



## Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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### Draft Wicklow County Development Plan 2021-2027

The Eastern and Midland Regional Assembly notes the publication of the Draft Wicklow County Development Plan 2021-2027 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 9<sup>th</sup> July 2021.

#### Regional Spatial and Economic Strategy (RSES)

As indicated in the Assembly's previous submission to the County Development Plan review process made under Section 27A of the Planning and Development Act 2000, as amended ( hereafter referred to as 'the Act'), The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, made on 28<sup>th</sup> June 2019, which consequently initiated the statutory time period within which the Council are required to prepare their Draft Development Plan, as stated at Section 11(1) (b) of the Act. In this regard, The Assembly welcomes the publication of the Draft Wicklow County Development Plan which enables the coordinated and timely incorporation of Project Ireland 2040 - the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), thus ensuring full alignment between local, regional, and national planning policy.

#### Legislative Context

As required by Section 27B of the Act, The Eastern and Midland Regional Assembly has prepared this submission and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the aforementioned Act, a submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft development plan, and in particular its core strategy is consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the draft development plan, and its core strategy are not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27B of the Act.

The attention of the Council is also directed to the requirements of Section 12 (4) of the Act, whereby a Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

## Submission

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in order to prepare the Draft Plan and, in particular, that this work follows a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the RSES and the establishment of the Office of the Planning Regulator. Accordingly, the Assembly welcomes the overall approach and effort of Wicklow County Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.

The Assembly is also aware of upcoming guidance for Development Plans to issue from the Department of Housing, Local Government and Heritage (DHLGH) and acknowledges that the absence of these guidelines, at this time, will create challenges for some local authorities. Furthermore, the Assembly notes the difficulties posed to Local Authorities undertaking the Development Plan Review process during the period of COVID-19 restrictions and commends the Council in facilitating online engagement and consultation during the preparation of the Draft Plan.

The Assembly considers that the overall draft development plan, including its Core Strategy, are generally consistent with the RSES subject to the contents of the remainder of this submission. The submission broadly follows the chapter headings of the Draft Development Plan:

1. Introduction and Strategic Context
2. Development Plan Strategy
3. Core Strategy
4. Settlement Strategy
5. Town and Village Centres, Placemaking and Regeneration
6. Housing
7. Community Development
8. Built Heritage
9. Economic Development
10. Retail
11. Tourism and Recreation
12. Sustainable Transportation
13. Water Services
14. Flood Risk Management
15. Waste and Environmental Emissions
16. Information Communications and Energy
17. Natural Heritage and Biodiversity
18. Green Infrastructure
19. Marine Planning and Coastal Zone Management
20. Implementation and Monitoring
21. Appendices: SEA, AA and SFRA

### **1.0 Introduction**

The Assembly welcomes the inclusion of the first chapter of the Draft County Development Plan (CDP), which provides an overview of the statutory context and planning policy hierarchy with which the CDP is required to be consistent with, including 'Project Ireland 2040' the National Planning Framework (NPF), the RSES, the National Transport Authority's 'Transportation Strategy for the Greater Dublin Area 2016-2035' and the National Climate Action Plan.

The Assembly also welcome the recognition given to the Dublin Metropolitan Area Strategic Plan (MASP), which is a key policy document to support sustainable population and economic growth in the Dublin Metropolitan Area, which includes parts of Bray and Greystones in Wicklow County Council.

The Plan is also informed by Ministerial Guidelines, including Specific Planning Policy Requirements (SPPRs) of Section 28 Guidelines as listed in Section 3.9 Core Strategy and in Appendix 10, and the required environmental assessments Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) in Appendices 6,7 and 8, respectively.

The Assembly further welcomes the setting out in Chapter 2 of the overarching cross-cutting themes of Healthy Placemaking, Climate Change and Economic Opportunity that inform the plan, which align with the key principles and National and Regional Strategic Outcomes identified in the NPF and RSES. This is supported by the identification of relevant National and Regional Policy Objectives (NPOs and RPOs) relating to the themes and embedded within the local, national and EU policy hierarchy.

