



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	State Body
Name:	Department of the Environment, Climate and Communications
Reference:	DWTRLAP-110139
Submission Made	November 20, 2024 11:18 AM

Topic

Overall Vision and Strategy of LAP

Submission

Please see attached a submission on behalf of the Department of the Environment, Climate and Communications.

File

2024-11-20 DECC Submission_Draft Wicklow Town-Rathnew LAP 2025-2031.pdf, 0.47MB



Administrative Officer,
Planning Section,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
Co. Wicklow
A67 FW96

20th November 2024

RE: Publication of the Draft Wicklow Town-Rathnew Local Area Plan 2025-2031

Dear Sir/Madam,

Further to the notice given to this Department of the publication of an invitation for submissions on the Draft Wicklow Town-Rathnew LAP (**the draft LAP**), the following submission outlines its observations in respect of a number of policy areas for which the Department is responsible.

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.

Wicklow County Development Plan (WCDP) 2022-2028

The Planning and Development Acts 2000 (as amended) require the LAP to be consistent with the objectives of the Development Plan and its Core Strategy. In this regard, DECC note the positive objectives of the WCDP 2022-2028, which places climate action as a strategic principle of the plan. Objectives at County level for climate action, renewable energy infrastructure, communications infrastructure inter alia should be reflected by objectives and actions of the LAP, as relevant for the plan area, to support implementation of national, regional and county level policy on these themes.

The following recommendations, which are reflected in the Department's previous submission for the Pre-Draft public consultation for the Wicklow Town-Rathnew LAP, are an opportunity to further strengthen objectives of the LAP.



Climate Action

The Climate Action Plan 2024 (CAP24) 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).

Recommendation 1:

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

National Adaptation Framework

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

Recommendation 2:

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

Local Authority Climate Action Plan

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

Under section 10(2)(n) of the Planning and Development Act 2000 (as amended), a CDP must, when being prepared, take into account the LACAP. While this provision is relevant to County Development Plans, the preparation of the draft LAP provides a positive opportunity to support the implementation of the WCDP 2022-2028 objectives for climate action and the Wicklow LACAP.



It is important that the Wicklow LACAP and related actions are appropriately reflected in the policies and objectives of the draft LAP, thereby ensuring consistency and alignment between both plans.

Recommendation 3:

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

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’.*¹
- *‘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’.*²
- *‘To facilitate and support the development of small-scale electricity generation installations’.*³
- *‘To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required’.*⁴

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.

¹ CPO 16.01, Section 16.3 Energy Infrastructure & Communications Objectives, Chapter 16 Energy & Information Infrastructure, Wicklow County Development Plan 2022-2028

² CPO 16.03, Section 16.3 Energy Infrastructure & Communications Objectives, Chapter 16 Energy & Information Infrastructure, Wicklow County Development Plan 2022-2028

³ CPO 16.15, Section 16.3 Energy Infrastructure & Communications Objectives, Chapter 16 Energy & Information Infrastructure, Wicklow County Development Plan 2022-2028

⁴ CPO 16.18, Section 16.3 Energy Infrastructure & Communications Objectives, Chapter 16 Energy & Information Infrastructure, Wicklow County Development Plan 2022-2028



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).

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)'.*⁵
- *'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'.*⁶
- *'To facilitate retrofitting of existing building with heat saving devices and installations, where permission is required for such works'.*⁷

⁵ Regional Policy Objective 7.40, Eastern and Midlands Regional Spatial & Economic Strategy

⁶ CPO 16.01, Section 16.3 Energy Infrastructure & Communications Objectives, Chapter 16 Energy & Information Infrastructure, Wicklow County Development Plan 2022-2028

⁷ CPO 16.33, Section 16.3 Energy Infrastructure & Communications Objectives, Chapter 16 Energy & Information Infrastructure, Wicklow County Development Plan 2022-2028



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'*.⁸
- 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'*.⁹
- CPO 16.34: *'To support the development of district heating systems, particularly those generating heat from renewable sources.'*¹⁰

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.

⁸ National Strategic Outcome 9, [National Planning Framework](#), Pg 149

⁹ Regional Policy Objective 7.38, Eastern and Midlands Regional Spatial & Economic Strategy

¹⁰ CPO 16.34, Section 16.3 Energy Infrastructure & Communications Objectives, Chapter 16 Energy & Information Infrastructure, Wicklow County Development Plan 2022-2028



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.



Telecommunications

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.

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.

Air Quality

The Department encourages the Local Authority to have regard to the [Clean Air Strategy for Ireland](#), bearing in mind the impacts of measures adopted in the draft CDP on current and future air quality.

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.



Conclusion

We would be grateful if Wicklow County Council would take these matters under consideration in the drafting of the Wicklow Town-Rathnew Local Area Plan 2025-2031.

Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of the Environment, Climate and Communications, relevant to the preparation of this plan.

Officials can provide support to the County Councils in the following areas:

- Climate Action, Engagement and Adaptation
- Energy Generation and Networks
- Energy Use / Demand in the Built Environment
- The Circular Economy
- Communications
- Environmental Policy and Governance
- Waste and Natural Resources (including geosciences)
- UN Agenda 2030 and the Sustainable Development Goals (SDGs)

Please direct any requests for further consultation to PlanningNotifications@decc.gov.ie

Yours Sincerely,

Planning Advisory Division

Department of the Environment, Climate and Communications

Encl.

1. List of Recommendations
2. Supplementary Submission from Geological Survey Ireland.



List of Recommendations

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Administrative Officer
Planning Department
Wicklow County Council
Station Road
Wicklow

04 November 2024

Re: Draft Wicklow Town-Rathnew Local Area Plan 2025

Your Ref: n/a

Our Ref: 24/373 [c.f. 23/193]

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and interpretation and gather various data for that purpose. Please see our [website](#) for data availability.

With reference to your email received on the 18 October 2024, concerning the Draft Wicklow Town-Rathnew Local Area Plan 2025, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

We welcome use of our Geoheritage, Landslides, Groundwater Vulnerability, Aquifers, and Coastal Vulnerability Index maps and datasets within the SEA Report (Appendix 5).

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

Trish Smullen
Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data are made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases these data are a baseline or starting point for further site specific assessments.