

Draft Wicklow Town-Rathnew Local Area Plan 2025

Strategic Flood Risk Assessment

Table of Contents

1.	FORE	WORD	& DISCL	AIMER
----	------	------	---------	--------------

- 2.1 Introduction
- 2.2 Flood Risk Analysis Stages
- 2.3 Definition of Flood Zones
- 2.4 Sources of Information
- 2.5 Wicklow & Ashford Flood Relief Scheme
- 2.6 The Sequential Approach and Justification Test

3. STAGE 1 FLOOD RISK IDENTIFICATION

- 3.1 Risk Identification
- 3.2 Indicators of Flood Risk

4. STAGE 2 FLOOD RISK ASSESSMENT

- 4.1 Flood Risk Assessment
- 4.2 Flood Risk Zones and Justification Test for Wicklow Town-Rathnew
- 4.3 Mitigation Objectives

5. FLOOD RISK & CLIMATE CHANGE

6. FLOOD MAPPING

1.1 FOREWORD

This is the Strategic Flood Risk Assessment (SFRA) for the Draft Wicklow Town-Rathnew Local Area Plan (LAP), which has been prepared and informed by 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009).

The purpose of the SFRA primarily is to provide an assessment of all types of flood risk to inform land-use planning decisions in the LAP. The SFRA enables the local authority to undertake the sequential approach, including the justification test, allocate appropriate sites for development and identify how flood risk can be reduced as part of the local area plan process. At each stage of the LAP process the Elected Members take into account the findings of the SFRA (and any addenda) as appropriate. The SFRA can also be used to assist other planning decisions (e.g. development management) however in any instance a site-specific flood risk assessment may be required when assessing a planning application for development.

After public display of the draft LAP and accompanying SFRA ends, the Chief Executive will prepare a report on the submissions received during the display period and will submit it to the Elected Members for their consideration. Any submissions regarding flooding will be addressed and added as an addendum to this report.

On adoption of the LAP, any SFRA Addenda which may supplement the original SFRA on the draft LAP and along with this 'Foreword' is the 'Strategic Flood Risk Assessment', which accompanies the adopted Wicklow Town-Rathnew Local Area Plan 2025.

1.2 DISCLAIMER

Wicklow County Council makes no representations, warranties or undertakings about any of the information provided in this assessment and associated maps including, without limitations, on its accuracy, completeness, quality or fitness for any particular purpose. To the fullest extent permitted by applicable law Wicklow County Council nor any of its members, offices, associates, consultants, employees, affiliates, servants, agents or other representatives shall be liable for loss or damage arising out of, or in connection with, the use of, or the inability to use, the information provided in this assessment including but not limited to, indirect or consequential loss or damages, loss of data, income, profit, or opportunity, loss of, or damages to, property and claims of third parties, even if Wicklow County Council has been advised of the possibility of such loss or damages, or such loss or damages were reasonably foreseeable. Wicklow County Council reserves the right to change the content and / or presentation of any of the information provided in this report at their sole discretion, including these notes and disclaimer. This disclaimer, guidance notes and conditions of use shall be governed by, and construed in accordance with, the laws of the Republic Of Ireland. If any provision of this disclaimer, guidance notes and conditions of use shall be unlawful, void or for any reason unenforceable, that provision shall be deemed severable and shall not affect the validity and enforceability of the remaining provisions.

1.3 UNCERTAINTY

Although great care and modern, widely-accepted methods have been used in the preparation of this assessment there is inevitably a range of inherent uncertainties and assumptions made during the estimation of design flows and the construction of flood models.

1.4 BEST AVAILABLE INFORMATION

There has been a wide range of datasets utilised in the production of this assessment which are constantly changing and subsequently the analysis of these datasets is only correct at the time of assessment.

It is important to note that compliance with the requirements of 'The Planning System and Flood Risk Management- Guidelines for Planning Authorities' is a work is progress and is currently based on emerging and incomplete data as well as estimates of the locations and likelihood of flooding. As a result, this Strategic Flood Risk Assessment was based on available information at the time of assessment.

All information in relation to flood risk may be substantially altered in light of future data, new methodologies and/or analysis. As a result, all landowners and developers are advised that Wicklow County Council can accept no responsibility for losses or damages arising due to assessments of the vulnerability to flooding of lands, uses and developments. Owners, users and developers are advised to take all reasonable measures to assess the vulnerability to flooding of lands in which they have an interest prior to making planning or development decisions.

In the development management process it is the responsibility of the applicant to gather relevant information sufficient to identify and assess all sources of flood risk for the development proposal. Any new data and analysis carried out after the time of assessment for this SFRA should be used in conjunction with this SFRA for development proposals.

2. BACKGROUND INFORMATION

2.1 Introduction

In accordance with the 'Planning System and Flood Risk Management: Guidelines for Planning Authorities', a Strategic Flood Risk Assessment (SFRA) of the draft 'Wicklow Town-Rathnew Local Area Plan 2025' has been undertaken.

The 'Planning System and Flood Risk Management – Guidelines for Planning Authorities' were issued in 2009 by the Minister for the Environment, Heritage and Local Government and the OPW under Section 28 of the Planning and Development Act 2000 (as amended). The purpose of the Flood Risk Guidelines is to ensure that, where relevant, flood risk is a key consideration for Planning Authorities in preparing development plans and local area plans and in the assessment of planning applications. The Flood Risk Guidelines introduce mechanisms for the incorporation of flood risk identification, assessment and management into the planning process. Implementation of the Flood Risk Guidelines is intended to be achieved through actions at the national, regional, local authority and site-specific levels. Planning Authorities and An Bord Pleanála are required to have regard to the Flood Risk Guidelines in carrying out their functions under the Planning Acts.

The key planning principles of the Flood Risk Guidelines are to:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water runoff;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders;
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

Clarification of advice contained in the Flood Risk Guidelines was issued in August 2014 (Circular PL2/2014) referring to two matters. The first was to ensure planning authorities are prudent in the use the draft PFRA or CFRAM flood maps as the sole basis for deciding on planning applications, to make use of site inspections and/or knowledge of local areas, to request a site-specific flood risk assessment by an appropriately qualified engineer where appropriate and to also generally use their professional judgement in this regard.

The second matter amends the text of the guidelines to indicate that during the preparation of the development plan (or a variation of a development plan) in areas located in flood zone A and B, where the existing use zoning is classified as a "vulnerable use", the planning authority should consider if the existing use zoning of the 'vulnerable use' is still the appropriate zoning for the area. Where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced. With regard to the second matter, the text amendment is noted; where the existing use zoning is in flood zone A/B and is considered a vulnerable use, where necessary a mitigation objective has been

incorporated into the local plan and/or an appropriate zoning has been applied for the existing use. Any flood risk management measures are to be considered at the development management stage.

The guidelines aim to facilitate the transparent consideration of flood risk at all levels of the planning process, ensuring a consistency of approach throughout the country. SFRAs therefore become a key evidence base in meeting these objectives.

The Guidelines work on a number of key principles, including:

- Adopting a staged and hierarchical approach to the assessment of flood risk; and
- Adopting a sequential approach to the management of flood risk, based on the frequency of flooding (identified through Flood Zones) and the vulnerability of the proposed land use.

2.2 Flood Risk Analysis Stages

The Flood Risk Guidelines recommend that a staged approach should be adopted when analysing flood risk; carrying out only such assessment stage as is needed for the purposes of decision-making. All stages of flood risk assessment may not be needed. This will depend on the level of risk and the potential conflict with proposed development and the scale of mitigation measures being proposed. The Flood Risk Guidelines state that both Stage 1 'Flood Risk Identification' and Stage 2 'Initial Flood Risk Assessment' are required to be undertaken in strategic flood risk assessment for a City or Town within a county plan. On the basis that Wicklow Town & Rathnew are settlements within the Wicklow County Development Plan 2022-2028, and that the Wicklow Town-Rathnew Local Area Plan will be consistent with that County plan, the Strategic Flood Risk Assessment shall proceed to Stage 1 and Stage 2.

A Staged Approach to Flood Risk Assessment

Stage 1 Flood Risk Identification

To identify whether there may be any flooding or surface water management issues related to either the area of regional planning guidelines, Development Plans and Local Area Plans or a proposed development site that may warrant further investigation at the appropriate lower level plan or planning application level. To suggest measures to be integrated into the CDP/LAP that will contribute towards both flood risk management in the county and compliance with the Flood Risk Guidelines.

Stage 2 Initial Flood Risk Assessment

To confirm sources of flooding that may affect a plan area or proposed development site, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve preparing indicative flood zone maps. Where hydraulic models exist, the potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment should be scoped.

Stage 3 Detailed Flood Risk Assessment

To assess flood risk issues in sufficient detail and to provide a quantitative appraisal of potential flood risk to a proposed or existing development or land to be zoned, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

Source: DoEHLG The Planning System and Flood Risk Management Guidelines

2.3 Definition of Flood Zones

In the 'Planning System and Flood Risk Management: Guidelines for Planning Authorities', 'Flood Zones' are used to indicate the likelihood of a flood occurring. These zones indicate a high, moderate or low risk of flooding from fluvial or coastal sources and are defined as follows:

Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding);

Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 years and 1% or 1 in 1000 years for river flooding and between 0.1% or 1 in 1000 years and 0.5% or 1 in 200 years for coastal flooding);

Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 years for both river and coastal flooding). Flood Zone C covers all areas of the plan which are not in zones A and B; hence it is not highlighted on the FRA maps.

The flood zones described above are indicative of river and coastal flooding only. They should not be used to suggest that any areas are free from flood risk, since they do not include the effects of other forms of flooding such as from groundwater or artificial drainage systems.

The indicative Flood Zone map for the plan area is provided in Section 6 of this report.

2.4 Sources of Information

The Wicklow County Development Plan 2022-2028 underwent Strategic Flood Risk Assessment and was adopted on the 12th September 2022. The Council Executive was assisted by JBA Consulting Ltd in the preparation of that SFRA. As part of that process, countywide flood zone mapping was developed based on a collation of various data sources. In preparing the flood risk zones, a precautionary approach was applied, where necessary, to reflect uncertainties in flooding datasets and risk assessment techniques.

This countywide mapping will be utilised as flood mapping for the Strategic Flood Risk Assessment of the Wicklow Town-Rathnew Local Area Plan 2024.

Section 2.1 of the Wicklow County Development Plan 2022-2028 Strategic Flood Risk Assessment outlines the sources of information available at the time of assessment. These sources of information included the following (refer to Section 2.1 of the CDP SFRA for full details):

- Catchment Flood Risk Assessment and Management (CFRAM)
- Flood Risk Management Plans (FRMP)
- National Coastal Protection Strategy Study flood and coastal erosion risk maps
- National Indicative Fluvial Mapping
- Previous Strategic Flood Risk Assessments
- OPW Historic Flood Points and Extents
- OPW Benefiting land maps
- Alluvial deposit maps
- Historic 'Six Inch' maps
- Historic 'Six Inch' maps with flood feature applied
- Expert advice from OPW
- In house studies
- RSES and associated Regional Flood Risk Appraisal
- Consultation with the relevant municipal area engineer in WCC
- An examination of contours of the land
- Aerial photography
- Information on flood defence condition and performance
- River Basin Management Plans and reports
- Local libraries and newspaper reports
- Interviews with local people, local history/natural history societies etc.
- Walkover survey to assess potential sources of flooding, likely routes for flood waters and the site's key features, including flood defences, and their condition
- River Dargle Flood Defence Scheme (Bray) [not relevant to Wicklow Town-Rathnew]
- River Avoca (Arklow Town) Flood Relief Scheme [not relevant to Wicklow Town-Rathnew]
- The Murrough Coastal Protection Study

2.5 Eastern & Midland Regional Assembly Regional Flood Risk Appraisal

As a key town in the Core Region, Wicklow-Rathnew was addressed in a high-level flood risk assessment within the EMRA Regional Flood Risk Appraisal, an accompanying document of the EMRA Regional Spatial & Economic Strategy. This assessment utilised CFRAM flood mapping. The assessment concluded the following:

Regional Flood R	tisk Appraisal: Wicklow Town-Rathnew
Flood Zone	CFRAM Flood Zone mapping
Mapping RPO - Urban Regeneration and Development	Regeneration of existing residential and commercial areas within Flood Zones A and B should be carried out in accordance with the Guidance specifically circular PL02/2014 (August 2014). Consideration should be given the sequential approach, FFLs and flood resilient construction. There are large areas that lie outside the flood zones that could be prioritised for regeneration. Flood Zones for the town centre should be generated to accurately define the residual risk for properties in defended areas.
Future Residential Development	Areas zoned for future residential appear to be zoned in Flood Zone C however due to the hilly nature of the Wicklow-Rathnew area an assessment of overland flow paths should still be carried out as part of FRAs for the development sites.
Existing - Flood Risk Management Measures	There is no existing flood scheme in place for Wicklow – Rathnew.
Proposed - Flood Risk Management Measures	Potentially viable flood relief works for Wicklow, Ashford and Rathnew that may be implemented after project-level assessment and planning or Exhibition [sic] and confirmation might include physical works, such as a series of hard defences, storage and improvement of channel conveyance. The hard defences would protect to the 1% AEP fluvial flood event, with an average height of 1.1m (reaching a maximum height of 1.5m) and a total length of 4km. The two storage areas on the Broomhall and Burkeen catchments have a total capacity of approximately 14,800m ³ .
Flood Risk Summary	The CFRAM study provides the best source of existing fluvial flooding information for Wicklow-Rathnew. This mapping is presented in Figure 4-16. This does not provide a complete assessment of flood risk to the area nor does it assess flood risk from all sources. This must be covered in the SFRA informing the LAP and FRAs for any other development plans in the town.
	The mixed use areas of the town centre adjacent to quays lie within Flood Zones A and B along with an industrial zoning adjacent to the Glebe Stream and the railway line. Rathnew neighbourhood centre has a few properties within Flood Zone A and B along with a low lying industrial zoning adjacent the Wicklow Road. Applications for major development within these areas required a site specific flood risk assessment to ensure no increase in flood risk to the development and surrounding areas. Future development plans and flood risk assessments should consider the potential of climate change influence on flood extents in accordance with the Guidelines. An

assessment of climate and catchment changes shows Wicklow, Ashford and Rathnew to be highly vulnerable to the increases as modelled in the mid-range and high end future scenarios.

