

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)

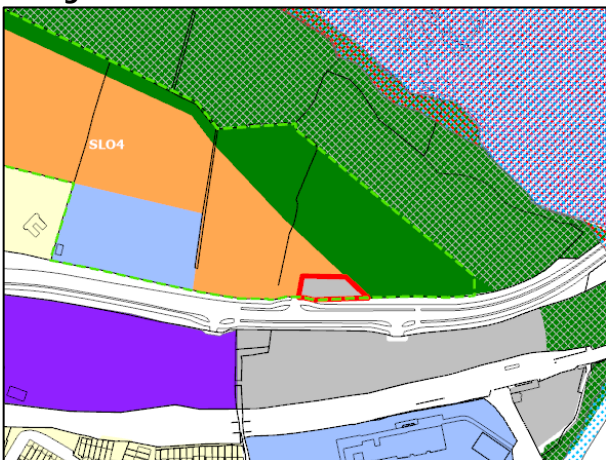
3. Amend text and map for SLO4 as follows

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:

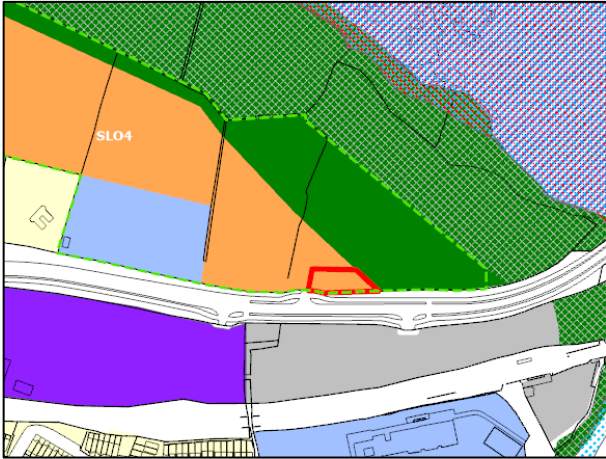
~~*To provide a new car park with access onto the Port Access Road for a minimum of 50 cars, with cycle parking facilities on lands zoned PU.*~~

- *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

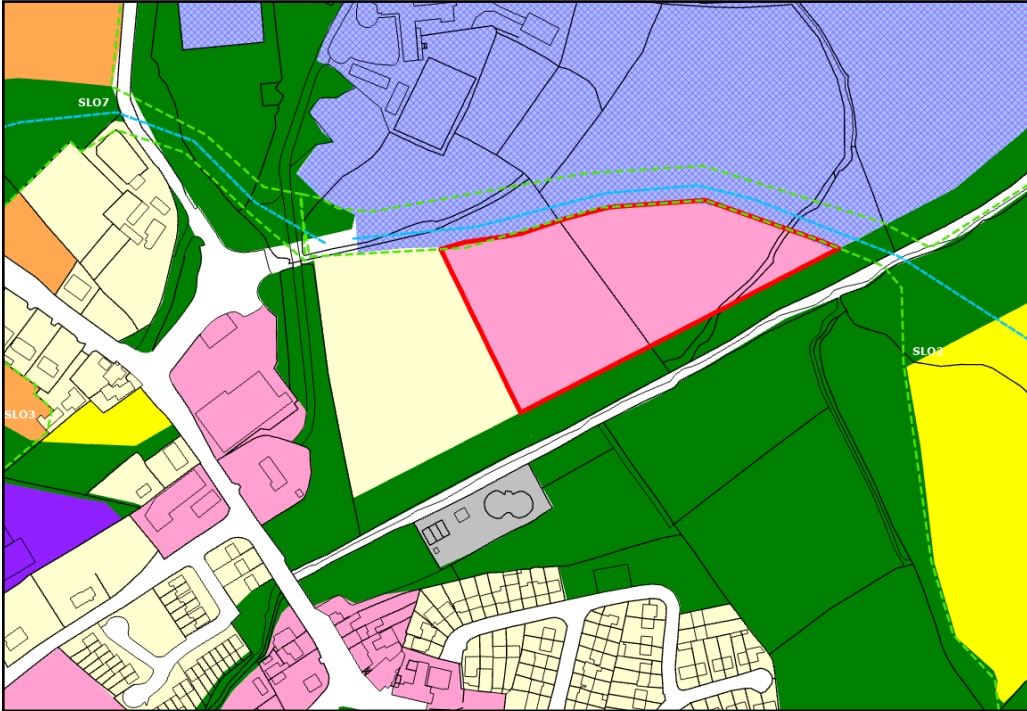
1. Add new objectives as follows:

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:*

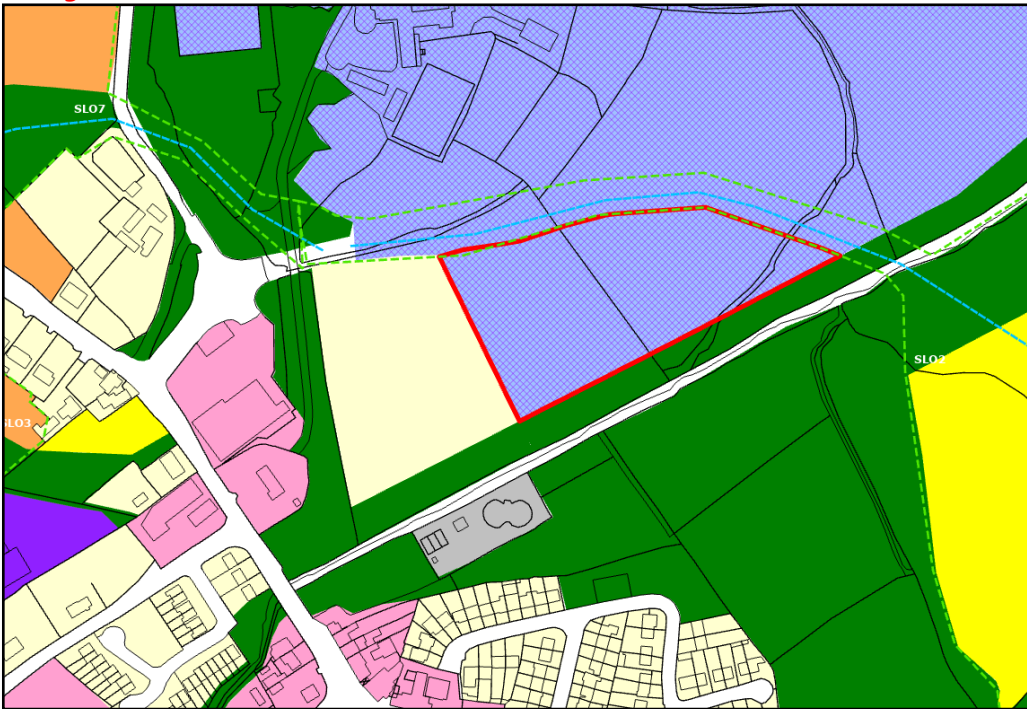
- *enhancing the urban realm in the village centre and creating new urban spaces, in order to provide for a welcoming, safe and vibrant place for the community to meet and interact;*
- *investment in pedestrian and cyclist accessibility and safety, in order to ensure excellent linkages between the village 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:

