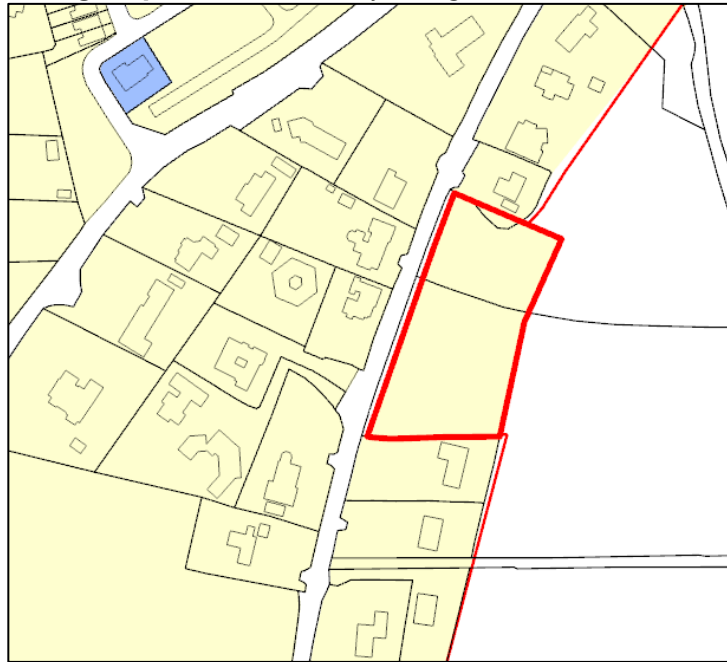
On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
120	<p>Claire Tracey Ref 133727</p>	<p>It is requested that c. 0.673ha of land at Ballyguile Beg, outside of the settlement boundary with no specific land use zoning, be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Agreement has been reached with Neville Developments allowing for the removal of the existing trees and ditch along the subject land's boundary, to provide a replacement ditch embankment, two designated entry points into the subject lands, and a compliance objective of a 1.5m footpath to Avondale Manor. ▪ Connection to existing services is very feasible at the existing foul main exiting service in place to serve Avondale Manor. Foul sewer pipe and surface water pipe are in proximity. The zoning of the lands would make efficient use of serviceable lands/existing infrastructure/promote infill development/respect the existing built fabric. ▪ An established pattern of both one-off housing and larger residential developments. ▪ The Draft LAP promotes infill development, which are encouraged in RE 'Existing Residential' areas. The subject lands are ideally suited for RE 'Existing Residential' zoning, offering a small number of detached bungalow-style homes, a flexible housing option. ▪ The proposal aligns with the core objective of Housing for All. <p>Draft Zoning:</p> 

Zoning Request (incl. boundary change):



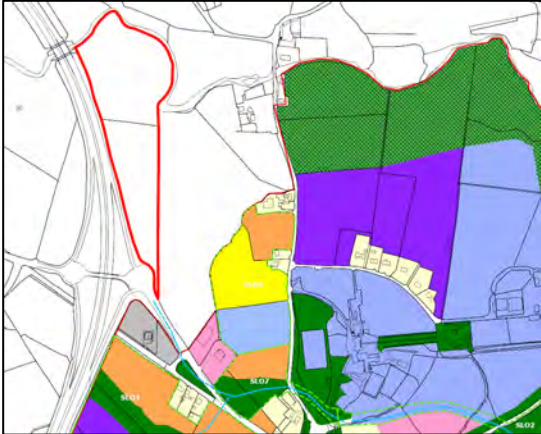
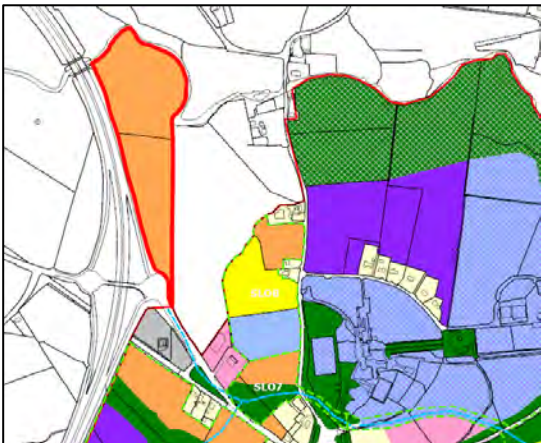
Chief Executive Response

The draft plan boundary at this location is intended to follow the boundary of existing developed lands, and as these lands are not developed, they are not included. This is in order to manage the spatial expansion of the settlement, particularly in peripheral and visually elevated areas, such as this. It is noted that there have been no applications for permission on these lands since 1996-97, when permission was refused, nor recent pre-planning inquiries.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
131	John Wilding	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>It is requested that lands of c. 8.62ha at Rosanna Lower, outside the settlement boundary and with no specific land use zoning, be zoned for residential development and included within the boundary. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ It would be in the interests of proper planning and sustainable development that the subject lands be zoned residential development in the Wicklow Town-Rathnew Development Plan. ▪ The subject lands have good access to all public services inclusive of roads, drainage, water supply, outside any potential flood risk zone. ▪ They adjoin residential development and are in close proximity to the local centres of Rathnew Village and Wicklow Town. ▪ Wicklow Town is a Level 2 Large Growth Town II where the consolidation of future development should be prioritised. <p>Draft Zoning:</p>  <p>Zoning Request (incl. boundary change) [the phasing of the requested residential zoning was not specified, the below map illustrates the request as RN2 'New Residential – Priority 2']:</p> 

Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices (including Strategic Flood Risk Assessment). This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development while protecting areas of biodiversity value and avoiding areas at risk of flooding.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:


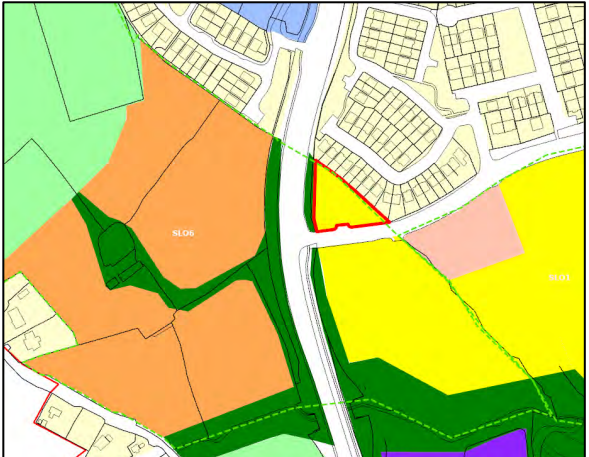
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Result in the significant extension and sprawl of the settlement into the unzoned countryside surrounding the settlement and comprise unacceptable 'leapfrogging' given the existence of other unzoned lands between the site and the plan boundary.
- Likely require access off the M11 or an associated roundabout which is contrary to '*Spatial Planning and National Road – Guidelines for Planning Authorities*'.
- Provide for residential development within 100m of the national road, which is precluded by the provisions of the Wicklow County Development Plan.
- Entail residential zoning in an area identified as at risk of flooding (see flood risk map below)



Therefore the CE does not recommend that zoning of these lands, and on foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
136	Anne Car Ref 161906	<p>It is requested that lands of c. 0.2ha at Ballynerrin, zoned RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The owner intends to dispose of two areas of zoned land together due to liability/exposure to Capital Acquisitions Tax and Residential Zoned Land Tax. ▪ The subject lands are strategically located near each other and benefit from a designated entry/exit point off the newly completed link road connecting Marlon Road and Hawkstown Road. ▪ The lands have access to all required utility services, making both sites ideally suited for immediate development and an excellent opportunity for developers seeking strategically located development. ▪ This subject site is a very small quantum of land, and its inclusion as Priority 1 will have little to no impact on the overall objectives of the proposed 2025 LAP. ▪ Reclassifying this parcel will facilitate an orderly disposal of all lands located on the Wicklow Town side of Hawkstown Road as a single lot. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

This request is considered reasonable given the location of the lands in question, within the boundary formed by the Hawkstown Road. Given the small, infill nature of these lands in the built up part of the settlement, it is not considered that a material breach of the Core Strategy would arise from this change.

Chief Executive's Recommendation

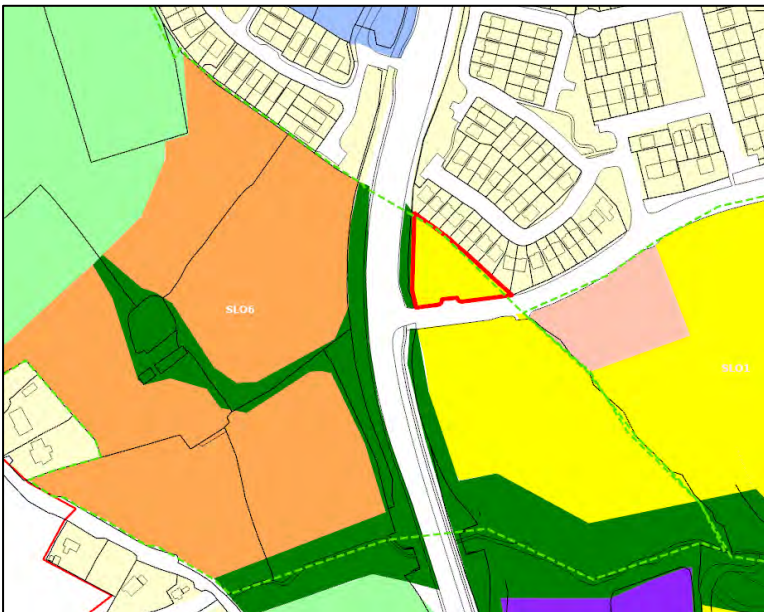
CE Recommendation X

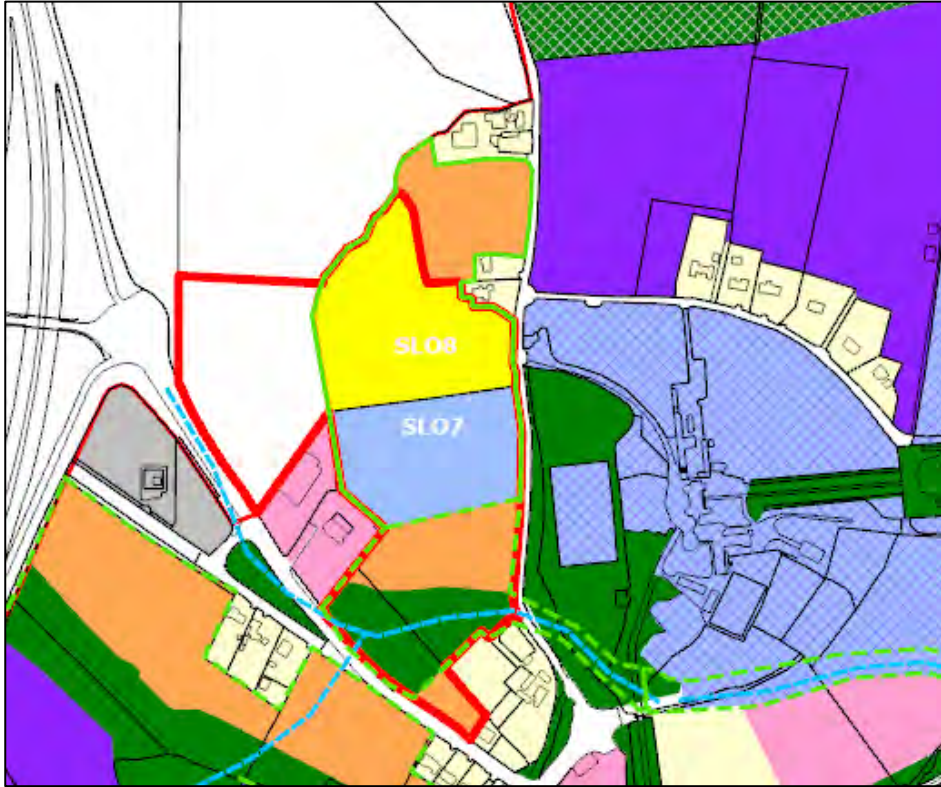
Amend land use zoning map as follows:

Draft LAP:

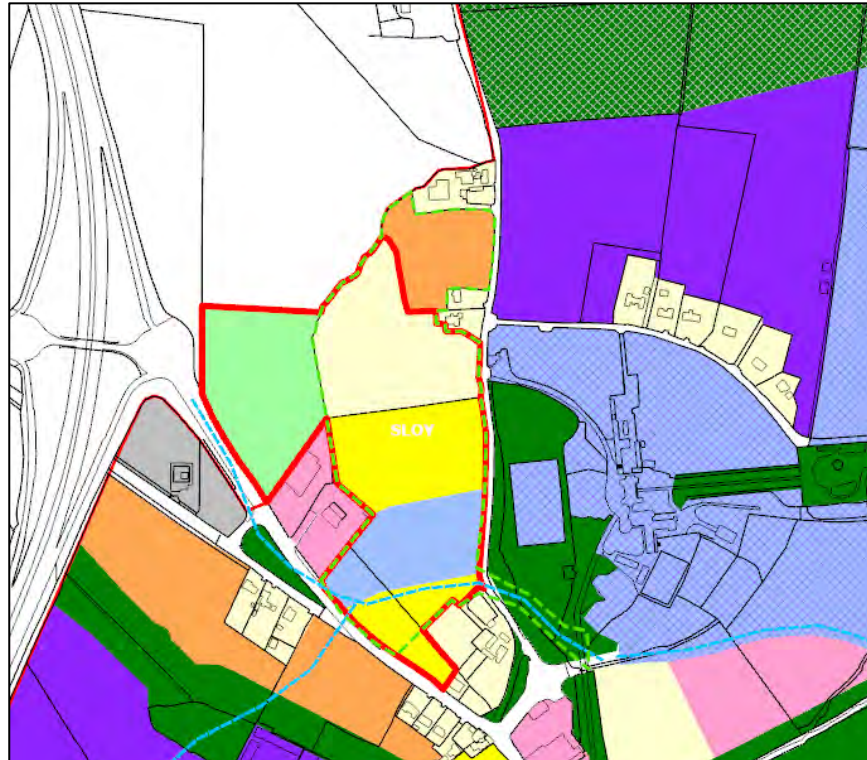


CE Recommendation:



No.	Name	Issues Raised
141	The Clarke Family & Rycroft RW Ltd. Ref 165650	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report; issues raised with respect to plan phasing / prioritising provisions are addressed under Section 4.2.3.1 of this report of this report; issues around school provision principle are addressed under Chapter 7 Community Development, Section 4.3.6.1 and Section 4.3.11 Appendix 2 Social Infrastructure Audit of this report of this report.</p> <p>This submission relates to lands at Rosanna Lower, north of Rathnew. It is requested that</p> <ul style="list-style-type: none"> ▪ lands of c. 1.1ha at Rosanna Lower, zoned RN2 in the draft plan, be zoned CE 'Community & Education' ▪ lands of c. 2ha at Rosanna Lower, zoned CE 'Community & Education', be zoned RN1 'New Residential – Priority 1'. ▪ lands of c. 2.6ha at Rosanna Lower, zoned RN1 'New Residential – Priority 1', be zoned RE 'Existing Residential'. ▪ lands of c. 1.2ha at Rosanna Lower, zoned OS1, be zoned CE 'Community & Education' and RN1 'New Residential – Priority 1'. ▪ lands of c. 2.5ha at Rosanna Lower, outside the settlement boundary and with no specific land use zoning, be for a Community Sports Campus. ▪ that SLO7 and SLO8 be amalgamated. <p>Draft Zoning:</p> 

Zoning Request [the request for lands for a 'Community Sports Campus' is illustrated below as AOS 'Active Open Space']:



In support of these changes, the following grounds are raised:

- It is intended to deliver family homes as well as the intended primary school and the new Inner Relief Road, as well as promoting a new sports campus in a sustainable matter for Rathnew. In this regard, the submission identifies lands that landowner could offer to Wicklow County Council lands for the purposes of providing a significant sports campus beside the proposed Rathnew Inner Relief Road, proposed primary school, close to the centre of Rathnew.
- A more logical arrangement of the zoning objectives of these lands could be achieved, which would thus require the SLOs to be amalgamated.
- The Draft CE zoning of c. 2ha is situated outside the indicative route of the RIRR, disconnecting the school from the village centre and potentially creating a traffic and public safety hazard. The quantum of land zoned CE seems excessive. It is proposed to move the CE land south to adjoin the RIRR.
- The Draft CE zoning could then be rezoned to RN1 'New Residential – Priority 1'. This would connect into the existing residential zoned lands currently under construction.
- Rezone RN1 lands to RE 'Existing Residential' as the lands are currently under construction under WCC Reg. Ref. 23/854. The rezoning should require the designation of alternative lands for RN1 'New Residential – Priority 1'.
- The quality and usability of Draft OS1 lands would be compromised by the delivery of the RIRR, dissecting the lands. The rationale for OS1 lands at this location is unclear, with no specific environmental/ecological designation. It would appear to be an unsustainable use of serviceable land within the centre of Rathnew. With lands north of the RIRR rezoned to CE 'Community

	<p>& Education’ and lands south of the RIRR rezoned RN1 ‘New Residential – Priority 1’, open space can be provided in this location as part of residential development as per development management guidance, i.e. up to 15% of site area.</p> <ul style="list-style-type: none"> ▪ The proposed lands for a Sports Campus could replicate the Shoreline Sports Centre in Greystones, and could also be used by the new school and growing population. ▪ In relation to population allocation and quantum of residential zoned lands, it is requested that RE ‘Existing Residential’ zoning be applied to sites where residential development has commenced or planning permission for residential has recently been granted and expected to commence/be completed before the adoption of the LAP. The rezoning of CE/RN2 lands to RN1 will result in no net loss of RN1 lands across the LAP area. ▪ The LAP Transport Assessment displays the 10-minute walking distance isochrones map of primary schools in Wicklow Town-Rathnew. Relocating the CE zoning as proposed would bring a large area of the catchment within a 10-minute walking distance to a school and would be in accordance with the ‘optimal locations’ identified in the Draft LAP’s Transport Assessment.
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Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines ‘Development Plans – Guidelines for Planning Authorities’ (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices (including Strategic Flood Risk Assessment). This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development while protecting areas of biodiversity value and avoiding areas at risk of flooding.

In addition, the draft plan has made provision for the delivery of essential infrastructure, including (but not limited to) new transportation and social infrastructure, such as the RIRR and new school sites. In this regard, the zoning provisions for this area have been carefully calibrated taking the following into account:

- Core Strategy residential zoning requirements, including likely longer term zoning requirements, to ensure consistency with the Wicklow County Development Plan;
- The strategic need complete the RIRR between the R761 and the R772; while the design of this route has not been finalised, it is most likely to pass through the area that the draft plan shows as OS1. This provides for a clear corridor for the route options for this connection, and it is essential that this be reserved during the lifetime of this plan, when the final route will be determined.
- Recommendations for school sites as provided by the Department of Education.

With regard to the submission, the suggestion that the lands proposed for OS1 zoning be instead zoned for

residential and school use could seriously impact on the delivery of both of these uses, including rendering the school site undevelopable, depending on where the final route of the RIRR is identified. In addition, given the most likely location of the road, the future school site will required to be north of the road, and therefore the reasoning behind the zoning change suggested (i.e. to the move the CE zoning southwards) is not sound and would result in a school site being closer to a main road, which is not considered optimal.

With respect to the suggested AOS zoning, there are concerns regarding (a) the peripherality of this suggested sports zone vis-a-vis the majority of the population and (b) how access to such a sports ground could be facilitated given the location of the lands adjoining the M11 interchange. Other than access via the suggested residential zones, access would likely be only feasible off the M11 roundabout which is contrary to 'Spatial Planning and National Road – Guidelines for Planning Authorities'.

With respect to the request that lands that are currently in development be amended from RN1 to RE – this is considered a reasonable request

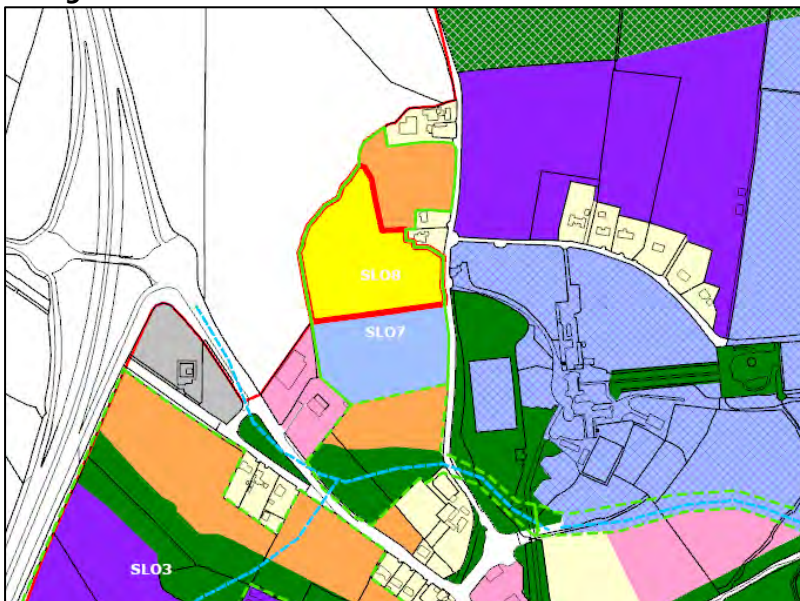
Chief Executive's Recommendation

1. Amend SLO7 as follows:

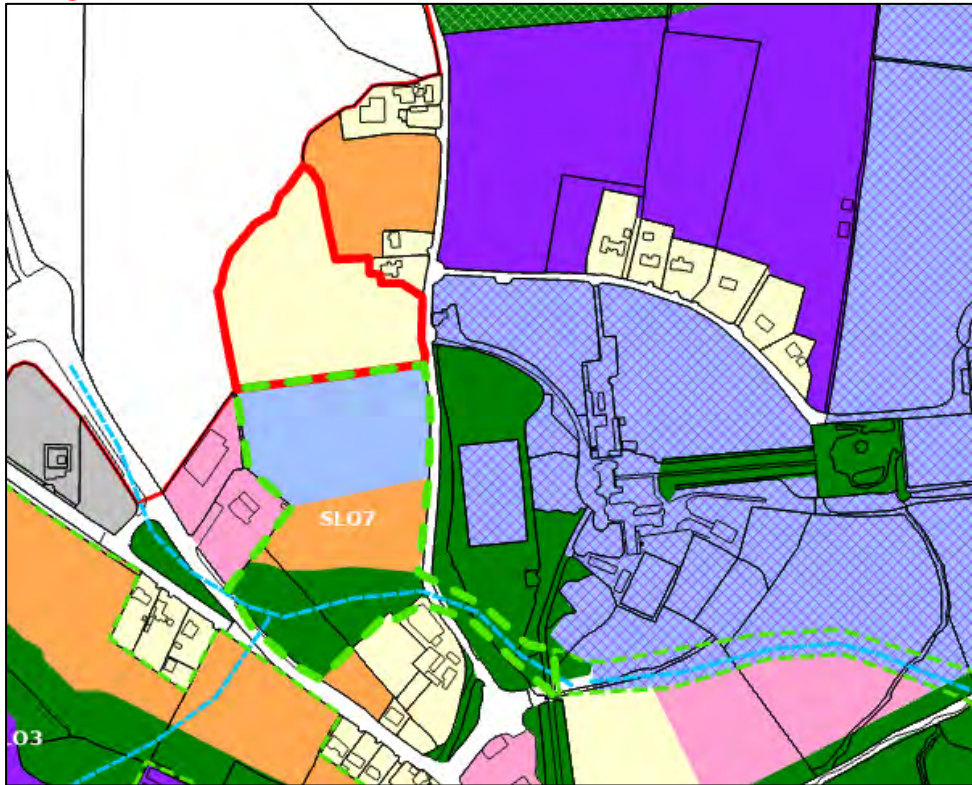
This SLO is located in the townland of Rosanna Lower. The SLO comprises New Residential (RN2), Community & Education (CE) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- *Lands zoned CE shall be reserved for future school use and shall not be developed for any other CE use during the lifetime of this plan.*
- *~~Provision of the Rathnew Inner Relief Road (RIRR). The RIRR shall be constructed in full by the developer Any design shall make provision for the completion of the RIRR from Clermont Grove to the R750 at the Maxol Garage. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road. The RIRR shall be developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;~~*
- *No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752 as set out in the future Wicklow Town – Rathnew Local Transport Plan;*

Change from:



Change to:

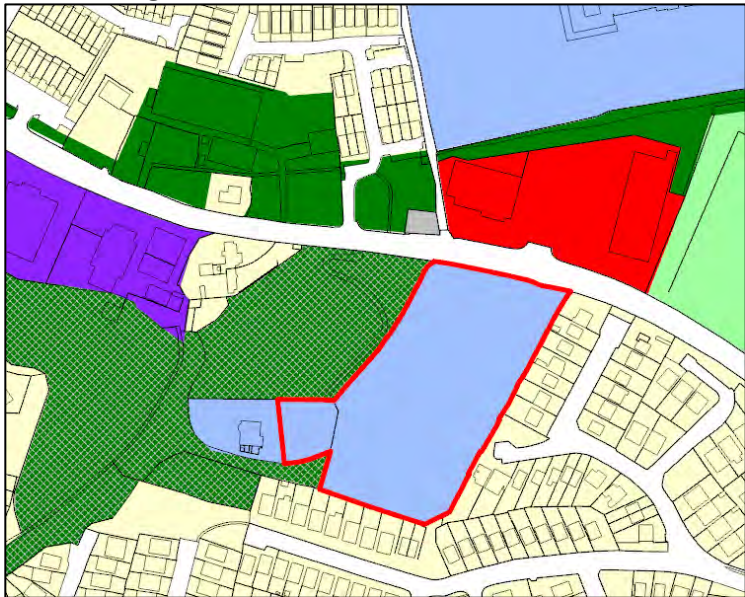
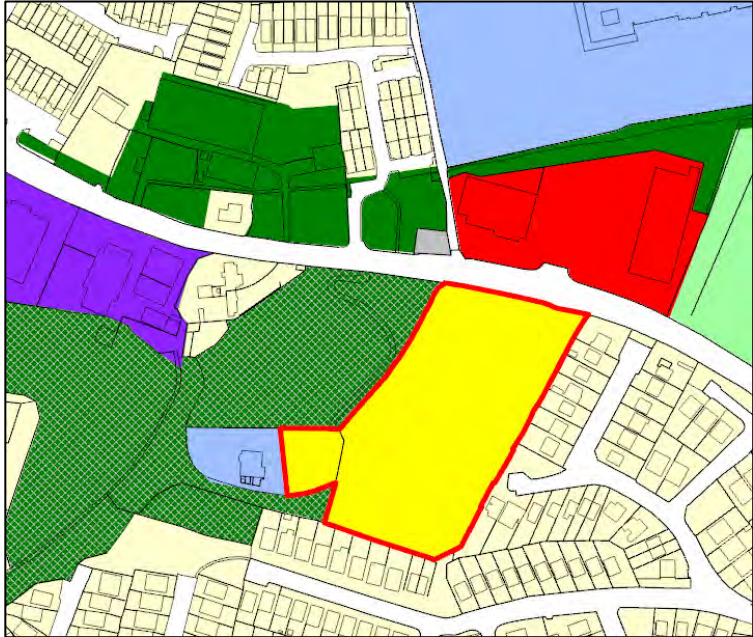


2. Amend SLO8 as follows:

Delete SLO8 map and text

~~This SLO is located in the townland of Rosanna Lower. The SLO comprises New Residential (RN1), New Residential (RN2) and Community & Education (CE) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:~~

- ~~▪ Lands zoned CE shall be reserved for future educational use and shall not be developed for any other CE use during the lifetime of this plan.~~

No.	Name	Issues Raised
142	The Delahunt Family Ref 133706	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning. This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report.</p> <p>It is requested that lands of c. 1.6ha of lands at Glebe (the former Girl Guides site), zoned CE 'Community & Education', be zoned RN1 'New Residential – Priority 1'. It is further requested that the subject lands are removed from the list of sites initially identified for the delivery of schools (LAP page 49 and Appendix 2, Table 2.10). In support of this rezoning, the following grounds are put forward:</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

	<ul style="list-style-type: none"> ▪ In recent years there has been a fire and the house has remained derelict ever since, the family consider it a matter of huge importance that the potential of this strategic property is fully realised. Fernhill House is not included on the Record of Protected Structures or list on the National Inventory of Architectural Heritage. A Tree Preservation Order covers parts of the lands. ▪ The submission is accompanied by a Feasibility Scheme and Design Note, Traffic and Transport Appraisal, Engineering Services Report, and Arboricultural Report, which should be read in conjunction with same. ▪ A residential and community development has been suggested for the site, with land around Fernhill House proposed for community and education use. Residential development of 61 units, where building heights have been suggested with consideration to site levels and adjoining properties, with a mix of housing types. ▪ The site is 800m from Wicklow Railway Station, where planned high capacity services include the extension of the DART. ▪ New access to the site proposed 100m east of existing access, with new pedestrian crossing proposed between the site and Lidl/SportsDirect. The design has taken into account the recommendations of the Local Transport Assessment with respect to R750 Dublin Road (Segment 2) and allows potential set back. ▪ The site can be serviced by water infrastructure; there is no risk of flooding on the subject lands. ▪ The subject lands are unlikely to be appropriate for the delivery of a school, with rising contours making a development with a large footprint difficult. The lands do not lend themselves to large outdoor play areas, are located less than 100m from an existing post-primary school and c. 650m from an existing primary school and would be thus an inefficient use of resources. Of the 7 sites identified in the Draft LAP, 3 sites (excluding the subject lands) have been selected for the delivery of new schools through the spatial analysis of existing schools and existing and future residential development, and a detailed Transport Assessment. The shortfall in capacity by 2031 (234 primary school places and 38 secondary school places) is likely to be easily absorbed by the delivery on the 3 designated school sites.
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Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would

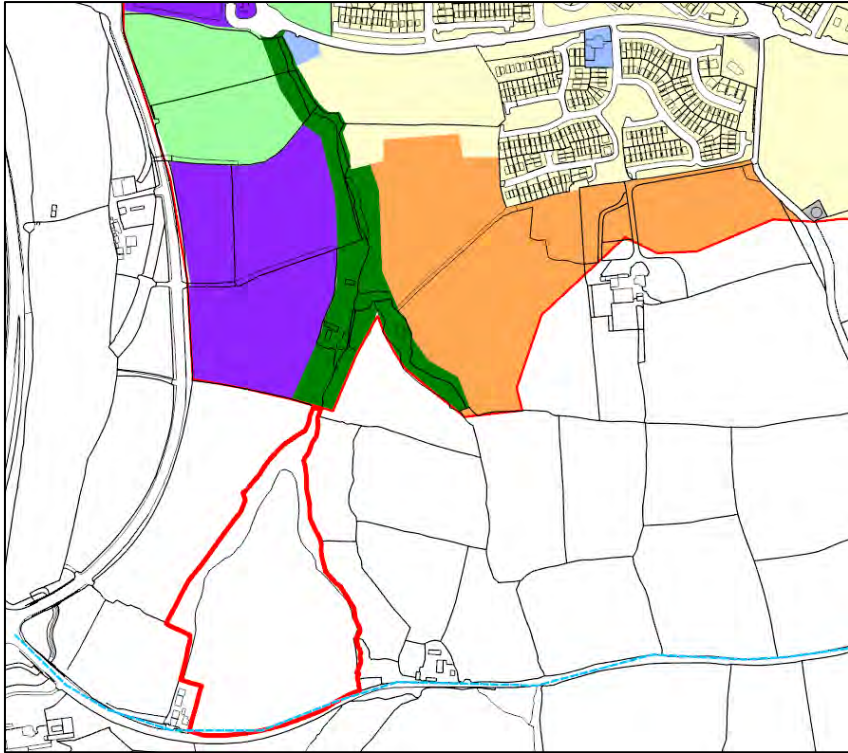
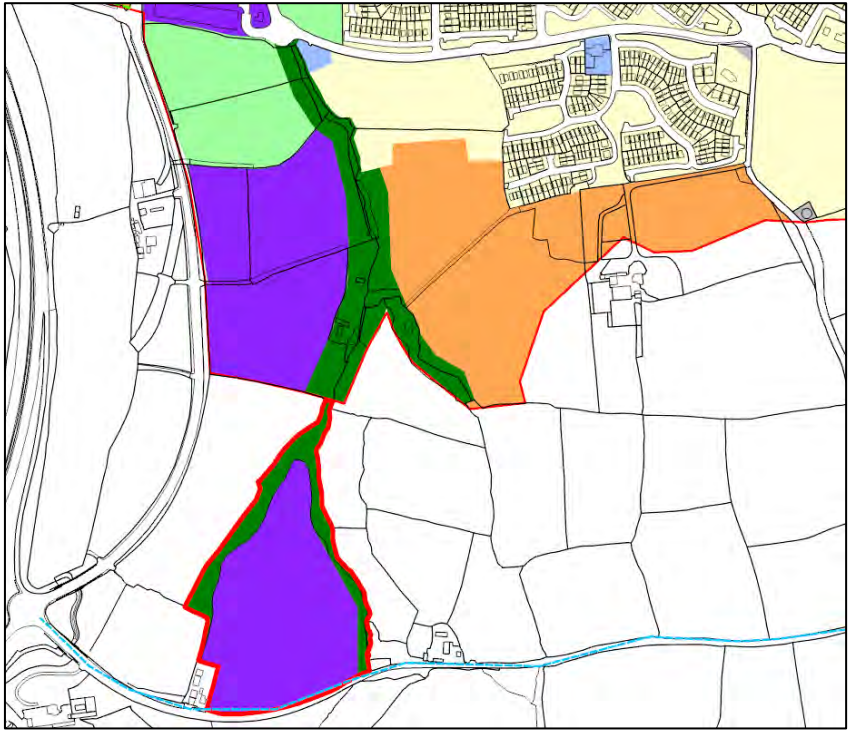
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Result in a reduction in CE 'Community & Education' zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles. It should be noted that CE zones are not identified or so zoned solely for the potential development of new schools; a range of social and community infrastructure is required to support any growing settlement.