Recommendations For Flood Risk Management

As detailed above the CFRAM FRMP has outlined flood alleviation measures for the town that should be reviewed by the planning authorities in conjunction with the OPW to deliver a flood alleviation scheme if it is deemed appropriate and viable. The planning authority should also review and implement where appropriate the suggested CFRAM flood risk management policy measures as outlined in Appendix B and the FRMP. SFRAs should be undertaken for all development plans and existing SFRAs should be updated and reviewed in line with statutory timelines for development plans. An assessment of climate and catchment changes shows Wicklow, Ashford and Rathnew to be highly vulnerable to the increases as modelled in the mid-range and high end future scenarios. Adaptation to maintain the level of protection as provided by the proposed measure would require increasing the height of the Hard Defence (by circa 1m) and extending their length. It is unlikely that the storage areas can be increased to provide the additional capacity required under the future scenarios. The weir removal proposed to increase channel conveyance would be sufficient for future flows, and the channel would not require further adaption. Future monitoring, and subsequent implementation of other measures such as Natural Flood Risk Management Measures, may be adopted to assist in identifying and off-setting the impacts of climate change.

Opportunities for Joint Studies

N/A

2.6 Wicklow & Ashford Flood Relief Scheme

In 2018, the Office of Public Works published a Flood Risk Management Plan for the Avoca-Vartry River Basin. Both Wicklow Town and Rathnew were included in this plan as Areas for Further Assessment (AFA).

Alongside a recommendation of various general measures, Section 7.4 of the Avoca-Vartry FRMP sets out proposed measures for each area identified as an AFA. Measures included for the Wicklow AFA and Ashford & Rathnew AFA, which is largely consistent with the area of the Wicklow Town-Rathnew Local Area Plan 2025, are described as follows:

'<u>Description of the Proposed Measure:</u>

Potentially viable flood relief works for Wicklow, Ashford and Rathnew that may be implemented after project-level assessment and planning or Exhibition and confirmation might include physical works, such as a series of hard defences, storage and improvement of channel conveyance. The hard defences would protect to the 1% AEP fluvial flood event, with an average height of 1.1m (reaching a maximum height of 1.5m) and a total length of 4km. The two storage areas on the Broomhall and Burkeen catchments have a total capacity of approximately 14,800m3. The improvement of channel conveyance consists of the removal of a weir on the Ballynerin watercourse. The potentially viable flood relief works, which at this stage of assessment are deemed to be preferred, are set out in Appendix G, noting that these will be subject to project-level assessment and possible amendment.'

The measures underwent multi-criteria analysis and climate change adaptability analysis, with implementation details given as follows:

Conclusion Property of the Conclusion of the Con	
Measure Name:	Progress the development of a Flood Relief Scheme for Wicklow AFA and Ashford & Rathnew AFA
Code:	IE10-IE-AFA-100124-0910-M33
Measure:	Progress the project-level development and assessment of a Flood Relief Scheme for Wicklow AFA and Ashford & Rathnew AFA, including environmental assessment as necessary and further public consultation, for refinement and preparation for planning / Exhibition and, if and as appropriate, implementation.
Implementation:	OPW and/or Wicklow CoCo - To be confirmed
Funding:	OPW

Figure 2.1: Proposed measures for a flood relief scheme in Wicklow Town-Rathnew.

Source: Avoca-Vartry Flood Risk Management Plan 2018.

In terms of prioritisation, the proposed measure falls into Stream 2 'Medium and Small Schemes: Measures costing in between €750k/€1m and €15m'. It is stated that measures in this stream will be prioritised on a regional basis, by reference to the six CFRAM study areas. The OPW's list of flood relief schemes, available on floodinfo.ie, lists the Wicklow & Ashford Flood Relief Scheme as a future

scheme with no status currently assigned to it. The body responsible for the implementation of this scheme has yet to be confirmed.

There is existing flood infrastructure and defences within the plan area. The Wicklow County Development Plan 2022-2028 states the following:

'There is a rock armour/revetment at the Murrough in Wicklow Town and maintenance/upgrade works [are] planned'.

2.7 The Sequential Approach and Justification Test

Each stage of the SFRA process aims to adopt a sequential approach to the management of flood risk in the planning process. The sequential approach to flood risk management is set out in Figure 1 (Source Planning System and Flood Risk Management Guidelines for Planning Authorities' DoEHLG/OPW 2009,). In summary, the key principles of the sequential approach include:

- 1. Avoid flood risk, where possible;
- 2. Substitute less vulnerable uses, where avoidance is not possible; and
- 3. Mitigate and manage the risk, where avoidance and substitution are not possible.

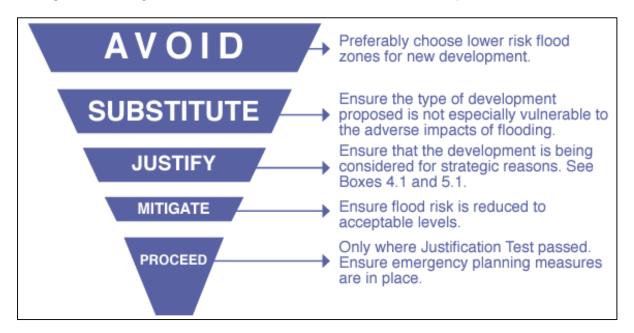


Figure 2.2: The sequential approach to the management of flood risk.

Source: DoEHLG The Planning System and Flood Risk Management Guidelines

In other words, where possible, development in areas identified as being at flood risk should be avoided; this may necessitate de-zoning lands within the plan area. If de-zoning is not possible, then re-zoning from a higher vulnerability land use, such as residential, to a less vulnerable use, such as open space, may be required. Where rezoning is not possible, exceptions to the development restrictions are provided for through the 'Justification Test'. The plan-making Justification Test is used at the plan preparation and adoption stage where a planning authority needs to consider the future development of areas at a high or moderate risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate. In such cases, the planning authority must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning or designation for development will satisfy the Justification Test. Tables 1.1 and 1.2 below illustrates those types of development that would be appropriate to each flood zone and those that would be required to meet the Justification Test. Section 2.2 sets out the Justification Test for plan making. Where the planning authority considers that land should be zoned for 'inappropriate development' that does not meet the criteria of the Justification Test, the flooding risk should be mitigated, so that the flood risk is reduced to an acceptable level by means of land use strategies or by means of detailed proposals for the management of flood risk, as addressed in a Flood Risk Assessment.

Development Types			
	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development Justification Test Appropriate Appropriate			Appropriate
Water compatible development Appropriate Appropriate Appropriate			
Source: DoEHLG The Planning System and Flood Risk Management Guidelines			

Table 1.1: Matrix of vulnerability versus flood zones to illustrate both appropriate development and development that is required to meet the justification test.

Classification of	f Vulnerability of Different Types of Development
Vulnerability	Land uses and types of development which include*:
Class	
Highly	Garda, ambulance and fire stations and command centres required to be operational
vulnerable	during flooding;
development	Hospitals;
(including	Emergency access and egress points;
essential	Schools;
infrastructure)	Dwelling houses, student halls of residence and hostels;
	Residential institutions such as residential care homes, children's homes and social services
	homes;
	Caravans and mobile home parks;
	Dwelling houses designed, constructed or adapted for the elderly or other people with impaired mobility; and
	Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution (SEVESO sites, IPPC sites, etc.) in the event of flooding.
Less	Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential
vulnerable	institutions;
development	Land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plans;
	Land and buildings used for agriculture and forestry;
	Waste treatment (except landfill and hazardous waste);
	Mineral working and processing; and
	Local transport infrastructure.
Water	Flood control infrastructure;
compatible	Docks, marinas and wharves;
development	Navigation facilities;
	Ship building, repairing and dismantling, dockside fish processing and refrigeration and
	compatible activities requiring a waterside location;
	Water-based recreation and tourism (excluding sleeping accommodation);
	Lifeguard and coastguard stations;
	Amenity open space, outdoor sports and recreation and essential facilities such as
	changing rooms;
	Essential ancillary sleeping or residential accommodation for staff required by uses in this
	category (subject to a specific warning and evacuation plan).
Source: DoEHLG TI	he Planning System and Flood Risk Management Guidelines

*Uses not listed here should be considered on their own merits.

Table 1.2: Classification of the vulnerability of different types of development.

3. STAGE 1 FLOOD RISK IDENTIFICATION

3.1 Risk Identification

'Identification' is the process for deciding whether a plan or project requires a flood risk assessment and is essentially a desk-based exercise based on existing information. In order to establish whether a flood risk issue exists or may exist in the future, a range of sources have been consulted.

3.2 Indicators of Flood Risk

The county-wide flood mapping developed during the Wicklow County Development Plan 2022-2028 indicates areas of flood risk within the Wicklow Town-Rathnew area. On this basis, it is determined that assessment should immediately proceed to Stage 2 Strategic Flood Risk Assessment.

4. STAGE 2 INITIAL FLOOD RISK ASSESSMENT

4.1 Flood Risk Assessment

Following the guidelines, this flood risk assessment shows the zoning objectives of the plan and their typical permitted uses. In accordance with the guidelines, an assessment was undertaken to determine the appropriateness of land uses (allowed by virtue of land use zoning) to each flood zone. The assessment is undertaken in accordance with Tables 3.1 and 3.2 of the guidelines (included as tables 1.2 and 1.1 above) and compares the vulnerability to flooding of different types of development with a specific site's location in any flood zone. Where the zone is deemed to be appropriate no further action is required in the FRA. Where the zone requires the Justification Test to be carried out, it is done so, with any necessary mitigation measures recommended.

The draft Wicklow Town-Rathnew Local Area Plan 2025 includes the following land use zonings:

ZONING	OBJECTIVE	DESCRIPTION
RE: Existing	To protect, provide and	To provide for house improvements, alterations and
Residential	improve residential amenities of existing residential areas	extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted.
RN1: New residential	To provide for new residential development and supporting facilities during the lifetime of	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town
Priority 1	the plan.	centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
RN2: New residential	To provide for new residential development and supporting facilities where it can be	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town
Priority 2	demonstrated that such development would accord with the Core Strategy housing target for that settlement after the activation of Priority 1 lands.	centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
TC: Town Centre	To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use.	To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure and residential uses, while delivering a quality urban environment, with emphasise on regeneration, infill town and historic centre conservation; ensuring priority for public transport where applicable,

ZONING	OBJECTIVE	DESCRIPTION
		pedestrians and cyclists, while minimising the impact of private car based traffic and enhance and develop the existing centre's fabric.
VC: Village Centre	To provide for the development and improvement of appropriate village centre uses in areas that are secondary or subsidiary area to the main town centre.	To develop and consolidate the village centre zones in an appropriate manner and to an appropriate scale and with such uses as specified in each town plan given their roles as a secondary or subsidiary area to the main town centre.
NC: Neighbourhood Centre	To protect, provide for, and improve a mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community.	To provide for small scale mixed use commercial / community / retail developments that serve only an immediate catchment or planned new areas of significant residential expansion. Locations: Merrymeeting, and Ballynerrin
LSS: Local Shops & Services	To provide for small scale local neighbourhood shops and services	To facilitate the limited development of small scale local neighbourhood shops and retail services and other local service uses that meet only the retail or service needs of residents in the immediate catchment and are not of such a scale or type that would detract or draw trade from lands designated town centre.
CC: Wicklow County Campus	To provide for educational facilities, research and development (R&D), and enterprise development uses.	To develop Wicklow County Campus in conjunction with the SETU and other stakeholders as a third level education facility and as a centre of excellence for enterprise development, education, training, research and development, with a focus on the film, food and renewable energy sectors. This will entail the development of appropriate infrastructure and facilities including classrooms, lecture theatres, labs, workshops, kitchen units, offices, etc. and other necessary student facilities.
WZ: Waterfront	To provide for the development and improvement of the waterfront zone, to facilitate the continuation and development of existing employment / maritime / port, residential, public utilities, and community / recreational uses and to promote and provide for new residential, tourism and other mixed-use development.	To facilitate the continued and more intensive / efficient use of the existing employment, maritime and port uses; To maintain existing and support the development / improvement of high quality community, amenity, leisure and tourism uses; To facilitate commercial and retail uses at a scale that do not undermine the role of the existing Town Centre; To facilitate the provision of high quality new residential developments at appropriate high densities with excellent layout and design, well linked to the existing town centre, community facilities and water amenities.
E: Employment	To provide for the development of enterprise and employment	To facilitate the further development and improvement of existing employment areas and to facilitate opportunities for the development of new high quality employment and enterprise developments in a good quality physical environment.
CE: Community & Education	To provide for civic, community and educational facilities	To facilitate the development of necessary community, health, religious, educational, social and civic infrastructure.