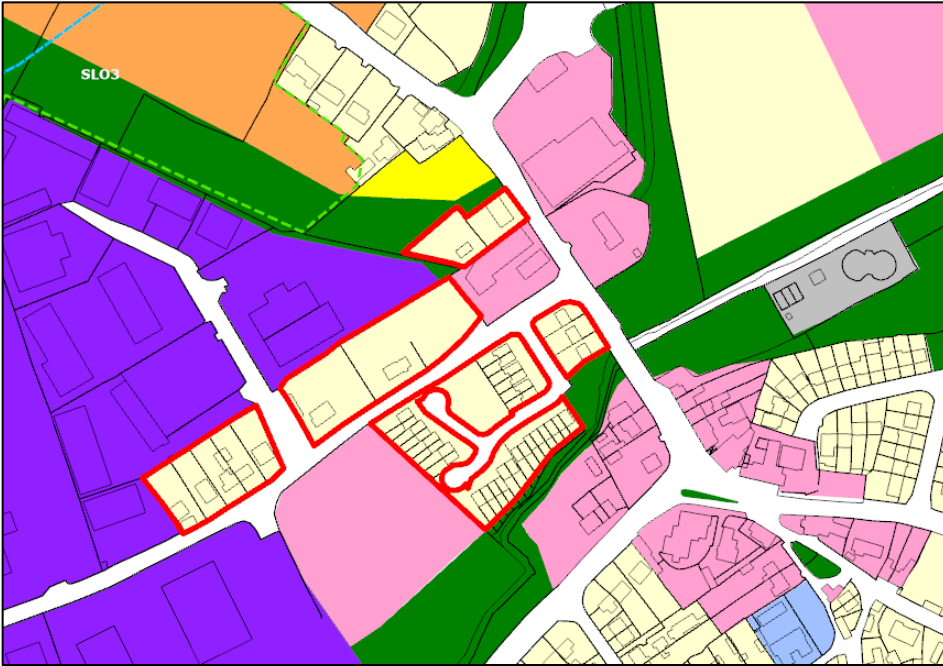


Change to:

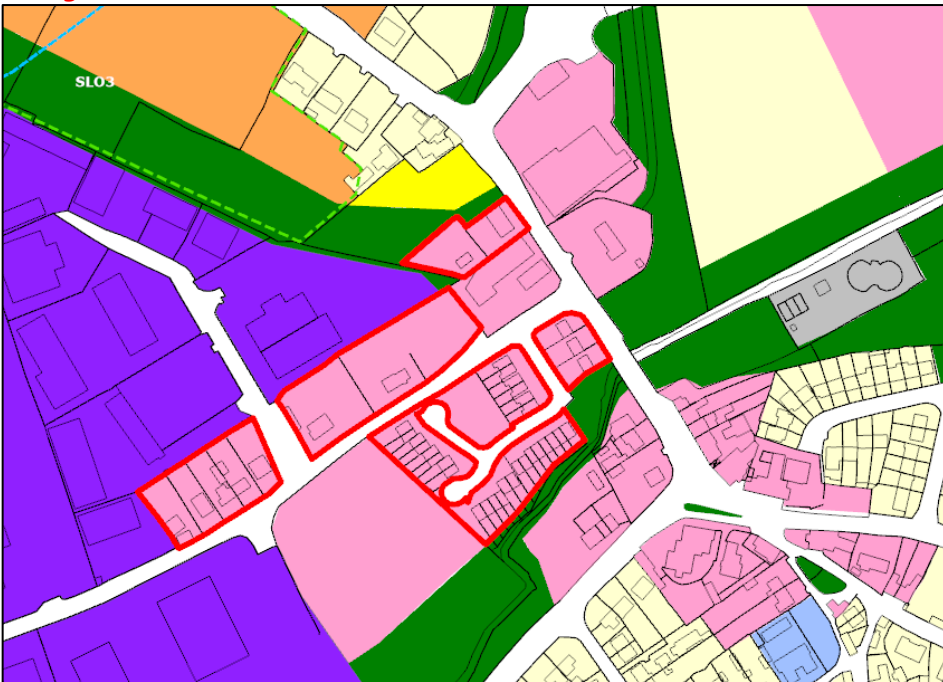


3. Change zoning of lands in Rathnew centre from RE to VC

Change from:



Change to:



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

WTR OP5 – Charvey Lane

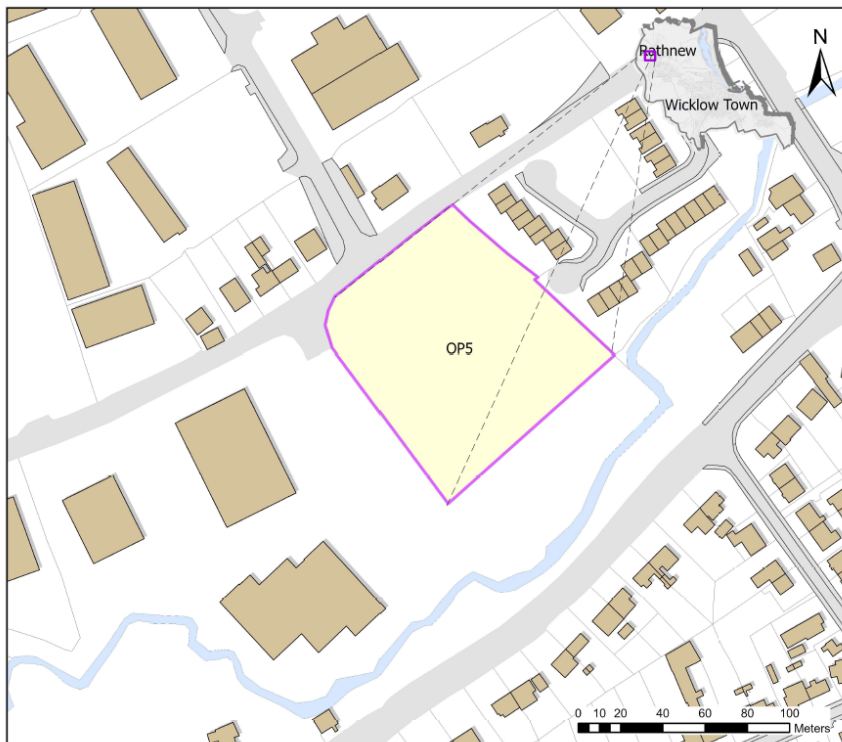
OP5 – Charvey Lane

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

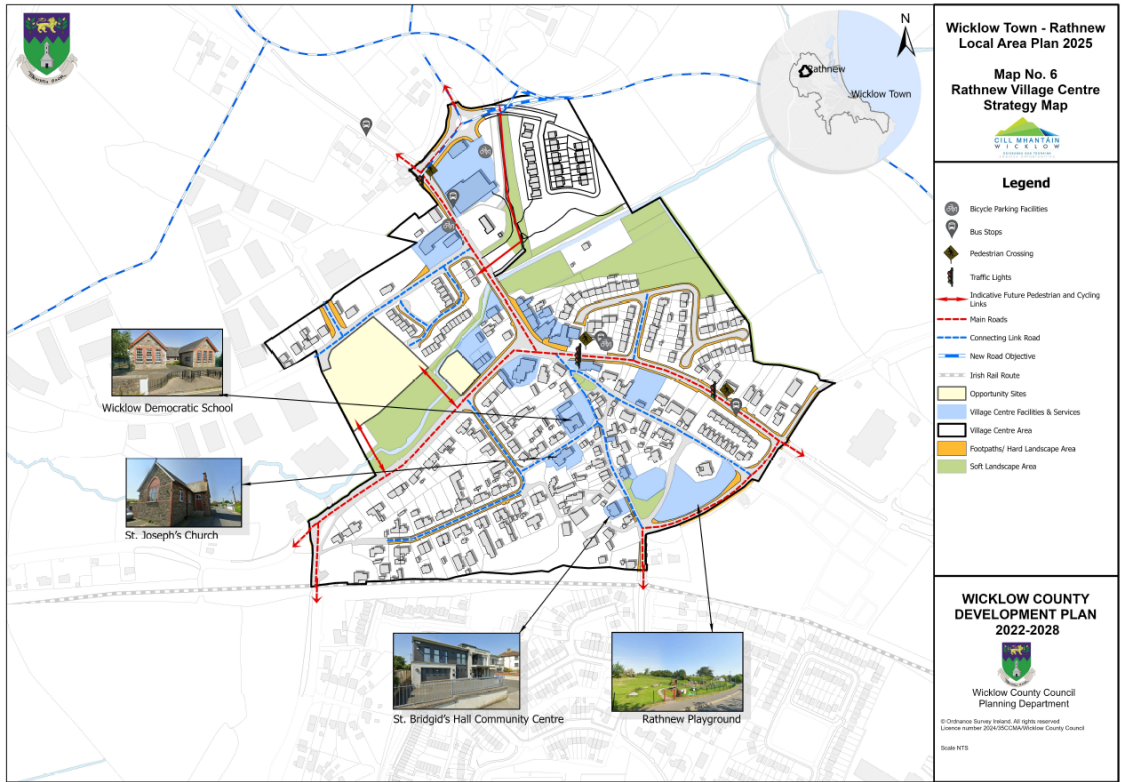
- *To provide for a high density mixed use development on lands zoned VC which may include commercial, retail, retail services, residential, community and cultural uses;*
- *Buildings shall be designed to the highest quality that provides for a strong street frontage along Charvey Lane, and maximum supervision 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