Therefore, the CE does not recommend the zoning of these lands for residential development.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
146	Lusra Teo Ref 182907	<p>It is requested the c. 5.3ha of land at Ballynabarny, outside the settlement boundary and with no specific land use zoning, be zoned E 'Employment'. It is further requested that c. 1.4ha of land at Ballynabarny, outside the settlement boundary and with no specific land use zoning, be zoned OS1 'Open Space'.</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

	<p>This submission puts forward a number of points in support of this rezoning of this site to Employment including the following:</p> <ul style="list-style-type: none"> ▪ The submitters are active developers of residential and employment lands in Wicklow Town-Rathnew. ▪ A permitted larger enterprise centre under WCC Reg. Ref. 22/1269, including footpath, will abut the subject lands. ▪ The subject lands were included in the Strategic Land Bank of the Wicklow Town-Rathnew Development 2013-2019. ▪ Wicklow-Rathnew is a Level 2 'Key Town' and a major employment hub in the County. This is further supported by Chapter 9 of the Wicklow County Development Plan 2022-2028 and the County Wicklow Commuter Study from 2019.. ▪ The 2015 Wicklow Socio-Economic Profile report provided a profile of Wicklow-Rathnew, with considerable outward and inward commuting. ▪ It is an objective, WTR8, of the draft plan <i>'to facilitate and support all forms of employment creation on appropriately zoned land in Wicklow Town-Rathnew and to promote the intensification of activities on existing employment sites and to take advantage of the existing economic assets in order to stimulate further employment within the area.'</i> ▪ The subject lands are conveniently located for access to the M11 to the west and the urban areas of Rathnew and Wicklow to the north and east. ▪ The lands are well served by existing road infrastructure and provide a natural expansion of the existing employment uses. ▪ This site would allow for the further expansion of an area of the OS2 space as indicated in the draft Lap to the north. <p>A separate submission for Lusra Teo land in the Marlton area has been prepared requesting employment lands to be rezoned for residential development. It is pit forward that the relocation of employment lands to the subject lands (of a similar area) would result in a similar quantum of overall lands zoned employment within the LAP boundary.</p>
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Chief Executive Response

The provisions of the draft plan, including employment zoning provisions, have been developed to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives including the employment supporting objectives;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices (including Strategic Flood Risk Assessment). This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being

identified for new residential development while protecting areas of biodiversity value and avoiding areas at risk of flooding.

In these regards, the request for the zoning of additional land for employment use as detailed in this submission would comprise significant extension and sprawl of the settlement into the unzoned countryside surrounding the settlement; comprise unacceptable 'leapfrogging' given the existence of other unzoned lands between the site and the plan boundary and would therefore contravene compact and sustainable growth principles; and would result in a car dependent employment zone having regard to the lack of active travel infrastructure and public transportation services in this area;

The CE is satisfied that ample provision is made for new employment zoned land in the draft plan and therefore the zoning of this land for such use is not an essential need in order for Wicklow Town – Rathnew to meet its enterprise and employment goals as set out in the RSES, LECP and County Development Plan.

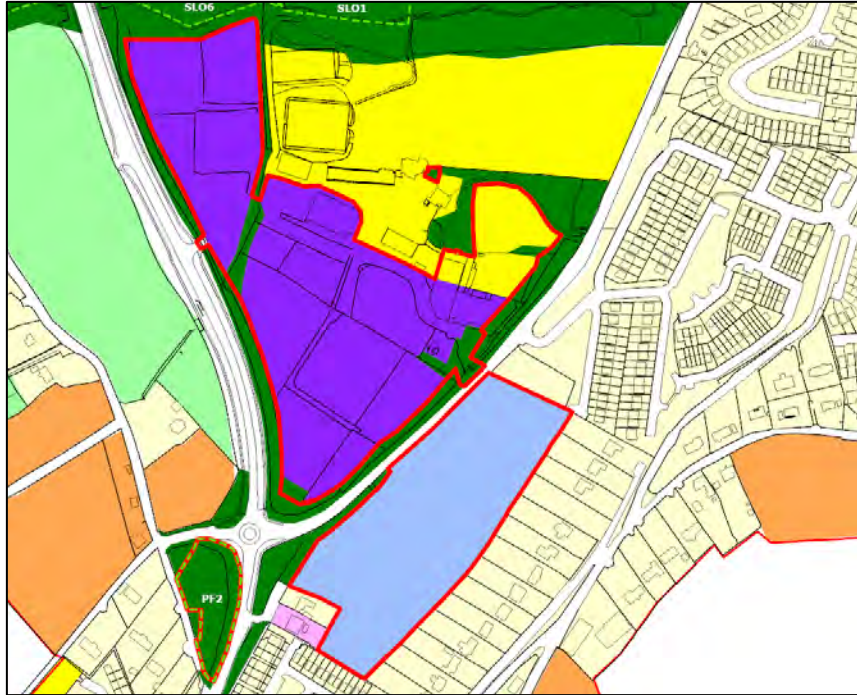
Therefore the CE does not recommend that zoning of these lands, and on foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

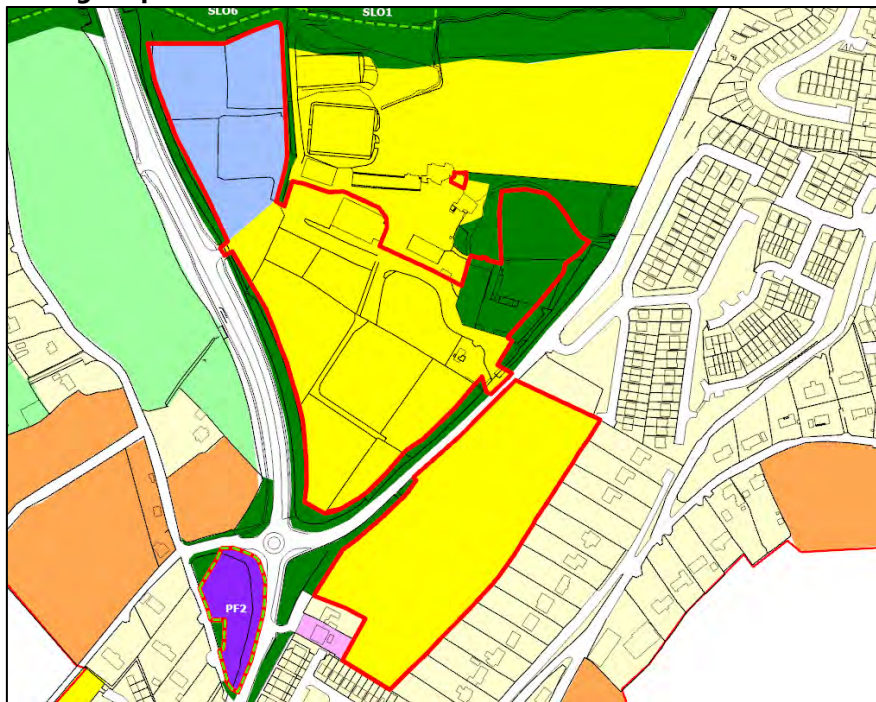
No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
147	Lusra Teo Ref 183127	<p>This submission relates to lands at Marlton - Ballynerrin Lower. A number of zoning changes are requested as follows:</p> <p>Change 1 : Rezoned c. 4.26 ha of 'E – Employment' lands to RN1 use for the following reasons:</p> <ul style="list-style-type: none"> ▪ The existing employment land in the northwest sector at Ballybeg, Broomhall and Ballynabarny, should be consolidated instead. ▪ This location is unsuitable for employment use due to high volumes of HGV traffic it would generate in a predominantly residential neighbourhood, close to Wicklow town centre, TRR, link road, proposed AOS, and schools. ▪ A separate submission by Lusra Teo requests that a similar area of land at Ballynabarny be zoned for employment to rebalance employment provision in the WRLAP area. ▪ The lands are located naturally adjacent to and within walking distance to existing residential, schools, parkland, town centre, public transport, Marlton River Line Park and requested CE zonings in the same ownership. <p>Change 2: Rezone c. 2.3 ha of 'E – Employment' lands to CE use for the following reason:</p> <ul style="list-style-type: none"> ▪ This site meets all the DES Site Suitability Assessment (SSA) guidelines, is adjacent to the Marlton Stream Riverwalk Park, opposite AOS lands in WCC ownership. <p>Change 3: Rezone c. 0.7 ha of 'R1 – new Residential (Phase 1)' lands to OS1</p> <ul style="list-style-type: none"> ▪ The site is a former landscaped private parkland area and is designated OS based on an arboricultural assessment and its potential for instatement as a public park. ▪ Existing large agricultural buildings can be converted into indoor active and passive recreation. <p>Change 4: Rezone c. 3.5 ha of CE lands to RN1 use for the following reason:</p> <ul style="list-style-type: none"> ▪ The land profile and access is unsuitable for school use and does not meet suitability criteria with reference to DES Technical Guidance Document TGD-025. <p>Change 5: Rezone c. 0.5 ha of OS1 lands to 'service station' use for the following reasons:</p> <ul style="list-style-type: none"> ▪ The previous zoning of the lands. ▪ The lands are an ideal location adjoining the Hawkstown roundabout, R751 Ashtown Lane, the TRR. ▪ A critical mass of residential developments is coming on-stream increasing the potential viability of the service station so as to attract several interested parties. ▪ This isolated OS site has little practical suitability for recreation and is an island surrounded by busy roads and is inaccessible and unsafe for use as Open Space. No explanation is given for the OS designation.

Draft Zoning:



Zoning Request:



Chief Executive Response

The provisions of the draft plan, including residential, employment, education and open space zoning provisions, have been developed to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives in particular consistency with the Wicklow Core Strategy and including the employment supporting objectives;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices (including Social Infrastructure Audit and Strategic Flood Risk Assessment). This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential and employment development while protecting areas of biodiversity value and avoiding areas at risk of flooding.

With respect to the request for the re-zoning of c. 7.75ha of lands from 'E – Employment' and 'CE – community, education etc' use to residential use, as detailed in this submission, this would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

With respect to the request to change c. 6.5ha from 'E – Employment' use to other uses (including residential and CE), particularly on the basis that employment development could be provided elsewhere at the very periphery of the settlement, this is not supported as this would run contrary to compact growth and sustainable development principles, which provide that the wide range of uses that are essential in a settlement, including employment uses, should be as close to and as accessible as possible by active and sustainable transport modes to where the population reside.

With respect to the request to change 3.5ha of CE lands to residential use, it is not agreed that these lands may not be suitable for future school use. The alternative suggested – a site of 2.3ha - would be significantly undersized to accommodate a new secondary school, which the SIA and Transport Assessment carried out clearly show is needed in this area. Therefore this change is not supported.

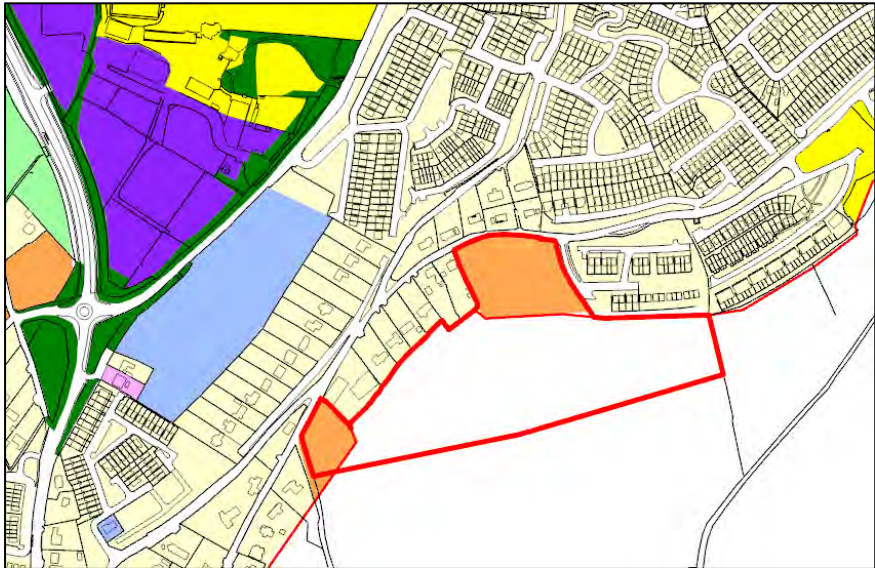
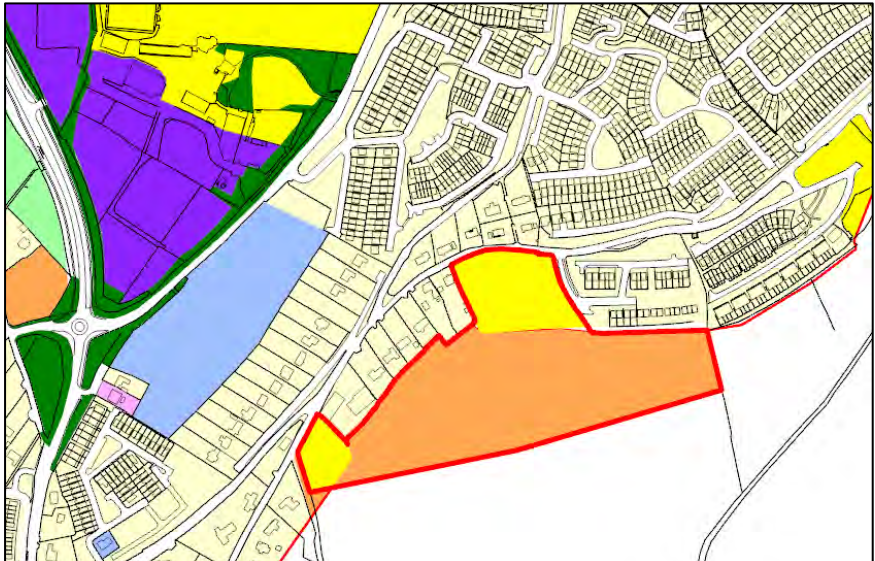
The CE has no objection to the suggested change of 0.7ha of RN1 to OS as suggested, although it is assumed this is only on the basis of the other changes set out and is not a 'stand alone' suggestion.

Finally, with regard to the request to change OS lands to 'service station' use, as part of the overall review of the previous plan, a review has been carried out of GI assets (trees, hedgerows, watercourses, natural areas etc) through the plan area, in order to fulfil the County Development Plan biodiversity and nature enhancement objectives. This assessment found that the lands surrounding this roundabout, including these subject lands, have mature trees, natural re-vegetated areas and significant biodiversity potential. In addition, notwithstanding the zoning of these lands for some time for service station use no applications have been made for such development and it is unclear why now it is desired. Therefore the change is not supported.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
148	Clouddale Ltd. Ref 182429	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>It is requested that lands of c. 1.8ha at Ballyguile, zoned RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. It is further requested that lands of c. 5.9ha at Ballyguile, outside the settlement boundary and with no specific land use zoning, be zoned RN2 'New Residential – Priority 2' and included within the settlement boundary as per the Wicklow Town-Rathnew Development Plan 2013-2019.</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

	<p>In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ 'Development Plans – Guidelines for Planning Authorities' indicates that zoned serviced land should not be subject to de-zoning. ▪ The Draft LAP has de-prioritised lands at Ballyguile (with established planning permissions under Reg. Ref. 21/84, 21/230, 15/595) to Priority 2 which undermines previous planning assessments (including ABP decisions) that the lands are suitable for residential development. ▪ The draft LAP proposes to change the settlement boundary with an arbitrary cut-off that regards all lands outside as "rural". Submitted that some of these lands (including those at Ballyguile) are highly suitable for the next phase of development as the town grows. ▪ The Wicklow Town and Rathnew 2013 settlement boundary should be retained in the new draft LAP as previous lands identified this Strategic Land Bank within the potential built envelope of the settlement could be considered for detailed zoning and development after 2019. ▪ The Clouddale lands are serviced, have road frontage and public transport access as well social infrastructure in the south of Wicklow Town. ▪ The lands consolidate the built-up area of Ballyguile and are effectively an infill greenfield site, set amongst an existing neighbourhood. ▪ Noting Section 6.3.4 of the County Plan on phasing, the site does not 'leapfrog' existing sites, presents an infill opportunities and better use of under-utilised land, and comprises an area which adjoins existing developed areas. ▪ Submitted that site should be brought into RH1 Priority 1 zoning designation, with the wider land holding defined as RH2 Priority 2 Residential lands.
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Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the zoning of additional land for residential use, and the alteration of the phasing of residential land from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1', as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Exceed the 105m contour in this area, which is the highest elevation of any development permitted on this

dominant landmark hillside, which has been established in the previous plan and continued in this draft plan as the upper limit for new development having regard to visual amenity and servicing considerations. Having regard to the availability of significant lands in and surrounding the settlement at less sensitive and more easily serviced lower elevations, these lands are not considered an optimal location for the expansion of the settlement.

Therefore, the CE does not recommend the zoning of these lands for residential development.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
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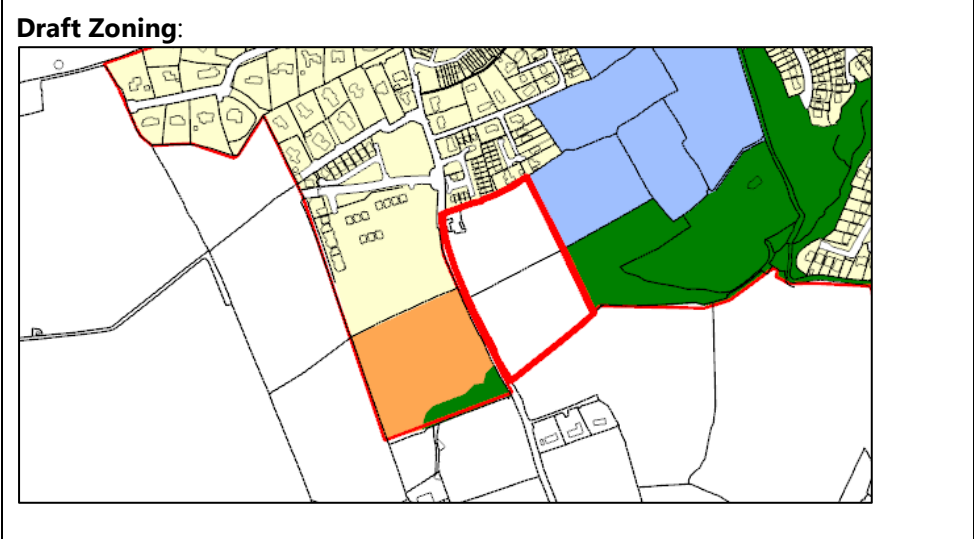
The following three submissions Nos. 154, 155, and 156 from the one landowner, **Ronan O’Caoimh**, were accompanied by a cover letter which outlines the following:

- The proposed LAP all but wipes out the development potential across the land in the same ownership in the area.
- The rezoning proposals for three sites is peculiar, particularly as there is a housing crisis.
- The landowner has lived in Co. Wicklow for 30 years and is heavily invested in the development of the county.
- Since purchase, the sites under the submitter’s ownership have gone from being fully zoned for residential housing, to Strategic Land Bank, to de-zoned, despite the three sites being within the LAP boundary or CSO boundary, having established connection points for services or are serviced, are accessed via existing roads.
- These characteristics are why the sites were purchased. It is not unreasonable to expect lands with such compelling characteristics to retain their zoning or improve over a twenty year period.
- 10 acres at Greenhill Road have been carved out of the LAP boundary to create a peninsula of unzoned land, despite being bordered by existing/zoned land, being serviced, with new footpaths put in by WCC this year. Similarly, the Dunbur Lower land wraps around the existing taken-in-charge Seacliff development and has ready to go services and access.
- A table is included indicating the changes in zoning status on the lands over the last c. 20 years.
- It is not believed that the urgent need for delivery of housing on sites that are ready to go is being given enough weight.
- Lowick Homes has a track record of delivering housing and would deliver housing on the lands immediately.
- It seems short-sighted not to take the opportunity to include more residentially zoned land when the current population projections do not reflect the reality on the ground.
- Wicklow Town may miss the opportunity to prosper by de-zoning lands within a 10-minute walk of the town centre.

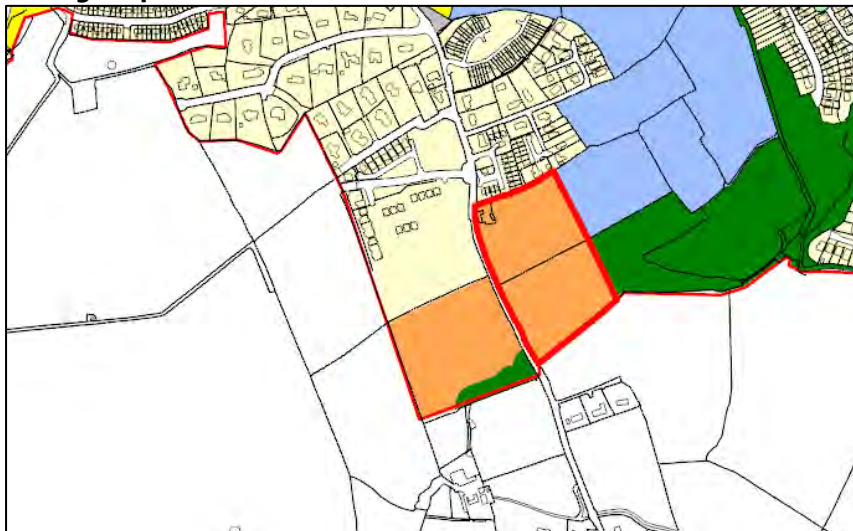
This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.

154 [Ronan O’Caoimh](#)
[Ref 194856](#)

It is requested that c. 4ha of land at Greenhills Road, Corporation Lands, outside of the settlement boundary and without a specific land use zoning, be zoned for residential development, with the cover letter stating a request for RN2 ‘New Residential – Priority 2’ on these lands.



Zoning Request:



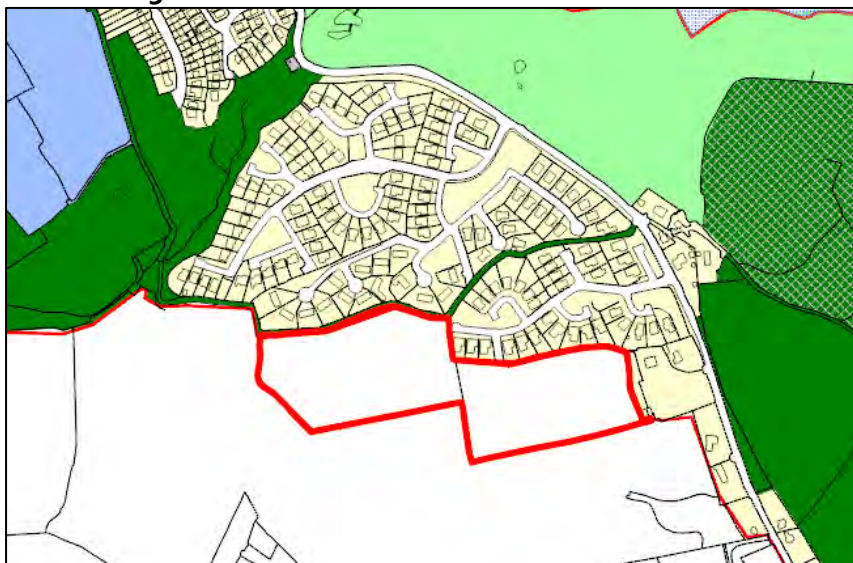
In support of this rezoning, the following grounds are put forward:

- The zoning of the land in previous plans, including residential and later Strategic Land Bank.
- The site is clearly an infill site and is surrounded by zoned land, taking a zoning designation away is unjustified.
- The land is located with the town boundary as defined by the CSO, and is within walking distance to the town centre.
- The land is fully serviced, with an existing foul drainage connection, served by an existing water tank, public footpath connection.
- The development of the land would constitute sequential development and provide approximately 120 units at 30 units per hectare.

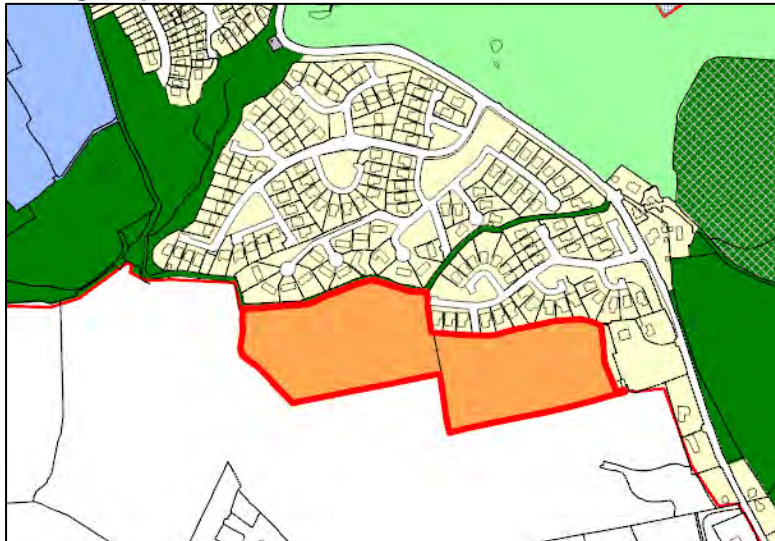
155 [Ronan O’Caoimh](#)
[Ref 220916](#)

It is requested that lands of c. 6.2ha at Dunbur Lower, outside the settlement boundary and with no specific land use zoning, be zoned for residential development, with the cover letter stating a request for RN2 ‘New Residential – Priority 2’ on these lands.

Draft Zoning:



Zoning Request:



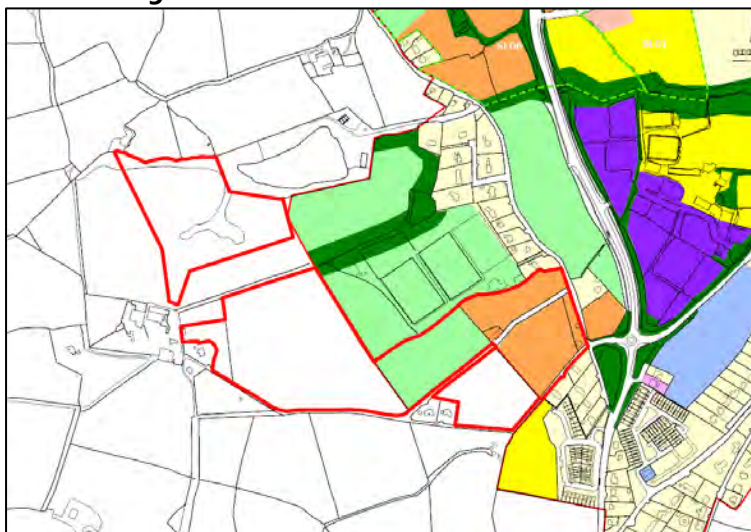
In support of this rezoning, the following grounds are put forward:

- The zoning of the land in previous plans, including residential and later Strategic Land Bank.
- The land is bounded by existing residential development to the north and east, adjacent to taken in charge and fully serviced developments.
- The land is located with the town boundary as defined by the CSO, within walking distance (1.5km) to the centre of the town which will promote compact growth.
- Connection to existing foul sewers and mains water connection at the adjoining Seacliff residential development is feasible, as is footpath and road access.
- The development of the land would constitute sequential development and provide approximately 200 units at 30 units per hectare.

156 [Ronan O’Caoimh](#)
[Ref 221123](#)

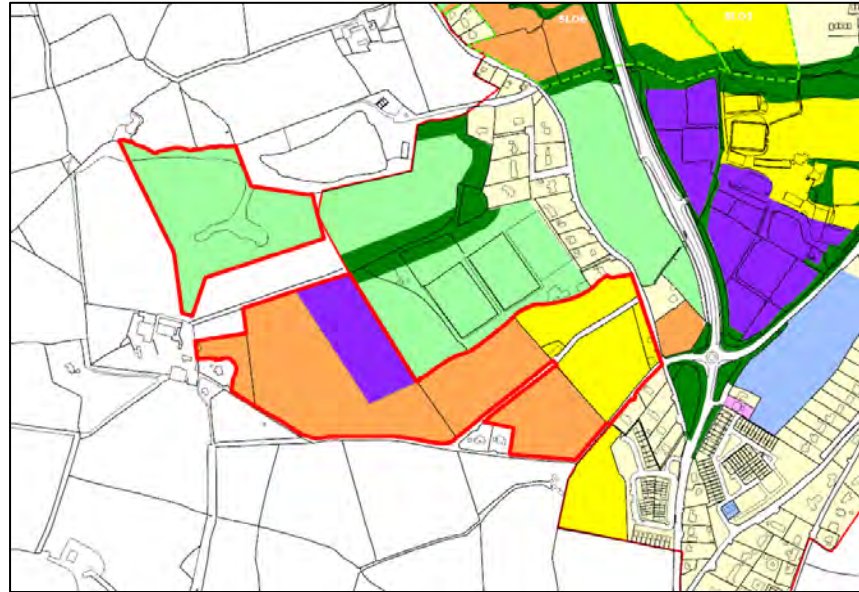
It is requested that c. 3.5ha of lands at Ashtown Lane, Ashtown/Hawkstown Lower, zoned RN2 ‘New Residential – Priority 2’, be zoned RN1 ‘New Residential Priority 1’ and c. 5.6ha additional lands be zoned for RN, E and AOS.