## **2.0 Core and Settlement Strategy**

The Assembly acknowledge the work that has gone into the preparation of Chapter 3 which details the Core Strategy and Settlement Hierarchy of the Draft CDP, Zoning Principles, Key Transport Infrastructure Proposals, a County Retail Hierarchy, and compliance with Section 28 Ministerial Guidelines. Chapter 4 - Settlement Strategy provides further detail on the role and function of settlements, growth targets and housing occupancy controls relating to their level in the County Settlement Hierarchy.

### **2.1 Statutory Requirements**

Local Authorities are required to prepare and incorporate a Core Strategy that shows the Development Plan is consistent with National and Regional Objectives under the National Planning Framework (NPF) and the relevant Regional Spatial and Economic Strategy (RSES), in accordance with the provisions of Section 10 of the Act. The Assembly draws the particular attention of the Council to Section 10 (2A), (2B) and (2C) of the Act and asks Wicklow County Council to ensure consistency in this regard.

### **2.2 National and Regional Population Projections**

Section 3.1 -Population sets out the statutory context for the application of population projections in the Draft CDP, which is welcomed by the Assembly. Table 3.1 sets out initial Population Projections for County Wicklow to grow up to 157,500 population to 2026 and up to 164,000 2031 in line with the National and Regional Population Projections in the NPF Implementation Roadmap issued under DHPLG Circular FPS04/2018 and Appendix B of the RSES.

The County population projections then apply an additional 25% headroom up to 2026 as allowed for in the Methodology for Transitional Projections in the NPF Implementation Roadmap, and a further 9,500 population to 2031 to be allocated directly to facilitate the growth of Bray as a Metropolitan Key Town. As allowed for in the Transitional Population Projections for the Dublin Metropolitan Area Strategic Plan (MASP), in line with National Policy Objective (NPO 68) of the NPF, which was approved by this Assembly on the 10<sup>th</sup> July 2020.

The total County population projections in Table 3.1 allow for County Wicklow to grow up to 161,269 by 2026 and up to 173,500 population by 2031. This equates to an additional population increase of 18,769 (high) in 2026 and an additional population of 31,075 (high) in 2031, over the 2016 census baseline population, which is considered to be consistent with the population prescribed for the County in the RSES and the NPF, as adjusted according to the transitional arrangements allowed for in the NPF Implementation Roadmap for headroom and NPO 68 of the NPF.

Notwithstanding that the Core Strategy population projections are generally consistent with the projections to 2026 and 2031 in the NPF and RSES, it is recommended the Core Strategy should also set out the population projections for the plan period, which is estimated to cover a six-year period from 2022 to 2028. The Draft CDP should also be strengthened through the inclusion of a robust

evidence-based analysis of population trends and distribution that will set the context and justification for the allocation and distribution of population growth in the County over the plan period.

### 2.3 Housing Targets

Section 3.2- Housing sets out the methodology for integrating National and Regional Population Projections into the number of housing units to be delivered between 2020 -2031 in the County.

Table 3.3 sets out a projected new housing demand for the period from 2021 to 2026 of 4,891 units, which is stated to be in accordance with the 'Housing Supply Target Methodology for Development Planning' Section 28 Guidelines published by DHLGH in December 2020, and that thereafter it is assumed that housing demand will be delivered evenly up to 2031. It is recommended that the Core Strategy should also set out clearly the projected Housing Demand for the plan period, which is estimated from 2022 to 2028, and to demonstrate consistency in this regard with the methodology in Table 1 of the Housing Supply Target (HST) Methodology Guidelines, which incorporates potential adjustments to facilitate convergence with the NPF Roadmap and application of additional headroom, where justified.