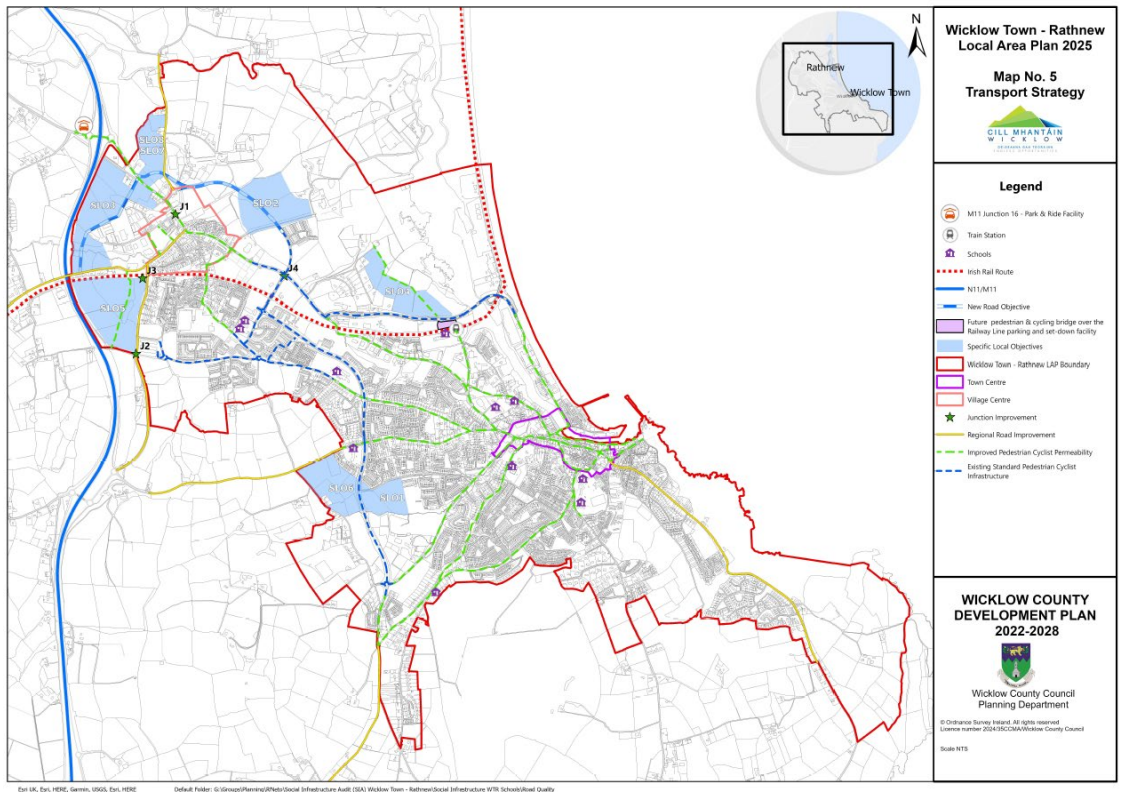
Proposed Amended Draft Rathnew Village Centre Map



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>
<p>Chief Executive Response</p>
<p>All maps / drawings can be reviewed to include opportunity sites and clearer labelling / numbering.</p>
<p>Chief Executive's Recommendation</p>
<p>On adoption of the final plan, all maps to be improved with respect to labelling, site numbering etc</p>

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 its finest asset which has greatly influenced its 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

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.