Draft Zoning:



Zoning Request:

[The phasing of additional residential lands was not raised and are shown below as RN2 'New Residential – Priority 2'.]



In support of this rezoning, the following grounds are put forward:

- The land is located within the LAP boundary, close to the centre of Wicklow Town and the relief road (Hawkstown Road), within walking distance (1km) of the town and will promote compact growth.
- The land is fully serviced with a foul waste connection, and the lower levels of the lands are served with a mains water connection, as confirmed by Irish Water pre-connection application. The landholder would be happy to build a water storage tank and associated infrastructure at his cost. The land is served by an existing surface water outfall in the form of a stream at the north-east corner of the land. A footpath terminates at the southeast corner of the lands, with the land fronting onto Ashtown Lane.
- A new planning application for residential development has been submitted on the lands (Reg. Ref. 24/60688).
- The development of the land would constitute sequential development and should be considered an infill site. The local authority has developed land for social housing to the south at Ashtown Lane. Development will provide approximately 100 units at 30 units per hectare.

It is requested that

- lands of c. 5.6ha at Ashtown/Hawkestown, outside the settlement boundary and without a specific land use zoning, be zoned AOS 'Active Open Space'.
- lands of c. 2.3ha at Ashtown/Hawkestown, outside the settlement boundary and without a specific land use zoning, be zoned for Commercial Light Industrial Use.
- that lands of c. 7.9ha at Ashtown/Hawkestown, outside the settlement boundary and without a specific land use zoning, be zoned for Residential Use.
- lands of c. 2.4ha at Ashtown/Hawkestown, zoned AOS 'Active Open Space', be zoned for Residential Use.
-

In support of this rezoning, the following grounds are put forward:

	<ul style="list-style-type: none"> ▪ The purpose of the Strategic Land Bank was to retain the land within the development boundary of the settlement for future strategic development. It would be appropriate now to consider this land for inclusion with a land use zoning other than SLB. ▪ The land should be considered for a mixture of uses to promote sustainable development and reduce vehicular journeys. Residential and commercial light industrial uses provide employment that is accessible by bicycle/walking, in line with the Draft Guidelines for Planning Authorities on Sustainable and Compact Settlements. ▪ The area is already well served with community and active open space uses and this could be expanded upon in the new plan.
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Chief Executive Response

While the sites put forward in these submissions have their own locational and physical characteristics, they have a number of commonalities and hence it is possible to respond to all three together. All of the sites are considered peripheral to the town / village centre and were previously zoned 'SLB – Strategic Land Bank'. Other than the site detailed in the first submission described above (Greenhills Road), the remaining sites are currently located outside of the CSO 'built up area' boundary.

During the preparation of the 2013 Plan, compliance with the Regional Plan, the County Development Plan and subsequently a Ministerial Direction, necessitated the SLB designation of some previously zoned lands, including the lands that are subject of these submissions. As part of the preparation of this new plan, more than 10 years later, a similar review was required to be undertaken, in order to ensure that any new draft plan prepared is similarly consistent with all higher order strategies and plans. The residential zoning provisions of the draft plan in particular have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the zoning of additional land for residential use, and the alteration of the phasing of residential land from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1', as detailed in this submission would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

Therefore, the CE does not recommend the zoning of these lands for residential development or amendment of RN2 to RN1.

With respect to the AOS zoning request for the Ashtown area, while an additional area of AOS would be welcome, it is taken that this suggestion are part of the overall proposal for this area and is not 'stand alone';

therefore this request is also not support. The suggested 'E Employment' zone is not supported given its haphazard and peripheral location.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.10.2 Specific Local Objectives (SLO)

SLO 2 Tinakilly / Newrath

No.	Name	Issue raised
20	Darren Fitzgerald Ref 095418	Protect Fairy Tree and lands around Tinakilly for Biodiversity.
24	Henry & Aoife Clarke Seamus & Evelyn Ryan David & Caroline O Neill. Ref 185913	<ul style="list-style-type: none"> ▪ Access to Rathnew Village centre will be difficult. People unlikely to walk like they do now due to increased traffic volumes in village centre. ▪ The R750 through the village centre will become a rat run for people to avoid traffic congestion along the so-called RIRR. This is highly likely to incentivise people to speed through the village centre to avoid traffic jams. ▪ Protect right of way along Tinakilly Avenue. This right of way is fundamental to our daily access. Full and uninterrupted rights of access to our homes must be considered a red line issue by Wicklow County Council before the implementation of any new LAP. Any interruption or attempted alteration of this right of way will be cause for legal action. ▪ The top section of Tinakilly Avenue is considered “overflow carparking” by Wicklow County Council. It is irresponsible and dangerous to try use it as access for pedestrians and cyclists as indicated in SL02 (LAP SL02 concept plan) to and from any proposed future housing development. Tinakilly Avenue is used as an access for residents, businesses, and local farmers. It is also a popular walking route for the communities of Rathnew and Wicklow Town. ▪ It is commendable that the fairy tree is proposed to be protected. Would like a TPO on this tree in its original location. ▪ Requested that the trees along Tinakilly Avenue should be considered for TPO's. Submitted that these trees should be protected through tree preservation orders due to their age and ecological importance.
25	Thomas O Sullivan Ref 162950	Heritage trees going to be eliminated at Tinakilly and Halpin's Avenue if they build the road.
46	Susan Gavin Ref 170719	Protect the trees along Tinakilly Avenue.
48	Eileen Howell	<ul style="list-style-type: none"> ▪ Use of Tinakilly Avenue by pedestrians/cyclist -public liability issue. ▪ Removal of vehicular access for those living on Tinakilly Lane. ▪ RIRR will destroy the Avenue. ▪ Trees lining Tinakilly Avenue are 100s of years old and deserve to be maintained and preserved.
81	Bill Clare Ref 191200	Tinakilly is being destroyed and is probably the last place people from the community have to enjoy nature and all it has to offer, there is plenty of places to build houses that are needed but we need to leave our beauty spots and wildlife alone.
83	Mia Merrigan Ref 202755	<ul style="list-style-type: none"> ▪ Specify type of residential build in Rathnew/Tinakilly Area. Removal of apartments with car parking and little or no green areas being replaced by residential houses with gardens would reduce run off and contribution to the flooding risks. ▪ ABP state that Rathnew is overzoned for housing. ▪ Plan to run a road through this avenue goes against the natural environment access, biodiversity and keeping/protecting amenities for public utility, tourism, educational/community, recreational use which Tinakilly Avenue and Broadlough lake provides for the community. ▪ It is proposed to destroy an historic tree line avenue.
87	Claire	Destruction of Tinakilly Avenue and green areas around Rathnew. Tinakilly Avenue –

	McGettigan Ref 203844	destroyed.
89	Sinéad Ryan Ref 211109	<ul style="list-style-type: none"> ▪ Long-term residents of Tinakilly Avenue have an established legal right of way along the entire avenue, extending up to Rathnew Cemetery. This right of way is not merely a convenience; it is a fundamental necessity that must always remain fully protected and uninterrupted. ▪ It is imperative that the council recognises this as a red-line issue and respects the legacy and future of Tinakilly Avenue and its residents. ▪ Positive that the Fairy Tree is to be protected.
100	Lisa Mc Gettigan Ref 234627	Why are we constructing a main road through the picturesque Tinakilly Avenue, a beloved spot for both local and distant residents for generations?
160	Mark Mcgettigan Ref 223707	The new proposed road through Tinakilly will destroy one of our last green /nature areas, it is unnecessary as alternative routes for relief of traffic from Wicklow town are available-i.e. Rocky road route to motorway and or upgrade to Marlton road to beehive connection.
162	Albert Morley Ref 224844	Thank you for sparing the Fairy Tree and recognising its cultural significance to the area. It thankfully remains as a reminder to our ancient tradition of storytelling. Can the plan be amended to included provisions to protect more mature trees on zoned lands.
165	Clare McEvoy Ref 234603	Too much additional land zoned as residential (RN1) - in particular the SLO2 area at Tinakilly. This land is dependent on the Inner Relief Road for access - this road will damage the natural character of Tinakilly Avenue and the mature trees.

Chief Executive Response

Submissions which raised issues with specific reference to flooding in the Rathnew and Tinakilly Area, including the SLO2 area have been addressed under Section 6 of this report, Strategic Flood Risk Assessment.

Issues which generally refer to the level of residential development in the settlement of Rathnew –Wicklow and the Tinakilly area in general are addressed under Chapter 3 Residential Development and Section 4.3.10.2 Specific Local Objectives (SLO) SLO 2 Tinakilly / Newrath of this report.

Issues raised with regard the need for the Rathnew Inner Relief Road (RIRR) and its route are addressed under Chapter 9, Topic 2: Transportation, of this report.

Issues raised with regard to the impact of residential development on nature/wildlife and biodiversity are addressed under Chapter 3 Residential Development, Issue 2: Impact of Residential Zoning on nature/biodiversity of this report.

The following topics are addressed under this section:

Issue 1: Fairy Tree

SLO2 of the Draft LAP requires that the Fairy Tree is retained in its original location as part of the development of the RN1 lands.

Issue 2: Tinakilly Avenue - Access to the Avenue, Pedestrian Safety and the RIRR (Rathnew Inner Relief Road).

With regard to Tinakilly Avenue, the LAP does not seek to close access to Tinakilly Avenue to the public. The LAP seeks that once the RIRR is complete and operational, the entire length of the Avenue will be accessible to pedestrians and cyclists while vehicular access to Tinakilly Lane will be retained on the eastern section of the Avenue with the option of turning left or right onto the RIRR depending on where individuals are travelling to in their vehicle.

The LAP seeks that the entrance onto the R750 remains open for pedestrian and cycle access providing a convenient, safer and more direct connection for walkers and cyclist to the Village Centre from Tinakilly Lane, the existing and future residential development in this area and the existing glamping site at Tinakilly House.

It is noted that the junction on the R750 from Tinakilly Avenue is currently difficult to egress from for vehicles, especially if turning right towards Rathnew Village. The future arrangement along the Avenue coupled with the RIRR and other planned road interventions in the area, including the upgrade works to the Rocky Road, will reduce pressure on the roundabout in Rathnew Village Centre and remove this vehicular egress from Tinakilly Avenue onto the R750. It should be noted that one road intervention/improvement alone will not accommodate the volume of current and future traffic movements in the area and that the RIRR is part of a suite of road interventions required to accommodate future traffic movements along with improving and promoting walking and cycling routes.

With a reduction in through traffic in Rathnew Village and creating cycle and pedestrian links from existing and new residential development in the area, it is envisaged that the village centre will become a more pleasant environment for pedestrians, therefore increasing footfall in the village which would be beneficial to existing businesses and encourage the rejuvenation and regeneration of the village over time. The future regeneration of the Village is supported by specific objectives CPO 5.1 – CPO 5.24 under Chapter 5 Town and Village Centres - Placemaking and Regeneration of the 2022-2028 Wicklow County Development Plan.

A submission has indicated that the R750 through the village centre will become a rat run for people to avoid traffic congestion along the RIRR, thereby incentivising people to speed through the village centre to avoid traffic jams. In this regard motorists are obliged to observe the legal speed limit through the village and this is regulated by law enforcement.

With regard to concerns regarding the safety of the pedestrian/cycle route as indicated at the far eastern end of Tinakilly Avenue close to the hotel entrance from the lands to the north of the Avenue, this pedestrian access point is indicative. The detailed design of this access point regarding safety will be assessed as part of any future planning application. Its inclusion in the Draft LAP is to ensure a direct cycle/walking route to the hotel and across to the parkland currently under construction at Tinakilly Park providing a walking route not only for amenity purposes but also promoting soft modes of travel.

Concerns have been raised with regard to public liability and the use of the Avenue as pedestrian/cycle route. In this regard it is noted that length of Tinakilly Avenue is currently in use by pedestrians and cyclists as well as motorists. The issue of public liability is also outside the remit of an LAP which is a land use zoning plan.

Issue 3: Impact on the Tree line and Amenity of Tinakilly Avenue

With regard to the protection of the trees along Tinakilly Avenue and the protection of mature trees in general, the following Objectives are stated under Chapter 17, Natural Heritage & Biodiversity, of the County Development Plan 2022-2028. These objectives shall be considered in the assessment of any development on zoned and un-zoned lands in the County.

CPO 17.18 *To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of the long-term sustainability of a stable ecosystem amenity or the environment generally, as set out in Schedule 17.05 and Maps 17.05 and 17.05A - H of this plan”.*

CPO 17.19 *To consider the making of Tree Preservation Orders (TPOs) to protect trees and woodlands of high amenity value”.*

CPO 17.20 *Development that requires the felling of mature trees of environmental and/or amenity value, even though they may not have a TPO in place, will be discouraged”.*

CPO 17.21 *To strongly discourage the felling of mature trees to facilitate development and encourage tree surgery rather than felling if such is essential to enable development to proceed. CPO 17.22 To require and ensure the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments”.*

CPO 17.23 *To require the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority)”.*

With regard to placing a TPO on the trees along Tinakilly Avenue, there is a separate procedure from the LAP for the protection of a tree / groups of trees via a Tree Preservation Order. Section 205 of the Planning and Development Act 2000 (as amended) sets out a process that must be followed before a tree / group of trees may be made subject to any such order, including public consultation and notification to owners, consideration of any submissions / objections and finally an adoption process by the members of the County Council. Any such process must be initially grounded on an assessment by a suitably qualified arborist. As Wicklow County Council does not have an arborist on staff it must therefore engage such expertise every few years when there are a number of trees / groups of trees needing assessment. Wicklow County Council does not currently have such an assessment scheduled. In this regard the draft LAP does not place a TPO on the individual Fairy Tree on the RN1 lands in SLO2 but the SLO does requires that the Fairy Tree is retained at its current location as part of the development of this residential zoned site.

The Avenue itself is zoned OS1 and no changes are envisaged along the length of most of the Avenue. The draft LAP also does not indicate that the tree line along Tinakilly Avenue is to be removed. The removal of vehicles from the western section of the Avenue will improve the safety and amenity of the avenue. It is noted that the surrounding fields are private property and were never publically accessible as amenity area for local people. In addition no changes are proposed to Tinakilly Lane and this route will still be available for walkers down to Broadlough.

With regard to the RIRR crossing and the trees along the Avenue, from a review of the tree survey submitted as part of PRR23/60219, a planning application which included the RIRR crossing and remaining northern section of this route, 4 no. trees were proposed to be removed from the Avenue to facilitate the RIRR crossing point comprising of 1 No. Category U tree, 2 no. Category C trees and 1 No. Category A tree. There were no proposals to remove other trees along the avenue as part of any this proposal. The removal of these 4 trees was considered reasonable to allow for the development of the RIRR.

Issue 4: Density/Unit Type

A submission has requested that no apartments or higher density development is specified on the lands in Tinakilly noting that the removal of apartments with car parking and little or no green area and their replacement by residential houses with gardens would reduce run off and contribution to the flooding risks.

In this regard zoned housing lands at Tinakilly, including the lands that are currently under construction, are not identified in any flood studies, either those of the Council or the OPW, the state agency responsible for flood identification and management, as being at risk of flooding, including in the longer term future scenarios developed by the OPW.

In terms of new development and the potential for increased run off to the Rathnew River, the Council is committed to implementing the objectives and standards of the County Development Plan in order to address and mitigate any potential impacts from new development.

With respect to the development format and the suggestion that a lower density type development would

mitigate potential risks, in accordance with national and county policy, land that is suitable for residential development should aim for the highest density feasible given settlement designation in the County hierarchy, the site location, services available and characteristics of the area. In this regard, a medium density development is suitable and optimal for the Tinakilly, lands, which incorporates a range of house types and sizes, including duplexes and apartments. However it should be noted that these 'higher' density formats are only a small element of the overall development permitted to date and the emerging plans for the future sections.

It is further noted that with regard to individual dwellings with back gardens, home owners may choose to pave/hard landscape large sections of these private gardens which results in a reduction in the ability for sites to absorb rainfall and reduce run off while the communal open spaces associated with apartment development are more easy to regulate in terms of the level and type of hard and soft landscaping proposed and the ability of these open space areas to absorb rainfall and reduce/control runoff.

Issue 5: Childcare to support development at Tinakilly

As part of the development of the RN1 lands in SLO2, the Draft LAP requires that the development of these lands includes the provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

SLO3 Milltown North

No.	Name	Issues Raised
38	<p>Mary Byrne. Liz Byrne. Carmel Whelan Ref 131457</p>	<p>This submission relates to lands located on the R752 west of Rathnew village centre (these lands are zoned RN2 and OS in the draft plan as part of SLO3). In the current Local Area Plan, there is a requirement to facilitate a road through the submitters' lands, specifically policy RP7.</p> <p>Submitted that the wording under the current LAP with regard to the provision of this road was clear:</p> <ul style="list-style-type: none"> ▪ To 'facilitate' the development of a road; ▪ To 'facilitate access to new developments from the existing road network'; ▪ To 'prevent congestion at the Rathnew mini roundabout due to the development of employment zoned lands at Milltown/Charvey and achieve a good traffic circulation in the area. <p>The submitters had no objection facilitating such a road. However, in the new proposed draft Local Area Plan, this road objective for this same road has expanded in Specific Land Objective 3 (SLO3) to be in effect a new Regional Road, being required to be designed by people seeking planning permission on these lands, and no permission can be lodged until the road has been fully designed. The new Local Area Plan has thus made it a requirement to develop this land from 'facilitating' this road to making it a requirement to provide the road.</p> <p>In effect, the core reason for this road is to enable the current Regional Route, in fact the former National Route, to become a town centre area free of significant through traffic. This seems like an unreasonable burden to be based on employment zoned land, that is traditionally hard to get developed, and our site that can accommodate circa 60 houses. As the route will be 900m or so, this will cost circa 3.5 million, if it is to be developed as a regional route. It is not clear who is to design this road from Tighes Ave to the R752.</p> <p>It is submitted that there is actually no need to have this entire road designed before development of the submitter's site. . The first 100m of the land cannot be developed for housing given the set back from the M11 boundary required by the County Development Plan. There is thus a surplus of land in which to get a road line designed, and thus allowing the site to proceed would not prejudice or inhibit the design of this route.</p> <p>The following amendment is requested to the text in SLO3</p> <ul style="list-style-type: none"> ▪ A new link road is to be provided to connect Tighe's Avenue to the R752 <i>to be developed in phases along with the development of the zoned lands it passed through.</i> ▪ No development may occur in this area until an overall design has been determined for the road network in the area, including but not limited to <ol style="list-style-type: none"> a) <i>the final northern section of the RIRR connecting same to the R772 and a route from the R772 to the R752 ,unless it can be demonstrated in an application that sufficient land will be left undeveloped to enable a satisfactory route to be designed.</i>

102

[Margaret Geary,](#)
[Roisin Snell, Olive](#)
[Stafford](#)

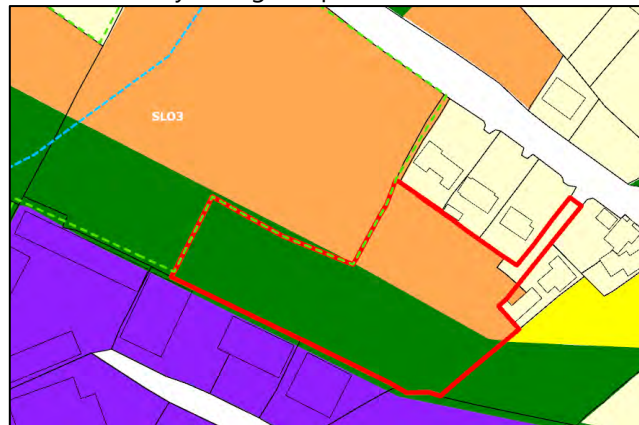
It is requested that lands of c. 0.8ha zoned for RN2 and OS1 are taken outside of the boundary of SLO 3. In support of this SLO boundary change, the following grounds are put forward:

- It is wished to build on this land in the immediate future, SLO3 would be prohibitive to this, specifically: *"No development may occur in this area until and overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting the same to the R772 and (b) a route from the R772 to the R752"*.
- The exclusion of the land is straightforward and will not impact any other plots or landowners.
- Exclusion of the lands would be immaterial to the aims and objectives of SLO3 due to the moderate size of the lands.
- Plans for neighbouring lands are unsure so the subject lands should be considered on a stand-alone basis.

Draft SLO3 boundary:



SLO3 boundary change request:



Chief Executive Response

Submission 38

The Local Authority is committed to addressing local transportation issues and a key element of its strategy is to address the congestion between Wicklow Town and Rathnew, and onwards between Rathnew and Junction 16, via a suite of interventions including (but not limited to) the development of a new link road between Tighe's Avenue and the R752 for Glenealy – Rathdrum bound traffic.

Following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will further detail an overall strategy and programme for addressing any existing transportation issues and supporting further development with appropriate infrastructure. This LPT will provide for a programme for

the finalisation of the optimal route and design for this new route, as well as a delivery and funding programme. This will address any phasing programme required, and therefore it is considered it would be premature at this time to make the change to the draft LAP is suggested.

Submission 102

While the removal of these lands from SLO3 would not undermine the objectives for SLO3, it is unclear how these lands could be access other than via other lands in the SLO3 block. The entry way shown in the submission is only 6m wide and would therefore no be adequate for a 2-way road (wide enough for refuse / emergency vehicles) and footpaths. However, this would be a design matter for any future applicant for permission to address and is not a reason to not accept to this request.

Chief Executive’s Recommendation

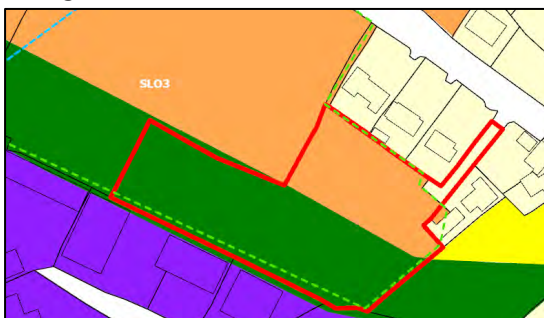
Amend SLO3 map and text as follows:

This SLO is located in the townlands of Milltown North and Ballybeg. The SLO comprises Employment (E), New Residential (RN – Priority 2) and Natural Areas (OS2) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- *A new link road is to be provided that connects Tighe’s Avenue to the R752, to be developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;*
- *No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752*
- *Any development on these lands shall take into account the N11 set back distances as specified for different development types in the County Development Plan.*

Amend SLO3 zoning map as follows:

Change from:



Change to: (remove the area in red from SLO3 area)



SLO 4 Bollarney North

No.	Name	Issue raised
41	Amy McNabb Ref 52435	Request removal of RN2 zoning from this site for residential amenity and biodiversity reasons.
49	Rosaleen and Martin McNabb Ref 210520	Opposed to SLO4 on biodiversity grounds, in particular birds and small animals. Suggest area be preserved as a public park or sports facility as not enough green infrastructure to cope with the level of residential development proposed.
51	Stephen Reynolds Ref 081816	Strongly opposes the RN(2) New Residential - Priority 2 rezoning area in SLO4 on residential amenity grounds, traffic and environmental grounds.
90	Louiaw McNabb Ref 202834	SLO4 – objects to new RN2 zoning.
99	Stan Breathnach Ref 000330	Suggest SLO4 be zoned for parkland and allow it to become the gateway to the Greystones to Wicklow Greenway.
109	Melissa McNabb Ref 093952	Objects to new RN2 zoning. SLO4 should be reconsidered for sports activities.
119	Kyran and Maeve O'Grady Ref 131316	Suggests de-zoning of lands next to Broadlough SAC for housing. Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife.
127	Garrett Kennedy Ref 150541	Suggests de-zoning of lands next to Broadlough SAC for housing. Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats directive
129	G Kennedy Ref 152438	Suggests de-zoning of lands next to Broadlough SAC for housing. Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats Directive.
134	Lyndsay Martin Ref 161122	Suggests de-zoning of lands next to Broadlough SAC for housing. Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife.

Chief Executive Response

Changes to Zoning

The following submissions which seek zoning changes to individual land parcels in SLO4 are addressed under Chapter 11, Section 4.3.10.1 of this report - submission No.'s 10, 14, 52, 69, 78, 86 and 91.

Submissions which raised concerns with regard to flooding on lands within or close to SLO4 are addressed under Section 6 Strategic Flood Risk Assessment of this report.

With regard to the proposed RN2 zoning in SLO4 and their impact on biodiversity and in particular their impact on The Murrough Wetlands SAC and The Murrough SPA please refer to Section 5 Strategic Environmental Assessment and Appropriate Assessment of this report. It is noted that based on Section 5 of this report it is recommended that the following text be included in the objectives listed for the development of SLO4:

"All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects.

In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans."

Traffic

With regard to the impact the RN2 zoning would have on local traffic in the Knockrobin area it is noted that these lands are proposed to have vehicular access onto the Port Access Road which was design to carry of the level of traffic generated by the previous and currently proposed land use zonings along it (the lands are currently zoned for Employment use).

In this regard it is noted that draft LAP seeks to reduce the level of land zoned for development in this area by increasing the green buffer along the southern side of The Murrough by zoning more lands for OS1 and OS2. The draft LAP also seeks to rezone lands previously indicated for employment use to residential use. It is noted that employment uses and residential uses are the biggest trip generating land uses and that on balance the Port Access Road has capacity to deal with trips generated by the level of residential zoned lands proposed. In addition, this site will be located directly across from the new active travel overbridge (over the railway line) which will make this site within a 5 minute walk of Wicklow Train Station and a 10-15 minute walk of Wicklow Main Street, encouraging future residents to walk or utilise public transport making this a more suitable location for residential development.

Residential Amenity

In terms of the impact the proposed RN2 zoning would have on existing residential properties in the area, the potential impact of any proposed development on the privacy and amenity, including impact on sunlight/daylight levels, would be assessed as part of any planning application submitted on these lands in accordance with the relevant objectives as outlined in the 2022-2028 Wicklow County Development Plan but in particular the following which relate specifically to the protection of the residential amenity of existing residential areas:

***CPO 6.3** New housing development shall enhance and improve the residential amenity of any location, shall provide for the highest possible standard of living of occupants and in particular, shall not reduce to an unacceptable degree the level of amenity enjoyed by existing residents in the area.*

***CPO 6.26** While the zoning objectives indicate the different uses permitted in principle in each zone it is important to avoid abrupt transitions in scale and use at the boundary of adjoining land use zones. In these areas it is necessary to avoid developments that would be detrimental to amenity. In zones abutting residential areas, particular attention will be paid to the use, scale, density and appearance of development proposals and to landscaping and screening proposals in order to protect the amenities of residential properties.*

Sports Facilities SLO4

With regard to the provision of sports facilities on these lands, please refer to Chapter 7 Community Development, Section 4.3.6.2. There would be concerns with regard to the provision of floodlighting to facilitate sports facilities at this location and the impact such lighting and noise from potential matches would have the birds in The Murrough SPA.

Chief Executive's Recommendation

Add the following objective to SLO4 Bollarney North

All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects.

In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans.

SLO 6 Ballynerrin

No.	Name	Issues Raised
30	Stephanie Gavin Ref 110933	<ul style="list-style-type: none"> ▪ Lands around Wicklow Educate Together National School zoned for sports and for Priority 2 housing. Priority 2 housing should also change to sport and community too. ▪ Current provision of AOS insufficient. ▪ No playground facility or sports facility for teenagers serving residential development along the Hawkstown Road side of the town.
32	Shane Cowell Ref 120640	Land along Hawkstown Road should be used for sports and recreation use. Lack of facilities on this side of the tow
31	Andrew Sullivan Ref 115529	Submission 31, 33, 34, 35 and 39 are similar in wording and have been grouped together. These submissions request the following: <ul style="list-style-type: none"> ▪ Change the residential zoning at SLO6 to AOS. ▪ This will compensate for the 37 acres in Tinakilly that were never developed. ▪ Allow for a large sports facility for multiple sporting facilities. ▪ It would have a number of access points and with the development of the Rocky Road out to the N11, it means teams traveling to Wicklow for matches would not have to travel through the town.
33	Orla Malone Ref 122859	
35	Deirdre Malone Ref 123205	
39	Catherine Ryan Ref 134204	
36	Caoimh Bruton Ref 124533	Suggests residential zoning at SLO6 be changed to AOS to allow for much needed proper sporting facilities - basketball courts, running tracks, Astro pitches etc
42	Siobhan Connery Ref 155959	<ul style="list-style-type: none"> ▪ Residential zoning at SLO6 should be changed to AOS. ▪ This will compensate for the 37 acres in Tinakilly that were never developed. ▪ Allow for a large sports facility with the potential for a 2km running track for local athletics club Inbhear Dee who currently train on a dark wet football pitch and in car parks. ▪ This site would have a number of access points and with the development of the Rocky Road out to the N11; it means teams traveling to Wicklow for matches would not have to travel through the town.
44	Fiona Fitzsimons Ref 164436	<ul style="list-style-type: none"> ▪ Residential zoning at SLO6 should be changed to AOS. ▪ This will compensate for the 37 acres in Tinakilly that were never developed ▪ Would provide facilities for a number of local sports clubs. These include Inbhear Dee athletics club, Wicklow basketball, Rathnew Boxing, Wicklow rowing club, Wicklow dolphins amongst others. In the last area plan submitted, not one single area identified for AOS was developed and this space identified would be perfect solution to meet the future needs of clubs. ▪ This area has a number of access points in situ and further development of Rocky Road out to the main artery of the N11, would reduce traffic flow through our already congested town for travelling visitors/opponents.
56	Lynda Bremner Ref 111936	<ul style="list-style-type: none"> ▪ Residential zoning at SLO6 should be changed to AOS to allow a greater integrated piece of land be dedicated solely for the sports and recreational needs of this growing community. ▪ Over the past number of years, with growing numbers of residents, the existing clubs have become oversubscribed and severely lacking safe space and access to even basic amenities.
64	Wicklow Squash Club Ref 122833	<ul style="list-style-type: none"> ▪ Objective: To establish Wicklow Squash Club; A squash facility with 3 indoor courts, and shared locker rooms, showers, and communal area with other clubs e.g. local boxing club, athletics club and basketball club for example.