Table 3.4 includes an additional allowance for a further 3,820 units<sup>1</sup> to be allocated directly to facilitate the growth of Bray as a Metropolitan Key Town to 2031, which is consistent with the Transitional Population Projections for the Dublin MASP and NPO 68 of the NPF. This is to be delivered in a linear manner over the period to 2031 which would equate to 382 units per annum to be delivered up to and during the plan period. The phased allocation to Bray is considered to be consistent with the short (2026) to medium (2031) term phasing for 'Bray-Fassaroe' in Table 5.1 of the MASP<sup>2</sup>.

To inform housing policies in the Draft CDP, the Council states that it has prepared an interim Housing Strategy in the absence of Ministerial Guidance on the preparation of an evidence-based Housing Need Demand Assessment (HNDA), as required by NPO 37 of the NPF and RPO 9.5 of the RSES. The Assembly welcome the stated intention of the Council to review the Housing Strategy following the adoption of relevant Section 28 Guidelines. The Council will further note the recent publication in April 2021 of HNDA Guidelines by the DHLGH and the accompanying Circular 14/2021, which states that the HST Methodology Guidelines will continue to facilitate decisions regarding new housing supply targets for the six-year period of development plans that are being formulated currently, to be determined in advance of the full integration of HNDA methodology into the Housing Strategy.

### 2.4 Settlement and Housing Strategy

The Assembly commends the Council for undertaking an evidence-based analysis of settlements in the County in accordance with the RSES Asset Based Methodology, to inform the designation of settlements in the County Settlement Hierarchy, which is set out in Table 3.5 of the Draft CDP and builds on the Settlement Strategy and Settlement Hierarchy in the RSES, and the strategic development areas in Table 5.1 of the MASP.

The Assembly also welcomes the graded approach to the allocation of population as appropriate to the level in the settlement hierarchy for the County, and the use of consistent terminology reflective of the RSES as follows;

- Key Towns: Level 1 – Bray, and Level 2 - Wicklow-Rathnew.
- Self-Sustaining Growth Towns: Level 3 - Arklow, Greystones-Delgany, Blessington.
- Self-Sustaining Towns: Level 4 - Baltinglass, Enniskerry, Kilcoole, Newtownmountkennedy (NTMK), Rathdrum.

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<sup>1</sup> Applying 2.5 persons per household to the permitted 9,500 population allowance to Bray in the Dublin MASP

<sup>2</sup> Development at Fassaroe should take place in collaboration between Wicklow and Dún Laoghaire–Rathdown County Councils and the transport agencies.

- Towns and Villages: 11 no. Small Towns at Level 5 - Ashford, Aughrim, Carnew, Dunlavin, Tinahely and Level 6 - Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh.
- Villages: 27 no. Villages at Level 7 and Level 8 Villages.
- Rural: 29 no. Rural Clusters and the Open countryside.

Notwithstanding the general consistency in the terminology and settlement typologies, it is recommended that consideration be given to the further rationalisation of designated settlements within the County Hierarchy, with particular reference to the high number of designated settlements in Levels 7-9 and this is further elaborated in Section 2.4.5 Villages and Rural Clusters.

The inclusion of supporting information in Chapter 4 – Settlement Strategy with reference to growth targets and the role and function of towns relative to their position in the Settlement Hierarchy is a positive addition to the Draft CDP. With reference to the 21 listed towns, it is noted that Volume 2 of the Draft CDP contains a set of ‘Small Town Plans’ for Ashford, Aughrim, Avoca, Baltinglass, Carnew, Donard, Dunlavin, Laragh-Glendalough, Newcastle, Newtownmountkennedy, Rathdrum, Roundwood, Shillelagh and Tinahely. Chapter 4 also maps settlement boundaries for Level 7-9 Settlements.