ZONING	OBJECTIVE	DESCRIPTION
AOS: Active Open Space	To protect and enhance existing and provide for new active open space	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for the development of new high quality active recreational areas.
OS1: Open Space	To protect and enhance existing and provide for recreational open space	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.
OS2: Natural Areas	To protect and enhance existing open, undeveloped lands	To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.
PU: Public Utility	To maintain lands providing services infrastructure	To allow for lands to be designated for public utilities such as waste water treatment plants, large ESB substations, gasworks etc.
T: Tourism	To provide for tourism related development	To provide for the sustainable development of tourism related structures, uses and infrastructure. To provide for the development of tourism facilities including accommodation of an excellent sustainable design and aesthetic quality. Tourism related office, civic and cultural and commercial development will be facilitated.

The box below gives typical appropriate uses for each zone type:

Uses generally appropriate for **residential (RN / RE)** zoned areas include houses, apartments, residential open space, education, community facilities, retirement homes, nursing homes, childcare, health centres, guest house, bed and breakfast, places of public worship, home based economic activity, utility installations and ancillary development and other residential uses in accordance with the County Development Plan (CDP) and Local Area Plan (LAP).

Uses generally appropriate for **town and village centres (TC / VC)** include residential development, commercial, education retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the CDP and LAP.

Uses generally appropriate for **neighbourhood centre (NC)** include retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, residential development, commercial, education, office, tourism and

recreational uses, community, including provision for religious use, utility installations and ancillary developments for neighbourhood centre uses in accordance with the with the CDP and LAP.

Uses generally appropriate for **local shops and services (LSS)** include retail, retail services, health, public house, guest houses, parking, residential development, commercial, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for local shops and services uses in accordance with the with the CDP and LAP.

Uses generally appropriate for **Wicklow County Campus (CC)** zoned land include Car Park, Community Facility, Crèche, Education, Enterprise Centre, Industry (Light), Laboratory, Office-Based Employment, Open Space, Playground, Public Services, Recreational Building, Recreational Facility/Sports Club, Residential¹, Restaurant/ public house², Skate Park, Film sector, Food sector, Renewable energy sector and ancillary developments for Wicklow County Campus uses in accordance with the CDP and LAP.

Uses generally appropriate for **employment (E)** zoned land include general and light industry, office uses, enterprise units, education, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, including sports grounds, community facilities including community and sports centres, utility installations and ancillary developments for employment and industry uses in accordance with the CDP and LAP.

Uses generally appropriate for **waterfront (WZ)** zoned land include aquaculture / fishing, residential, childcare, civic / cultural uses, community facilities, education, employment / office uses, general and light industry, harbour uses, health related service / uses, hotels, maritime uses, recreational and leisure uses, retail, restaurants, parking, public house, tourism uses, utility installations and ancillary development in accordance with the CDP and LAP.

Uses generally appropriate for **community and educational (CE)** zoned land include community, educational and institutional uses include burial grounds, places of worship, schools, training facilities, community hall, nursing homes, health related developments, sports and recreational facilities, utility installations and ancillary developments for community, educational and institutional uses in accordance with the CDP and LAP.

Uses appropriate for **active open space (AOS)** zoned land are sport and active recreational uses including infrastructure and buildings associated with same. Schools are appropriate.

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

Uses appropriate for **natural areas (OS2)** zoned land are uses that protect and enhance the function of these areas as flood plains, buffer zones along watercourses and rivers, green

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

¹ Only Student accommodation related to the college

breaks between built up areas, green corridors and areas of natural biodiversity. The development of these lands for recreational uses may only be considered where such use is shown to not undermine the purpose of this zoning.

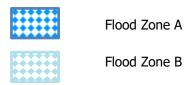
Uses generally appropriate for **public utility (PU)** zoned land are for the provision of necessary infrastructure and services such as roads / footpaths / cycleways, carparks, train station, water and waste water treatment plants, large ESB sub-stations, gasworks.

Uses generally appropriate for **tourism (T)** zoned land are tourism accommodation and tourism / recreational uses such as Bed & Breakfast, cultural uses, holiday homes, hotels, recreational facilities.

4.2 Flood Risk Zones and the Application of the Sequential Approach/Justification Test for Wicklow Town-Rathnew

The following is an analysis of the vulnerability of land uses on sites that fall within Flood Zones A and B, and where appropriate, the application of the Justification Test for plan making. The full extent of flood zones A & B within Wicklow Town-Rathnew is shown on Map No. 4 'Indicative Flood Zones' of the draft Local Area Plan.

In the assessment to follow, flood risk zones are shown thus:



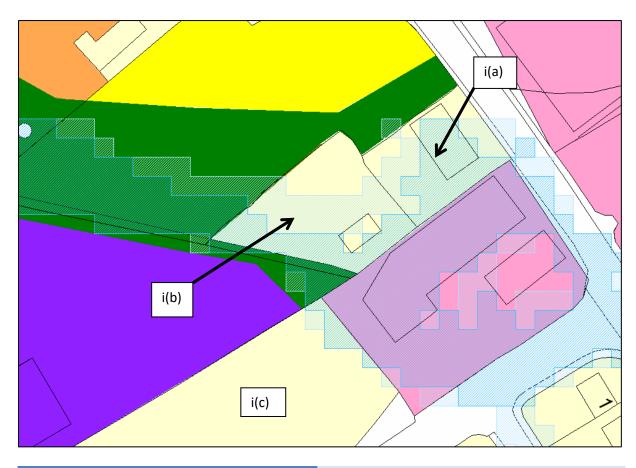
Proposed Land Use Zones are as follows:



LAND USE ZONING: Existing Residential (RE)

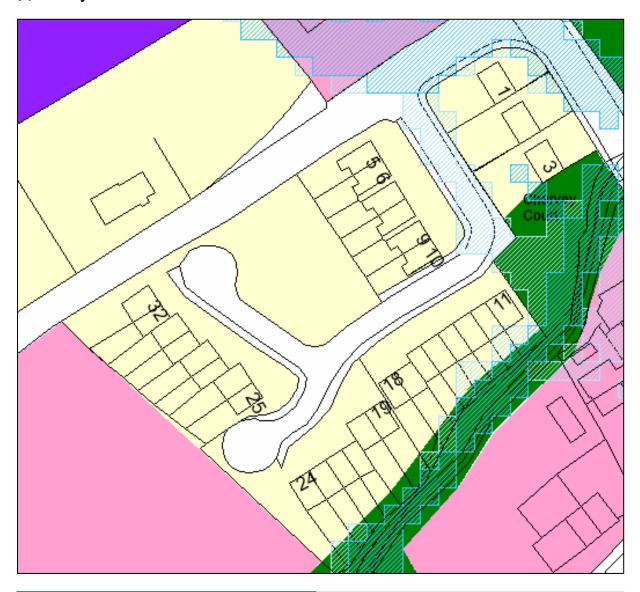
It has been determined that there are 13 No. locations within the plan area that are proposed to be zoned 'RE – Existing Residential' which are located within Flood Zones A or B.

(i) Rathnew Village: North and west of Service Station



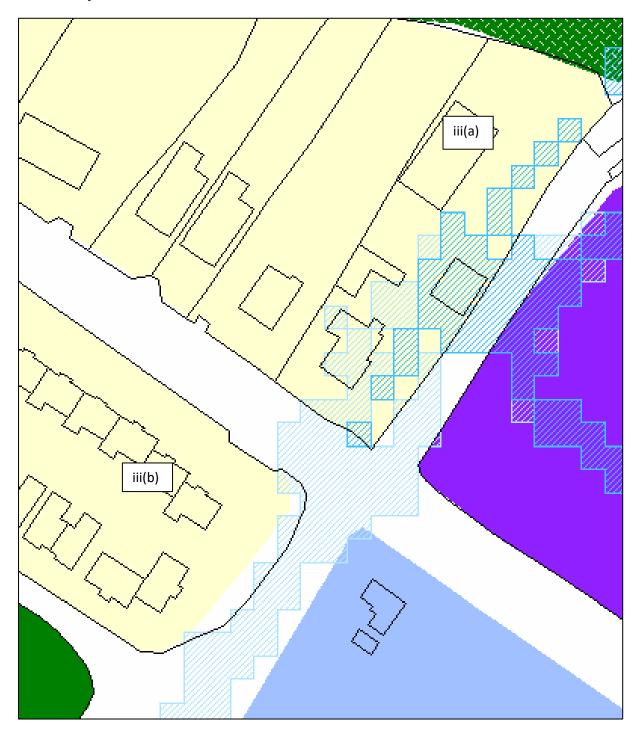
Land Use Zoning	Existing Residential (RE)
Flood Zone	Sites i(a), i(b), & i(c): A & B.
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(ii) Charvey Court



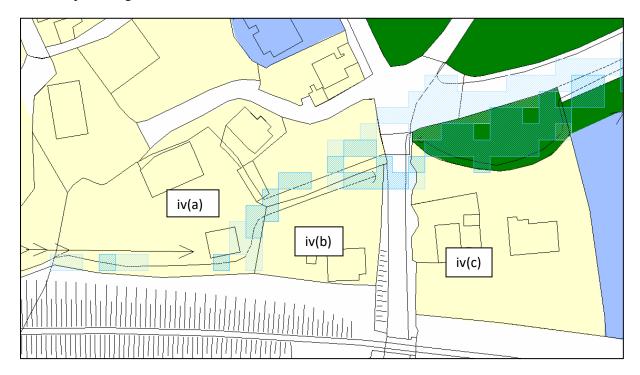
Land Use Zoning	Existing Residential (RE)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(iii) Tinakilly Lane



Land Use Zoning	Existing Residential (RE)
Flood Zone	Site iii(a): A & B. Site iii(b): B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(iv) Merrymeeting



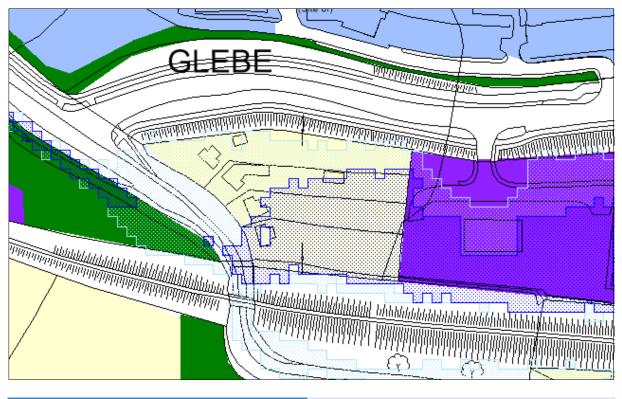
Land Use Zoning	Existing Residential (RE)
A & B	All sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(v) Hazelbrook Rise/St. Bridget's & St. Patrick's Terraces



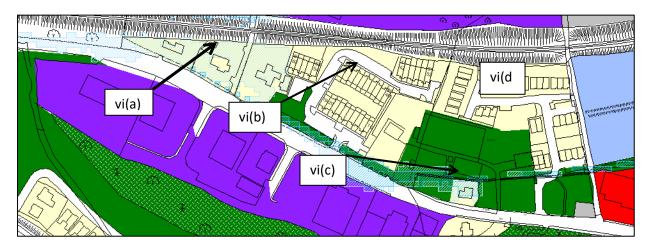
Land Use Zoning	Existing Residential (RE)
Flood Zone	All sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(v) Knockrobin Cottages



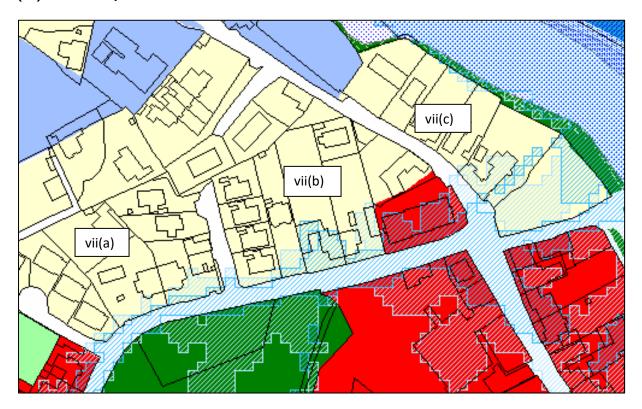
Land Use Zoning	Existing Residential (RE)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(vi) Railway Bridge/Highfield Court/Bollarney House/Bollarney Woods:



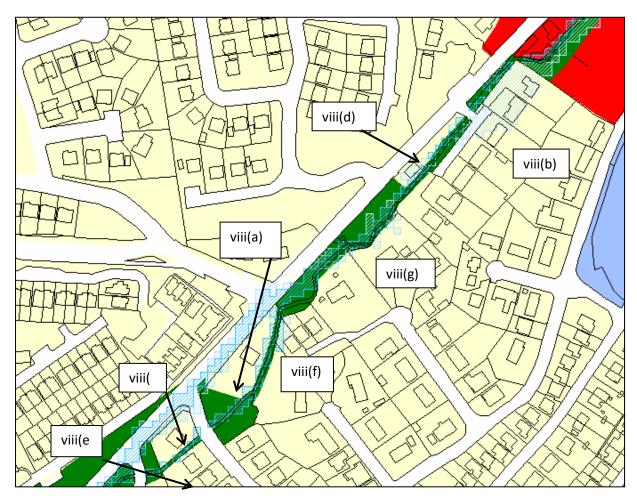
Land Use Zoning	Existing Residential (RE)
Flood Zone	All sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(vii) Church Hill/Wentworth Place