		<ul style="list-style-type: none"> Requested that SLO6, the area zoned residential between the Rocky road and Hawkstown road be changed to AOS. Would in some way compensate for the 37 acres in Tinakilly that were never developed as AOS. This would also have huge potential to develop multiple sporting facilities for our future generations. SLO6 would have a number of access points and with the development of the Rocky Road to the N11, giving the possibility of teenagers / children to walk from local schools while also allowing traveling teams to Wicklow for matches have easy access.
103	Louise Ruttledge Ref 065711	Change the RN2 zoning in SLO6 to AOS. There are too many houses and not enough sports resources for growing population
116	Noreen O'Reilly Ref 111620	<ul style="list-style-type: none"> Lack of suitable sports facilities athletics Tinakilly, which was a designated active leisure area is now history as with no parking and no lighting, it is unsuitable. SLO6 - Residential zoning at SLO6 change to AOS to provide for sporting needs of all sporting communities. This site is the final opportunity for a greenspace, in the town, to be developed to meet the growing needs for a sport facility in Wicklow
121	Anja Karamalis Ref 142758	<ul style="list-style-type: none"> Amend the local area plan to include sports pitches, playgrounds etc on the north side of the Hawkstown road between the Rocky Road and the roundabout to Marlton area. The area needs to be developed as a sports & recreation area, not housing. The whole area between Marlton Road and Hawkstown road has housing and housing is still being built without a single playground, adequate green area or sports facility.
122	Colm Ó Broin Ref 142644	Submissions 122 and 123 are similar in wording and have been grouped together. These submissions request the following:
123	The Meadows Estate Residents Association Ref 143928	<ul style="list-style-type: none"> Land to the north side of the Hawkstown Road between the Rocky Road and the Marlton Road should be zoned for amenity and development as a sports and recreation area. This type of facility is sorely needed in this part of Wicklow Town, there are a large and growing number of families in the area but no sports pitches (including 5 a Side pitches) or playground. Making this change will have health (including mental health) benefits.
124	Epi Karamalis Ref 144557	<ul style="list-style-type: none"> The land on the north side of the Hawkstown Road between the Rocky Road and the Marlton Road should be zoned for amenity and development as a sports and recreation area. This type of facility is sorely needed in this part of Wicklow Town, there are a large and growing number of families in the area but no sports pitches (including 5 a Side pitches) or playground.
137	Anne Dowling Ref 155101	<ul style="list-style-type: none"> Requested that the land zoned for amenity and development as a sports and recreation area on the Northside of the Hawkstown Road. Not enough sports or play facilities on this side of the town. Need to keep this whole area for the running track and extra pitches (including astro) which are badly needed.
138	Caroline Cullen Ref 163112	<ul style="list-style-type: none"> Request to have sports pitches, playgrounds etc built on the north side of the Hawkstown road between the Rocky Road and the roundabout. The whole area should be developed as a sports & recreation area and not housing. Would be great as we don't have anything like that in this part of the town.
150	Helen Fitzsimons Ref 200032	<ul style="list-style-type: none"> Leave entire field above Hawkstown Road for amenity and consider allotments. Back gardens in new build estates are small and often overshadowed, and

		<p>the soil left by builders is often down to boulder clay with poor drainage. Landlords are often very reluctant to allow a tenant to grow fruit trees or plant vegetables and prefer to pave the back garden, and apartments obviously have nothing.</p> <ul style="list-style-type: none"> ▪ A lot of benefits from allotments including physical and mental health benefits and community building.
151	Aoife Kirwan Ref 211650	The land between Rocky Road and the roundabout at the top of Marlton Road should be used for sports facilities. We have no local playground or play areas for kids. Need more green spaces and parks. Too much housing.
161	Wicklow Basketball Club Ref 225317	<ul style="list-style-type: none"> ▪ In the past 30 years there hasn't been sufficient allocation of sports and recreation resources to accompany the growing population of the Wicklow/Rathnew area. ▪ SLO6 - Having reviewed the Land Use Zoning Map it seems clear that the Hawkstown Road & Rocky Road sites should become a Sports Hub. It doesn't make sense to insert a residential development between the two. ▪ By combining these three sites into one, you are essentially future proofing the needs of generations to come. This combined site can then be developed over a period, as and when funding becomes available. As the local clubs will be the end users, collaboration with them is essential in how this site will be developed to ensure that we get it right.
164	Leonie Quinn Ref 231637	<ul style="list-style-type: none"> ▪ Need recreational space at the south west end of Wicklow. ▪ Marlton area full of housing estates but there are no real green spaces, walks, playgrounds. ▪ The area south of Educate Together primary school on the west side of the Hawkstown road would be an ideal area to develop sports facilities and a playground for all the young children in the area in particular. ▪ Also as a member of a group trying to set up a volleyball club, it would be great to have a communal space that could facilitate that. There are no halls for rent in Wicklow town big and especially tall enough to allow many indoor sports.

Chief Executive Response

The submissions listed above are seeking to change in the RN2 zoning to the western side of Hawkstown Road in SLO6 to AOS. The map below shows the current proposed zoning on the SLO6 lands with circa 5.5ha zoned AOS as indicated in light green with the remainder of SLO6 zoned RN1 (Yellow), RN2 (Orange) and OS2 (Dark Green).



The following map shows the rezoning request with the RN2 zoning to the west of the Hawkstown Road changed to AOS.



The Social Infrastructure Audit appendix of the LAP includes an audit of sports and recreation future land use needs within the settlement. The draft LAP has zoned the required amount of land for Active Open Space (AOS) and Community (CE), which allows for sports facilities to be developed, for the future needs of the population of the settlement and its catchment.

In this regard in accordance with WCC's Active Open Space Policy, active open space shall be provided at a rate of 2.4ha per 1,000 population divided into:

- 1.6ha outdoor play space (pitches, courts, sports grounds)
- 0.6ha casual play spaces (parks)
- 0.2ha equipped play space (playgrounds and MUGAs)

Based on the above rates and considering the 2031 population target of 19,400 persons for Wicklow Town - Rathnew, the following areas of active open space are required at a minimum:

46.4ha overall needed for the plan area comprising of:

- 31ha outdoor play space
- 11.6ha casual play spaces
- 3.8ha equipped play space

However, the sports and recreational facilities in the settlement cater for the population within the settlement as well as the population of the surrounding rural areas. **The projected 2031 population of the settlement and catchment is c.27,900 persons.** The following areas of active open space are therefore required at a minimum:

66.8ha overall needed for the plan area and catchment area comprising of:

- 44.6ha outdoor play space
- 16.7ha casual play spaces
- 5.5ha equipped play space

It was also identified through the pre-draft plan public consultation that there are additional / specific needs as follows:

- Athletics club grounds / running track
- Sports and community centre
- Indoor amenity facilities
- Indoor sports facilities
- Walking and cycling trails

With respect to organised sports grounds, outdoor / casual play spaces and equipped play spaces, there is currently a total of c.45ha in open space use in the settlement **excluding** Wicklow Golf Club.

Therefore at a minimum there is a **need to zone a total of c.66.8ha** of active open space in the settlement to cater for the settlement and its catchment during the lifetime of the next LAP. The Draft LAP therefore proposes to zone an additional 30.6ha of AOS in addition to the existing c. 45.7ha of AOS in the settlement **giving a total of 76.3ha zoned AOS in the settlement.** This is **9.5ha above the minimum requirement.**

With regard to the location of AOS there is a need to ensure a **suitable spatial distribution of spaces**, so that all developed areas, particularly residential areas (existing and planned) can access amenity and sports grounds by active and sustainable means (walking / cycling / public transport). Having considered the catchment of existing sports clubs, there are clearly existing areas where there are deficiencies. In this regard, new undeveloped AOS lands are proposed at the following locations:

Zoned Undeveloped Land		
Location	Zoning	Area (ha)
Hawkstown Road	Active Open Space	4.7
Rocky Road	Active Open Space	5.6
Brides Head	Active Open Space	4
Ashtown Lane	Active Open Space	7
Tinakilly	Active Open Space	2.45
Ballynabarney	Active Open Space	3.7
Bollarney	Open Space	3
Total new open space lands		30.6 hectares

The table above includes the 5.6ha of AOS zoned along Rocky Road in addition to a further 4.7ha along the Hawkstown Road circa 200m to the south of the AOS lands at Rocky Road. With respect to these adjacent lands, WCC has developed draft Sports & Recreation plan for the Hawkstown Road site and it is intended this will be developed as a multisport facility ideally including an indoor facility.

SLO6 includes a proposal to create a green cycle/pedestrian link through the proposed RN2 zoning connecting the proposed AOS between Rocky Road and Hawkstown Road. This green link follows a mature hedgerow and tree line which is to be retained as part of any future residential development on this site. The route will also benefit from passive surveillance from the residential development on either side. The proposal to retain this mature tree line and hedgerow may have hampered the development of sports facilities on this particular site and it is considered that this site is more suitable to future residential development noting it is also serviced and accessible and located close to schools and future AOS. There are also some existing residential dwellings located along Ashtown Lane immediately to the west of this RN2 site.

In addition, as identified by the Social Infrastructure Audit referred to above, there isn't a need for additional AOS lands to be zoned in this particular area above what is proposed in the draft Local Area Plan.

There are also concerns that if sports facilities were to be clustered together on one single large site on the

scale requested, this would lead to traffic issues in the immediate locality, especially on match/event days. It would also result in such facilities not falling within a reasonable walking/cycling distance of the majority of residents in Rathnew and Wicklow Town. However, it is considered that the clustering similar type sports together, for example racket sports or field sport, could work well.

With regard to the development of AOS, it should be noted that the purchase of lands and provision / development of sports facilities by the Local Authority is outside the remit of the LAP, however in 2025, as part of the National Sports Policy, Wicklow County Council will be developing a **Local Sports Plan** for the County, which will identify infrastructure needs as well as a project delivery programme for new facilities. All of the submissions made with respect to sports infrastructure to this LAP will be considered in the preparation of the Local Sports Plan.

With regard to the AOS in Tinakilly, 2.45ha zoned AOS under the current plan is permitted to be developed as a parkland with an area reserved/levelled for the possible future development of a playing pitch and associated car park when funding allows. The OS1 Open Space (c.6ha) on either side of the AOS in Tinakilly is permitted to be developed as parkland with walking routes, native woodland planting and wildflower planting linking back up to Tinakilly Avenue close to Tinakilly House. While this is not the amount of AOS envisaged under the 2013 LAP, the future development of this permitted public amenity is considered to be positive addition for both existing and future residents in this area.

With regard to the development of allotments the benefits of such a use in villages, towns and cities is acknowledged in particular with regard to mental health, general wellbeing and community building. It is considered that such a use would be more suited to Land Use Zoning OS1 rather than AOS. In this regard it is recommended that uses generally permitted on OS1 lands as outlined under Chapter 11, Section 11.1 of the Draft LAP be amended to include allotments.

Submissions which refer to the provision of playgrounds, open space, active open space and sports facilities in general are addressed under the Community and Development Section of this report.

Chief Executive's Recommendation

No change to zonings within SLO6.

Amend uses generally permitted on OS1 lands as outlined under Chapter 11, Section 11.1 of the Draft LAP be amended to include allotments as follows:

Uses appropriate for open space (OS1) zoned land are recreational uses such as formal / informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, Mixed Use Games Areas , ~~and~~ outdoor gyms **and allotments**.

SLO7 Rosanna Lower (RIRR) and SLO8 Rosanne Lower (School Site)

Issue 1: Tighe Avenue

No.	Name	Issue raised
48	Eileen Howell	The Concept Plan for SLO7 seems to show that Tighe Avenue will be closed off at the Maxol Petrol Station to create a 'T' Junction forcing traffic onto a portion of the proposed RIRR currently the R761(Newcastle Road) on which a further 100 houses are under construction. Ignoring current traffic volumes, if all of the housing zoned for is constructed this would mean almost a further 1000 cars on the road within a 1km radius of Rathnew village. Please acknowledge the rural aspect of this area.
Chief Executive's Response		
<p>Issue 1: Tighe Avenue</p> <p>Submission No. 141 refers specifically to a rezoning request and refers to SLO7 and SLO8. This submission is addressed under Chapter 11 Zoning and Land Use, Section 4.3.10.1 of this report, and therefore has not been included under this section.</p> <p>Submission No.48 refers to the Concept Plan for SLO7 and raises concerns that it is proposed to close off the access to Tighe Avenue from the R761 across from the Maxol Station and that cars will be forced onto a section of the RIRR, currently the R761 Newcastle Road.</p> <p>A concept plan has been prepared for each SLO to demonstrate how the future layout of the area may evolve however it should be noted that this is indicative only. The final layout and route of this section of the RIRR will be subject to detailed design at a later stage and will require planning permission.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendations		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.11 Appendix 2 Social Infrastructure Audit

4.3.11.1 Issue 1: Quantum of CE Zoned Lands

No.	Name	Summary of issues raised
142	The Delahunt Family Ref 133706	<p>We have reviewed the Social Infrastructure Audit (SIA) included with the Draft LAP and note the need for additional facilities based on the capacity of the existing primary and post primary schools in Wicklow-Rathnew.</p> <p>Submitted that the subject lands on the submitters land holding are unsuitable for the development of a school due to challenging topography and its proximity to existing schools. With three alternative sites already designated for school development that collectively address the projected shortfall in education capacity, the subject lands are unlikely to be necessary or practical for future school provision, Requested that the site is removed from page 49 of the draft LAP and from Table 2.10 of Appendix 2 of the draft LAP. It is also requested to rezone these lands to New Residential RN1.</p>
<p>Chief Executive Response</p>		
<p>Please note that submissions relating to the provision of schools, childcare/crèches, healthcare, Active Open Space/Sports Facilities and Playgrounds have been addressed under with Chapter 7 Community Development of this report.</p>		
<p>Please also refer to Chapter 11 Zoning and Land Use, Section 4.3.10.1 of this report for issues with regard to Land Use Zoning (Submission No. 142).</p>		
<p>With regard to the quantum of lands zoned Community and Education under the Draft LAP the Social Infrastructure Audit the following is noted:</p>		
<p>The draft LAP, in combination with the Social Infrastructure Audit appendix of the LAP has carried out a full audit of primary and secondary school capacity in the settlement of Wicklow-Rathnew. The Social Infrastructure Audit identified that there may be a need for additional primary and secondary school places in the settlement by 2031 to cope with the growth in demand within the settlement itself and the rural catchment it serves.</p>		
<p>The draft LAP has zoned the required amount of land for Community (CE), which allows for schools to be developed for the future needs of the population of the settlement and its catchment based on the findings of the accompanying Social Infrastructure Report.</p>		
<p>The LAP as a land use plan, can facilitate the provision of new schools through appropriate land use zoning however, it should be noted that the purchase of lands and provision / development of schools is outside the remit of the LAP and the Local Authority. The provision of primary and secondary school facilities in Ireland is determined on an area specific basis by the Department of Education (DoEd), having regard to available school capacity, demographic projections, an analysis of child benefit records, and local travel pattern modelling.</p>		
<p>The DoEd is monitoring the demand for and provision of schools in the LAP area on an ongoing basis and WCC will continue to consult and liaise with the DoEd in this regard.</p>		
<p>In accordance with objectives CPO 7.10, CPO 7.11 and CPO 7.12 of the County Development Plan, the Local Area Plan has zoned a number of sites within the plan area for 'Community and Education' that have the potential for the future provision of primary and post primary schools.</p>		
<p>The following undeveloped / brownfield lands have been zoned Community and Education (CE) for the potential development of new schools within the settlement in the future, and should be specifically reserved in the plan for school development only.</p>		

The following 3 sites have been selected following a detailed Transport Assessment and where it was clear that there was a gap in primary/secondary school provision within 15 minute walk of existing and proposed residential communities in these areas. From this assessment it is clear that there is a need for a primary school site to the north east of Rathnew village (Rosanna) and to the south west of Wicklow Town (Ballynerrin).

With regard to secondary schools it is clear that there is a need for a site in Rathnew, hence the lands at Ballybeg have been zoned for a secondary school site.

Zoned Undeveloped Land for a School		
Location	Zoning	Area (ha)
Marlton Road, Ballynerrin Lower	Community & Education	3.5
Ballybeg, Rathnew	Community & Education	5
Rosanna Lower	Community & Education	2

It is considered that these undeveloped/brownfield sites could be developed to provide for new schools in the area when the DoEd deem there is sufficient demand and funds available to facilitate the development of new schools in the area. The sites are located so that they are sufficiently distanced away from existing primary and secondary schools so that they will cater for the existing and future residential development within a 15 minute walk of the chosen site location.

In terms of primary and secondary school provision no amendments to the LAP are recommended.

With regard to other undeveloped sites zoned Community and Education including the site at Fernhill House which is the subject of this submission and measures c 1.7ha, the Social Infrastructure Report notes that *“there are further smaller undeveloped/brownfield CE zonings within the settlement that may be suitable but are considered less optimal but could also accommodate a new school site if needed”*.

These sites may also accommodate uses that are considered to be consistent with the zoning objective and description associated with this land use zoning. In the case of CE: Community and Education this land use has an objective *“to provide for civic, community and educational facilities”* and a description *“To facilitate the development of necessary community, health, religious, education, social and civic infrastructure”*.

In this regard the use of the site at Fernhill House is not limited to the provision of a primary or secondary school but may be use for the development of other uses considered to be consistent with the zoning objective and description as outlined above.

With regard to the request to change the land use zoning of this site from CE to RN1, the residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with the NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy.

Increasing the amount of lands zoned New Residential – Priority 1 (RN1) as detailed in this submission would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

On foot of this submission, no amendments to the LAP are recommended.

Chief Executives Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.11.2 Issue 2: Provision of Community, Leisure and Entertainment Facilities

No.	Name	Issues raised
63	Luciana Queiroz Rufino Ref 114036	<ul style="list-style-type: none"> ▪ Build a sports centre and also build an art centre. There are so many good artists locally and it would be nice if they could expose their work in a specific place. ▪ Build a community centre where professionals could rent rooms to offer classes like yoga, pilates, dance class, for adults and kids. ▪ Cinema for leisure.
75	Mairead Coffey Ref 175829	Hotel and cinema needed.
110	Silviu Ref 093814	Cinema needed.
150	Helen Fitzsimons Ref 200032	There isn't much social infrastructure, The library tries hard and does a great job, but we are a growing town and we have no cinema or theatre.

Chief Executive Response

Please note that submissions relating to the provision of schools, childcare/crèches, healthcare, Active Open Space/Sports Facilities and Playgrounds have been addressed under Chapter 7 Community and Development of the draft LAP. See also Chapter 6 Retail and Opportunity Sites, Issue 3: Provision of a Cinema and Chapter 8 Tourism, Issue 3: Tourism Accommodation.

With regard to the provision of facilities such as cinemas, theatres, community centres etc, it should be noted that the LAP is land use plan only. The draft LAP and County Development Plan 2022-2028 support the provision of such facilities/services and the enhancement of business, retail, leisure, entertainment and cultural uses within town and villages centres, however the purchase of lands and provision / development of such facilities is outside the remit of the LAP and the Local Authority.

In terms of Community Facilities, Chapter 7 of the Wicklow County Development Plan 2022 - 2028 sets out the Community Facilities Hierarchy Model for the county, which sets out the social and community facilities that are considered necessary in settlements of varying sizes, as represented by four levels.

Having regard to the CSO population of 16,439 persons in 2022, the population target and the fact that Wicklow is the county town, it would have a larger catchment of persons travelling to the town from the nearby countryside and local villages for services; Wicklow Town - Rathnew would fall into Level 1 of the Community Facilities Hierarchy Model (Level 1 - 'Settlements with population range

15,000-30,000'). On this basis, Wicklow Town - Rathnew would ideally require the facilities listed in Table 2.3 of the Social Infrastructure Audit, see below:

COMMUNITY FACILITIES HIERARCHY MODEL

LEVEL 1 – SETTLEMENTS WITH POPULATION RANGE 15,000 – 30,000

Multi-purpose Community Resource Centre Regional and Local Indoor Sports and Recreation Facilities Swimming Pool/Leisure Centre Youth Centre Athletics Track and Field Facilities Arts and Cultural Centre Local Multi-Purpose Community Space/Meeting rooms	Outdoor Water Sports Facilities (where applicable) Neighbourhood Parks and Local Parks Outdoor (full size) Multi-Use Games Areas – Synthetic/ Hardcourt Playground(s) Playing Pitches Alternative/Minority Sports Facilities Open Space/Urban Woodlands/Nature Areas Library
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Acceptable rural catchment commuting time by car: 30 min

In terms of actual provision of such facilities the Social Infrastructure Audit has identified the following current provision and shortfalls.

Community Facility Hierarchy Level 1	Existing Community Facilities
Multi-purpose Community Resource Centre	St Brigid's Community Hall, Rathnew. Assembly Hall, Wicklow Town. Parochial Hall, Wicklow Town
Regional and Local Indoor Sports and Recreation Facilities	Kidzone Wicklow Town Spotlight Studios, Wicklow Town
Swimming Pool/Leisure Centre	Coral Leisure Wicklow Town
Youth Centre	The Parochial Hall, Wicklow Town
Athletics Track and Field Facilities	No athletics track and field facilities
Arts and Cultural Centre	Wicklow Gaol, Wicklow Town Wicklow Library, Wicklow Town
Local Multi-Purpose Community Space/Meeting rooms	Hillview Community Centre, Wicklow Town
Outdoor Water Sports Facilities (where applicable)	Multiple clubs operate from Wicklow Town sea front (e.g. sailing, kayaking, swimming, sub aqua)
Neighbourhood Parks and Local Parks	Murrough skate park / outdoor gym / dog park Wicklow Town
Outdoor (full size) Multi-Use Games Areas – Synthetic/ Hardcourt	Wicklow hockey club
Playground(s)	Ballynerrin Playground Wicklow Town, Rathnew Playground, The Murrough Playground
Playing Pitches	Wicklow Rugby Ground, Ashtown Lane St Patrick's GAA Club, Wicklow Town, Wicklow Town AFC, Finley Park, Wicklow Town Wicklow Rovers AFC, Wicklow Town Wicklow Rovers AFC Rocky Road Pitch Hockey Pitches (East Glendalough School, Dominican Convent Wicklow), Rathnew AFC ground, Rathnew GAA ground, Wicklow Golf Club, Wicklow Tennis Club
Alternative/Minority Sports Facilities	FYI Dance Club, Wicklow Town Wicklow school of Dance, Wicklow & Rathnew Polo Wicklow, Wicklow Town Wicklow Hand Ball Alley
Open Space/Urban Woodlands/Nature Areas	The Murrough (including Murrough dog park), Black Castle, Wicklow Outdoor Gym, Abbey grounds, Wicklow Head.
Library	Wicklow Library
Acceptable rural catchment commuting time by car: 30 min	

It should be noted that this is not an exhaustive list and that it is envisaged that as funding allows and the population increases, sufficient critical mass would make the provision of further facilities in the settlement viable. In this regard the population of Wicklow Town is at the lower end of the 15,000- 30,000 population identified under the Community Facilities Hierarchy Model while Bray and Greystones population was at circa 33,000 and 22,000 respectively in 2022.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.12 Appendix 3 Green Infrastructure

4.3.12.1 Issue 1: Protection of Trees in the Settlement

No.	Name	Issues Raised
150	Helen Fitzsimons Ref 200032	Too many trees felled in the town in the last 10 years.
162	Albert Morley Ref 224844	<ul style="list-style-type: none"> ▪ Request to include a provision requiring planning submissions on zoned lands to accommodate the mature trees please ▪ Protect existing trees and hedgerows and incorporate into proposed development
Chief Executive Response		
<p>Submissions which raised concerns with regard to the cultural and historical significance of the trees along Tinakilly Avenue, Tinakilly Avenue itself and Tinakilly House are addressed under Chapter 11 Zoning and Land Use, Section 4.3.10.2 Specific Local Objectives, SLO 2 Tinakilly Newrath of this report.</p> <p>With regard to the general protection of trees throughout the settlement, the Council aims to protect individual trees, groups of trees and woodlands which are of environmental and/or amenity value. Mature trees in the County, whether in groups or individually, should be preserved where possible. The following objectives of the County Development Plan protect trees, CPO 17.18, CPO 17.19, CPO 17.20, CPO 17.21, CPO 17.22 and CPO 17.23.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.12.2 Issue 2: Marlton Linear Park/Green Corridor

No.	Name	Issues Raised
150	Helen Fitzsimons Ref 200032	<ul style="list-style-type: none"> ▪ There is an attempt to make a linear park alongside a stream which runs alongside the borders of The Meadows and Meadow Gate estates, but its original design has been badly affected by revisions and extensions to original plans for the estate. ▪ The plan to make a linear park for biodiversity is theoretically a great idea however it is failing as there is currently no management plan for the park. The Municipal District has no budgets to take them on. ▪ Due to the linear park being unfinished it has become a focus for anti-social behaviour.
Chief Executive Response		
<p>A green corridor is proposed along the Marlton stream that includes a riverine linear park, providing a green link through the Marlton estates. The delivery of this park will be done in phases in tandem with future development on either side.</p> <p>The first section of this linear park was delivered with The Meadows residential area and has been taken in charge however the remainder of the linear park has yet to be completed/delivered and taken in charge. Once the remainder of the park is delivered by the developers and each estate is taken in charge, the maintenance of this amenity will fall under the remit of the Municipal District.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.13 Appendix 4 Strategic Flood Risk Assessment

4.3.13.1 Issue 1: General

No.	Name	Issues Raised
65	Niamh Breslin Ref 135501	Concerns raised that poorly planned new development is giving rise to increased likelihood of flooding and this need to be addressed before more houses are built.
72 87	Anna Pocock Ref 163511 Claire McGettigan Ref 203844	<p>These submission raised similar issues as follows:</p> <ul style="list-style-type: none"> ▪ Concern is raised that Lower Rathnew faces a high risk of flooding and current and proposed developments, including roads and housing, are either directly within or adjacent to these flood-prone zones. ▪ Concern raised that the expansion of impermeable surfaces exacerbates flooding risk through increased surface runoff and reduced water infiltration, and the plan provides for a 'waiver' of responsibility absolving developers and planners of accountability for future flooding impacts. It is suggested that without a comprehensive and well-executed flood mitigation strategy, the area remains vulnerable to severe flooding events.
83 87	Mia Merrigan Ref 202755 Claire McGettigan Ref 203844	<p>These submission raised similar issues as follows:</p> <ul style="list-style-type: none"> ▪ Concerns are raised, with particular reference to Rathnew, that existing and proposed developments with increased density housing, apartment blocks, car parking and roads situated above or directly within the flood prone zones increase the chance and extent of flooding and associated damages to these areas from increased with run off and reduced capacity for water infiltration caused by expansion of impermeable surfaces in these areas. ▪ The submission questions wherever the existing Flood Risk Guidelines are out of date considering significant changes in climate, sea level, housing and questions to adequacy of the data used in the assessment. ▪ Issue is raised with the 'disclaimer' in the SFRA which it is put forward removes the Council's responsibility and accountability for any future flooding. ▪ Concern is raised with respect to the lack of Flood Risk Management Measures and lack of a 'pumphouse' to address the current flooding risks. The submission questions the type and adequacy of the two pumphouse options proposed.
89	Sinéad Ryan Ref 211109	This submission raised concerns about flooding becoming a more regular problem due to ineffective drainage system particularly in the vicinity of lands proposed for new housing development at Tinakilly. The submission provides details of filed flooded in September 2023.
97	Andrew Malone Ref 212613	This submission puts forward that it would be irresponsible to be building at density close to, or on an area of high flood risk and that this would, in theory, put existing structures in harm's way, by removing natural drainage/soakage avenues.
98	Vincent Collard Ref 231629	This submission puts forward that much of Rathnew is on a flood plain and new developments have put extra pressure on the flood plains as they drain into rivers and streams that flow through these flood plains. Attention is drawn to problems some Rathnew households face in obtaining flood cover on their house insurance.

110	Silviu Ref 093814	The coast requires strengthening with rocks
112	Cormac Byrne	Concerns raised as follows: <ul style="list-style-type: none"> ▪ Little consideration has been given to the effects of global warming and sea level rise, particular in the area from Wicklow Town to Newcastle. The OPW maps show this area at risk of significant flooding if coastal defences are not developed. ▪ Permission should not be considered for new residential development in area at risk in the near future

Chief Executive Response

The concerns raised are noted; the likelihood of flooding is increasing as a result of a myriad of factors, including (but not limited to) climate change, rising sea / river levels, inadequate / overflowing storm drainage etc. The Council, along the various state agencies with a role in this area, is committed to implementing all possible strategies and actions to mitigate and adapt to these changes, and to minimise additional risk that could arise from new development. For example, a key component of this plan is the lack of zoning for new residential development of land identified at risk of flooding today or in the future (including long range scenarios).

In this regard, all development proposals within the Wicklow Town-Rathnew Local Area Plan area will be subject to the full range of objectives of the Wicklow County Development Plan 2022-2028 (or any update thereof) as follows:

- CPO 14.01** *To support the implementation of recommendations in the OPW Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.*
- CPO14.02** *To support and facilitate flood management activities, projects or programmes as may arise, including but not limited to those relating to the management of upstream catchments and the use of 'natural water retention' measures¹, **and** ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.*
- CPO14.03** *To recognise the concept of coastal evolution and fluvial flooding as part of our dynamic physical environment, and adopt an adaptive approach to working with these natural processes. The focus of a flood management strategy should not solely be driven by conservation of existing lands; it should recognise that marshes, mud flats and other associated eco-systems evolve and degenerate, and appropriate consideration should be given to the realignment of defences and use of managed retreat and sacrificial flood protection lands to maintain such habitats as part of an overall strategy.*
- CPO 14.04** *To ensure the County's natural coastal defences (beaches, sand dunes, salt marshes and estuary lands) are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.*
- CPO14.05** *To continue to work with the OPW and other agencies to deliver Flood Defence Schemes in the County as identified in current and future FRMPs, and in particular:*
 - *Avoca River (Arklow) Flood Defence Scheme;*
 - *Avoca River (Avoca) Flood Defence Scheme;*
 - *Low cost works in accordance with the OPW's Minor Works Scheme;*
 - *Coastal Protection Projects, where funding allows;*

¹ *Natural Water Retention Measures (NWRM) are multi-functional measures that aim to protect water resources and address water-related challenges by restoring or maintaining ecosystems as well as natural features and characteristics of water bodies using natural means and processes*

and ensure that development proposals support, and do not impede or prevent, progression of such schemes.

CPO 14.06 To implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009).

CPO 14.07 To prepare new or update existing flood risk assessments and flood zone maps for all zoned lands within the County as part of the review process for Local Area Plans, zoning variations and Small Town Plans, where considered necessary.

CPO 14.08 The zoning of land that has been identified as being at a high or moderate probability of flooding (flood zones A or B) shall be in accordance with the requirements of the Flood Risk Management Guidelines and in particular the 'Justification Test for Development Plans' (as set out in Section 4.23 and Box 4.1 of the Guidelines).

CPO 14.09 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 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 Guidelines.
- Flood Risk Assessments shall be in accordance with the requirements set out in the 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, 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.

CPO 14.10 To prohibit development in river flood plains or other areas known to provide natural attenuation for floodwaters except where the development can clearly be justified with the Flood Risk Management Guidelines 'Justification Test'.

CPO 14.11 To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.

CPO 14.12 Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.

CPO 14.13 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.

CPO 14.14 Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SuDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.

CPO 14.15 *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

CPO 14.16 *For developments adjacent to all watercourses or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse in accordance with the guidelines in 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland.*

Furthermore, the following objectives relating to flooding and flood risk management are included in the Draft Wicklow Town –Rathnew LAP Written Statement:

WTR82 *To ensure the natural coastal defences are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.*

WTR83 *To continue to work with the OPW and other agencies to deliver Flood Defence Schemes and Coastal Erosion Schemes.*

Guidelines & Data sources

The guidelines set out clear and sound principles of the assessment of flood risk and its integration in to the planning process. These principles have not changed in the period since the guidelines were developed.

The Guidelines clearly provide that the most up to date data is considered in any flood risk assessment and in the case of this plan, the data was most recently collected from all sources in 2022 in order to create the flood maps that were presented in the draft plan. In addition, as part of this report, further assessment has been carried out with respect to a new data set in order to re-evaluate whether this new data alters any of the existing assessment (see Addendum I to the SFRA).

As part of the SFRA of the draft plan, maps were also produced showing the OPWs estimate for medium and long term future risk, which takes into account future climate change scenarios. In order to show these more clearly additional maps are proposed to be included in the SFRA in order to aid the public's understanding of the risks.

With respect to the disclaimer, this is a standard disclaimer that is necessary as it is clearly acknowledged in the SFRA that there is inherent uncertainty and assumptions that must be made in the estimates of design flows and flood models.

Insurance

While this is a matter for the insurance companies and the Local Authority / LAP have no input to their decision making, it is correct that there are existing older properties that are located in areas at risk of flooding. As detailed by the OPW '*Insurance companies make commercial decisions on the provision of insurance cover based on their assessment of the risks using their own models and methods. The disclaimer attaching to the OPW Flood Maps makes clear that users of the website must not use the Flood Maps or any other content of the website for commercial purposes. The provision of insurance cover, the level of premiums charged and the policy terms applied are matters for individual insurers.*'

This is a nation-wide issue, that requires a national coordinate response from Government with the insurers.

Local Authorities have been proactive for many years in ensuring, to the best of their knowledge given the data available, that new developments are not located in areas at risk of flooding.