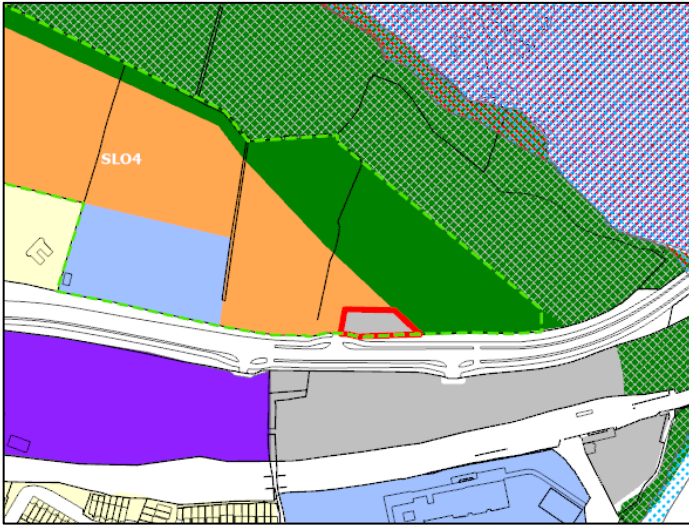
Chief Executive's Recommendation

Amend text and map for SLO4 as follows

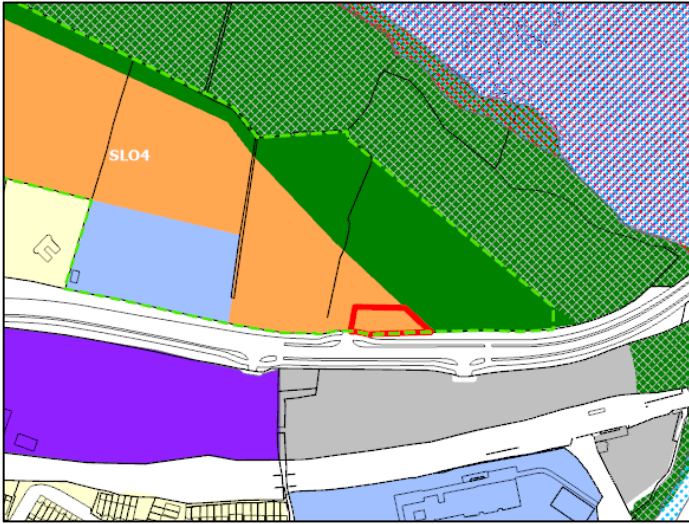
This SLO is located in the townland of Bollarney North. The SLO comprises New Residential (RN – Priority 2), Open Space (OS1), Public Utility (PU) and Community/ Education (CE). Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- ~~*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 Eireann.

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

<p>Item 2 Wicklow County Development Plan</p>
<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>
<p>Chief Executive Response</p>
<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>
<p>Chief Executive Recommendation</p>
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031</p>

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

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	
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.	
Chief Executive's Recommendation	
No change to draft Wicklow Town – Rathnew Local Area Plan 2025 -2031	

<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>'. 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.
<ul style="list-style-type: none"> ▪ 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. <p>Department of Transport can assist with appropriate text in the development plan regarding integrated, accessible public transport if desirable.</p>	
Chief Executive Response	
<p>The CE agrees fully with all of the point raised with respect to improving accessibility and mobility for all in society.</p> <p>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.</p>	
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	Bollarne 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