Land Use Zoning	Existing Residential (RE)
Flood Zone	All sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

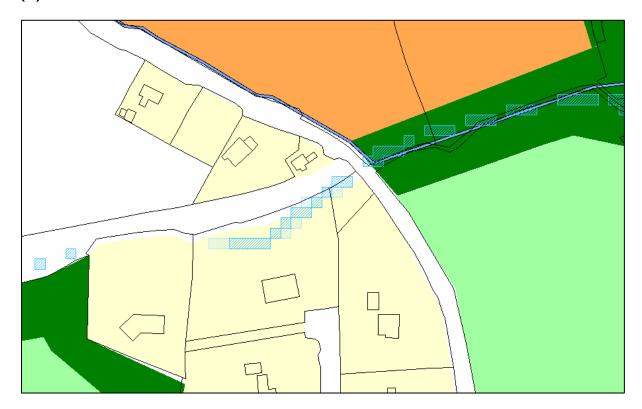
(viii) Marlton Road



Land Use Zoning
Flood Zone
Vulnerability of Land Use vs. Flood zone
Requirement for Justification Test

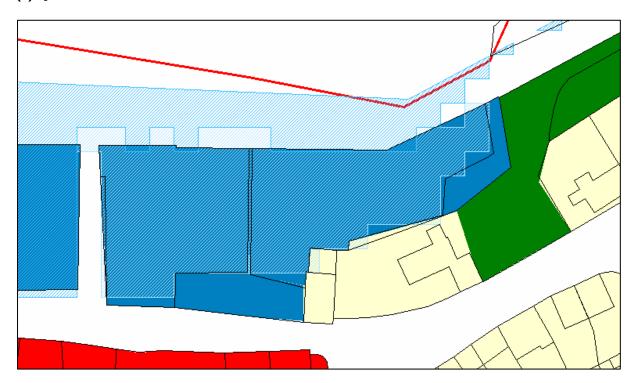
Existing Residential (RE)
Site viii(b): B. All other sites: A & B
All sites: Land use zoning not appropriate
All sites: Yes

(ix) Ashtown Lane



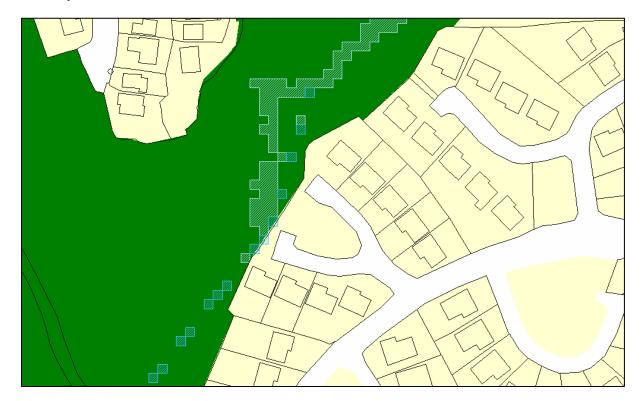
Land Use Zoning	Existing Residential (RE)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(x) Quarantine Hill



Land Use Zoning	Existing Residential (RE)
Flood Zone	В
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(xi) Seapoint



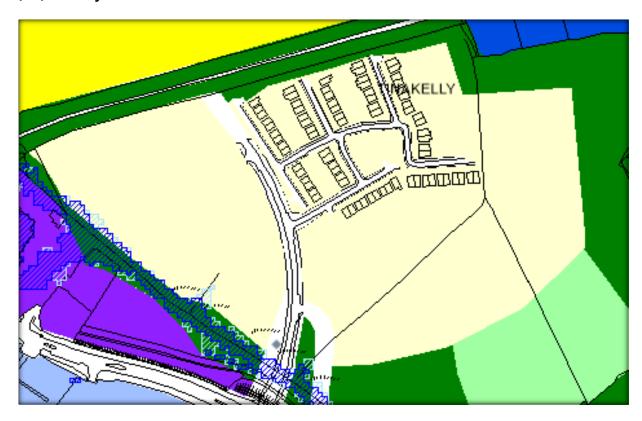
Land Use Zoning	Existing Residential (RE)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(xii) Knockrobin Estate/R750



Land Use Zoning	Existing Residential (RE)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(xiii) Tinakilly Park



Land Use Zoning	Existing Residential (RE)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional The Growth Centres. Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

- The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
 - (i) Is essential to facilitate regeneration and/or expansion of the centre of All sites: No the urban settlement;

(ii) Comprises significant previously developed and/or under-utilised lands:

Site (xiii): Under construction.

(iii) Is within or adjoining the core of an established or designated urban settlement;

All other sites: Yes Sites (i)(all), (ii)(all), (vii)(all), (viii)(b), (x): Yes

All other sites: No

(iv) Will be essential in achieving compact and sustainable urban growth; and

All sites: No

(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

N/A – these lands are developed or under construction

A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment part of the development preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

Assessment of flood risk has been incorporated into the Plan SEA Process

Conclusion

All sites requiring a justification test: Justification test failed

Recommendation

These lands are currently developed for a permitted housing development, or are currently under construction. As such, it is considered appropriate to retain the RE zoning objective (No dwellings are permitted within the Flood zones). Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (see Section Mitigation Objectives below).

LAND USE ZONING: New Residential – Priority 1 (RN1)

There are no areas zoned New Residential – Priority 1 (RN1) that are located within Flood Zones A or B.

Land Use Zoning	RN1
Flood Zone	All sites: C
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

LAND USE ZONING: New Residential – Priority 2 (RN2)

There are no areas zoned New Residential – Priority 2 (RN2) that are located within Flood Zones A or B.

Land Use Zoning	RN2
Flood Zone	All sites: C
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

LAND USE ZONING: Town Centre (TC)

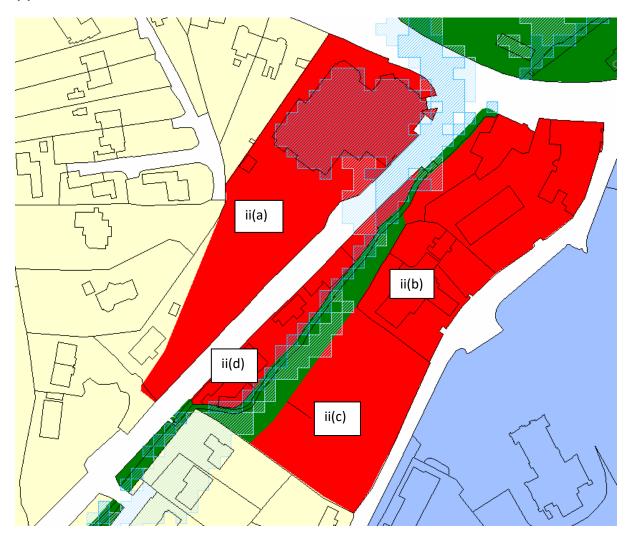
It has been determined that there are 6 No. locations within the plan area that are proposed to be zoned 'TC – Town Centre' which are located within Flood Zones A or B.

(i) Lidl/Sports Direct



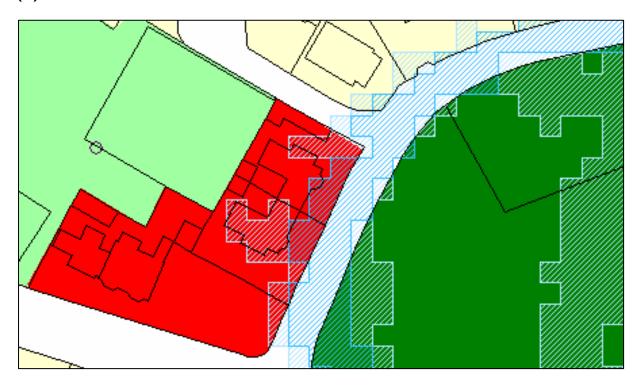
Land Use Zoning	Town Centre (TC)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(ii) Marlton Road



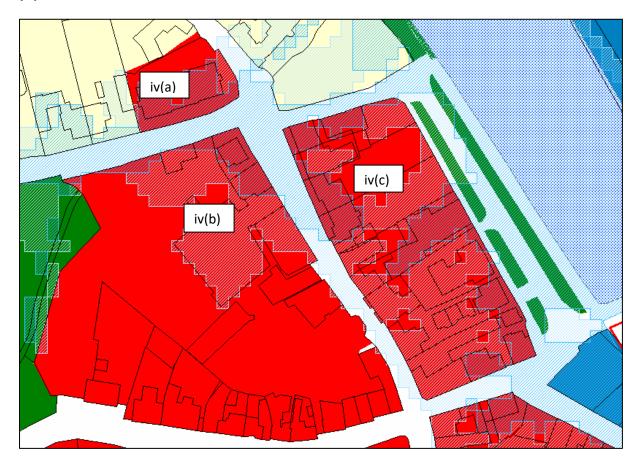
Land Use Zoning	Town Centre (TC)
Flood Zone	Site ii(c): B. All other sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(iii) Wentworth Place



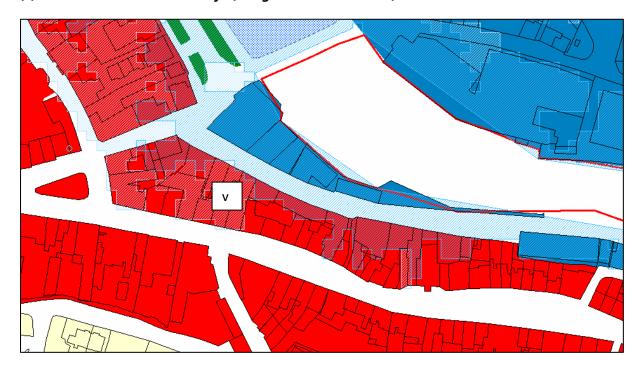
Land Use Zoning	Town Centre (TC)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(iv) Church Street



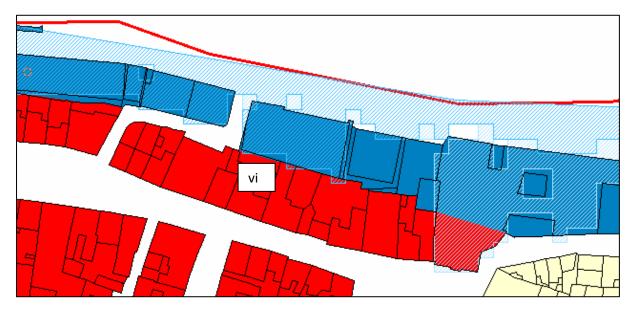
Land Use Zoning	Town Centre (TC)
Flood Zone	All sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(v) Wicklow Main Street & Quays (Bridge to Salthouse Lane)



Land Use Zoning	Town Centre (TC)
Flood Zone	All sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(vi) Wicklow Main Street & Quays (East of Salthouse Lane)



Land Use Zoning	Town Centre (TC)
Flood Zone	All sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

Plan-Making Justification Test

The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional The Wicklow County Growth Centres. development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:

(i) Is essential to facilitate regeneration and/or expansion of the centre of	All sites: Yes
the urban settlement;	
(ii) Comprises significant previously developed and/or under-utilised	All sites: Yes
lands;	
(iii) Is within or adjoining the core of an established or designated urban	All sites: Yes

settlement; (iv) Will be essential in achieving compact and sustainable urban All sites: Yes (v) There are no suitable alternative lands for the particular use or N/A - these lands development type, in areas at lower risk of flooding within or adjoining are developed. the core of the urban settlement. Assessment of flood risk has been incorporated 3 A flood risk assessment to an appropriate level of detail has been carried out as part into the Plan SEA process. of the Strategic Environmental Assessment

part of the development 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.

Conclusion

All sites: Justification test satisfied.

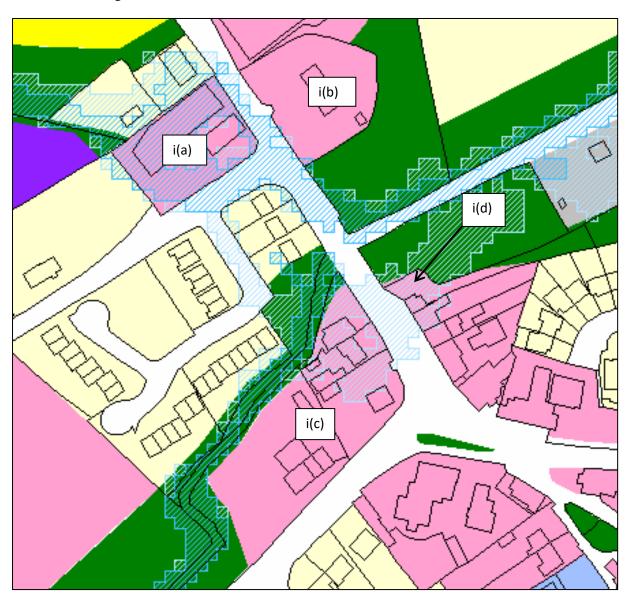
Recommendation

No further action required.