Flood Management Measures

Section 2.6 of the SFRA detailed the OPWs Flood Risk Management Plan for the Avoca – Vartry River Basin. The full and detailed design of this scheme has yet to be determined, and any issues surrounding adequacy of the suggested 'storage areas' at Broomhall and Burkeen can be interrogated when this scheme moves towards consent stage, which would include public consultation.

Submission 83 refers in this context to proposed 'pumphouses' and it is assumed that this reference is to these suggested 'storage areas'. If it is not, it is unclear what pumphouse are the subject of the submission, as no surface water / flood water pumping stations are proposed or indicated in this Management Plan or this LAP. The LAP and SFRA does identify the two existing wastewater plants, at Rathnew and the Murrough, but these are not surface / flood water pumphouse.

Coastal Protection / Protection of Infrastructure

The CE notes the concern raised with respect to coastal protection. The provisions of both the Wicklow County Development Plan and the LAP would support additional coastal protection works:

CPO 19.5 *To work with the OPW and any other relevant bodies to address the effects of sea level changes, coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.*

CPO 19.12 *To facilitate the provision of new or the reinforcement of existing coastal defences and protection measures where necessary along the full coastline of the County and in particular to consider the implementation of the measures identified in the Murrough Coastal Protection Study², the draft East Coast Erosion Study³ and any other similar studies that are produced during the lifetime of the plan. To employ soft engineering techniques or natural solutions as an alternative to hard coastal defence works, wherever feasible.*

WTR1 *To ensure the natural coastal defences are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.*

WTR2 *To continue to work with the OPW and other agencies to deliver Flood Defence Schemes and Coastal Erosion Schemes.*

Tinakilly

The information provided with respect to a past flood event in the vicinity in Tinakilly is noted; having regard to the information provided in the submission, the lands that flooded are not proposed for development zoning and are in an area where the SFRA identifies the flood risk.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

² 2007, WCC/RPS

³ Irish Rail / ARUP 2020

4.3.13.2 Issue 2: Residential Development in Flood zones

No.	Name	Issues Raised
25	Thomas O'Sullivan Ref 162950	Concern expressed about the building of houses on a flood plain at Tinakilly, Rathnew.
41 45 90	Amy McNabb Ref 152435 Ref 165943 Louiaw McNabb Ref 202834	Concerns raised about flood risk on lands zoned RN2 at SLO4. It is put forward that there is a corner of the field with very soft ground after rain and the flood risk maps shows this area as prone to flooding.
51	Stephen Reynolds Ref 081816	Concern raised about flood risk on lands zoned RN2 at SLO4. It is put forward that an updated flood risk assessment has not been carried out for these lands as with other locations in the plan area; proximity to the wetlands, the coast and sea level rise due to climate change has not been factored in.
55	Paul Walsh	<p>This submission relates to lands located in the Charvey Court housing development in Rathnew, in particular the lands between houses No.'s 3 and 11 (these lands are zoned OS2 in the draft plan).</p> <p>It is put forward that the flood risk present at this location, as shown in the flood risk maps, does not extend to the entirety of the OS2 zone and therefore the zoning of these lands for this OS2 use has not been justified on the basis of flood risk. In addition, it is put forward that a site specific flood risk assessment would likely show a smaller area at actual risk of flooding.</p> <p>It is requested that a sentence be added to the plan that allows for housing on these lands if they can be shown to not be vulnerable to flooding.</p>
81	Bill Clare Ref 191200	The submission raises concerns with flooding in Woodside, Rathnew. It is indicated that surface water from surrounding areas drains to this location and this is affecting the residents, including problem with obtaining insurance. In this regard, concern is raised about the development of future dwellings at Tinakilly; including concerns about additional surface water entering the Rathnew river as a result and the impact on the nature and biodiversity of the watercourse.
83	Mia Merrigan Ref 202755	Future development in Tinakilly should be specified to comprise houses with gardens rather than apartments with car parking as this would reduce run off and contribution to flood risk.
99	Stan Breathnach Ref 000330	<p>Concerns raised about flood risk on lands zoned at SLO4. It is put forward that</p> <ul style="list-style-type: none"> - The topography and geology of the lands has not been adequately considered; there is no bedrock above sea level underlying much of the site so any potential development would be particularly vulnerable to sea level rises - Field below the proposed housing area are already experiencing seasonal flooding as well as being heavily saturated; the estuary is tidal and the soil will become saturated and will be susceptible to subsidence and slippages - A small area of SLO4 is identified as at risk of flooding on the flood maps produced and this isn't addressed in the SFRA

100	Lisa McGettigan Ref 234627	Concern raised with respect to the zoning of lands at SLO2 Tinakilly. It is put forward that high density residential development is proposed on lands classified as Flood Zones A and B, and this is extremely concerning for existing and new residents.
109	Melissa McNabb Ref 093952	Concern raised about flood risk on lands zoned RN2 at SLO4. It is put forward that the fields in SLO4 are marshy soft land and are often flooded after heavy rain. Concern expressed about the proximity of the Murrough flood risk area to future houses.
129	G Kennedy Ref 152438	Concern raised about flood risk on lands zoned SLO4. It is put forward that the development of impermeable surfaced would increase surface water run-off and heighten the risk of flooding, and could also lead to contamination of the Broadlough.
134	Lyndsay Martin Ref 161122	Concern raised about flood risk on lands zoned SLO4. It is put forward that development would increase surface water run-off, raise the risk of flooding and pollution of the Broadlough and surrounding areas.

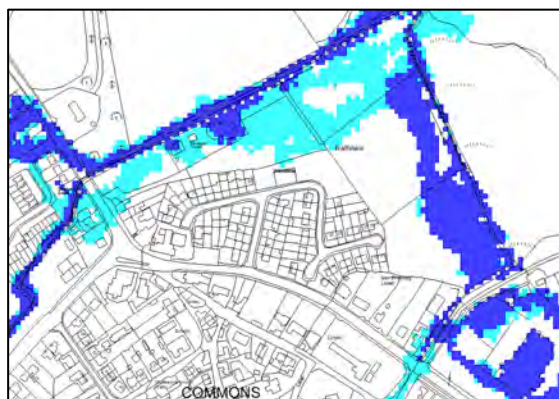
Chief Executive Response

Tinakilly:

The zoned housing lands at Tinakilly, including the lands that are currently under construction, are not identified in any flood studies, either those of the Council or the OPW, the state agency responsible for flood identification and management, as being at risk of flooding, including in the longer term future scenarios developed by the OPW. In terms of new development and the potential for increased run off to the Rathnew River, as set out in part A of this section, the Council is committed to implementing the objectives and standards of the County Development Plan in order to address and mitigate any potential impacts from new development.

With respect to the development format and the suggestion that a lower density type development would mitigate potential risks, in accordance with national and county policy, land that is suitable for residential development should aim for the highest density feasible given settlement designation in the County hierarchy, the site location, services available and characteristics of the area. In this regard, a medium density development is suitable and optimal for the Tinakilly, lands, which incorporates a range of house types and sizes, including duplexes and apartments. However it should be noted that these 'higher' density formats are only a small element of the overall development permitted to date and the emerging plans for the future sections.

The Woodside housing development is located in close proximity to a number of identified flood risk zones, as shown on the image below. In accordance with the application of the objectives and standards of the County Development Plan, existing future development at Tinakilly includes and will include (for later phases) implementation of a range of measures to ensure no increased run off to the watercourses in the area or increased risk of flooding in the area.



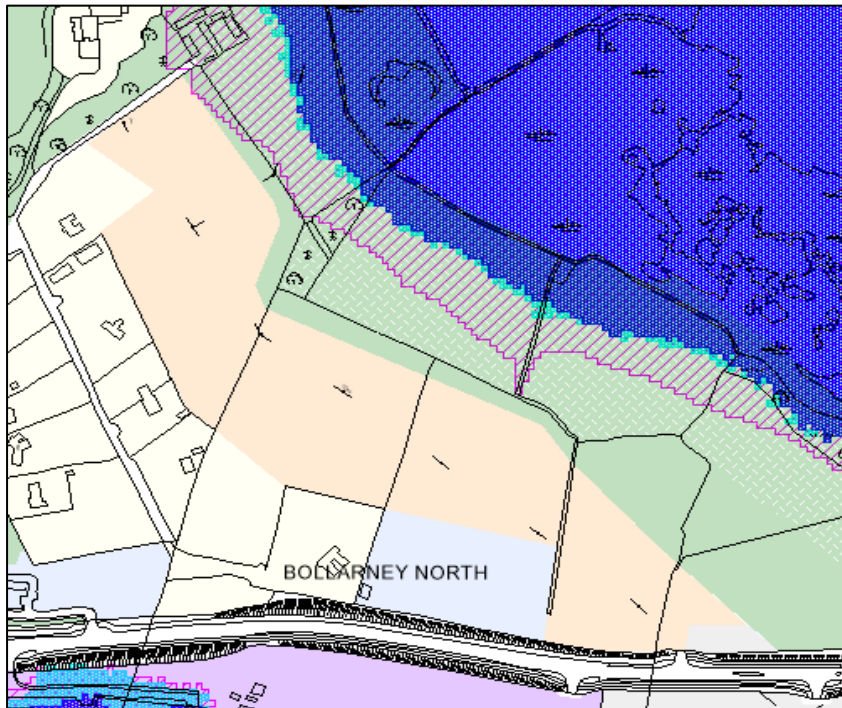
SLO4:

The zoned housing lands at SLO4 are not identified in any flood studies, either those of the Council or the OPW, the state agency responsible for flood identification and management, as being at risk of flooding. Any flood risk areas in the vicinity are located further downhill and east of the proposed residential lands. It is not correct that no updated flood risk assessed has been carried out for these lands - updated flood risk identification maps, commissioned for the recent Wicklow County Development Plan, as well as additional data sources, have been factored into the SFRA carried out for all zoned lands in the draft plan area.

With respect to longer term risk due to climate change, this has also been considered and shown on the SFRA map as areas at risk in the future (with data sourced from the OPW), and again, the lands proposed to be zoned for new residential in this area are not identified as at risk in the medium and long term future scenarios.

The SFRA did not carry out a 'Justification Test' for these lands proposed to be zoned in SLO4 as the flood risk identified in the area coincides with lands proposed to be zoned OS1 and OS2 which are both water compatible land uses.

The image below shows: in dark blue – area currently at 1:100 risk (Flood zone A), in light blue - area currently at 1:1000 risk (Flood Zone B) and in pink - areas of future potential risk. The proposed residential zoning is in orange.

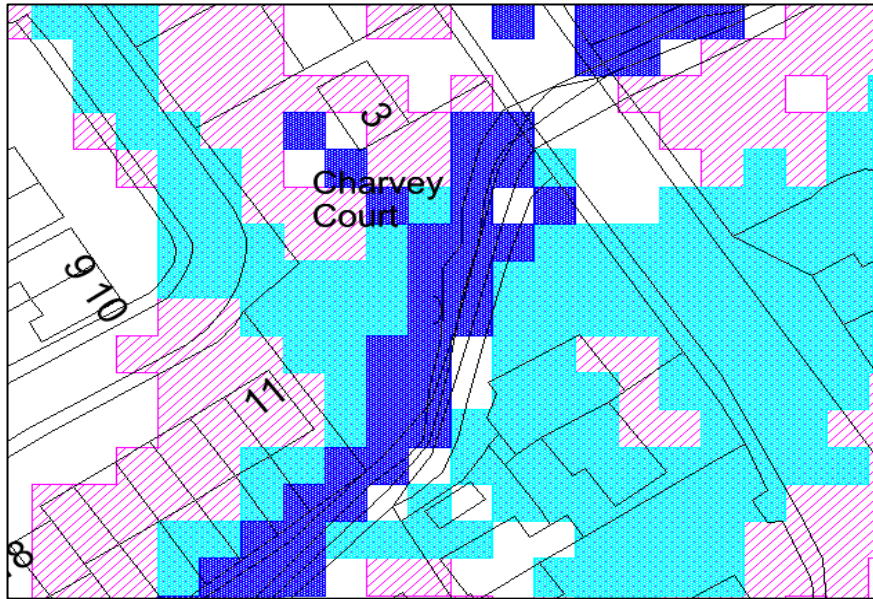


With respect to the potential for increase surface water run-off that could arise from the development of these lands, the Council is committed to the implementation of the objectives and standards set out in the County Development Plan, as detailed in part A of this section, in order to control and manage surface water in new developments.

Charvey Court:

A flood risk corridor has been identified along the Rathnew stream in this area. Any lands identified as flood zones A or B are appropriately zoned OS2, which limits development and aims to leave the lands in their natural state. The submission is correct that there are also some areas beyond the A and B flood zones that are proposed for OS2 zoning in the draft plan; however these are very minimal and would not be adequate in size to accommodate the development of a dwelling. Furthermore, when one considers the OPW future scenarios maps of flood risk, the entire area is potentially at risk.

The image below shows: in dark blue – area currently at 1:100 risk (Flood zone A), in light blue - area currently at 1:1000 risk (Flood Zone B) and in pink - areas of future potential risk.



In addition, all of these undeveloped lands that are within 25m of the river and are appropriately zoned OS2 in order to be consistent with Wicklow County Development Plan objective 17.26 i.e.

CPO 17.26 *Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.*

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025, however on foot of these and other submissions, it is proposed to produce additional flood risk identification maps so that the public can be better informed.

4.3.13.3 Issue 3: Open Space

No.	Name	Issues Raised
24	Henry & Aoife Clarke Seamus & Evelyn Ryan David & Caroline O'Neill Ref 185913	Lands proposed to be zoned for 'Open Space' in and around Rathnew, Tinakilly and Newrath are not readily useable or developable for that purpose due to flood risk on the lands. Rathnew and the surrounding areas have been heavily developed in recent years and there is now a real lack of any usable green open spaces for the benefit of the community at large.
38	Mary Byrne, Liz Byrne, Carmel Whelan Ref 131457	This submission relates to lands located on the R752 west of Rathnew village centre (these lands are zoned RN2 and OS in the draft plan as part of SLO3). A question has been raised with respect to the interpretation of OS2 zoning at DM stage, if it can be shown that the lands do not flood via a site specific flood risk assessment.
55	Paul Walsh	This submission relates to lands located in the Charvey Court housing development in Rathnew, in particular the lands between houses No.'s 3 and 11 (these lands are zoned OS2 in the draft plan. A question has been raised with respect to the interpretation of OS2 zoning at DM stage, if it can be shown that the lands do not flood via a site specific flood risk assessment.
83	Mia Merrigan Ref 202755	The role of the existing avenue to Tinakilly House as a 'sponge' to absorb surface water run-off in the area is raised; it is put forward that alterations proposed to the avenue including removal of mature trees will reduce this capacity.

Chief Executive Response

Open Space around Rathnew, Tinakilly and Newrath:

Lands zoned for 'AOS – Active Open Space' are explicitly designated for the development for active sport and amenity uses. There are no lands zoned in the draft LAP for AOS in the Rathnew, Tinakilly and Newrath areas that are at risk of flooding.

There is c. 40ha zoned for OS1 use (more informal parks and casual play areas) in the draft plan in the Rathnew area, of which c. 12-15ha may be at risk of flooding. It is clear therefore that substantial, flood risk free lands therefore are provided for this use.

Lands identified as OS2, some of which are at risk of flooding, are not identified for human use, and have been given that zoning precisely because of the flood risk and other designation that apply, that make the land unsuitable for human activity and benefit.

OS2 interpretation:

When the OS2 zone category was first drawn up and utilised, it was to cover flood plains, buffer zones along protected sites etc. However, as the Council only had preliminary flood risk assessment maps (PFRAs) at that time, the Council could not be fully confident that all such lands were definitively at risk of flooding, and a proviso was included that development could be considered on OS2 if the development could show no flood risk, no adverse impacts on protected sites etc

However this was changed in the 2022 County Development Plan as a more detailed set of flood maps and more accurate assessment of buffers along protected sites was available, as well as our 25m set back from watercourses policy.

Now OS2 is not open to other development and the definition in the County Development Plan is '*To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones*

along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity'. 'Uses appropriate for passive open space (OS2) zoned land are uses that protect and enhance the function of these areas as flood plains, buffer zones along watercourses and rivers, green breaks between built up areas, green corridors and areas of natural biodiversity. The development of these lands for recreational uses may only be considered where such use is shown to not undermine the purpose of this zoning'.

This has been carried forward into the new LAP. Therefore residential or other forms of built development as not permissible in OS2 zones.

Note: With respect to these submissions re OS2 and flood risk, an inconsistency between the plan text and map has been determined; in some locations where the land zoning is OS2 and is thus stated in the text, on the map it is shown as OS1. This requires correction and requires to be a formal material amendment for the sake of clarity.

Tinakilly Avenue

This LAP does not set out objectives for the removal of this avenue or trees thereon, other than to facilitate the development of the RIRR. The lands along this full length of the avenue are proposed to be zoned 'open space'. While the route of the RIRR would cut across this avenue, this would not significantly reduce its overall area and absorptive qualities.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 however the following is required:

Error correction – Proposed Material Amendment

- (a) All locations shown on the map as OS1 shall be corrected to OS2 where
 - The lands are located in the flood zone
 - The lands are host to natural habitats

4.3.13.4 Issue 4: Infrastructure

No.	Name	Issues Raised
60	Peter Dignam Ref 121504	Concerns raised that water and sewerage infrastructure is at capacity and struggling to meet current population needs and this in turn heightens the risk of flooding and ecological damage to rivers, lakes and coastal waters.
72	Anna Pocock Ref 163511	Concern raised with respect to the location of the Rathnew Inner Relief Road across a flood zone
83	Mia Merrigan Ref 202755	Concern raised with respect to the location of the Rathnew Inner Relief Road across a flood zone. It is put forward this road is not essential infrastructure as there are alternative routes possible for alleviating traffic flows in Rathnew.
112	Cormac Byrne	Concern raised that inadequate consideration has been given to the protection of vital infrastructure such as roads and rail lines with regard to probability of rising water levels.

Chief Executive Response

Drainage infrastructure:

It is not fully clear from the submission what the concern is in relation of flood risk, but in accordance with the data from Uisce Eireann, there are no current overall capacity issues in the water supply and wastewater treatment infrastructure in the plan area, and there is adequate capacity to accommodate the future growth envisaged by the plan. It is acknowledged that some areas in the plan are not currently served by the public sewer network and depending on the size and type of development proposed, local capacity constraints in the network may require local up sizing, or extensions of network, to the existing wastewater network.

The concern may arise with respect to surface water drainage and the consequences of additional surface water from new developments being discharged into local watercourses. In this regard, the following County Development Plan objectives will continue to be implemented in the plan area:

- CPO 14.11** *To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.*
- CPO 14.12** *Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.*
- CPO 14.13** *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.*
- CPO 14.14** *Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SuDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.*
- CPO 14.15** *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

RIRR:

The route of the RIRR passes over the Rathnew river. The SFRA carried out has demonstrated how and why this crossing is justified and must be managed in order to ensure no increased risk of flooding. It

is agreed that a number of road improvement projects are necessary in order to improve traffic flows in and around the overall settlement of Wicklow Town - Rathnew, but the RIRR is considered an essential element of the overall strategy and in particular, would potentially bring significant benefits to the village centre of Rathnew, allowing for regeneration of the village centre and public realm improvements.

Protection of Infrastructure

Section 2.6 of the SFRA detailed the OPWs Flood Risk Management Plan for the Avoca – Vartry River Basin. In 2018, the Office of Public Works published a Flood Risk Management Plan for the Avoca- Vartry River Basin. Both Wicklow Town and Rathnew were included in this plan as Areas for Further Assessment (AFA). Alongside a recommendation of various general measures, Section 7.4 of the Avoca-Vartry FRMP sets out proposed measures for each area identified as an AFA. Measures included for the Wicklow AFA and Ashford & Rathnew AFA, which is largely consistent with the area of the Wicklow Town-Rathnew Local Area Plan 2025, are described as follows:

'Description of the Proposed Measure:

Potentially viable flood relief works for Wicklow, Ashford and Rathnew that may be implemented after project-level assessment and planning or Exhibition and confirmation might include physical works, such as a series of hard defences, storage and improvement of channel conveyance. The hard defences would protect to the 1% AEP fluvial flood event, with an average height of 1.1m (reaching a maximum height of 1.5m) and a total length of 4km. The two storage areas on the Broomhall and Burkeen catchments have a total capacity of approximately 14,800m³. The improvement of channel conveyance consists of the removal of a weir on the Ballynerrin watercourse. The potentially viable flood relief works, which at this stage of assessment are deemed to be preferred, are set out in Appendix G, noting that these will be subject to project-level assessment and possible amendment.'

Irish Rail is undertaking the East Coast Railway Infrastructure Protection Project (ECRIPP) with the aim to address and implement protection of the existing railway and coastal infrastructure against the further effects of coastal erosion due to climate change in five key areas on the railway line between Dublin and Wicklow. The plan area is in ECRIPP Coastal Cells CCA6.2 (Newcastle to Wicklow). The project is in Phase 2 - Project Concept, Feasibility and Option Selection.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

Section 5 Strategic Environmental Assessment and Appropriate Assessment.

Submission No. 144 Office of Planning Regulator			
Item	Submission Text/Issues Raised	Response	Recommended Updates
A	<p>Environmental Assessments</p> <p>The Office notes that the lands identified as SLO 4 at Bollarney North have been zoned to provide a range of land uses, including Residential, Car Parking, Community / Education and Recreation. There is a concern in respect of the potential environmental impacts of the proposed zonings which are in close proximity (circa 75m) to the Murrough Special Protection Area and the Murrough Special Area of Conservation.</p> <p>While development within and close to European sites is not precluded, any likely significant effects of the proposed objective would need to be fully assessed and addressed by means of site-specific mitigation measures. The draft Natura Impact Report (NIR), however, includes only high-level mitigation measures.</p> <p>The Planning Authority should therefore review the mitigation measures set out in the NIR to ensure that the stated conclusion that ‘upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site’ is a complete, precise or definitive finding and conclusion, and that no reasonable scientific doubt remains as to the adverse effects of zoning SLO 4 on the European sites.</p> <p>Recommendation 6 - The Murrough SPA and SAC Having regard to the protection of natural heritage and the appropriate assessment of plans, and in particular to:</p> <ul style="list-style-type: none"> ▪ RSO 7.16 of the RSES to support the implementation of the Birds and Habitats Directives and ensure alignment with development plans; and ▪ Policy Objectives CPO 17.4 and CPO 17.6 of the 	<p>AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far. The AA process is ongoing and will be concluded at adoption of the Local Area Plan.</p> <p>The AA NIR has been prepared in compliance with the European Habitats Directive and is appropriate to this strategic, Local Area Plan-level of decision making.</p> <p>The AA concludes as follows:</p> <p>“This Natura Impact Report demonstrates that, upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site.</p> <p>The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European sites identified have been addressed by the inclusion of mitigation measures into the Draft Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Draft Plan will themselves be subject to AA/screening for AA when further details of design and location are known.</p> <p>In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Draft Plan are seen to</p>	<p>To add the following measure to the Local Area Plan and to include it in the final version of the AA Natura Impact Report for the Local Area Plan that will be considered at adoption of the Local Area Plan:</p> <p style="color: green;">“All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects.</p> <p style="color: green;">In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans.”</p> <p>To update the following text to “Analysis of Site Sensitivities against Potential Adverse Effects and Mitigation Measures” for the Murrough SPA on Table 4.1 of the AA NIR for the Local Area Plan “Characterisation of Site Sensitivities against Potential Adverse Effects and Mitigation” as follows (existing text in black, new text in green):</p> <p style="color: green;">“The known threats to this site are walking, horse-riding and non- motorised vehicles, fertilisation and railway lines.</p> <p>These pressures relate to amenity and leisure activities, built environment and pollution. The Draft Plan does present sources for potential adverse effects to this SPA from amenity and leisure activities, built environment and pollution.</p>

<p>County Development Plan to protect designated ecological sites including Special Areas of Conservation and Special Protection Areas, and to ensure any projects giving rise to adverse effects on the integrity of European sites shall not be permitted; the Planning Authority is required to:</p> <ul style="list-style-type: none"> (i) review the mitigation measures outlined in the draft Natura Impact Report for the Draft Wicklow Town - Rathnew Local Area Plan 2025; and (ii) where it cannot be concluded that there would be no adverse effect on the integrity of any European site omit the proposed zoning objectives for the lands identified as SLO 4. 	<p>be robust to ensure that there will be no significant effects as a result of the implementation of the Draft Plan either alone or in-combination with other plans/projects.</p> <p>Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects¹. This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>This Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the Plan.”</p> <p>As recommended, the mitigation measures from the Local Area Plan have been reviewed and it is confirmed that the conclusion of the AA for the Local Area Plan stands and that no additional mitigation or amendments to the Natura Impact Report are necessary. Nonetheless, in order to address the concerns raised, it is proposed to add an additional measure to the Local Area Plan that will be referenced in the AA for the Local Area Plan. Additional detail will also be added to the AA Natura Impact Report for the Local Area Plan at Table 4.1 “Characterisation of Site Sensitivities against Potential Adverse Effects and Mitigation”.</p>	<p>Zoning and indicative locations for future infrastructure (subject to strict environmental mitigation, including the protection of European sites, that has already been integrated into the Draft Plan) is identified by the Plan in proximity to this site.</p> <p>Potential impacts may arise from issues including: recreational disturbance (including from dogs) and lighting, noise, which may be more significant due to disturbance elsewhere; and construction activities – which are potential sources of sediment input and may impact water quality. Furthermore, surface water run-off may increase the likelihood of pollutant mobilisation during storm events, including run-off from car-parks, and the buffering provided by vegetated land may be reduced by replacing it with hard infrastructure.</p> <p>Therefore, the following mitigation measures have been integrated into the Draft Plan to ensure no adverse effects occur to this European site as a result of the implementation of the Draft Plan:</p> <ul style="list-style-type: none"> ▪ The local amenity use of sites and tourism is encouraged throughout the Draft Plan but with due consideration for sustainability, local biodiversity and European sites through policy objectives such as WTR92 and WTR93. ▪ The development of the Draft Plan area’s built environment with appropriate regard to ecological sensitivities is provided for in the Draft Plan via policy objectives such as WTR52 ▪ The provision and maintenance of good water quality standards throughout the Draft Plan area relative to pollutants is provided for via policies such as WTR42 and WTR73. <p>For further details in relation to mitigation measures/Policy Objectives incorporated into the Draft Plan please refer to Section 5 below.”</p> <p>To update the following text to “Analysis of Site Sensitivities against Potential Adverse Effects and Mitigation Measures” for the Murrrough Wetlands SAC on Table 4.1 of the AA NIR for the Local Area Plan “Characterisation of Site Sensitivities against Potential Adverse Effects and Mitigation” as follows (existing text</p>
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			<p>in black, new text in green):</p> <p>“The known threats to this site are sea defence or coast protection works, tidal barrages, modification of water flow (tidal & marine currents), grazing, fertilisation, sylviculture, forestry, railway lines, erosion, sand and gravel extraction, paths, tracks, cycling tracks, walking, horse-riding and non-motorised vehicles and disposal of industrial waste.</p> <p>These pressures relate to the built environment, amenity and leisure activities, forestry, coastal protection works, erosion, extractive industry, agriculture, pollution, hydrological changes and direct land use management.</p> <p>There are no provisions in the Draft Plan that introduce sources for potential effect from forestry and the extractive industry to this European site as a result of implementation of the Draft Plan, therefore there are no sources for effects in these regards. The Draft Plan does present sources for potential adverse effects to this SAC from built environment, amenity and leisure activities, coastal protection works, erosion, agriculture, pollution, hydrological changes and direct land use management.</p> <p>Zoning and indicative locations for future infrastructure (subject to strict environmental mitigation, including the protection of European sites, that has already been integrated into the Draft Plan) is identified by the Plan in proximity to this site.</p> <p>Potential impacts on the site’s sensitive habitats may arise from issues including recreational disturbance (including from trampling arising from increased visitor pressure) and construction and operation interactions with water quality. These potential impacts may be more significant due to development that has occurred elsewhere in proximity to the site.</p> <p>Therefore, the following mitigation measures have been</p>
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			<p>integrated into the Draft Plan to ensure no adverse effects occur to this European site as a result of the implementation of the Draft Plan:</p> <ul style="list-style-type: none"> ▪ No direct land take or habitat loss will occur due to the implementation of the Draft Plan either within any European sites or any connectivity corridors necessary to support the ecological integrity of the site, due to Policy Objectives such as WTR52, WTR92 and WTR93. ▪ The local amenity use of sites and tourism is encouraged throughout the Draft Plan but with due consideration for sustainability, local biodiversity and European sites through policy objectives such as WTR92 and WTR93. ▪ The development of the Draft Plan area's built environment with appropriate regard to ecological sensitivities is provided for in the Draft Plan via policy objectives such as WTR52. ▪ The Draft Plan promotes the development of agricultural activities, however alignment with the policies and objectives of the County Development plan via objective WTR86 encourages sustainable agricultural practices that enhance biodiversity and provide for the appropriate management of agricultural run-off into freshwater systems. ▪ The provision for coastal protection works that have regard to the environmental and ecological sensitivities of the Wicklow Bay area are provided for via policies such as WTR94. ▪ The provision and maintenance of good water quality standards throughout the Draft Plan area relative to pollutants is provided for via policies such as WTR42 and WTR73. ▪ <p>For further details in relation to mitigation measures/Policy Objectives incorporated into the Draft Plan please refer to Section 5 below."</p>
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¹ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

Submission No.106 Department of Housing, Local Government and Heritage			
Item	Submission Text/Issues Raised	Response	Recommended Updates
A	<p>This submission raises concerns regarding potential impacts, if unmitigated, related to the Murrrough SPA and Murrrough Wetlands SAC.</p> <p>The submission concludes:</p> <p>In the absence of an objective assessment of the impact of the zoning of SLO4 at this location, the Department considers that it cannot be concluded that there is no risk of adverse effects on the integrity of the European sites for the reasons outlined above. Whilst development within and close to European sites is not precluded, in order for the proposed zoning to be deemed acceptable, any likely significant effects of the proposed objective would need to be fully assessed and address by means of site-specific mitigation measures. High-level mitigation measures proposed in the draft Natura Impact Report are not deemed appropriate to deal with the impacts of zoning SLO4 for development.</p> <p>The conclusions in the Natura Impact Report (NIR) that it demonstrates that, 'upon inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site' is therefore not supported by evidence that adverse effects will be avoided. This conclusion is not a complete, precise or definitive finding and conclusion, and reasonable scientific doubt remains as to the adverse effects of the zoning of SLO4 for development on the European sites in question.</p>	<p>Please refer to response under Submission 144 above.</p>	<p>Please refer to recommended update under Submission 144 above.</p>

Submission No. 8 EPA			
Item	Submission Text/Issues Raised	Response	Recommended Updates
A	<p>We acknowledge your notice, dated 8th October 2024, in relation to the Draft Wicklow Town – Rathnew Local Area Plan 2025 ('the Plan') and SEA Environmental Report ('the SEA ER'). The EPA is one of the statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans. As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via the attached guidance document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources'.</p> <p>This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. We suggest that you take this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the Plan.</p> <p>Wicklow County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.</p>	<p>The 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been considered in the SEA of the Plan and will be kept on file for reference throughout the SEA process.</p> <p>Wicklow County Council has ensured that the Plan aligns with and is consistent with higher-level plans and programmes, including the National Planning Framework and the Regional Spatial and Economic Strategy.</p>	None.

