



Draft Wicklow Town - Rathnew LAP Submission - Report

Who are you:	State Body
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Topic

Overall Vision and Strategy of LAP

Submission

EMRA submission to the Draft Wicklow Town-Rathnew LAP 2025 (see attached)

File

EMRA submission on the draft Wicklow Town and Rathnew LAP 2025.pdf, 0.47MB



Draft Wicklow Town – Rathnew Local Area Plan 2025

The Eastern and Midland Regional Assembly notes the publication of the draft Wicklow Town – Rathnew Local Area Plan (LAP) 2025 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at its meeting of 8th November 2024.

1.0 Legislative Context

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.

2.0 Regional Spatial and Economic Strategy (RSES)

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 Wickow-Rathnew’s role as a hub for tourism, training and education.

3.0 Submission

At the outset, the Assembly would like to acknowledge the extensive work that Wicklow County Council have carried out in order to prepare the draft LAP and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

The draft LAP outlines the strategic policy framework that highlights how the plan will be informed by a hierarchy of planning guidance, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region and the Wicklow County Development Plan. The structure and content of the draft LAP constitutes the following headings:

1. Introduction
2. Overall Vision and Strategy
3. Residential Development
4. Economic Development

5. Key Regeneration Areas
6. Centres and Retail, including Opportunity Sites
7. Community Development
8. Tourism
9. Infrastructure
10. Heritage, Biodiversity and Green Infrastructure
11. Zoning and Land Use

The Assembly considers that these areas of focus satisfactorily align with the three key principles of the RSES (Healthy Placemaking, Climate Action and Economic Opportunity) and the sixteen Regional Strategic Outcomes (RSOs), which are outlined in Section 2.3 of the RSES.

3.1 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).

3.2 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.”*

3.3 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.

3.4 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.

3.5 Key Regeneration Areas

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.

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.

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.

3.6 Centres and Retail, including Opportunity Sites

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.

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.

3.7 Community Development

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.

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.

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’*.

3.8 Tourism

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.’*

3.9 Infrastructure

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.

The RSES highlights the travel and infrastructure challenges facing Wicklow Town – Rathnew, *‘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’*. 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.

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.

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.

The Assembly also notes objective WTR75 of the draft LAP which supports '*completion of the Rathnew Inner Relief Road*' and '*improvement of the road connections between the Wicklow Town – Rathnew and M11*' as well as objective WTR78 – '*to continue to work with Iarnród Éireann and the NTA on the improvement of mainline train services to Wicklow Town station and to extend the DART services to Wicklow Town station*'.

3.10 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.

3.11 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.

3.12 SEA, AA and SFRA

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).

The SEA Environmental Report sets out an assessment of the environmental effects in combination with the wider planning framework arising from the draft LAP to provide a clear understanding of the likely environmental consequences of decisions arising from the LAP. Regarding mitigation, the draft LAP states that by integrating all related recommendations into the draft LAP, the Council has ensured that both the beneficial environmental effects of implementing the LAP have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset.

The draft LAP is also subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has been prepared which states that having incorporated mitigation measures into the draft LAP, it has been demonstrated that the draft LAP is not foreseen to give rise to any significant adverse effects to

designated European sites, alone or in combination with other plans or projects. This demonstration has been made in view of the conservation objectives of the habitats and/or species, for which these sites have been designated. The Natura Impact Report will, alongside any other inputs from the plan preparation/AA process, inform the Competent Authority when it undertakes the final AA determination at adoption of the LAP. The AA process is ongoing and will inform and be concluded at adoption of the LAP.

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.

4.0 Recommendations

The Regional Assembly would like to acknowledge the extensive work that Wicklow County Council has carried out in order to prepare the draft Wicklow Town – Rathnew Local Area Plan 2025 and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

The Regional Assembly advises that Wicklow County Council pay particular attention to the following issues in the preparation of the Wicklow Town - Rathnew Local Area Plan 2025 in order to ensure consistency with the RSES, and makes the following recommendations:

Economic Development

- 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.

Key Regeneration Areas

- 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.

Reason: In the interest of clarity.

Heritage, Biodiversity and Green Infrastructure

- 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.

Climate Action

- 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.

5.0 Conclusion

It is considered that the draft Wicklow Town-Rathnew Local Area Plan 2025 is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031 and would be further enhanced by addressing the recommendations set out above.

It should be noted that the officials of the Eastern and Midland Regional Assembly are available to discuss the matters raised and the Assembly welcomes further opportunities to engage in the statutory process of the making of the draft Wicklow Town- Rathnew Local Area Plan 2025.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
11th November 2024