LAND USE ZONING: Village Centre (VC)

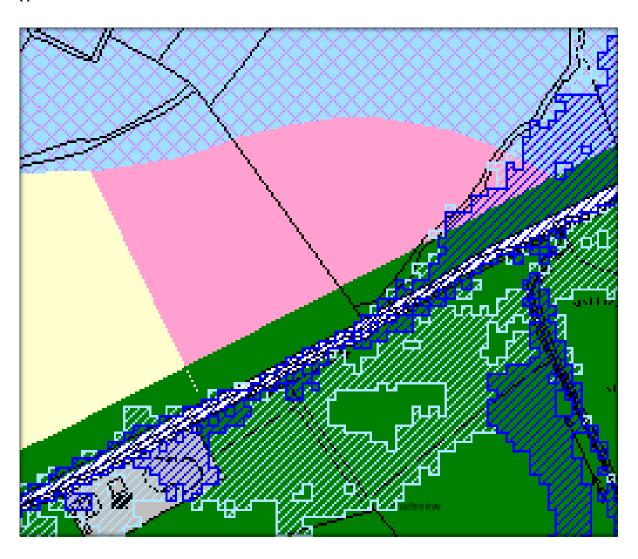
It has been determined that there is 1 No. location within the plan area that is proposed to be zoned 'VC – Village Centre' which is located within Flood Zones A or B.

(i) Rathnew Village



Land Use Zoning	Village Centre (VC)
Flood Zone	Sites i(a) & a(b): A & B. Sites i(c) & i(d): B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(i) South of Rathnew Inner Relief Road



Land Use Zoning	Village Centre (VC)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

Plan-Making Justification Test

The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development

Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in

(i) Is essential to facilitate regeneration and/or expansion of the centre of	All sites: Yes
the urban settlement;	
(ii) Comprises significant previously developed and/or under-utilised lands;	All sites: Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	All sites: Yes
(iv) Will be essential in achieving compact and sustainable urban	All sites: Yes

growth; and (v) There are no suitable alternative lands for the particular use or N/A - these lands development type, in areas at lower risk of flooding within or adjoining

are developed

level of detail has been carried out as part into the Plan SEA process. of the Strategic Environmental Assessment as part of the development plan which preparation process, 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.

the core of the urban settlement.

A flood risk assessment to an appropriate Assessment of flood risk has been incorporated

Conclusion

All sites: Justification test satisfied

Recommendation

No further action required.

LAND USE ZONING: Neighbourhood Centre (NC)

There are no areas zoned Neighbourhood Centre (NC) that are located within Flood Zones A or B.

Land Use Zoning	Neighbourhood Centre (NC)
Flood Zone	С
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

LAND USE ZONING: Local Shops & Services (LSS)

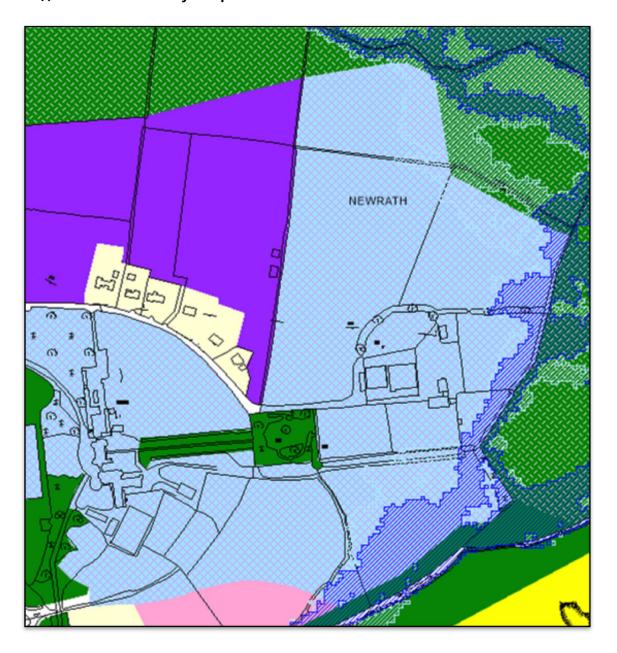
There are no areas zoned Local Shops & Services (LSS) that are located within Flood Zones A or B.

Land Use Zoning	Local Shops & Services (LSS)
Flood Zone	С
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

LAND USE ZONING: Wicklow County Campus (CC)

It has been determined that there is 1 No. location within the plan area that is proposed to be zoned 'CC – Wicklow County Campus' which is located within Flood Zones A or B.

(i) Wicklow County Campus



Land Use Zoning	Wicklow County Campus (CC)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning is not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Economic Strategy 2019-2031 Spatial designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional The Growth Centres. Wicklow County development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:

(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
(iv) Will be essential in achieving compact and sustainable urban growth; and	No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Yes

A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

Assessment of flood risk has been incorporated into the Plan SEA Process.

Conclusion

Justification test failed.

Recommendation

Significant areas within this site are already developed, for a variety of permitted uses. As such, it is considered appropriate to retain the Wicklow County Campus (CC) zoning objective. Applications

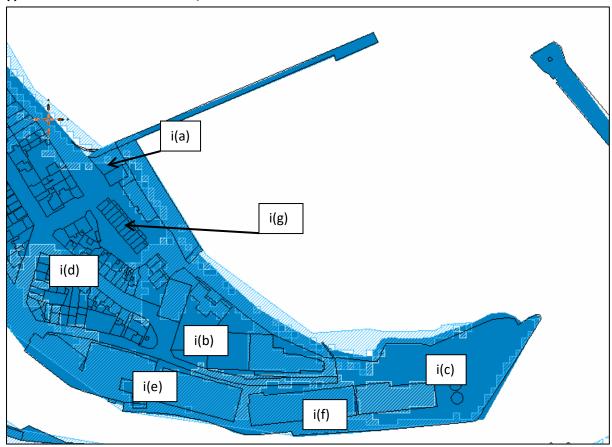
for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (see Section Mitigation Objectives below).

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 the at risk area. Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with the relevant policies and objectives in the County Development Plan and Wicklow Town-Rathnew Local Area Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

LAND USE ZONING: Waterfront (WZ)

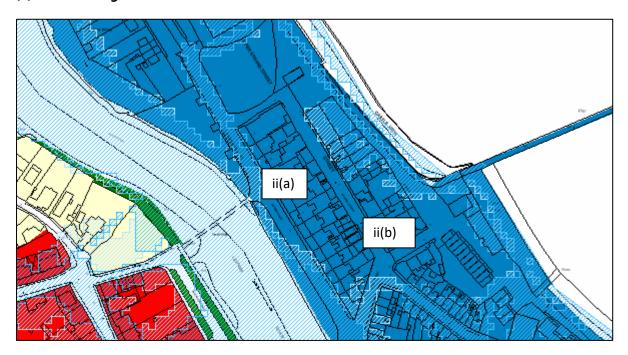
It has been determined that there are 6 No. locations within the plan area that are proposed to be zoned 'WZ - Waterfront' which are located within Flood Zones A or B.

(i) Wicklow Port to Bath Street/Castle View



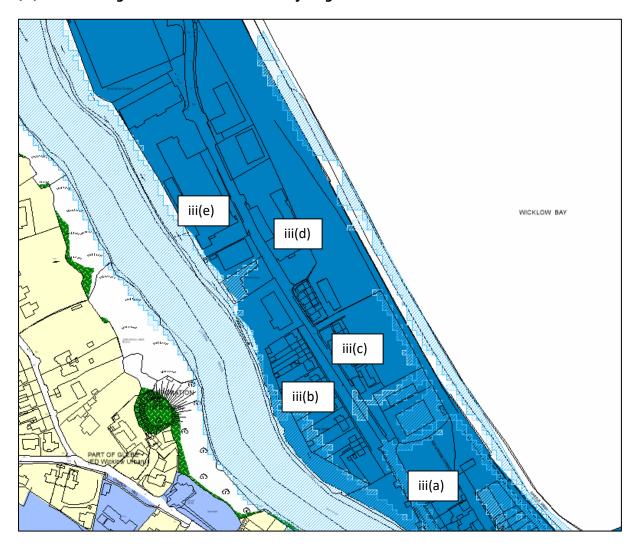
Waterfront (WZ)
Site i(g): C. All other sites: A & B
Site i(g): Land use zoning is appropriate. All other
sites: Land use zoning not appropriate
Site i(g): No. All other sites: Yes

(ii) The Murrough: Bath Street to Brass Fox



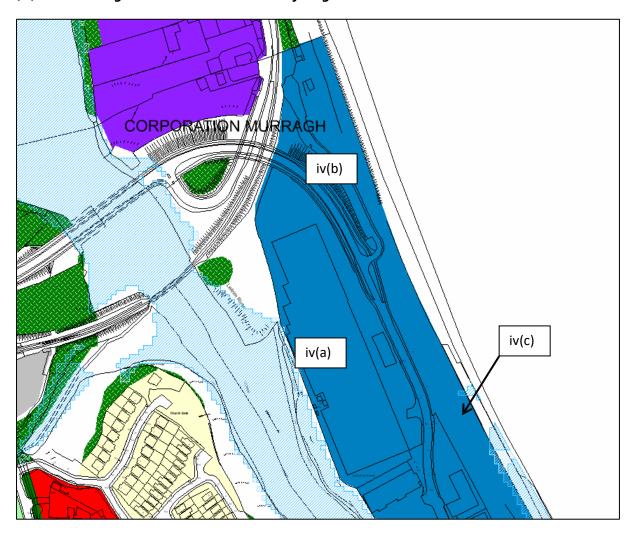
Land Use Zoning	Waterfront (WZ)
Flood Zone	All sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(iii) The Murrough: Brass Fox to Wicklow recycling Centre



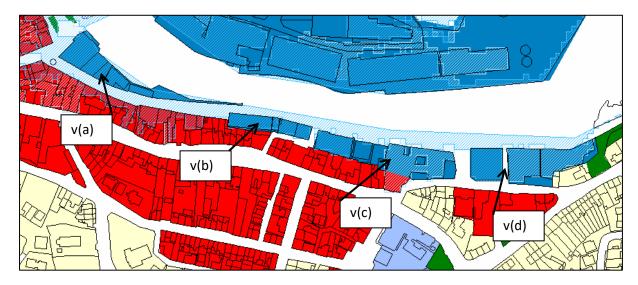
Land Use Zoning	Waterfront (WZ)
Flood Zone	Site iii(e): B. All other sites: A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(iv) The Murrough: North from Wicklow Recycling Centre.



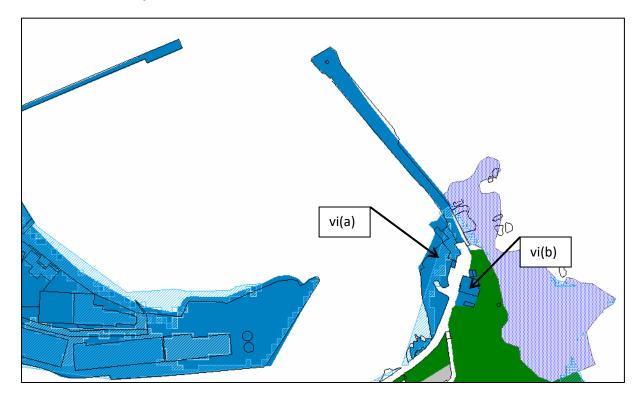
Land Use Zoning	Waterfront (WZ)
Flood Zone	Site iv(a): B. Site iv(b): C. Site iv(c): A & B.
Vulnerability of Land Use vs. Flood zone	Site iv(b): Land use zoning is appropriate. All other sites: Land use zoning not appropriate
Requirement for Justification Test	Site iv(b): No. All other sites: Yes

(v) South Quays



Land Use Zoning	Waterfront (WZ)
Flood Zone	All sites: A & B.
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

(vi) East Pier and adjacent facilities.



Land Use Zoning	Waterfront (WZ)
Flood Zone	Site vi(a): A & B. Site vi(b): C.
Vulnerability of Land Use vs. Flood zone	Site vi(a): Land use zoning not appropriate. Site
	vi(b): land use zoning is appropriate.
Requirement for Justification Test	Site vi(a): Yes. Site vi(b): No.

Plan-Making Justification Test

1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional 2019-2031 Spatial & Economic Strategy designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

- 2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
 - (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;

All sites: Yes

(ii) Comprises significant previously developed and/or under-utilised lands;

All sites: Yes

(iii) Is within or adjoining the core of an established or designated urban settlement;

All sites: Yes

(iv) Will be essential in achieving compact and sustainable urban growth; and(v) There are no suitable alternative lands for the particular use or

Sites i(b), i(c), i(e), i(f), v(d), vi(a), vi(b): Yes – these lands

development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

Yes – these lands are already developed and require a waterfront location.

All other sites: No.

A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

Assessment of flood risk has been incorporated into the Plan SEA Process.

Conclusion

Sites i(b), i(c), i(e), i(f), v(d), vi(a), vi(b): Justification test satisfied.

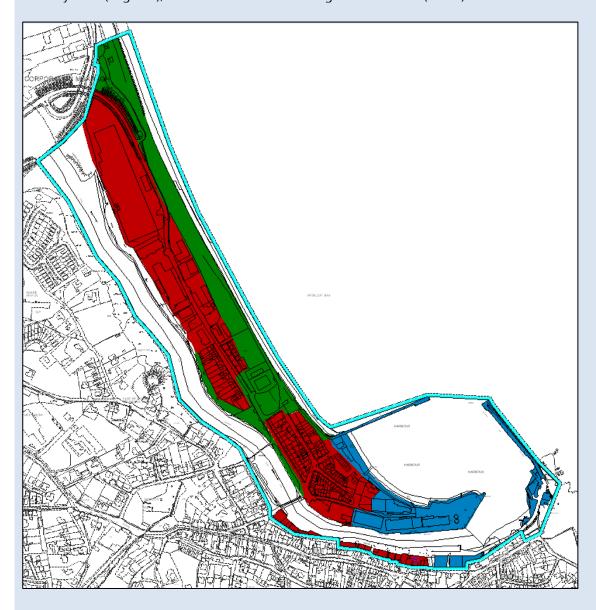
All other sites: Justification test failed.