Item	Submission Text/Issues Raised	Response	Recommended Updates
B	<p>Content of the Environmental Report The SEA Regulations set out the information to be contained in an Environmental Report.</p> <p>Assessment of Alternatives You should describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative. You should assess the alternatives against the 'Strategic Environmental Objectives' identified in the SEA ER.</p> <p>Assessment of Environmental Effects You should assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.</p> <p>Mitigation Measures Where you have identified the potential for likely significant effects, you should provide appropriate mitigation measures to avoid or minimise these. You should ensure that the Plan includes clear commitments to implement the mitigation measures.</p> <p>Monitoring The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.</p> <p>If the monitoring identifies adverse impacts during the implementation of the Plan, Wicklow County Council</p>	<p>The Environmental Report that accompanies the Draft Plan addresses each of these issues. The cited Guidance on SEA-related monitoring has been considered in the preparation of monitoring measures and will be considered when preparing the SEA Statement at the end of the process.</p>	<p>None.</p>

	<p>should ensure that suitable and effective remedial action is taken.</p> <p>Guidance on SEA-related monitoring is available on the EPA website at</p> <p>https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/guidance-on-sea-statements-and-monitoring.php</p>		
Item	Submission Text/Issues Raised	Response	Recommended Updates
C	<p>Ireland's State of the Environment Report 2024</p> <p>In October 2024, the EPA published the latest iteration of our 4-yearly State of the Environment Report. This report should be considered and integrated as appropriate, in implementing the plan or programme over its lifetime. It is available at: https://www.epa.ie/our-services/monitoring--assessment/assessment/state-of-environment-report-/.</p>	<p>The Plan preparation and associated SEA has taken into account the EPA's State of the Environment Report 2024.</p>	<p>None.</p>
Item	Submission Text/Issues Raised	Response	Recommended Updates
D	<p>Future Amendments to the Plan</p> <p>You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.</p>	<p>Any future amendments will be screened for effects in accordance with SEA Regulations and using a methodology consistent with the method of assessment applied in the SEA of the Draft Plan.</p>	<p>None.</p>

Item	Submission Text/Issues Raised	Response	Recommended Updates
E	<p>SEA Statement – “Information on the Decision” Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> ▪ How environmental considerations have been integrated into the Plan; ▪ How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; ▪ The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, ▪ The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p> <p>Guidance on preparing SEA Statements is available on the EPA website at the following link:</p> <p>https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/guidance-on-sea-statements-and-monitoring.php</p>	<p>An SEA Statement will be prepared including the required information and taking into account the cited EPA guidance on SEA Statements.</p>	<p>None.</p>
Item	Submission Text/Issues Raised	Response	Recommended Updates
F	<p>Environmental Authorities Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; and • Minister for Agriculture, Food and the Marine. • any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan. 	<p>The relevant environmental authorities have been consulted with throughout the SEA/Plan preparation process.</p>	<p>None.</p>

Submission No. 12 Eastern and Midland Regional Assembly			
Item	Submission Text/Issues Raised	Response	Recommended Updates
A	<p>3.12 SEA, AA and SFRA</p> <p>The Assembly welcomes the preparation of the draft LAP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).</p> <p>The SEA Environmental Report sets out an assessment of the environmental effects in combination with the wider planning framework arising from the draft LAP to provide a clear understanding of the likely environmental consequences of decisions arising from the LAP. Regarding mitigation, the draft LAP states that by integrating all related recommendations into the draft LAP, the Council has ensured that both the beneficial environmental effects of implementing the LAP have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset. The draft LAP is also subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has been prepared which states that having incorporated mitigation measures into the draft LAP, it has been demonstrated that the draft LAP is not foreseen to give rise to any significant adverse effects to designated European sites, alone or in combination with other plans or projects. This demonstration has been made in view of the conservation objectives of the habitats and/or species, for which these sites have been designated. The Natura Impact Report will, alongside any other inputs from the plan preparation/AA process, inform the Competent Authority when it undertakes the final AA determination at adoption of the LAP. The AA process is ongoing and will inform and be concluded at adoption of the LAP.</p>	<p>Noted.</p> <p>If amendments arise as a result of these submissions they will be considered.</p>	<p>None.</p>

Item	Submission Text/Issues Raised	Response	Recommended Updates
B	<p>Finally, a Strategic Flood Risk Assessment (SFRA) has been undertaken, which aligns with RPO 7.12 of the RSES, alongside the preparation of the draft LAP, the SEA and the NIR. The recommendations from the SFRA are stated to have been integrated into the draft LAP which is welcomed. In keeping with best practice, it is recommended that the local authority take opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.</p>	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards the protection and management of biodiversity, flora and fauna and amenities. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 17 Department of Transport			
Item	Submission Text/Issues Raised	Response	Recommended Updates
A	<p>This submission provides information and suggestions under a number of headings including:</p> <ul style="list-style-type: none"> ▪ Sustainable Mobility ▪ Systems Change in Transport ▪ Air Quality ▪ LA Climate Action Plans ▪ Accessible public transport for All, and especially for Disabled People, Persons with Disabilities, Persons with Reduced Mobility and Older People 	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards sustainable mobility, climate action and air quality protection. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 53 Inland Fisheries Ireland			
Item	Submission Text/Issues Raised	Response	Recommended Updates
A	<p>Chapter 2 Overall vision and Strategy Future Compact Growth of the Settlement “The key parameters for the future physical development of Wicklow Town - Rathnew are based around protection of the environment, sustainability,”</p> <p>Residential Development Strategy for Wicklow Town - Rathnew “To ensure sufficient zoned and serviced land is available at appropriate locations capable of meeting the housing needs of the targeted population of the settlement over the plan period in a sustainable manner.”</p> <p>IFI welcomes the Compact Growth Settlement strategy for the future physical development of Wicklow Town – Rathnew with the key parameters based around protection of the environment which includes the European Sites of the Murrough Wetlands SAC, Murrough SPA and the watercourses within the LAP area.</p> <p>In recognising the physical and infrastructural limitations including water services infrastructure etc, development must be carefully controlled in order to safeguard these legally protected sites.</p>	Noted.	None.
Item	Submission Text/Issues Raised	Response	Recommended Updates
B	<p>“Having regard to the characteristics of these protected sites, it is important to ensure that the lands surrounding these sites are protected from new development and to limit the extension of existing development in this area.”</p> <p>“To ensure that the lands surrounding the European Sites of the Murrough Wetlands SAC and the Murrough SPA are protected from adverse impacts arising from new development and to carefully manage and control the extension of existing development in proximity to</p>	AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA is a focused and detailed impact assessment of the implications of the plan, alone and in combination with other plans and projects, on the integrity of European Sites in view of their conservation objectives. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far.	None.

<p>these areas.”</p> <p>IFI would respectfully recommend that the above referenced strategies are extended to not only include those proposed development areas in close proximity to protected sites but also to lands adjacent to rivers and streams within the LAP area.</p> <p>Development outside of lands immediately surrounding the</p> <p>European sites has equal potential to adversely impact these sites through the connectivity of the rivers and streams which discharge into them, conveying potential pollutants from the drainage and foul infrastructure.</p> <p>Because of the connectivity of the drainage network to rivers and streams and to the protected sites, it is recommended that the LAP recognises the importance for the maintenance of all existing and future drainage infrastructure.</p> <p>IFI are aware that the above referenced strategies, will be difficult to realise in their entirety and in a sustainable manner due to a number of factors, including:</p> <ul style="list-style-type: none"> • Inadequate wastewater infrastructure, in particular the conveyance pipe network and pumping stations currently servicing the needs of the existing built environment both residential and commercial. • Required maintenance of the existing drainage network, including all agreed SuDS measures in the new and existing built environment for which the Local Authority do have limited resources to maintain. • Some of the existing and proposed zoned residential lands within the LAP - RN1 & RN2 will require the installation of sewage pumping stations to facilitate the conveyance of sewage into a network that appears to be already hydraulically overloaded. 	<p>The AA demonstrates that, having incorporated mitigation measures into the Draft Plan, the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects². This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>The quoted plan text relates to specific lands surrounding European sites. Various other provisions within the Draft Plan and associated existing County Development Plan address issues relating to the protection of European sites, the protection of other environmental components including surface and ground waters, and drainage and water services infrastructure.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	
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² Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

Item	Submission Text/Issues Raised	Response	Recommended Updates
C	<p>IFI are increasingly concerned about the rising frequency of incidents within the sewage network, which have led to surcharging. These surcharging events have resulted the release of harmful substances into the aquatic environment. IFI would contend that while there may be adequate capacity within the Wicklow Town Wastewater Treatment Facility, there is inadequate capacity in the conveyance network, which has the potential to increase the number of overflow events into our rivers.</p> <p>All of the collected wastewater from within the Wicklow, Rathnew, Ashford agglomeration converges to central pumping station on the Murrough where there have been ongoing operational difficulties resulting in numerous complaints to the Local Authority and to the licencing authority, the EPA.</p> <p>It is important to note that Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water.</p> <p>The concerns outlined above are challenging for the Local Authority and Uisce Éireann to address, but they must be considered and corrected when identified, to comply with statutory obligations to protect the aquatic environment and to allow for sustainable development to take place.</p> <p>It is recommended that before considering future development within the LAP, Uisce Éireann should confirm that there is sufficient hydraulic capacity within the sewage conveyance network and pumping stations servicing the Wicklow, Rathnew areas, to convey foul waste to the Wastewater Treatment Plant without risk to the aquatic environment.</p> <p>Where it is identified that the wastewater infrastructure</p>	<p>As identified in the SEA Environmental Report that accompanied the Draft Plan on public display, Uisce Éireann is responsible for all public water services, involving the supply of drinking water and the collection, treatment and disposal of wastewater. Notwithstanding this, the existing Wicklow County Development Plan and the Draft Local Area Plan include various measures relating to the protection of surface and ground waters and the provision of drainage and water services infrastructure.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	None.

	<p>does not have sufficient capacity, the planning authority should be notified to ensure that no additional loading is added to this infrastructure until the necessary upgrades or remediation works have been completed.</p> <p>It is further recommended that the Local Authority conduct an audit of all the drainage assets in their charge, to ensure operational status, maintenance and repair requirements before considering any future development within these areas.</p>		
Item	Submission Text/Issues Raised	Response	Recommended Updates
D	<p>2.10 Built Heritage and Natural Environment</p> <p>The key heritage and environmental factors that have influenced the shape of this plan include:</p> <ul style="list-style-type: none"> • Protection and enhancement (where possible) of European Sites (the Murrough SPA, the Murrough Wetlands SAC, and Wicklow Head SAC), including lands adjacent to and linked to these sites. • Identification of rivers and watercourses and their associated green corridors, and the recognition of same as a 'Green Infrastructure' resource. <p>There are two proposed zonings within the LAP, one of which is RN1- Existing Residential (Ref., SLO2) and the other RN2- New Residential Priority 2 (Ref SLO4), both of which are located in high risk / sensitive areas in respect of environmental receptors.</p> <p>Given the risk of sewage infrastructure failure and potential discharge into waterbodies connected to the "Murrough Wetlands SAC," it would be very difficult to rule out a significant impact on these Special Areas of Conservation (SAC), either alone or in combination with other nearby developments, and for this reason, IFI recommends that the Local Authority should reconsider the designation of SLO4 as potential development lands.</p> <p>WTR95 Where relevant, applications for development must demonstrate that the proposal for development</p>	<p>AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA is a focused and detailed impact assessment of the implications of the plan, alone and in combination with other plans and projects, on the integrity of European Sites in view of their conservation objectives. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far.</p> <p>The AA demonstrates that, having incorporated mitigation measures into the Draft Plan, the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects³. This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>With respect to SLO4 please also refer to response under Submission 144.</p>	<p>Please also refer to update under Submission 144.</p>

	would not, individually or cumulatively, affect a water body's ability to meet its objectives under the Water Framework Directive		
Item	Submission Text/Issues Raised	Response	Recommended Updates
E	<p>CHAPTER 9 INFRASTRUCTURE</p> <p>13.2 Water Services Objectives (Wicklow County Development Plan 2022-2028)</p> <p>IFI wish to highlight the following objectives in relation to Water Quality, Water Supply, Waste Water and Storm & Surface Water Infrastructure as set out in the Wicklow County Development Plan 2022-2028.</p> <p>These objectives are very positive in their aims to protect and improve water quality within both surface and groundwater sources and to protect the aquatic environment and its riparian zones.</p> <p>It also highlights the complexity and interconnections between, wastewater, surface water/drainage and drinking water infrastructure and the need to approach all future development in a joined-up manner, ensuring that all three components have sufficient capacity and are fit for purpose to facilitate sustainable development in the Wicklow Rathnew LAP.</p> <p>IFI are concerned that the current waste water infrastructure in the area does not have capacity to support any further growth within the Wicklow – Rathnew & Ashford area at this time. It is recommended, as previously stated, that an audit of the waste infrastructure within the LAP (to include the Ashford agglomeration, as it is part of the same wastewater infrastructure) be undertaken by the relevant authority, and where issues such as conveyance capacity limitations are identified, remedial actions are undertaken. This will help to ensure sustainable development occurs in accordance with the objectives set out in the County Development Plan (CDP) and LAP.</p> <p>IFI recommends that adequate resources are assigned to maintain and service the drainage network and</p>	<p>As identified in the SEA Environmental Report that accompanied the Draft Plan on public display, Uisce Éireann is responsible for all public water services, involving the supply of drinking water and the collection, treatment and disposal of wastewater. Notwithstanding this, the existing Wicklow County Development Plan and the Draft Local Area Plan include various measures relating to the protection of surface and ground waters and the provision of drainage and water services infrastructure, including those listed in the submission.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>The inclusion of Plan measures relating to the protection of European sites for particular lands or sites is consistent with the approach advocated by the Department of Housing, Local Government and Heritage in their submission.</p>

	<p>associated infrastructure to protect the aquatic environment and prevent or minimise future flooding events.</p> <p>Submission lists various Water Quality, Water Supply, Waste Water and Storm and Surface Water Infrastructure Objectives from the CDP.</p>		
Item	Submission Text/Issues Raised	Response	Recommended Updates
F	<p>CHAPTER 10 HERITAGE, BIODIVERSITY & GREEN INFRASTRUCTURE</p> <p>Biodiversity and Natural Heritage There are a number of very positive objectives proposed within this section, and it is important that the Fisheries Service are consulted at as early a stage as possible where development plans are being considered to facilitate these objectives.</p> <p>It is recommended that the following Guidance documents are referenced when considering development strategies and policy.</p> <ul style="list-style-type: none"> ▪ IFI guidelines- "Planning for Watercourses in the Urban Environment" ▪ Department of Housing Local Government and Heritage Strategy and guidance documents <ol style="list-style-type: none"> 1. Nature Based Management of Urban Rainwater and Urban Surface Water Discharges A National Strategy. 2. Rainwater Management Plans Guidance for Local Authorities. There is a zone of influence associated with Greenway's/Blueway's which must be considered and planned for within some of these objectives of the LAP. <p>A wildlife corridor system that protects regional diversity should be at the forefront of the Greenway/Blueway planning processes. Riparian areas play a disproportionately large role in filtering out pollutants and sediment from overland surface runoff, flood defence, maintaining biodiversity and for these reasons</p>	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards the protection of surface and ground waters, cooperation with Inland Fisheries Ireland and the provision of green and blue infrastructure. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

	<p>greenways must not impinge on or degrade the riparian zones. In considering wildlife, focus should not be solely on the width of the path of the greenway, consider the wider area it may influence.</p> <p>IFI are aware of incidents of considerable damage to biodiversity resulting from the construction of greenways and amenity walks where there has been an over engineering of the pathways and cycleways in terms of the widths and finishes used, which has resulted in a degradation of the natural environment.</p> <p>Careful consideration should be given at the design stage and a balance should be struck in relation to moving access away from the riparian corridor along rivers and streams and sensitive areas of conservation to provide refuge for the flora and fauna within these areas.</p> <p>IFI is grateful for the opportunity to have these views considered and incorporated as a component of the Draft Wicklow Town - Rathnew Local Area Plan 2025.</p>		
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³ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

Submission No. 111 Land Development Agency		
Submission Text/Issues Raised	Response	Recommended Updates
This submission provides information and suggestions relating to topics including development and regeneration.	If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.	None.

Submission No. 113 Department of the Environment, Climate and Communications		
Submission Text/Issues Raised	Response	Recommended Updates
<p>This submission provides information and suggestions under a number of headings including:</p> <ul style="list-style-type: none"> • Climate Action • Renewable Energy • Offshore Renewable Energy • Built Environment and Heating • Compact Growth and District Heating • Circular Economy and Waste • Telecommunications • Air Quality 	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards the achievement of objectives under the headings laid out in the submission. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>
Submission No. 125 Transport Infrastructure Ireland		
Submission Text/Issues Raised	Response	Recommended Updates
<p>This submission provides information and suggestions relating to transport infrastructure.</p>	<p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>
Submission No. 128 Office of Public Works		
Submission Text/Issues Raised	Response	Recommended Updates
<p>This submission provides information and suggestions relating to flood risk management.</p>	<p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 135 National Transport Authority		
Submission Text/Issues Raised	Response	Recommended Updates
<p>This submission provides information and suggestions under a number of headings including:</p> <ul style="list-style-type: none"> • Overview and Policy Context • Local Transport Assessment • Active Travel Proposals • Public Transport Measures • Car Parking • Modal Share Ambitions • Integration of Local Area Plan & Local Transport Assessment 	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards the achievement of objectives under the headings laid out in the submission. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. s 2, 6, 7, 9		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Various recommendations and comments in relation to:</p> <p>The protection of the Murrough and the lakes up as far as Kilcoole</p> <ul style="list-style-type: none"> • Coastal erosion protection • The protection of coastal areas, not only The Murrough but Brittas Bay also • Stopping over fishing. 	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards coastal zone management and the protection and management of biodiversity, flora and fauna, including the Murrough and surrounding areas. Neither the designation of marine protected areas nor the regulation of over fishing is within the scope of the Local Area Plan. The Local Area Plan relates to the Wicklow Town and Rathnew area and does not extend to the wider east coast, including Brittas Bay. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 10		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Various requests, including rezoning of OS1.</p>	<p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land- take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi- natural lands remains unchanged.</p> <p>Any flood issues to be considered by the SFRA. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 21		
Submission Text/Issues Raised	Response	Recommended Updates
<i>SLO7 Remove portion of new residential zoning. More natural greenspace.</i>	Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the protection and management of biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions.	None.

Submission No. 24		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Community Development, Transport, Biodiversity, Rights of Way –Tinakilly Avenue Protection of Trees along Tinakilly Avenue and Fairy Tree AOS – Need more AOS around Tinakilly as current open space areas flood or are wetlands. Lack of AOS in Rathnew noting level of development. Murrough – LAP lacks protection of this area by constructing high density housing new it, in particular the management of drainage systems new residential areas. According to the Natura Impact Report in support of the AA for the Draft Wicklow Town-Rathnew Local Area Plan 2025, there is a likelihood of significant impact on the SAC and SPA due to the proposed zonings in this draft LAP.</p>	<p>Any flood issues to be considered by the SFRA.</p> <p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards sustainable mobility and the protection and management of biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far. The AA process is ongoing and will be concluded at adoption of the Local Area Plan.</p> <p>The AA NIR has been prepared in compliance with the European Habitats Directive and is appropriate to this strategic, Local Area Plan-level of decision making.</p> <p>The AA concludes as follows:</p> <p>“This Natura Impact Report demonstrates that, upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site.</p> <p>The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European sites identified have been addressed by the inclusion of mitigation measures into the Draft Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the</p>	<p>None.</p>

	<p>Draft Plan will themselves be subject to AA/screening for AA when further details of design and location are known.</p> <p>In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Draft Plan are seen to be robust to ensure that there will be no significant effects as a result of the implementation of the Draft Plan either alone or in-combination with other plans/projects.</p> <p>Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects⁴. This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>This Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the Plan.”</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	
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Submission No. 25		
Submission Text/Issues Raised	Response	Recommended Updates
Construction of Houses of Floodplain and the impact this has had on the environment.	The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards the protection and management of the environment. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.	None.

⁴ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

Submission No. 28		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Economic Development</p> <p>Generally in support of the general direction of the zoning and phasing in the Draft Local Area Plan.</p> <p>Rational for zoning of employment uses is less clear and doesn't conform to the recently published OPR practice notes.</p> <p>SEA –Monitoring proposed in the SEA is inadequate.</p> <p>Light Pollution – Character of Town and Impact on Environment It would be appropriate to protect the character of the town by including specific guidelines for lighting new developments including along the shoreline which is zoned for significant new development.</p>	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards the protection and management of the environment, including provisions relating to lighting.</p> <p>Monitoring measures are proposed by the SEA in compliance with the SEA Directive, transposing Regulations and the Ministerial Guidelines on SEA.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	None.

Submission No. 41		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning Residential Development Knockrobin SLO4 Remove RN2 Zoning from this site for residential amenity and biodiversity reasons.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the protection and management of biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 45		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Remove RN2 Zoning from this site. Part of the site is prone to flooding. Not enough commuting infrastructure to Dublin to cope with more residential development.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the protection and management of biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

Submission No. 47		
Submission Text/Issues Raised	Response	Recommended Updates
Rezoning employment lands at the Murrough to Tourism.	Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the protection and management of biodiversity, flora and fauna and the landscape. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.	None.

Submission No. 49		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Opposed to SLO4 on biodiversity grounds, in particular birds and small animals.</p> <p>Could the area not be preserved as a public park or sports facility?</p> <p>Not enough green infrastructure to cope with the level of residential development proposed.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards sustainable mobility and the protection and management of biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	None.

Submission No. 51		
Submission Text/Issues Raised	Response	Recommended Updates
Opposed to SLO4 RN2 Zoning.	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards sustainable mobility and the protection and management of biodiversity, flora and fauna and the landscape. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	None.

Submission No. 52		
Submission Text/Issues Raised	Response	Recommended Updates
Lands Knockrobin - Change from RN2 to RE.	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards sustainable mobility and the protection and management of biodiversity, flora and fauna and the landscape. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	None.

Submission No. 58 (no map seemed to be included)		
Submission Text/Issues Raised	Response	Recommended Updates
<p>2.8ha site Murrough Changing from E1 to OS2. Asked to rezone only 2.8ha and retain 1ha as E1</p>	<p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land- take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi- natural lands remains unchanged.</p> <p>Any flood issues to be considered by the SFRA</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 67		
Submission Text/Issues Raised	Response	Recommended Updates
<p>2.8ha site Murrough Changing from E1 to OS2. Asked to rezone only 2.8ha and retain 1ha as E1</p>	<p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land- take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi- natural lands remains unchanged.</p> <p>Any flood issues to be considered by the SFRA.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 69		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Farmyard and buildings Knockrobin. Gone from Res Infill to OS2. Requested to revert back</p>	<p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land- take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi- natural lands remains unchanged.</p> <p>Any flood issues to be considered by the SFRA.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA</p>	<p>None.</p>

Submission No. 72		
Submission Text/Issues Raised	Response	Recommended Updates
<p>The single train line is at risk of being lost to coastal erosion within a year or two, and there is no double line to extend DART services to the town.</p> <p>Heightened risks of flooding and ecological damage to local rivers, lakes, and the sea.</p>	<p>As identified in the Draft Plan, Irish Rail are undertaking the ECRIPP12 project to protect the coast and rail line from erosion. The primary focus of East Coast Railway Infrastructure Protection Projects (ECRIPP) is to address and implement protection of the existing railway and coastal infrastructure against the further effects of coastal erosion due to climate change in five key areas on the railway line between Dublin and Wicklow. Wicklow Town is in ECRIPP Coastal Cell CCA6.2 - Newcastle to Wicklow Harbour. The project is in Phase 2 - Project Concept, Feasibility and Option Selection.</p> <p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the protection and management of the environment. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

Submission No. 78		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Knockrobin Farm. Revert site from RN2 back to RE.</p>	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards the protection and management of the environment. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 79		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Need to secure the coast and relocate the railway line. Protect the waterways.</p>	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards coastal zone management and the protection and management of surface and ground waters and biodiversity, flora and fauna.</p> <p>Relocating the railway line is not within the scope of the Local Area Plan.</p> <p>As identified in the Draft Plan, Irish Rail are undertaking the ECRIPP12 project to protect the coast and rail line from erosion. The primary focus of East Coast Railway Infrastructure Protection Projects (ECRIPP) is to address and implement protection of the existing railway and coastal infrastructure against the further effects of coastal erosion due to climate change in five key areas on the railway line between Dublin and Wicklow. Wicklow Town is in ECRIPP Coastal Cell CCA6.2 - Newcastle to Wicklow Harbour. The project is in Phase 2 - Project Concept, Feasibility and Option Selection.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 83		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Infrastructure Delivery/ Transportation</p> <p>Relief road route partly in floodzone. Should upgrade Rocky Road and/or Marlton Road to improve access to the N11</p> <p>Financial constraints and deals with contractors should not override what is best for a community for the long term, just because the relief road plan was set a number of years ago does not mean it cannot change for what makes better sense. Which could be used also in relation to the WTR92 point where the plan provides connecting links as a potential walkway could be designed to link Tinakilly, Broadlough lake and the Murrough.</p> <p>Heritage/Biodiversity/Green Infrastructure/Coastal Erosion/ Tourism Tinkilly Avenue –plans go against the natural environment and biodiversity.</p> <p>Murrough not been protected by the plan (metal transfer station)</p> <p>Tinakilly Avenue destroyed by proposals</p> <p>Flooding Areas below Tinakilly / lower Rathnew are all under flood Zone A&B which classifies them as areas of high risk of flooding. Existing and proposed developments will increase this risk.</p> <p>Specify type of residential build in Rathnew/Tinakilly Area. Replace apartments which have little greenspace with residential houses.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards sustainable mobility and the protection and management of biodiversity, flora and fauna and coastal zone management. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

Submission No. 86		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Knockrobin –SLO4</p> <p>Adjust quantum of RN zoning within the 500-meter radius of Train Station and to remove zoning on the land to the east, directly adjacent to the existing low-density housing and Knockrobin farmyard.</p>	<p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land- take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi- natural lands remains unchanged.</p> <p>Any flood issues to be considered by the SFRA.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 87		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Flooding - Specifically in Rathnew which will be exacerbated by increased residential development.</p> <p>Rathnew is overzoned –ABP</p> <p>Community and Development- Lack of School places, GP and dental appointments available.</p> <p>Rathnew Village Strategy/Transportation</p> <p>Tinakilly Avenue –destroyed</p> <p>Inner relief road will form at bottleneck at Aldi roundabout Alternatives should be considered –Rocky Road, Marlton Road/Friars Hill.</p> <p>Heritage/Biodiversity Destruction of Tinakilly Avenue and green areas around Rathnew.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards environmental protection and management. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

Submission No. 89		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Heritage/Transportation/Overall strategy and Vision Tinakilly Avenue Right of Way</p> <p>Residential Development Biodiversity Dezone Tinakilly Avenue and surrounding lands and restore to POS.</p> <p>Flooding Flooding has become an issue near the newly proposed development at Tinakilly Demesne.</p> <p>Due diligence is not been carried out with regard to existing floodplains in the Wicklow/Rathnew environs. Photos of flooding from the 17th of September 2023 included.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the sustainable development infrastructure and the protection and management of biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

Submission No. 90		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning SLO4 – Object to new RN2 zoning. Biodiversity Proposed rezoning in SLO4 will destroy wildlife. Flooding Sites proposed for rezoning in SLO4 are constantly muddy and prone to spot flooding after heavy rain.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the coastal zone management, noise management, lighting and the protection and management of biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

Submission No. 91		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning Lands south of Port Access Road –remove part of employment zoning and change to RE. Lands north of the Port Access Road – Proposed zonings means that the RN2 zoning on SLO4 is not feasible and will not be able to fund the other objectives in SLO4. Increase RN2 Zoning. Biodiversity</p>	<p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan’s zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct ‘land- take’ within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi- natural lands remains unchanged.</p> <p>Any flood issues to be considered by the SFRA.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 92		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Rathnew Village Centre Overdeveloped. Heritage / Biodiversity / Heritage Maps Green areas disappearing. No forward thinking.</p>	<p>SEA has been undertaken in compliance with the SEA Directive and transposing Regulations. The findings of the SEA, thus far, were provided in an SEA Environmental Report that was placed on display alongside the Draft Plan. The SEA facilitated the integration of environmental considerations into the Plan, which contributes towards environmental protection and management within the Plan area</p>	

Submission 95		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Infrastructure Delivery/Community and Development</p> <p>Before there are any more houses more infrastructures – transportation. Too many pressures at junction of Hawkstown Road with Wicklow Road.</p> <p>The intention of this plan is to build thousands of more houses with no provision for schools, playing pitches, doctors, running track, internet access, garda station etc.</p> <p>Heritage/Biodiversity</p> <p>Worried that under this plan access to Broadlough via Tinakilly avenue will be denied to locals. This is a traditional right of way to the wetlands and area of conservation.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards sustainable mobility and environmental protection and management. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

Submission No.97		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Infrastructure Delivery</p> <p>Biodiversity</p> <p>SEA/AA</p> <p>Increase capacity of waste water treatment before any more housing. To have raw sewage running into the port any time there's much rain is unacceptable.</p> <p>Flooding</p> <p>Irresponsible to be building at density close to, or on an area of high flood risk. This would, in theory, put existing structures in harm's way, by removing natural drainage/ soakage avenues. ref: SLO2, land zoning map</p>	<p>As identified in the SEA Environmental Report that accompanied the Draft Plan on public display, Uisce Éireann is responsible for all public water services, involving the supply of drinking water and the collection, treatment and disposal of wastewater. Notwithstanding this, the existing Wicklow County Development Plan and the Draft Local Area Plan include various measures relating to the protection of surface and ground waters and the provision of drainage and water services infrastructure. Other provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the sustainable provision of infrastructure and environmental protection and management. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA</p>	<p>None.</p>

Submission No. 98		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Heritage / Biodiversity Need to do more to protect our local heritage and biodiversity. Green Infrastructure - Must be welcomed.</p> <p>Flooding So much of Rathnew is on a flood plain Development has put extra pressure on the fragile balance. Many Rathnew households cannot obtain flood cover on their house insurance. SEA/AA</p> <p>Need to really up our game to protect the wonderful nature reserve at Broadlough and Murrough.</p> <p>Need to protect the salmonoid rivers that flow into the Broadlough.</p> <p>Green corridor should be applied around the area to protect it from future development.</p> <p>Other issues The people who the LAP directly affects should have the biggest say ie the local population. The LAP should be fair and intelligently drawn up. Not drawn up to facilitate financial gain by some entities. It's a beautiful place to live. Let's make it a better place to live rather than a worse place to live. Don't follow the money but rather what is best for the community in general.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards environmental protection and management, including that related to ecology at the Murrough and Broadlough and the status of surface waters. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

Submission No. 99		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning</p> <p>Residential Development</p> <p>Flooding</p> <p>SEA/AA</p> <p>Biodiversity</p> <p>SLO4 fails to prudently consider the topography and geology of the site – there is no bedrock above sea level across much of the site and the soil is a mix of clay and loam.</p> <p>In the adjacent fields to zone SLO4 there is seasonal flooding. Concerned impacts climate change will have on flooding in coastal areas and near floodplains.</p> <p>Concerns Regarding the erosion of the Murrough and impact on SLO4 in the future.</p> <p>Wise to employ the Sequential Approach and Justification Test to this area SLO4.</p> <p>Urge the local authority to reflect on the mitigation objectives of the flood risk assessment, chiefly CPO14.04 and CPO14.16. Protection of The Murrough Wetlands. EIA may be required before zoning the land.</p> <p>Greenway</p> <p>Zone SLO4 for parkland and allow it to become the gateway to the Greystones to Wicklow Greenway. Preserve for ecological reasons and future generations.</p>	<p>Any flood issues to be considered by the SFRA.</p> <p>SEA has been undertaken in compliance with the SEA Directive and transposing Regulations. The findings of the SEA, thus far, were provided in an SEA Environmental Report that was placed on display alongside the Draft Plan. The SEA facilitated the integration of environmental considerations into the Plan, which contributes towards environmental protection and management within the Plan area. EIA may be required for individual projects under the Plan.</p> <p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the protection and management of biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far. The AA process is ongoing and will be concluded at adoption of the Local Area Plan.</p> <p>The AA NIR has been prepared in compliance with the European Habitats Directive and is appropriate to this strategic, Local Area Plan-level of decision making.</p> <p>The AA concludes as follows: “This Natura Impact Report demonstrates that, upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site.</p> <p>The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation</p>	<p>None.</p>

	<p>Objectives of the European sites identified have been addressed by the inclusion of mitigation measures into the Draft Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Draft Plan will themselves be subject to AA/screening for AA when further details of design and location are known.</p> <p>In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Draft Plan are seen to be robust to ensure that there will be no significant effects as a result of the implementation of the Draft Plan either alone or in-combination with other plans/projects.</p> <p>Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects⁵. This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>This Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the Plan.”</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	
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Submission No. 105		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning Waterfront</p> <p>Zone SEA/AA</p> <p>Location - Old radiator site. Welcomed that the content of the Draft LAP generally supports and encourages regeneration of the lands at the Murrough (south of the Port Access Road).</p> <p>Site located in Area 3 – Mixed Use Regeneration Area. Submitted that to make any development viable, a strong quantum of residential must be included.</p> <p>Hotel -Unviable Requested that Objective WTR72 of the LAP be amended. Requested that Objective WTR54 be deleted.</p> <p>Submitted that the LAP should be amended to include A portion of land owned by WCC within Area 3, with an objective for Wicklow County Council to work with landowners/developers to facilitate the provision of this land for public open space and improved pedestrian and cyclist linkages as part of any proposed regeneration.</p>	<p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 109		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning</p> <p>SLO4 – Object to new RN2 zoning.</p> <p>SLO4 should be reconsidered for sports activities.</p> <p>Biodiversity</p> <p>Proposed rezoning in SLO4 will destroy wildlife.</p> <p>Biodiversity</p> <p>Murrough should be protected from further erosion</p> <p>Flooding</p> <p>Sites proposed for rezoning in SLO4 are prone to flooding after heavy rain. Should not build here.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards the protection and management of biodiversity and flora and fauna, including that related to the Murrough. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	<p>None.</p>

⁵ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

Submission No. 110		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Waterfront Zone Strategy -Creating more sports/water activities around Redeveloping the Murrough.</p> <p>Retail /Opportunity Sites - Around the Murrough warehouses, a small shopping centre. A Cinema needed in the town for the kids.</p> <p>Flooding Get the coast stronger with rocks</p> <p>SEA/AA- Very often the water in the harbour is contaminated, that makes swimming impossible in the area</p>	<p>The existing Wicklow County Development Plan and the Draft Local Area Plan include various provisions that will contribute towards coastal zone management and the protection and management of the environment, including surface and groundwaters. Neither the designation of marine protected areas nor the regulation of over fishing is within the scope of the Local Area Plan. The Local Area Plan relates to the Wicklow Town and Rathnew area and does not extend to the wider east coast, including Brittas Bay.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	None.