Recommendation

Sites i(b), i(c), i(e), i(f), v(d), vi(a), vi(b): No further action required.

All other sites:

The Waterfront (WZ) land use zoning objective contains multiple 'strategy areas' that further restrict land uses within that zone, as follows: Area 1 – Wicklow Port (in blue); Area 2 – Recreational and Amenity Area (in green); and Area 3 – Mixed Use Regeneration Area (in red).



As per the written statement of the Draft Wicklow Town-Rathnew Local Area Plan 2025:

'Within **Area 1 (Wicklow Port)** the following uses are deemed 'priority uses' and will be permitted

in principle:

- Maritime related employment including buildings associated with the management / operation of maritime activities or the training / education of staff engaged in maritime operations;
- Maritime infrastructure including quaysides, jetties, pontoons, lifts / cranes / winches, infrastructure associated with loading / unloading of vessels etc;
- Fishing / aquaculture related activities including infrastructure and buildings supporting such use including gear huts, stalls / stands for the sale of landed seafood;
- Buildings / infrastructure associated with port management, regulation, safety, rescue, customs, utilities etc.
- Leisure sailing / boating related uses including infrastructure and buildings supporting such use clubhouses, small craft storage and repair;

Other uses allowed by the WZ zoning will only be permitted in Area 1 where it can be demonstrated that uses of this area for these non-priority uses would not:

- undermine the role of this area to support and provide services to maritime activity
- prejudice this area remaining and being developed further for maritime activities
- interfere with or remove maritime infrastructure such as quay space for docking'

Those sites included within Area 1 have passed the justification test above, reflecting existing maritime/water-compatible uses that must be located in a waterfront location. It is clear from the above that it is the intention to maintain this area for maritime activity. On this basis it is appropriate to maintain the Waterfront (WZ) zoning within Area 1.

'Within **Area 2 (Recreation & Amenity Area)** the following uses are the 'only uses' that will be permitted in principle:

- Formal and informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, 'Mixed Use Games Areas' and outdoor gyms;
- Tourist / visitor infrastructure including car parking, Aires sites³, information signage / booths, toilets:
- Buildings / infrastructure associated with safety, rescue, utilities, etc.
- Seasonal markets / fairs / events.'

Area 2 restricts development to the above uses. These uses, with one exception, would be considered water-compatible development that would render the Waterfront (WZ) zoning to be appropriate within this area. However, an Aires site would rather be considered 'less vulnerable development'. Such is the size of Area 2 and sites therein, including large areas in Flood Zone C, that the area is considered sufficiently large to provide for the development of less vulnerable uses such as an Aires site while avoiding development in the at risk area. As such, it is considered appropriate to maintain the Waterfront (WZ) land use zoning in Area 2. Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with the relevant policies and objectives in the County Development Plan and Wicklow Town-Rathnew Local Area Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

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

'Within **Area 3 (Mixed Use Regeneration Area)** the following uses are deemed '**priority uses'** and will be permitted in principle:

- High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc.
 Low density tourism accommodation such as holiday homes, glamping etc. will not be considered;
- High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;
- High quality community, civic / cultural and recreation uses.
- High quality commercial, retail, retail services, restaurants, public house, café,
- High density residential use where developed in conjunction with other priority uses described above

Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc.) with higher value uses will be particularly supported in this area.'

In Area 3, the majority of the lands in this zone are already developed, for a variety of permitted uses. As such, it is considered appropriate to retain the Waterfront (WZ) land use zoning objective in Area 3. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (see Section Mitigation Objectives below).

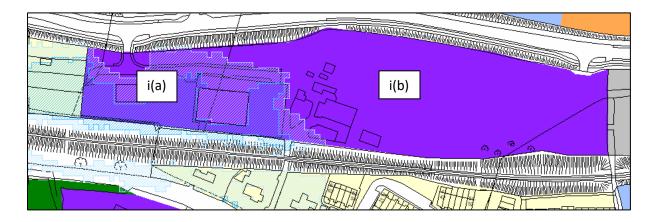
The Draft Written Statement of the Wicklow Town-Rathnew Local Area Plan sets out that the development strategy for this area is for the further development and intensification for a mix of uses, including potentially vulnerable uses such as residential and community use.

The zoning objective does not proscribe exactly where in the zone development should occur and the zone (and sites therein) is sufficiently large to provide for the development of desired (mixed use including residential use) while avoiding development in the at risk area. Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with the relevant policies and objectives in the County Development Plan and Wicklow Town-Rathnew Local Area Plan, and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

LAND USE ZONING: Employment (E)

It has been determined that there are 3 No. locations within the plan area that are proposed to be zoned 'E - Employment' which are located within Flood Zones A or B.

(i) Port Access Road (south of the PAR and north of rail line)



Land Use Zoning	Employment E
Flood Zone	Site i(a): A & B. Site i(b): B.
Vulnerability of Land Use vs. Flood zone	i(a): land use zoning not appropriate
	i(b): land use zoning is appropriate
Requirement for Justification Test	i(a): Yes
	i(b): No – no further action required

(ii) Bollarney Nth (Dublin Road)



Land Use Zoning	Employment 'E'
Flood Zone	Site ii(b): A & B. Site ii(a): C
Vulnerability of Land Use vs. Flood zone	i(a): land use zoning is appropriate
	i(b): land use zoning not appropriate
Requirement for Justification Test	i(a): No – no further action required
	i(b): Yes

(iii) Merrymeeting (former Corn Company site)



Land Use Zoning

Flood Zone

Vulnerability of Land Use vs. Flood zone

Requirement for Justification Test

Employment 'E'

Site iii(a): A & B. Site iii(b): C

i(a): land use zoning not appropriate

i(b): land use zoning is appropriate

i(a): Yes

i(b): No – no further action required

Plan-Making Justification Test

1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional 2019-2031 Spatial & Economic Strategy designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

2 The zoning or designation of the lands for the particular use or development type is required to

	achieve the proper planning and sustainable development of the urba particular:	in settlement and, in
	(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	All sites: No
	(ii) Comprises significant previously developed and/or under-utilised lands;	All sites: Yes
	(iii) Is within or adjoining the core of an established or designated urban settlement;	All sites: No
	(iv) Will be essential in achieving compact and sustainable urban growth; and	All sites: No
	(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are developed
3	A flood risk assessment to an appropriate Assessment of flood risk h	as been incorporated

A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

Assessment of flood risk has been incorporated into the Plan SEA process.

Conclusion

All sites requiring justification test: Justification test failed.

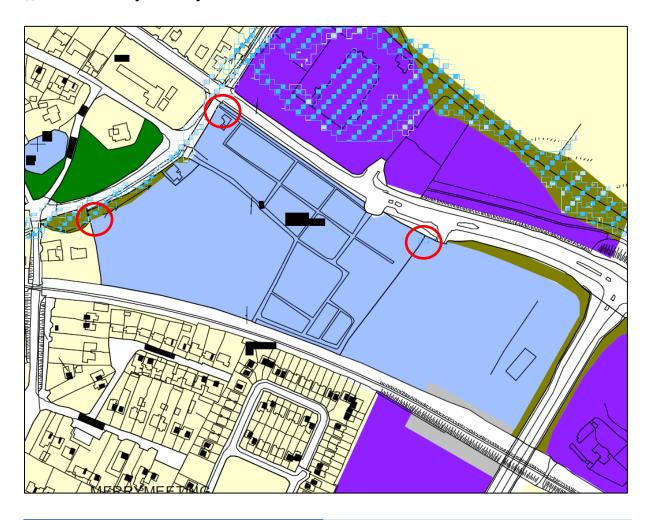
Recommendation

These lands are currently developed for permitted employment uses. As such, it is considered appropriate to retain the E zoning objective. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (see Section Mitigation Objectives below).

LAND USE ZONING: Community & Education (CE)

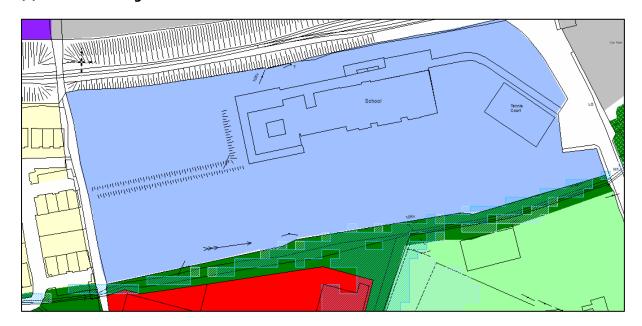
It has been determined that there are 2 No. locations within the plan area that are proposed to be zoned 'CE – Community & Education' which are located within Flood Zones A or B.

(i) Rathnew Graveyard & adjacent lands



Land Use Zoning	Community & Education (CE)	
Flood Zone	A & B (small areas along site boundaries,	
	indicated in red).	
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate	
Requirement for Justification Test	Yes	

(ii) East Glendalough School



Land Use Zoning	Community & Education (CE)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Economic Strategy 2019-2031 Spatial designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Centres. The Growth Wicklow County development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:

(i) Is essential to facilitate regeneration and/or expansion of the centre of	All sites: No	
the urban settlement;		
(ii) Comprises significant previously developed and/or under-utilised	All sites: Yes	
lands;		

	(iii) Is within or adjoining the core of an establishment;	olished or designated urban	Site (i): No Site (ii): Yes
	(iv) Will be essential in achieving compact and growth; and	d sustainable urban	All sites: No
	(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.		N/A – these lands are developed
3	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	Assessment of flood risk h into the Plan SEA process.	as been incorporated

Conclusion

All sites: Justification test failed.

impacts elsewhere.

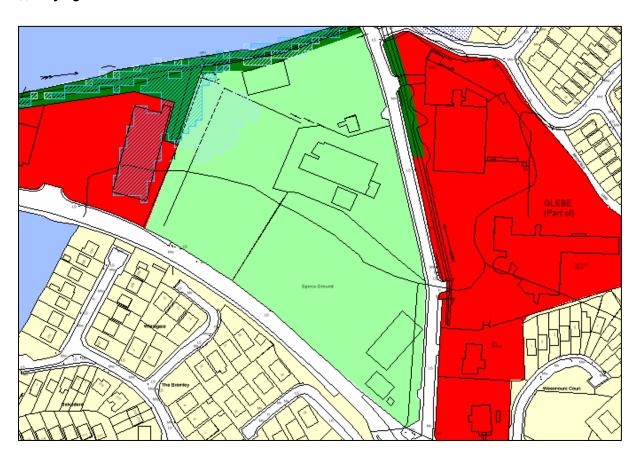
Recommendation

These lands are currently developed for permitted community & education uses. As such, it is considered appropriate to retain the CE zoning objective. An area of flood zone A along the boundary of the undeveloped portion of Site (i) is of such a small size that it is easily avoidable in applying the sequential approach in site planning, such that it is also appropriate to retain the CE zoning objective on that site. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (see Section Mitigation Objectives below).

LAND USE ZONING: Active Open Space (AOS)

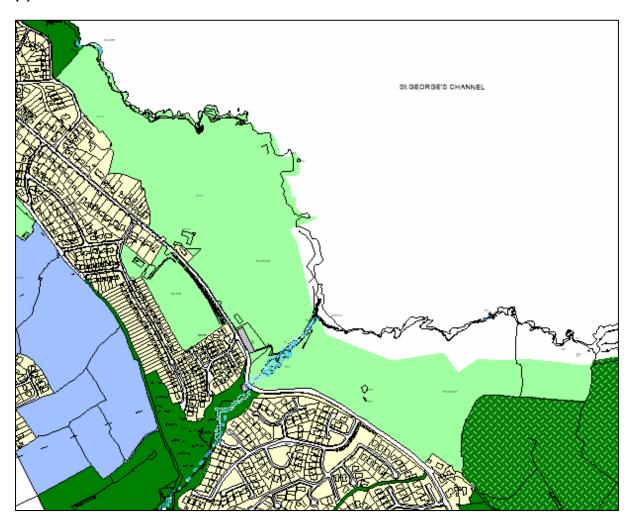
It has been determined that there are 2 No. locations within the plan area that are proposed to be zoned 'AOS – Active Open Space' which are located within Flood Zones A or B.

(i) Playing Pitches at Wicklow Town AFC



Land Use Zoning	Active Open Space (AOS)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(ii) Wicklow Golf Club



Land Use Zoning Act	ctive Open Space (AOS)
Flood Zone A 8	& B
Vulnerability of Land Use vs. Flood zone Lar	and use zoning not appropriate
Requirement for Justification Test Yes	es

Plan-Making Justification Test

1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of

	population of 14,114 perso further indicates a total hou	ns. The Core Strategy using growth target of
	•	• •
(i) Is essential to facilitate regeneration and/or the urban settlement;	r expansion of the centre of	No
(ii) Comprises significant previously developed and/or under-utilised lands;		No
(iii) Is within or adjoining the core of an established or designated urban settlement;		No.
(iv) Will be essential in achieving compact and sustainable urban growth; and		No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.		N/A – these lands are developed
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands	Assessment of flood risk h into the Plan SEA process.	as been incorporated
	achieve the proper planning and sustainab particular: (i) Is essential to facilitate regeneration and/or the urban settlement; (ii) Comprises significant previously developlands; (iii) Is within or adjoining the core of an estable settlement; (iv) Will be essential in achieving compact and growth; and (v) There are no suitable alternative lands development type, in areas at lower risk of for the core of the urban settlement. 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	(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement; (ii) Comprises significant previously developed and/or under-utilised lands; (iii) Is within or adjoining the core of an established or designated urban settlement; (iv) Will be essential in achieving compact and sustainable urban growth; and (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement. 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

Conclusion

All sites: Justification test failed.

impacts elsewhere.

will not cause unacceptable adverse

Recommendation

These lands are currently developed for permitted active open space uses. As such, it is considered appropriate to retain the AOS zoning objective. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (see Section Mitigation Objectives below).