Submission No. 112		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Environment/Murrough/Flooding Little consideration given to global warming and increase in water levels along the coast by granting houses near these areas.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards sustainable mobility, the sustainable provision of infrastructure and the protection and management of the environment. Any proposal for development under the Plan will be required to comply with these provisions. If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	None.

Submission No.118		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning Requested that zoning reverts back to Enterprise and Employment</p>	<p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land- take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi- natural lands remains unchanged.</p> <p>Any flood issues to be considered by the SFRA.</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p>	<p>None.</p>

Submission No. 119		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning SLO4: De-zone lands next to Broadlough SAC for housing. Knockrobin Farm</p> <p>SEA/AA: Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats directive</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute towards sustainable mobility, the sustainable provision of infrastructure and the protection and management of the environment, including biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far. The AA process is ongoing and will be concluded at adoption of the Local Area Plan.</p> <p>The AA NIR has been prepared in compliance with the European Habitats Directive and is appropriate to this strategic, Local Area Plan-level of decision making.</p> <p>The AA concludes as follows: "This Natura Impact Report demonstrates that, upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site.</p> <p>The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European sites identified have been addressed by the inclusion of mitigation measures into the Draft Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Draft Plan will themselves be subject to AA/screening for AA when further details of</p>	<p>None.</p>

	<p>design and location are known.</p> <p>In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Draft Plan are seen to be robust to ensure that there will be no significant effects as a result of the implementation of the Draft Plan either alone or in-combination with other plans/projects.</p> <p>Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects⁶. This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>This Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the Plan.”</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	
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⁶ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

Submission No. 127		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning Flooding SLO4: De-zone lands next to Broadlough SAC for housing. Knockrobin Farm. SEA/AA: Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats directive</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute the protection and management of the environment, including biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far. The AA process is ongoing and will be concluded at adoption of the Local Area Plan.</p> <p>The AA NIR has been prepared in compliance with the European Habitats Directive and is appropriate to this strategic, Local Area Plan-level of decision making.</p> <p>The AA concludes as follows:</p> <p>“This Natura Impact Report demonstrates that, upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site.</p> <p>The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European sites identified have been addressed by the inclusion of mitigation measures into the Draft Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Draft Plan will themselves be subject to AA/screening for AA when further details of design and location are known.</p>	<p>None.</p>

	<p>In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Draft Plan are seen to be robust to ensure that there will be no significant effects as a result of the implementation of the Draft Plan either alone or in-combination with other plans/projects.</p> <p>Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects⁷. This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>This Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the Plan.”</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA. Any flood issues to be considered by the SFRA.</p>	
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Submission No. 129		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning</p> <p>Flooding</p> <p>SLO4: De-zone lands next to Broadlough SAC for housing. Knockrobin Farm.</p> <p>SEA/AA: Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats directive</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute the protection and management of the environment, including biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far. The AA process is ongoing and will be concluded at adoption of the Local Area Plan.</p> <p>The AA NIR has been prepared in compliance with the European Habitats Directive and is appropriate to this strategic, Local Area Plan-level of decision making.</p> <p>The AA concludes as follows:</p> <p>“This Natura Impact Report demonstrates that, upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site.</p> <p>The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European sites identified have been addressed by the inclusion of mitigation measures into the Draft Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Draft Plan will themselves be</p>	<p>None.</p>

	<p>subject to AA/screening for AA when further details of design and location are known.</p> <p>In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Draft Plan are seen to be robust to ensure that there will be no significant effects as a result of the implementation of the Draft Plan either alone or in-combination with other plans/projects.</p> <p>Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects⁸</p> <p>This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>This Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the Plan.”</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	
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⁷ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

⁸ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

Submission No. 134		
Submission Text/Issues Raised	Response	Recommended Updates
<p>Zoning</p> <p>Flooding</p> <p>SLO4: De-zone lands next to Broadlough SAC for housing, Knockrobin Farm.</p> <p>SEA/AA: Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats directive.</p> <p>Biodiversity Zoning-SLO4</p> <p>Increase surface run off from development impacting on SAC/SPA.</p> <p><input type="checkbox"/>Increased risk of flooding. <input type="checkbox"/>Loss of habitat/greenbelt <input type="checkbox"/>SLO4 should be a conservation zone.</p>	<p>Provisions have been integrated into the existing Wicklow County Development Plan and the Draft Local Area Plan that will contribute the protection and management of the environment, including biodiversity, flora and fauna. Any proposal for development under the Plan will be required to comply with these provisions.</p> <p>AA is being undertaken alongside the preparation and adoption of the Local Area Plan, in compliance with the European Habitats Directive. The AA Natura Impact Report that accompanied the Draft Local Area Plan on public display provides the findings of the AA thus far. The AA process is ongoing and will be concluded at adoption of the Local Area Plan.</p> <p>The AA NIR has been prepared in compliance with the European Habitats Directive and is appropriate to this strategic, Local Area Plan-level of decision making.</p> <p>The AA concludes as follows:</p> <p>“This Natura Impact Report demonstrates that, upon the inclusion of suitable mitigation measures, the Draft Plan will not result in any adverse effects to the ecological integrity of any European site.</p> <p>The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European sites identified have been addressed by the inclusion of mitigation measures into the Draft Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Draft Plan will themselves be subject to AA/screening for AA when further details of design and location are known.</p>	<p>None.</p>

	<p>In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Draft Plan are seen to be robust to ensure that there will be no significant effects as a result of the implementation of the Draft Plan either alone or in-combination with other plans/projects.</p> <p>Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to any designated European site, alone or in combination with other plans or projects⁹. This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.</p> <p>This Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the Plan.”</p> <p>If any amendments are proposed to the Draft Plan on foot of this submission, they will be screened for the need to undertake SEA and Stage 2 AA.</p> <p>Any flood issues to be considered by the SFRA.</p>	
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⁹ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.



Comhairle Contae Chill Mhantáin Wicklow County Council



ADDENDUM I

TO THE STRATEGIC FLOOD RISK ASSESSMENT

OF THE

DRAFT WICKLOW TOWN & RATHNEW LOCAL AREA PLAN 2025

ADDITIONAL STRATEGIC FLOOD RISK ASSESSMENT OF ELEMENTS OF DRAFT LOCAL AREA PLAN

STRATEGIC FLOOD RISK ASSESSMENT OF PROPOSED MATERIAL AMENDMENTS TO THE
DRAFT LOCAL AREA PLAN

1 Introduction

A Strategic Flood Risk Assessment (SFRA) of the draft Wicklow Town and Rathnew Local Area Plan was undertaken and prepared in accordance with *'The Planning System and Flood Risk Management - Guidelines for Planning Authorities'* published in 2009 by the Department of the Environment, Heritage and Local Government and Office of Public Works (Flood Risk Guidelines).

The draft plan and associated reports, including the SFRA, were published in October 2024 and observations invited from the public and prescribed authorities. This 'Addendum I' to the Strategic Flood Risk Assessment of the Wicklow Town and Rathnew Local Area Plan 2025 has been prepared on foot of submissions received, and sets out:

- (a) Additional data and explanation of elements of the original SFRA for the Draft Plan that require additional clarification and explanation, in order to address issues raised in submissions received;
- (b) A Strategic Flood Risk Assessment of any recommended Material Amendments to the Draft Plan, as set out in the Chief Executives Report. On completion of the consideration by the members of the CE's report, a final set of proposed material amendments to the Draft Plan may be agreed. This Addendum will be updated at that stage to include only an assessment of those proposed material amendments approved by the members;
- (c) Additional flood maps

It should be noted that changes are not made to the original Strategic Flood Risk Assessment Report at this stage; this addendum forms part of the documentation of the ongoing SFRA/Plan-making process. It supplements and should be read in conjunction with the Strategic Flood Risk Assessment Report published in October 2025.

2 Additional information regarding SFRA of the Draft Plan

2.1 Though the public consultation process, concerns were raised as follows:

- (a) that 'overlay' maps were not provided or were not adequately clear, showing areas at risk of flooding (Flood risk A and B) overlaid with proposed zoning maps;
- (b) that principle rivers and watercourses were not sufficiently clear, nor were locations of existing flood risk management infrastructure;

In order to address these concerns, additional maps are provided at the end of this document, as follows:

Map 1 Flood Risk Zones (Present day)

Map 2 Future Climate Change Scenario Flood Risk Zones

Map 3 Overlay of Flood Maps with Zoning Map

All maps will more clearly show watercourses and flood retention infrastructure.

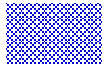
2.2 Though the public consultation process, concerns were raised that the National Coastal Flood Hazard Mapping (NCFHM) had not been sufficiently considered in the SFRA. In order to address this concern, set out to follow is additional flood risk assessment of any location identified in the 'present day' National Coastal Flood Hazard Mapping (NCFHM) as being in Flood Zone A or B.

It should be noted that National Coastal Flood Hazard Mapping (NCFHM) 'future scenarios' were identified in the original SFRA maps as 'area of potential future flood risk'.

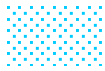
3.0 NCFHM

The purpose of this assessment is to identify any locations identified in the NCFHM 'present day' flood risk maps that were not previously identified as Flood Zones A or B in the original SFRA and then to evaluate the suitability of the zoning proposed for said locations.

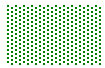
Map key:



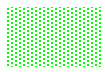
Flood Zone A shown in original SFRA



Flood Zone B shown in original SFRA



Flood Zone A NCFHM

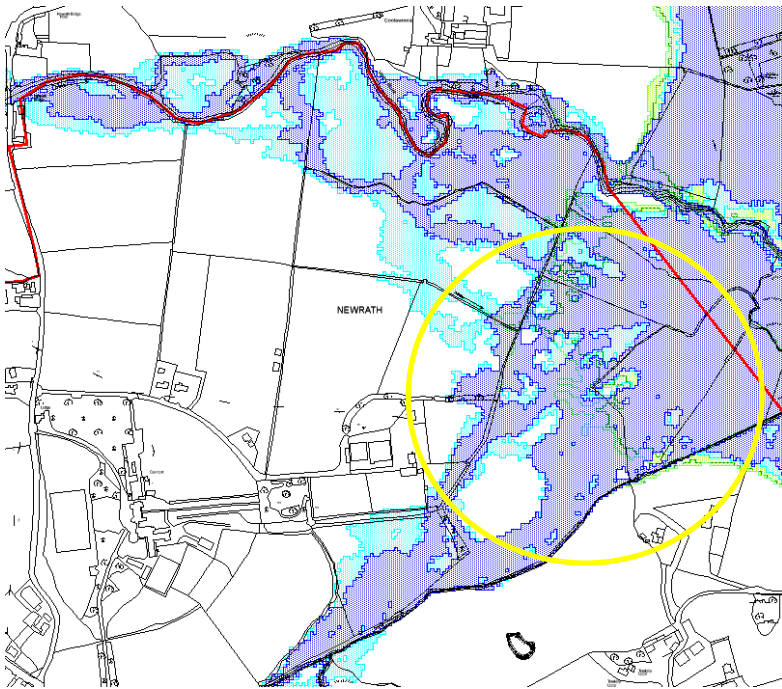


Flood Zone B NCFHM



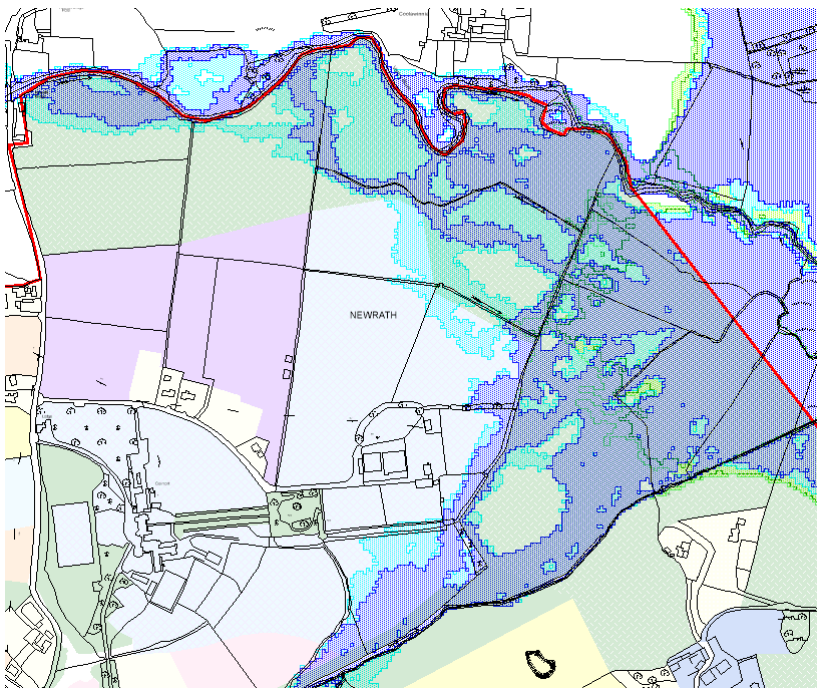
Draft Plan boundary

3.1 Clermont - Newrath



The NCFHM identifies an additional area at risk of flooding to the east of Clermont House, as highlighted. These lands are proposed for OS2 zoning.

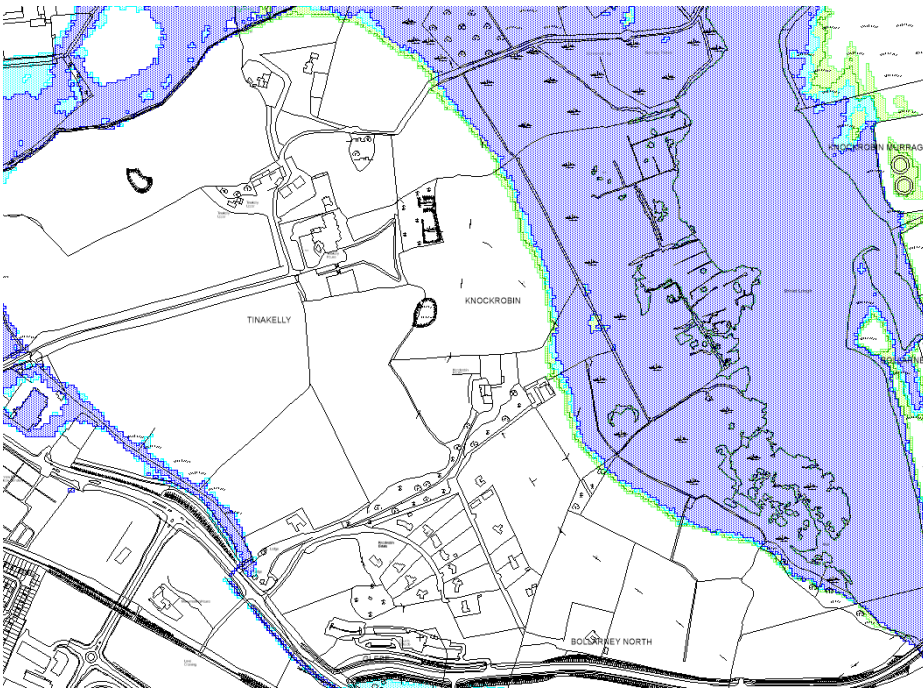
<p>OS2: Natural Areas</p>	<p>To protect and enhance existing open, undeveloped lands</p>	<p>To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.</p>
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Strategic Flood Risk Assessment

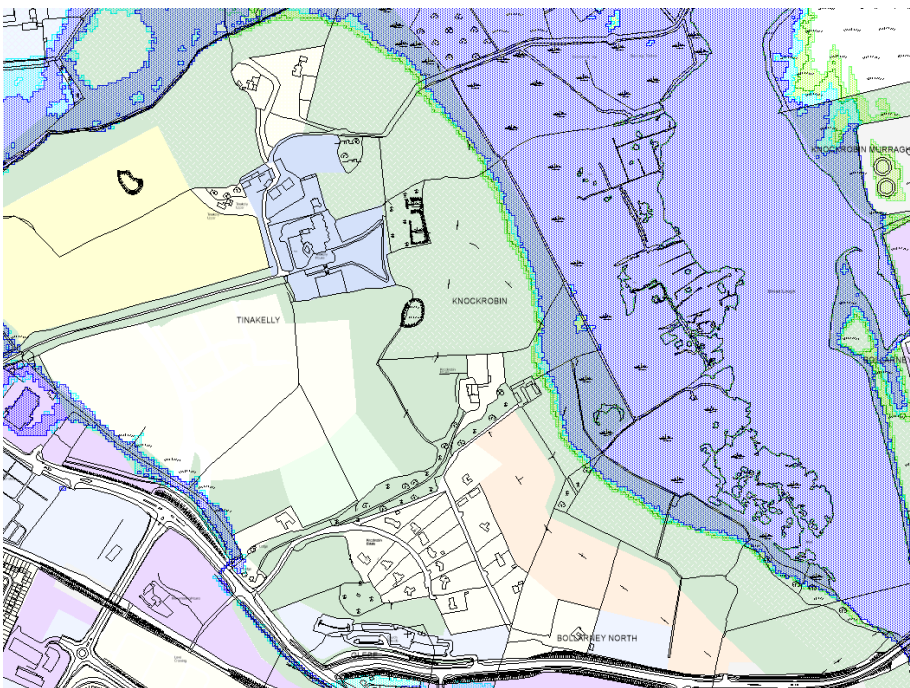
Land zoning	OS2 'Natural Areas'
Development Type	Water Compatible
Flood Zone	A and B
Requirement for Justification Test	No

3.2 Tinakelly-Knockrobin



The NCFHM identifies an additional area at risk of flooding along the eastern boundary of the original flood risk zone. These lands are proposed for OS2 zoning.

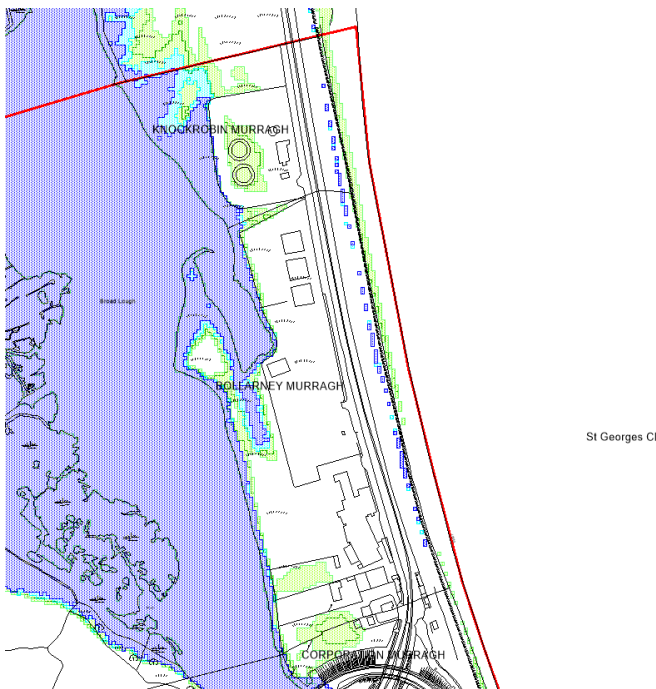
<p>OS2: Natural Areas</p>	<p>To protect and enhance existing open, undeveloped lands</p>	<p>To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.</p>
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Strategic Flood Risk Assessment

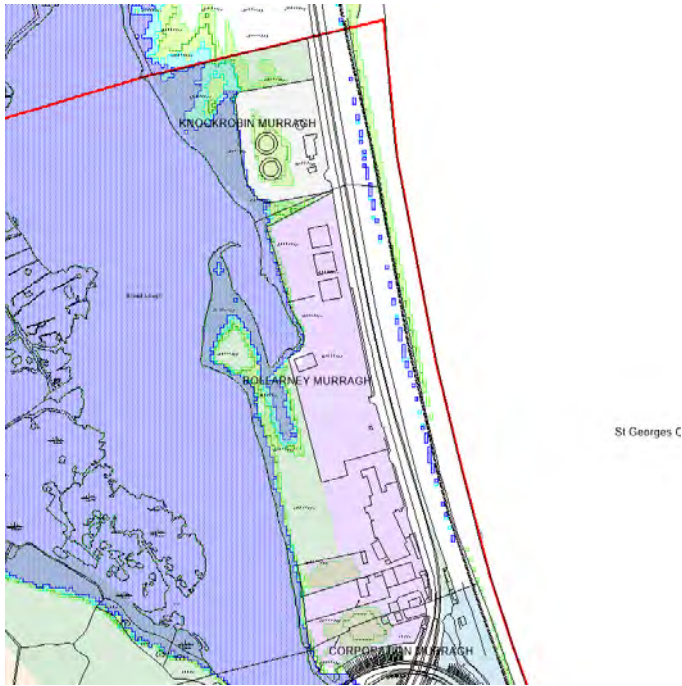
Land zoning	OS2 'Natural Areas'
Development Type	Water Compatible
Flood Zone	A and B
Requirement for Justification Test	No

3.3 Knockrobin Murrough



The NCFHM identifies additional areas at risk of flooding between the Broadlough and the coast. These lands are proposed for the following land uses: OS2, PU and E.

OS2: Natural Areas	To protect and enhance existing open, undeveloped lands	To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.
PU: Public Utility	To maintain lands providing services infrastructure	To allow for lands to be designated for public utilities such as waste water treatment plants, large ESB sub-stations, gasworks etc
E: Employment	To provide for the development of enterprise and employment	To facilitate the further development and improvement of existing employment areas and to facilitate opportunities for the development of new high quality employment and enterprise developments in a good quality physical environment.



Strategic Flood Risk Assessment

Land zoning	OS2 'Natural Areas'
Development Type	Water Compatible
Flood Zone	A and B
Requirement for Justification Test	No

Land zoning	PU Public- Existing Wastewater Treatment Plant
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes

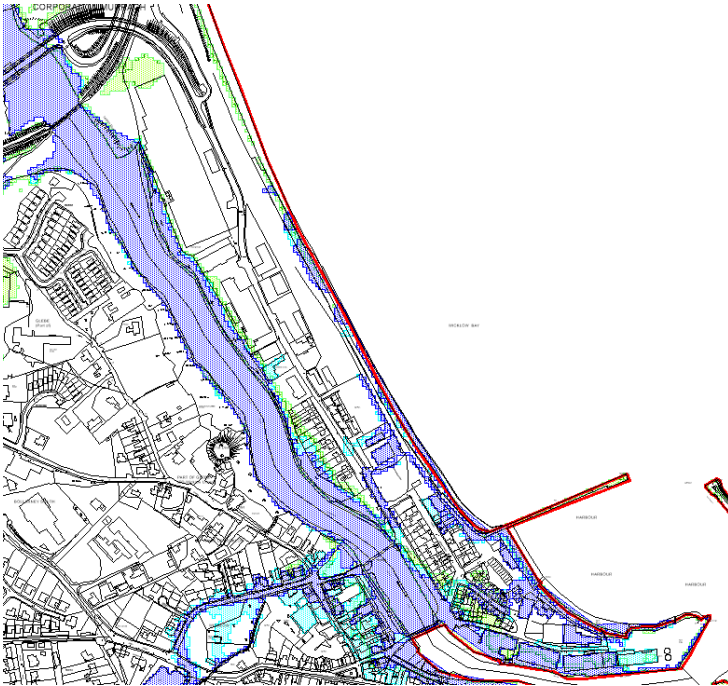
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable	

development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
These lands are currently developed for a permitted WWTP. Any proposals for new / further development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.	

Land zoning	E – Employment
Development Type	Less vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further

	indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
<p>A small area of the already developed lands in this employment zone have been identified as being located in Flood Zone A and B with a high and moderate probability of flooding from coastal sources.</p> <p>Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.</p>	

3.4 Corporation Murrough



The NCFHM identifies additional areas at risk of flooding between the Leirim River and the coast. These lands are proposed for 'WZ – Waterfront' zoning.

WZ: Waterfront

To provide for the development and improvement of the waterfront zone, to facilitate the continuation and development of existing employment / maritime / port, residential, public utilities, and community / recreational uses and to promote and provide for new residential, tourism and other mixed-use development.

To facilitate the continued and more intensive / efficient use of the existing employment, maritime and port uses ;
 To maintain existing and support the development / improvement of high quality community, amenity, leisure and tourism uses;
 To facilitate retail uses at a scale that do not undermine the role of the existing Town Centre;
 To facilitate the provision of high quality new residential developments at appropriate high densities with excellent layout and design, well linked to the existing town centre, community facilities and water amenities.

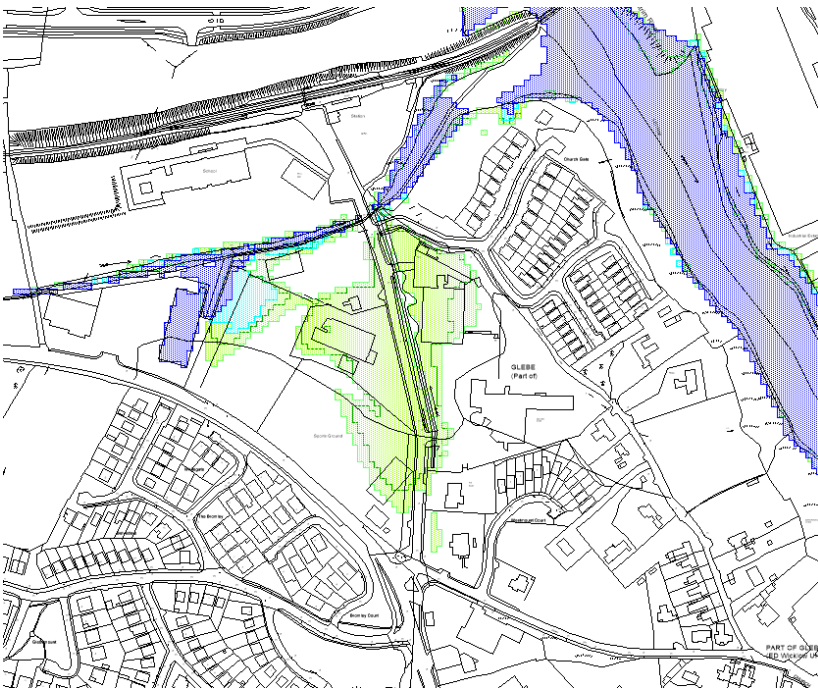


Strategic Flood Risk Assessment

Land zoning	WZ – Waterfront
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes

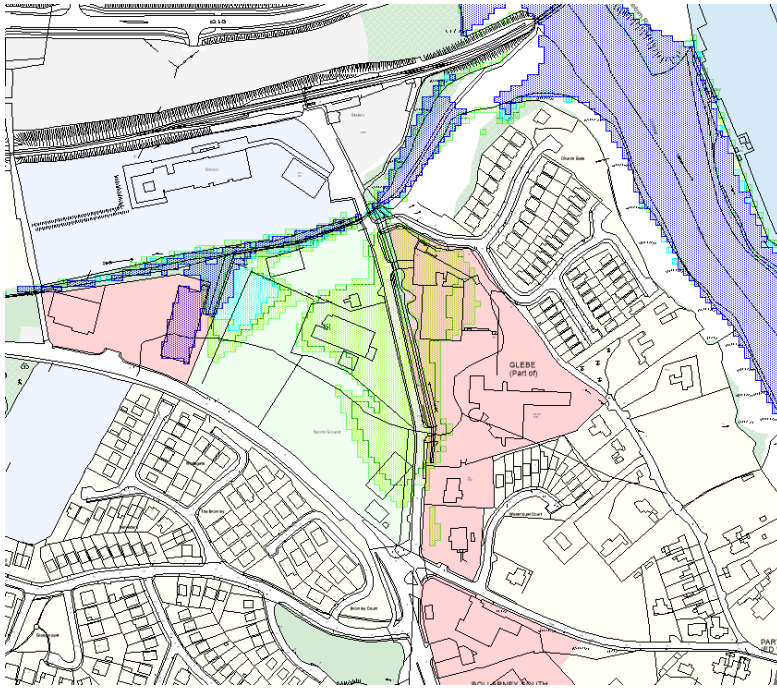
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
<p>Some areas within the already developed zone have been identified as being located in Flood Zone A and B with a high and moderate probability of flooding from coastal sources.</p> <p>Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.</p>	

3.5 Glebe - Station Road



The NCFHM identifies additional areas at risk of flooding along Station Road. These lands are proposed for the following land uses: AOS, CE and TC

AOS: Active Open Space	To protect and enhance existing and provide for new active open space	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for the development of new high quality active recreational areas.
CE: Community & Education	To provide for civic, community and educational facilities	To facilitate the development of necessary community, health, religious, educational, social and civic infrastructure.
TC: Town Centre	To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use.	To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure and residential uses, while delivering a quality urban environment, with emphasise on regeneration, infill town and historic centre conservation; ensuring priority for public transport where applicable, pedestrians and cyclists, while minimising the impact of private car based traffic and enhance and develop the existing centre's fabric.



Strategic Flood Risk Assessment

Land zoning	AOS 'Active Open Space'
Development Type	Water Compatible
Flood Zone	A and B
Requirement for Justification Test	No

Land zoning	CE 'Community & Education'
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes

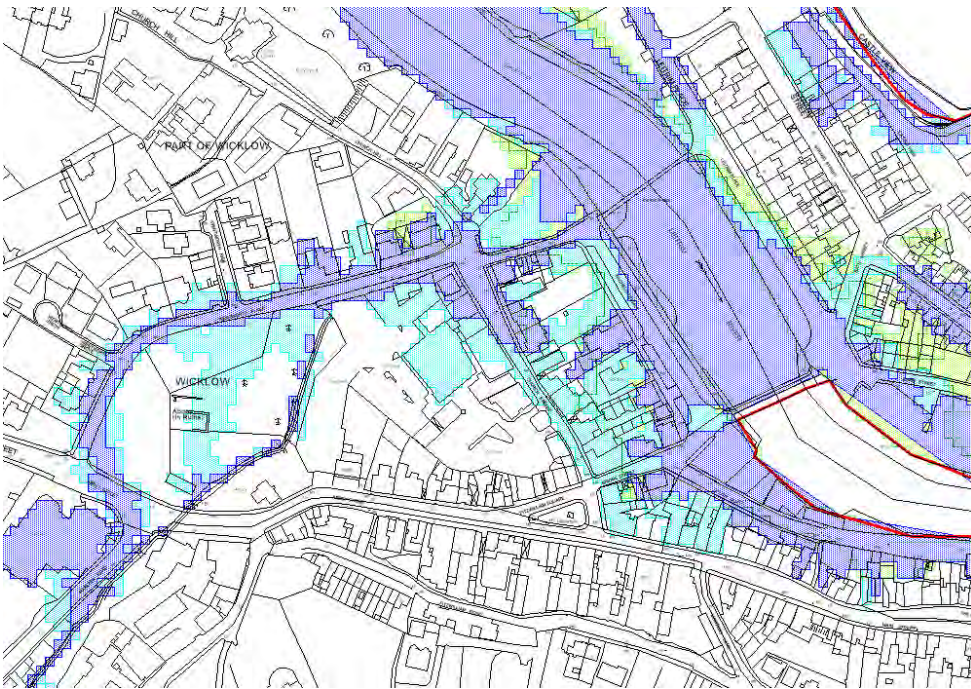
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable	

development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
These lands are currently developed for a permitted secondary school (east Glendalough).	
Any proposals for new / further development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.	

Land zoning	TC 'Town Centre'
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016

	population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
<p>These lands are currently developed for permitted County Council offices and yard, fire station and medical centre.</p> <p>Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.</p>	

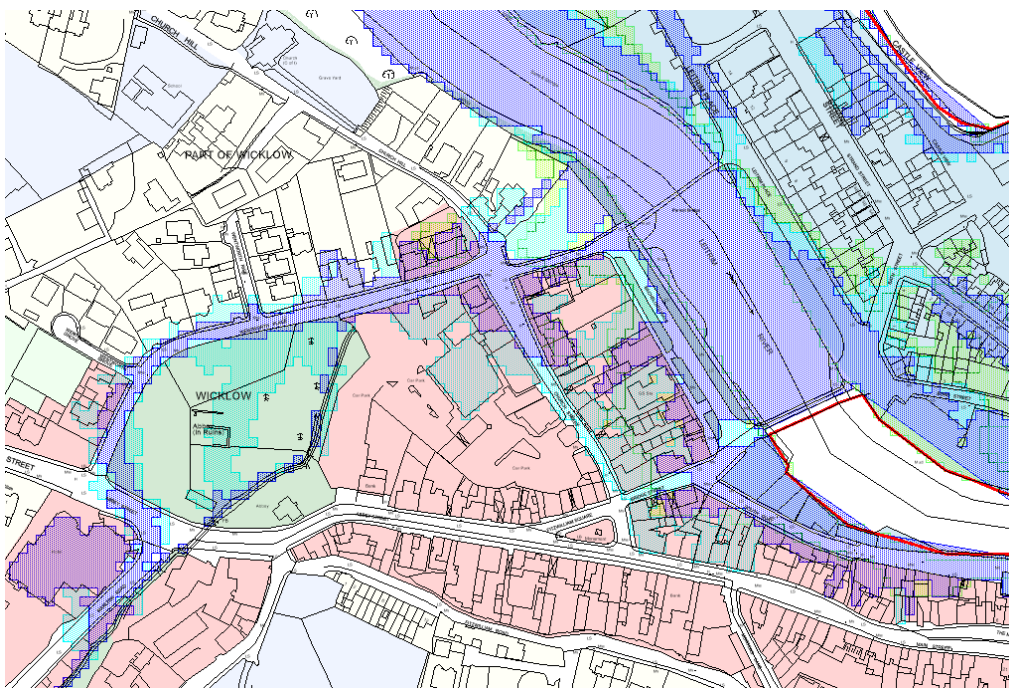
3.6 Wicklow Town Centre



The NCFHM identifies additional areas at risk of flooding to the west and south of the Leirim River. These lands are proposed for the following land uses: OS1, RE, TC and WZ

OS1: Open Space	To protect and enhance existing and provide for recreational open space	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.
RE: Existing Residential	To protect, provide and improve residential amenities of existing residential areas	To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted.
TC: Town Centre	To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use.	To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure and residential uses, while delivering a quality urban environment, with emphasise on regeneration, infill town and historic centre conservation; ensuring priority for public transport where

		applicable, pedestrians and cyclists, while minimising the impact of private car based traffic and enhance and develop the existing centre's fabric.
WZ: Waterfront	To provide for the development and improvement of the waterfront zone, to facilitate the continuation and development of existing employment / maritime / port, residential, public utilities, and community / recreational uses and to promote and provide for new residential, tourism and other mixed-use development.	To facilitate the continued and more intensive / efficient use of the existing employment, maritime and port uses ; To maintain existing and support the development / improvement of high quality community, amenity, leisure and tourism uses; To facilitate retail uses at a scale that do not undermine the role of the existing Town Centre; To facilitate the provision of high quality new residential developments at appropriate high densities with excellent layout and design, well linked to the existing town centre, community facilities and water amenities.



Strategic Flood Risk Assessment

Land zoning	OS1 ' Open Space'
Development Type	Water Compatible
Flood Zone	A and B
Requirement for Justification Test	No

Land zoning	RE 'Existing Residential'
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the

Development Act, 2000, as amended.	capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
<p>These lands are currently developed for permitted residential usage.</p> <p>Any proposals for new / further development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.</p>	

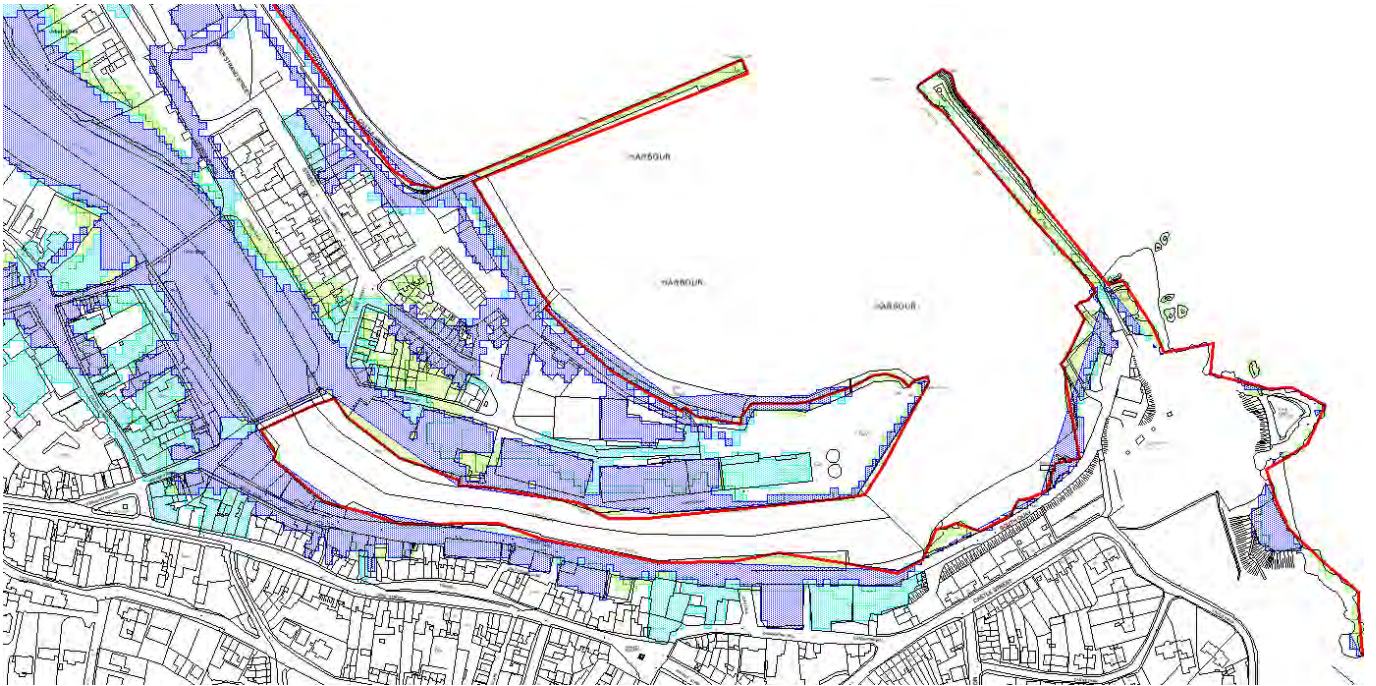
Land zoning	TC 'Town Centre'
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
These lands are currently developed for a range of 'town centre' uses including commercial, retail, residential etc, this being the historic centre of the town.	

Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.

Land zoning	WZ – Waterfront
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process

Conclusion
Justification Test: PASSED
Recommendation
<p>Some areas within this already developed zone along the Wicklow town south quays have been identified as being located in Flood Zone A and B with a high and moderate probability of flooding from coastal sources.</p> <p>Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.</p>

3.7 Wicklow Town South Quay and Harbour

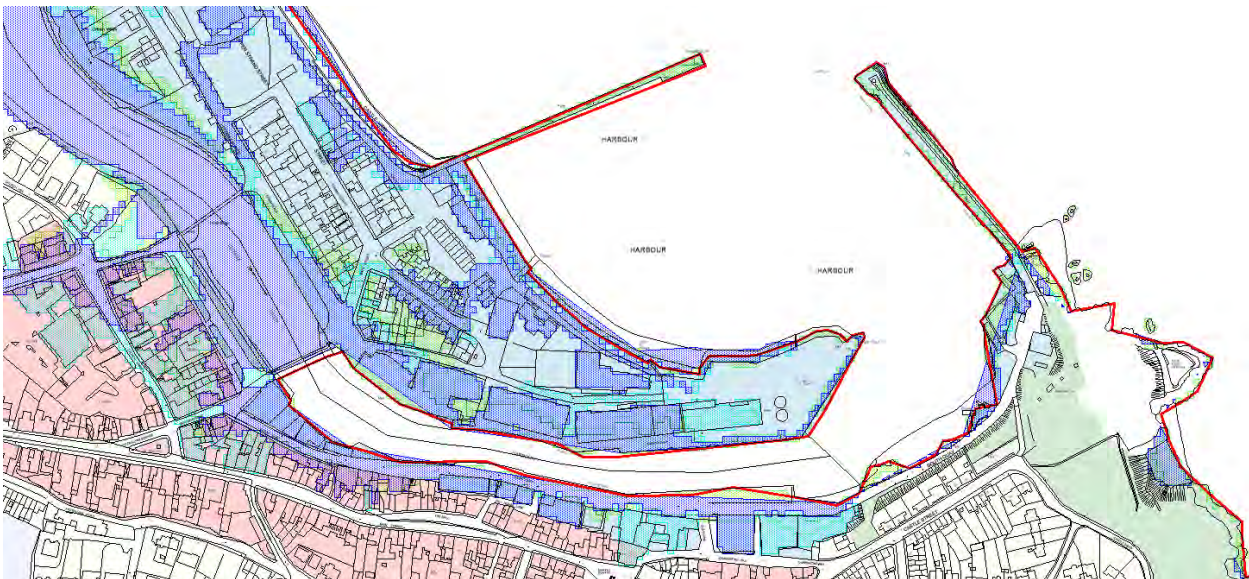


The NCFHM identifies additional areas at risk of flooding in this area. These lands are proposed for the following land uses: OS1, TC and WZ

<p>OS1: Open Space</p>	<p>To protect and enhance existing and provide for recreational open space</p>	<p>Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.</p>
<p>TC: Town Centre</p>	<p>To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use.</p>	<p>To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure and residential uses, while delivering a quality urban environment, with emphasise on regeneration, infill town and historic centre conservation; ensuring priority for public transport where applicable, pedestrians and cyclists, while minimising the impact of private car based traffic and enhance and develop the existing centre's fabric.</p>
<p>WZ: Waterfront</p>	<p>To provide for the development and improvement of the waterfront zone, to facilitate the continuation and development of existing employment / maritime / port, residential, public utilities, and community / recreational uses</p>	<p>To facilitate the continued and more intensive / efficient use of the existing employment, maritime and port uses ; To maintain existing and support the development / improvement of high quality community, amenity, leisure and tourism uses; To facilitate retail uses at a scale that do not undermine the role of the existing Town Centre;</p>

and to promote and provide for new residential, tourism and other mixed-use development.

To facilitate the provision of high quality new residential developments at appropriate high densities with excellent layout and design, well linked to the existing town centre, community facilities and water amenities.



Strategic Flood Risk Assessment

Land zoning	OS1 ' Open Space'
Development Type	Water Compatible
Flood Zone	A and B
Requirement for Justification Test	No

Land zoning	TC 'Town Centre'
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes

Plan-Making Justification Test

The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031

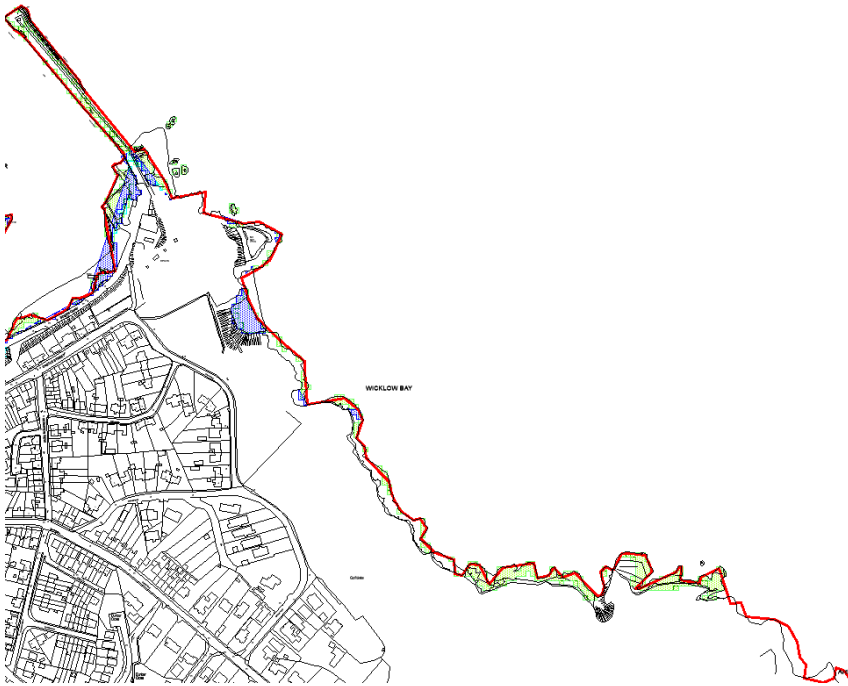
The zoning or designation of the lands for the

particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
<p>These lands are currently developed for a range of 'town centre' uses including commercial, retail, residential etc, this being the historic centre of the town.</p> <p>Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.</p>	

Land zoning	WZ – Waterfront
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth

	rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
Some areas within this already developed zone along the Wicklow town quays and harbour have been identified as being located in Flood Zone A and B with a high and moderate probability of flooding from coastal sources.	
Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.	

3.8 Wicklow Bay

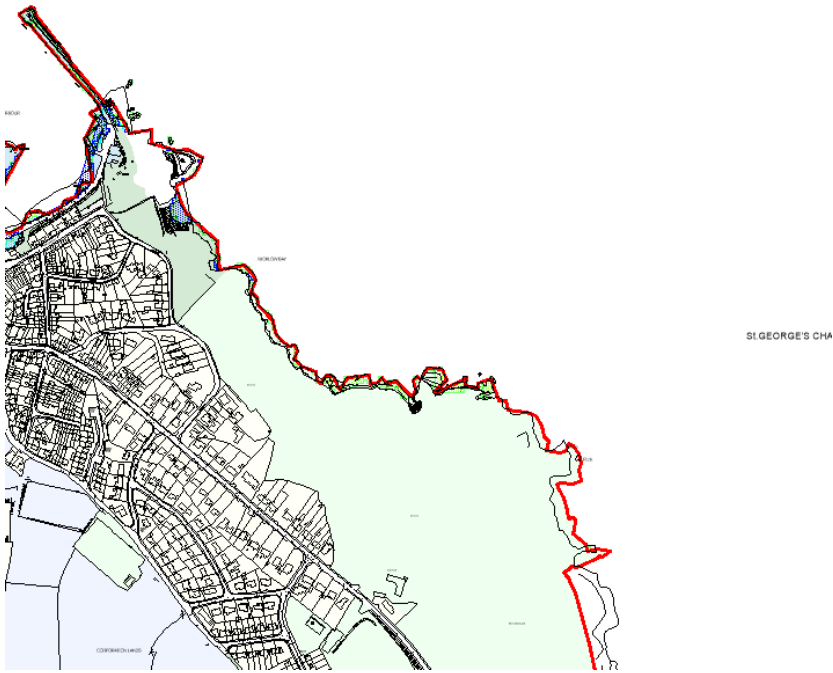


The NCFHM identifies additional areas at risk of flooding along the coast to the south of Wicklow harbour. These lands are proposed for the following land uses: OS1 and AOS.

OS1: Open Space	To protect and enhance existing and provide for recreational open space	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.
AOS: Active Open Space	To protect and enhance existing and provide for new active open space	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for the development of new high quality active recreational areas.

Strategic Flood Risk Assessment

Land zoning	OS1 ' Open Space'
Development Type	Water Compatible
Flood Zone	A and B
Requirement for Justification Test	No



Strategic Flood Risk Assessment

Land zoning	OS1 'Open Space' and AOS 'Active Open Space'
Development Type	Water Compatible
Flood Zone	A and B
Requirement for Justification Test	No

4.0 Assessment of CE's recommended amendments

The purpose of this assessment is to identify and evaluate any locations proposed for new zoning or zoning changes that are located in flood risk zones.

The following proposed amendments relate to zoning changes:

Amendment No.	Proposed land zoning change	Flood Zone	Requirement for Justification Test
18	Unzoned - WZ	A & B	Y
21	PU – RN2	C	N
22	CE – RN2	C	N
23	RN2 – RN1	C	N
26	VC - CC	A & B	Y
27	RE - VC	A & B	* Already assessed in Section 4.2 of SFRA
28	OS1 - CE	C	N
29	OS1 – RN1	C	N
30	RE - CE	C	N
31	Unzoned - WZ	A & B	Y
32	OS1 – OS2	A & B	N – water compatible

ZONING	OBJECTIVE	DESCRIPTION
RN1: New residential Priority 1	To provide for new residential development and supporting facilities during the lifetime of the plan.	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
RN2: New residential Priority 2	To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement after the activation of Priority 1 lands.	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
VC: Village Centre	To provide for the development and improvement of appropriate village centre uses in areas that are secondary or subsidiary area to the main town centre.	To develop and consolidate the village centre zones in an appropriate manner and to an appropriate scale and with such uses as specified in each town plan given their roles as a secondary or subsidiary area to the main town centre.
CC: Wicklow County Campus	To provide for educational facilities, research and development (R&D), and enterprise development uses.	To develop Wicklow County Campus in conjunction with the SETU and other stakeholders as a third level education facility and as a centre of excellence for enterprise development, education, training, research and development, with a focus on the film, food and renewable energy sectors. This will entail the development of appropriate infrastructure and facilities including classrooms, lecture theatres, labs, workshops, kitchen units, offices, etc and other necessary student facilities.
WZ: Waterfront	To provide for the development and improvement of the waterfront zone, to facilitate the continuation and development of existing employment / maritime / port, residential, public utilities, and community / recreational uses and to promote and provide for new residential, tourism and other mixed-use development.	To facilitate the continued and more intensive / efficient use of the existing employment, maritime and port uses ; To maintain existing and support the development / improvement of high quality community, amenity, leisure and tourism uses; To facilitate retail uses at a scale that do not undermine the role of the existing Town Centre; To facilitate the provision of high quality new residential developments at appropriate high densities with excellent layout and design, well linked to the existing town centre, community facilities and water amenities.
CE: Community & Education	To provide for civic, community and educational facilities	To facilitate the development of necessary community, health, religious, educational, social and civic infrastructure.
OS1: Open Space	To protect and enhance existing and provide for recreational open space	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and

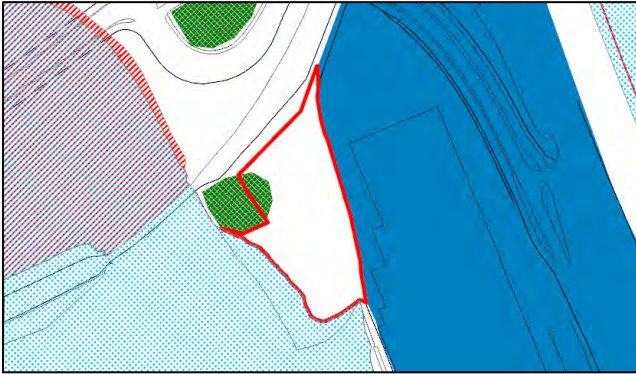
ZONING	OBJECTIVE	DESCRIPTION
		casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.
OS2: Natural Areas	To protect and enhance existing open, undeveloped lands	To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.
PU: Public Utility	To maintain lands providing services infrastructure	To allow for lands to be designated for public utilities such as waste water treatment plants, large ESB sub-stations, gasworks etc

Proposed Amendment No.'s 14 & 26 (same change)

No. 31

Amend zoning of lands from 'unzoned' and 'OS2 – Natural Areas' to 'WZ Waterfront Zone' and 'OS2 – Natural Areas' as illustrated below:

Change from:



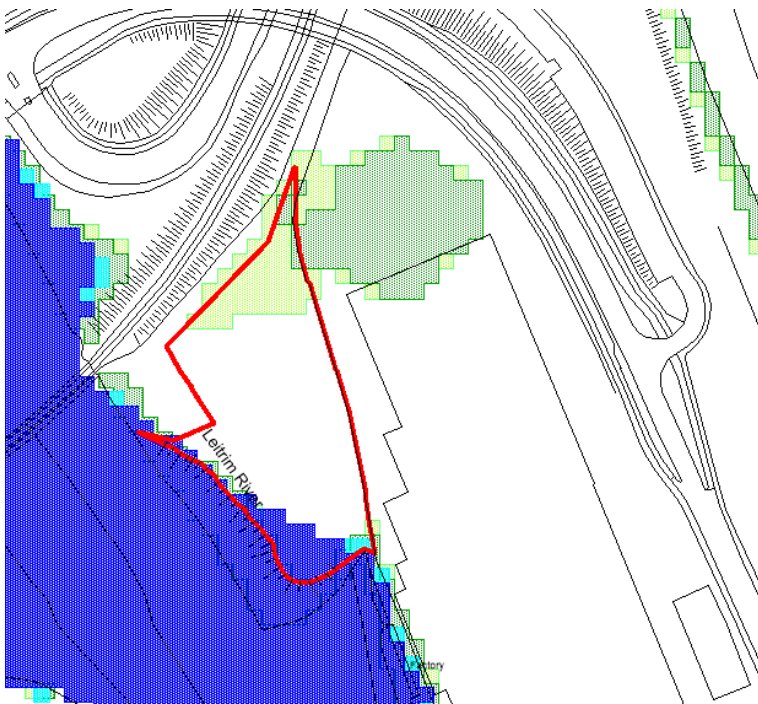
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




In addition, via Proposed Amendment No. 18, to identify this area as part of the Waterfront Zone 'Regeneration Area'



Identification of flood risk



Map key:

-  Flood Zone A shown in original SFRA
-  Flood Zone B shown in original SFRA
-  Flood Zone A NCFHM
-  Flood Zone B NCFHM
-  Subject Site

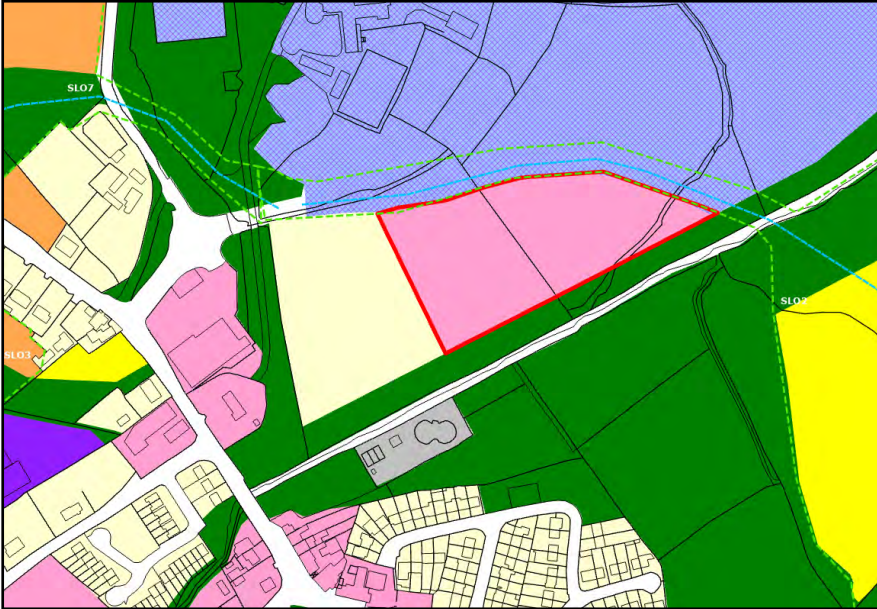
Land zoning	WZ – Waterfront (Regeneration Area)
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this

	settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	Yes
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are already developed
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: PASSED	
Recommendation	
<p>These lands are identified as being located in Flood Zone A and B with a high and moderate probability of flooding from coastal sources.</p> <p>These lands are already developed as a hard surface commercial yard associated with the former factory on the lands. The lands in question were previously unzoned solely due to the fact that they were located within a European Site (The Murrough SPA). The SPA boundary has now been amended by the NPWS.</p> <p>Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development will be permitted for the lands which are identified as being at risk of flooding within that site.</p>	

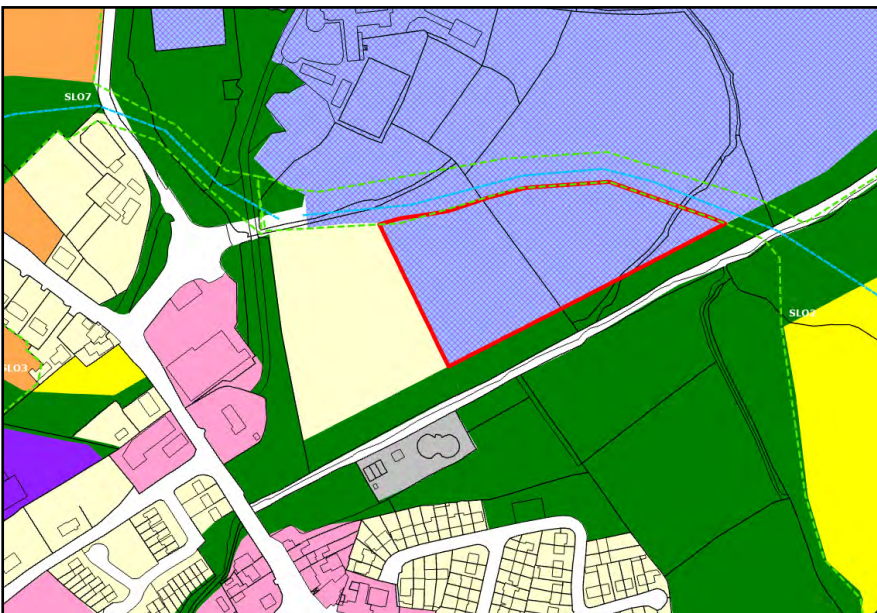
Proposed Amendment No. 26

Amend zoning of lands from 'VC Village Centre' to 'WCC-Wicklow County Campus' as illustrated below:

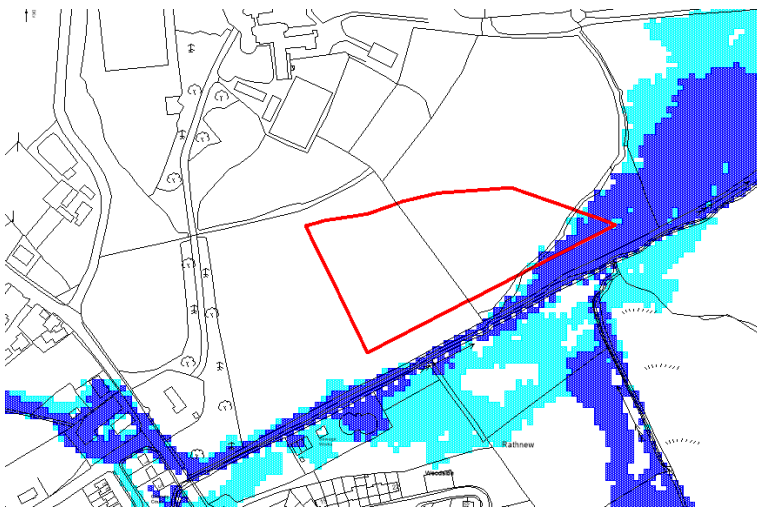
Change from:








Change to:



Identification of flood risk



Map key:

-  Flood Zone A shown in original SFRA
-  Flood Zone B shown in original SFRA
-  Flood Zone A NCFHM
-  Flood Zone B NCFHM
-  Subject Site

Land zoning	CC – Clermont Campus
Development Type	Highly vulnerable
Flood Zone	A and B
Requirement for Justification Test	Yes
Plan-Making Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The settlement strategy as contained within the Eastern & Midland Regional Assembly’s Regional Spatial & Economic Strategy 2019-2031 designates ‘Wicklow-Rathnew’ as a ‘Key Town’ in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
(ii) Comprises significant previously developed and/or under-utilised lands;	No
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Yes
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	Assessment of flood risk has been incorporated into the Plan SEA Process
Conclusion	
Justification Test: FAILED	
Recommendation	
<p>These lands currently form part of the Clermont Campus parcel in the ownership of the Local Authority. Under the previous development plan for the area the lands were zoned 'Clermont Campus'. The proposed change is a reversion to the previous zoning. In accordance with the Clermont Masterplan, these lands are identified as suitable for enterprise / innovation park type development, which is a 'less vulnerable' use.</p> <p>Only a very minor part of the overall proposed zone is located within an area identified as at risk of flooding (south east corner close to a watercourse). The zoning objective does not proscribe exactly where in the zone development should occur and the CC zone is sufficiently large to provide for the development of desired uses while avoiding development in the at risk area. Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with the relevant policies and objectives in the County Development Plan and Wicklow Town-Rathnew Local Area Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.</p> <p>Therefore, the Wicklow County Campus (CC) zoning objective is considered acceptable.</p>	