LAND USE ZONING: Open Space (OS1)

As uses permitted under an Open Space 'OS1' land use zoning are water compatible, all such areas located within flood zones A or B are zoned appropriately.

Land Use Zoning	Open Space (OS)
Flood Zone	A, B & C
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

LAND USE ZONING: Passive Open Space (OS2)

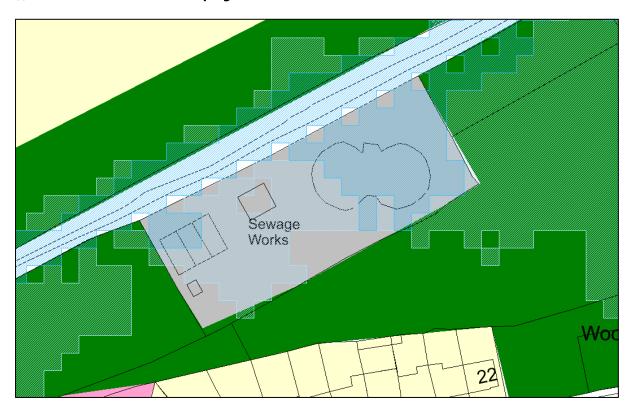
As uses permitted under a Passive Open Space 'OS2' land use zoning are water compatible, all such areas located within flood zones A or B are zoned appropriately.

Land Use Zoning	Passive Open Space (OS2)
Flood Zone	A, B & C
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

LAND USE ZONING: Public Utilities (PU)

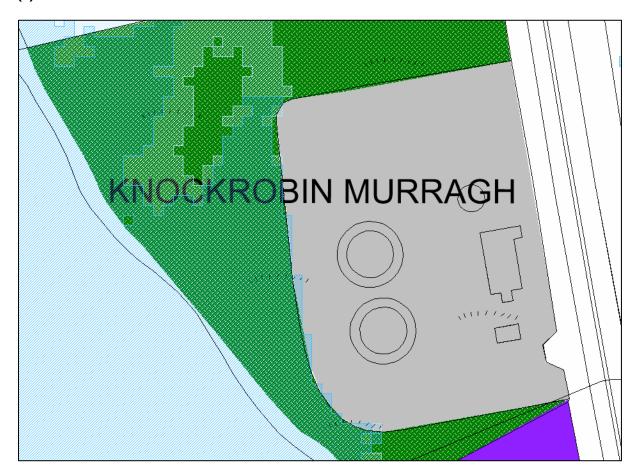
It has been determined that there are 3 No. locations within the plan area that are proposed to be zoned 'PU – Public Utilities' which are located within Flood Zones A or B.

(i) Rathnew Waste Water Pumping Station



Land Use Zoning	Public Utilities (PU)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

(ii) Knockrobin Waste Water Treatment Plant



Land Use Zoning	Public Utilities (PU)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional The Growth Centres. Wicklow County development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

- The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
 - (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;

All sites: Yes - Waste Water Treatment Plants / Pumping Stations serve all parts of established or designated urban settlements, including the core.

(ii) Comprises significant previously developed and/or under-utilised lands;

Site (iii): No. All other sites: Yes

(iii) Is within or adjoining the core of an established or designated urban settlement;

All sites: N/A Waste Water
Treatment Plants /
Pumping Stations
serve all parts of
established or
designated urban
settlements,
including the core.

(iv) Will be essential in achieving compact and sustainable urban growth; and

N/A – these lands

All sites: Yes

(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

are developed

A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the

Assessment of flood risk has been incorporated into the Plan SEA process.

development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

Conclusion

Sites (i) and (ii): Justification test satisfied.

Recommendation

Sites (i) and (ii): No further action required.

LAND USE ZONING: Tourism (T)

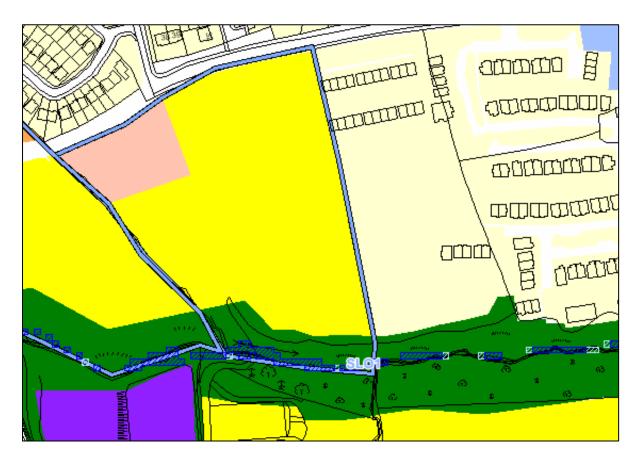
There are no areas zoned Tourism (T) that are located within Flood Zones A or B.

Land Use Zoning	Tourism (T)
Flood Zone	C
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

LAND USE OBJECTIVE: Specific Local Objectives (SLO)

There are locations within the plan area that are proposed to be subject to 'Specific Local Objectives', of which 5 No. coincide with lands identified as Flood Zones A or B. The objectives of each SLO that may coincide with a flood zone are highlighted in bold below:

(i) SLO1 - Ballynerrin Neighbourhood Centre



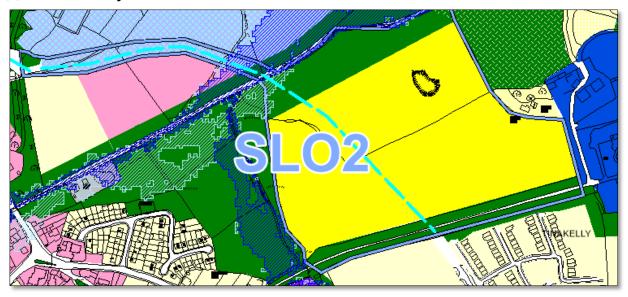
This SLO is located in the townland of Ballynerrin. The SLO comprises Neighbourhood Centre (NC), Open Space (OS1) and New Residential (RN1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- Appropriate retail and social / community facilities shall be provided, of a type and scale to be determined following the carrying out a Retail Impact Assessment and social / community needs audit of the area. Any such retail and social / community facilities shall be provided on lands zoned 'NC' and shall, unless otherwise agreed, be located in a combined 'neighbourhood centre'.
- The Neighbourhood Centre shall to be designed in a way that all elevations are of a high quality design. It is acknowledged that there is a difference in level from the Marlton Link Road down to the ground level of the site; the design of the Neighbourhood Centre shall include an active, well designed façade onto the Marlton link road whereby the neighbourhood centre building can be accessed by pedestrians coming off the link road as well as having a well designed façade and pedestrian access at the ground level of the site.
- Lands zoned Open Space (OS1) shall be developed as a riverine park / formal landscaped park, including an amenity walkway along the river.
- A 'green link' including walking/cycling links shall be to the forefront of the overall design, linking the riverine park to the Neighbourhood Centre and the Marlton Link Road, with the

- public open space for the residential development designed in a way to provide this green/walking/cycling link. The green link should be an attractive, supervised and easily accessible link that is a planted and well-landscaped open space.
- The potential for future pedestrian and cycling links shall be included in any proposal to allow for access to the neighbourhood centre from the undeveloped residential lands to the west.

Land Use Objective	Specific Local Objective (SLO) – SLO1 Land use zoning – OS1
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use objective is appropriate
Requirement for Justification Test	No

(ii) SLO2 - Tinakilly/Newrath

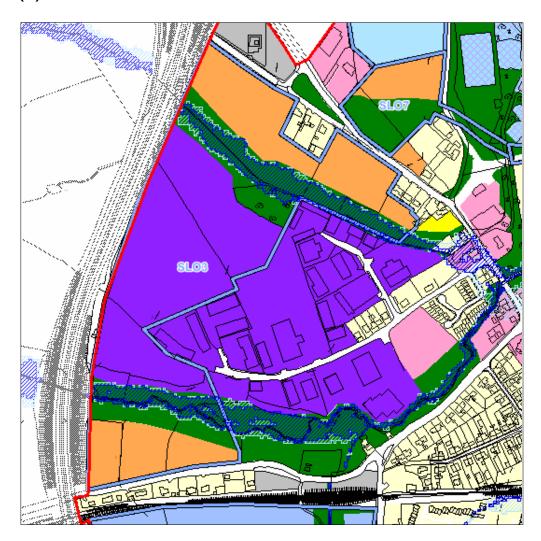


This SLO is located in the townlands of Tinakelly and Newrath. The SLO comprises New Residential (RN1), Natural Areas (OS2) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area and to achieve good traffic circulation in the area. The RIRR shall be constructed in full by the developer from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road.
- Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and
- Retain the 'fairy tree' at its current location (shown with green tree symbol on map SLO 2).

Land Use Zoning	Specific Local Objective (SLO) – SLO2 New road objective
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use objective not appropriate
Requirement for Justification Test	Yes

(iii) SLO3 - Milltown North

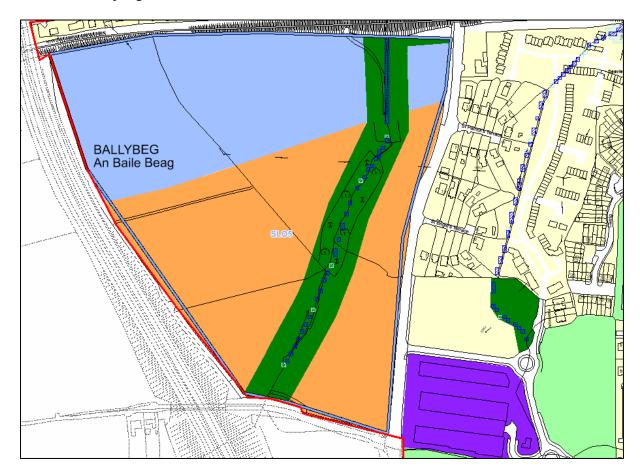


This SLO is located in the townlands of Milltown North and Ballybeg. The SLO comprises Employment (E), New Residential (RN –Priority 2) and Natural Areas (OS2) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- A new link road is to be provided that connects Tighe's Avenue to the R752.
- No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752.
- Any development on these lands shall take into account the N11 set back distances as specified for different development types in the County Development Plan.

Land Use Objective	Specific Local Objective (SLO) – SLO3 New road objective
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use objective not appropriate
Requirement for Justification Test	Yes

(iv) SLO5 – Ballybeg

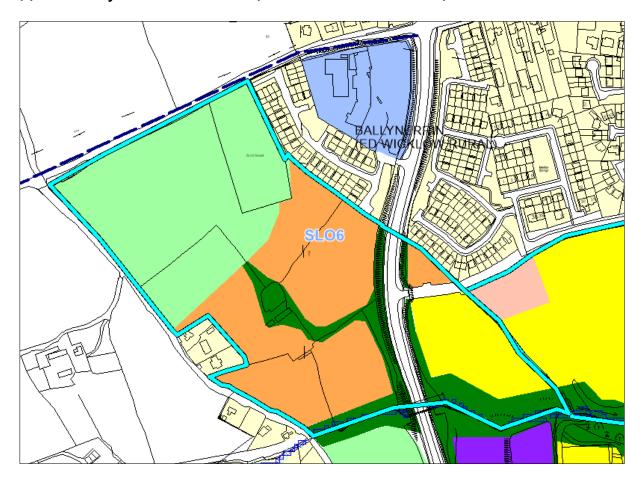


This SLO is located in the townland of Ballybeg. The SLO comprises New Residential (RN –Priority 2), Natural Areas (OS2) and Community and Education (CE) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- Lands zoned CE shall be reserved for future educational use and shall not be developed for any other CE use during the lifetime of this plan. Vehicular access to these lands shall be provided from the R772 to the east, with pedestrian access also to be provided via the existing railway underpass onto the R752.
- Any development on these lands shall protect the water course by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least 25m along each side free from development. Road / cycleway / footpath crossings over / through the OS2 riverine corridor shall be minimised to that absolutely necessary for access; any such crossing shall be via a clean span bridge over the watercourse that maintains its natural character.
- Any development on these lands shall take into account set back distances from the railway line and the N11 set back distances as specified for different development types in the County Development Plan.

Land Use Objective	Specific Local Objective (SLO) – SLO5 Land use zoning – OS2
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use objective is appropriate
Requirement for Justification Test	No

(v) SLO6 – Ballynerrin AOS Green link (west of the Hawkstown Road)



This SLO is located in the townland of Ballynerrin. The SLO comprises New Residential (RN1 – Priority 1 and RN2 – Priority 2) and zoning with Active Open space (AOS) to the northwest and OS2 and AOS to the south. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- A minimum area of 5.5ha shall be developed as a sports ground, including the laying out of pitches and the construction of appropriate parking and changing room facilities. The future management/maintenance arrangements and use of this facility shall be agreed with Wicklow County Council prior to the commencement of its use.
- Only 30% of the proposed total residential lands may be developed prior to the completion/delivery of the required sports facilities.
- The public open space for the residential development (RN2 lands) to the west of the Hawkstown Road shall be designed in a way to provide a 'green link', through the New Residential RN2 zoning, including walking/cycling links providing a connection between the Active Open Space (AOS) on the Hawkstown Road to the AOS on the Rocky Road. The green link should be an attractive, supervised and easily accessible link that is a planted and well-landscaped open space.
- Pedestrian and cycling links to the Neighbourhood Centre shall be included in any proposal on the lands adjoining the Neighbourhood Centre.
- The existing stream running through these lands, on OS1 lands, shall be incorporated in the overall design and layout of the action area, shall be developed as a riverine park / formal landscaped park, including an amenity walkway along the river.

Land Use Objective	Specific Local Objective (SLO) – SLO6
	Land use zoning – OS1
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use objective is appropriate
Requirement for Justification Test	No

Justification Test for SLO2, SLO3

Plan-Making Justification Test

The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

- 2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
- (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:

SLO2 and SLO3: The Rathnew Inner Relief Road and the Route between the R772 and R752 are essential to facilitate regeneration and/or expansion of the centre of Rathnew.

(ii) Comprises significant previously developed and/or under-utilised lands;

sly All sites: No.

(iii) Is within or adjoining the core of an established or designated urban settlement;

All sites: No.

(iv) Will be essential in achieving compact and sustainable urban growth; and

All sites: Yes

(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

All sites: Yes, as the road links in question would all require passing over flood zones regardless of the exact route in question.

A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

Assessment of flood risk has been incorporated into the Plan SEA process.

Conclusion

All sites requiring justification test: Justification test failed.

Recommendation

In relation to **SLO2** it is considered appropriate to maintain the SLO objective. There is no other possible route for the Rathnew Inner Relief Road that does not pass through flood zones, as the start and endpoints of the road have been already constructed on either side of the site. On the basis of the above, it is deemed appropriate to maintain the road objective on the site. The flood risk objectives of the County Development Plan shall apply to any development application.

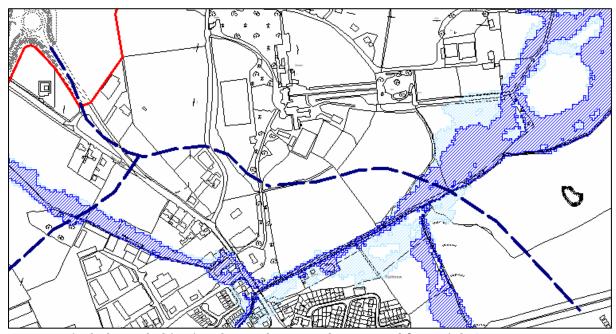
In relation to **SLO3**, it is considered appropriate to maintain the SLO objective; the road link proposed would require to pass over areas of flood risk regardless of exact location and layout. Such a road link would have to be consistent with CPO 17.26 of the Wicklow County Development Plan 2022-2028, which would require riparian buffers and clear-span bridges over watercourses rather than culverting, i.e. less development within the area at risk of flooding.

In the design of these road links, flood mitigation measures are required (see Section Mitigation Objectives below).

LAND USE OBJECTIVE: Road Objectives (RO)

It has been determined that there are 2 No. locations within the plan area that are proposed to be subject to 'Road Objectives' which are located within Flood Zones A or B.

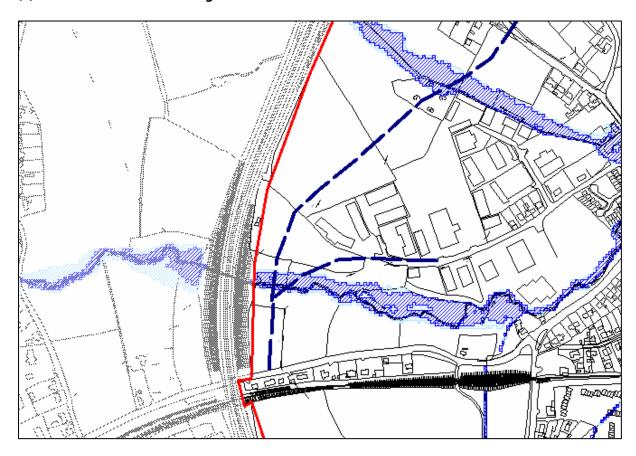
(i) Rathnew Inner Relief Road



[Does not include road objective shown above south-westward from Tighe's Avenue]

Land Use Objective	Road Objective (RO)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use objective not appropriate
Requirement for Justification Test	Yes

(ii) New Link Road Between Tighe's Avenue and the R752



Land Use Objective	Road Objective (RO)
Flood Zone	A & B
Vulnerability of Land Use vs. Flood zone	Land use objective not appropriate
Requirement for Justification Test	Yes

Justification Test for Road Objectives

Plan-Making Justification Test

The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The settlement strategy as contained within the Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031 designates 'Wicklow-Rathnew' as a 'Key Town' in the Core Region. This typology of settlement is described as having the capacity to act as a growth driver to complement the Regional Growth Centres. The Wicklow County Development Plan 2022-2028 maintains this designation within its settlement hierarchy and identifies this settlement typology as being identified for a growth rate of c. 35%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 18,515 persons by Q2 2028, from a 2016 population of 14,114 persons. The Core Strategy further indicates a total housing growth target of 2,392 units from 2016 to 2031.

The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:

(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;

The Rathnew Inner Relief Road and the Route between the R772 and R752 are essential to facilitate regeneration and/or expansion of the centre of Rathnew.

(ii) Comprises significant previously developed and/or under-utilised lands;

All sites: No.

(iii) Is within or adjoining the core of an established or designated urban settlement;

All sites: No.

(iv) Will be essential in achieving compact and sustainable urban growth; and

All sites: Yes

(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement. All sites: Yes, as the road links in question would all require passing over flood zones regardless of the exact route in question.

A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

Assessment of flood risk has been incorporated into the Plan SEA process.

Conclusion

All sites requiring justification test: Justification test failed.

Recommendation

In relation to **the Rathnew Inner Relief Road**, it is considered appropriate to maintain this road objective. There is no other possible route for the Rathnew Inner Relief Road that does not pass through flood zones, as the start and endpoints of the road have been already constructed on either side of the site. Such a road link would have to be consistent with CPO 17.26 of the Wicklow County Development Plan 2022-2028, which would require riparian buffers and clear-span bridges over watercourses rather than culverting. On the basis of the above, it is deemed appropriate to maintain the road objective on the site. The flood risk objectives of the County Development Plan shall apply to any development application.

In relation to **Tighe's Avenue-R752 link road**, it is considered appropriate to maintain the road objective; the road link proposed would require to pass over areas of flood risk regardless of exact location and layout. Such a road link would have to be consistent with CPO 17.26 of the Wicklow County Development Plan 2022-2028, which would require riparian buffers and clear-span bridges over watercourses rather than culverting.

In the design of these road links, flood mitigation measures are required (see Section Mitigation Objectives below).

4.3 Mitigation Objectives

All development proposals within the Wicklow Town-Rathnew Local Area Plan area will be subject to the full range of objectives of the Wicklow County Development Plan 2022-2028 (or any update thereof). The following mitigation objectives are included in Chapter 14 'Flood Risk Management' of the Wicklow County Development Plan 2022-2028:

CPO 14.01 To support the implementation of recommendations in the OPW Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.

CPO14.02 To support and facilitate flood management activities, projects or programmes as may arise, including but not limited to those relating to the management of upstream catchments and the use of 'natural water retention' measures⁴, and ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.

CPO14.03 To recognise the concept of coastal evolution and fluvial flooding as part of our dynamic physical environment, and adopt an adaptive approach to working with these natural processes. The focus of a flood management strategy should not solely be driven by conservation of existing lands; it should recognise that marshes, mud flats and other associated eco-systems evolve and degenerate, and appropriate consideration should be given to the realignment of defences and use of managed retreat and sacrificial flood protection lands to maintain such habitats as part of an overall strategy.

CPO 14.04 To ensure the County's natural coastal defences (beaches, sand dunes, salt marshes and estuary lands) are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.

CPO14.05 To continue to work with the OPW and other agencies to deliver Flood Defence Schemes in the County as identified in current and future FRMPs, and in particular:

- Avoca River (Arklow) Flood Defence Scheme;
- Avoca River (Avoca) Flood Defence Scheme;
- Low cost works in accordance with the OPW's Minor Works Scheme;
- Coastal Protection Projects, where funding allows;

and ensure that development proposals support, and do not impede or prevent, progression of such schemes.

⁴ Natural Water Retention Measures (NWRM) are multi-functional measures that aim to protect water resources and address water-related challenges by restoring or maintaining ecosystems as well as natural features and characteristics of water bodies using natural means and processes

- **CPO 14.06** To implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009).
- **CPO 14.07** To prepare new or update existing flood risk assessments and flood zone maps for all zoned lands within the County as part of the review process for Local Area Plans, zoning variations and Small Town Plans, where considered necessary.
- CPO 14.08 The zoning of land that has been identified as being at a high or moderate probability of flooding (flood zones A or B) shall be in accordance with the requirements of the Flood Risk Management Guidelines and in particular the 'Justification Test for Development Plans' (as set out in Section 4.23 and Box 4.1 of the Guidelines).
- **CPO 14.09** Applications for new developments or significant alterations/extension to existing developments **in an area at risk of flooding** shall comply with the following:
 - Follow the 'sequential approach' as set out in the Flood Risk Management Guidelines;
 - An appropriately detailed flood risk / drainage impact assessment will be required with all planning applications, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site), taking into account all sources of flooding;
 - Restrict the types of development permitted in Flood Zone A and Flood Zone B to that which are 'appropriate' to each flood zone, as set out in Tables 3.1 and 3.2 of the Flood Risk Management Guidelines unless the 'plan making justification test' has been applied and passed;
 - Where a site has been subject to and satisfied the 'Plan Making Justification Test' development will only be permitted where a proposal complies with the 'Justification Test for Development Management', as set out in Box 5.1 of the Guidelines.
 - Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines and the SFRA.

Where flood zone mapping **does not indicate a risk of flooding** but the Planning Authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment will be required to be submitted by an applicant for planning permission and the sequential approach shall be applied as the 'Plan Making Justification Test' will not be satisfied.

- **CPO 14.10** To prohibit development in river flood plains or other areas known to provide natural attenuation for floodwaters except where the development can clearly be justified with the Flood Risk Management Guidelines 'Justification Test'.
- **CPO 14.11** To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.

- **CPO 14.12** Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.
- **CPO 14.13** Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.
- CPO 14.14 Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SuDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.
- **CPO 14.15** To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.
- **CPO 14.16** For developments adjacent to all watercourses or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse in accordance with the guidelines in 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland

Furthermore, the following objectives relating to flooding and flood risk management are included in the Draft Wicklow Town –Rathnew LAP Written Statement:

- WTR82 To ensure the natural coastal defences are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.
- **WTR83** To continue to work with the OPW and other agencies to deliver Flood Defence Schemes and Coastal Erosion Schemes.

5. FLOOD RISK & CLIMATE CHANGE

'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009) make reference to the potential effects of climate change on flood risk and flood risk management.

In consultation with the Office of Public Works, future scenario flood mapping has been reviewed in relation to the area of the Wicklow Town-Rathnew LAP area. A precautionary approach to future estimates has been taken in that, where multiple future scenarios are available (e.g. mid-range, highend, etc.), the highest-end/worst case scenarios have been reviewed.

The following flood mapping has been reviewed:

CFRAM River Flood Extents High-End Future Scenario:

The High-End Future Scenario extents were generated taking in the potential effects of climate change using an increase in rainfall of 30% and sea level rise of 1,000 mm (40 inches).

CFRAM Coastal Flood Extents High-End Future Scenario:

The High-End Future Scenario extents were generated taking in the potential effects of climate change using an increase in rainfall of 30% and sea level rise of 1,000 mm (40 inches).

National Coastal Flood Hazard Mapping 'High++' End Future Scenario:

The High++ End Future Scenario (H++EFS) maps represent a projected future scenario for the end of century (circa 2100) and include allowances for projected future changes in sea levels and glacial isostatic adjustment (GIA). The maps include an increase of 2000mm in sea levels above the current scenario estimations. An allowance of -0.5mm/year for GIA was included for the southern part of the national coastline only (Dublin to Galway and south of this).

Having reviewed the above future scenario flood mapping, the following can be stated:

- The increase in fluvial and coastal flood extent, and sea level, generally affects the already developed areas within the area of the Wicklow Town-Rathnew LAP. As such, it is not appropriate to change the zoning of these lands from their existing permitted uses.
- Where green field land is affected by future scenario flood mapping, the sites are generally large enough such that the development of desired uses may avoid development in the at risk area utilising the sequential approach in site planning.

On this basis, the written statement of the Draft Wicklow Town – Rathnew Local Area Plan 2025 includes the following objective:

To have regard to the most up to date future scenario 'worst-case' flood mapping in any development proposal.

6. FLOOD MAPPING

See attached Map No. 4 'Indicative Flood Zones' indicating flood zones A & B as relevant to the Draft Wicklow Town-Rathnew Local Area Plan 2025.

Map No. 4 'Indicative Flood Zones' also indicates the area in which there may be a risk of flooding in the future when accounting for the effects of climate change. This area corresponds to a future Flood Zone B as represented by a combination of such zones from each of the datasets listed in Section 5 above.



ENDLESS OPPORTUNITIES