However, the larger towns of Bray, Greystones, Wicklow – Rathnew, Arklow, NTMK and Blessington currently have their own stand-alone ‘Local Area Plans’ (LAPs), which do not form part of the Draft CDP and it is intended that these will be reviewed after the adoption of the Plan. The Assembly welcomes the inclusion of Settlement Strategy Objective CPO 4.8 that commits the Council to preparing new LAPs for Bray Municipal District (including Eniskerry), Greystones-Delgany and Kilcoole, Wicklow-Rathnew, Arklow and Blessington during the lifetime of the CDP, and this should be further strengthened by setting out the intention of the Council to incorporate the land zoning objectives for these settlements into any future iterations of this CDP.

It is considered that the Core and Settlement Strategy could be further strengthened by setting out clear parameters for the provision of compact growth, in particular for the LAP areas in higher order settlements Levels 1-3, in accordance with the projected growth targets in the County Settlement Hierarchy, and this is further elaborated in Section 2.5 Core Strategy and in particular Sections 2.5.2 Compact Growth Targets and 2.5.3 Land use Zoning.

#### **2.4.1 Key Towns (Levels 1 and 2)**

Bray and Wicklow-Rathnew are designated as Level 1 and Level 2 Key Towns in the Wicklow County Hierarchy. This is consistent with the RSES, which designates Bray and Wicklow-Rathnew as ‘Key Towns’ in the third tier of the RSES Settlement Hierarchy (with the former located within the Dublin Metropolitan Area). Key Towns are defined as large economically active towns that provide employment for their surrounding areas with the capacity to act as growth drivers for the County.

The Core Strategy allocates 52% of the total population growth to 2031 in the County to the Key Towns, providing for population growth in Bray and Wicklow-Rathnew to increase by 10,779 and 5,357 respectively over their 2016 populations to 2031. This equates to a total population in 2031 of 29,646 (+36%) in Bray and 14,114 (+ 38%) in Wicklow-Rathnew.

It is noted that the significant growth identified for these towns i.e. 30% or more above 2016 population levels are in accordance with NPO 9 of the NPF, and are consistent with their designation in the RSES Settlement Hierarchy.

#### **2.4.2 Self-Sustaining Growth Towns (Level 3)**

The Wicklow County Hierarchy identifies Arklow, Greystones-Delgany and Blessington as Level 3 ‘Self-Sustaining Growth Towns’, defined in the RSES Settlement Hierarchy as towns with a moderate level of jobs and services, including sub County market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.

The Core Strategy allocates 25% of the total population growth in the County to these 3 towns reflecting a graded approach in the settlement hierarchy. The Core Strategy also sets out population increases of 3,215 in Arklow (+24%), 3,611 in Greystones-Delgany (+20%) and 802 in Blessington (+15%) over their 2016 populations. This equates to a total population in 2031 of 16,441 in Arklow (+24%), 21,632 in Greystones-Delgany (+20%) and 6,036 in Blessington (+15%). It is noted the level of planned growth for these 'Self-Sustaining Growth Towns' is below the significant growth rates for Key Towns.

Notwithstanding this and noting the level of development that is already underway in Greystones-Delgany (1,738 units constructed/under construction since 2016 - Table 3.9), that need to be taken into account in the Core Strategy, it is recommended that further consideration should be given to the designation of Greystones-Delgany. Having regard to past and current trends of rapid commuter-focused population growth, without equivalent increases in jobs and a weak employment base, characterised by a low ratio of jobs to resident workforce, it is recommended that a more appropriate designation as a 'Self-Sustaining Town', would promote 'catch up' investment in local employment, services and sustainable transport options and enable Greystones-Delgany become more self-sustaining.

#### **2.4.3 Self Sustaining Towns (Level 4)**

The County Hierarchy identifies Baltinglass, Enniskerry, Kilcoole, Newtownmountkennedy (NTMK) and Rathdrum as Level 4 'Self-Sustaining Towns', which are defined in the RSES as towns with a high level of population growth and a weak employment base that are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining.

The Core Strategy provides for growth in these 5 towns from approximately 13,640 in 2016 to 16,660 in 2031, which equates to an increase of 3,020 (+22%) over 2016 population, or 10% of the total allocated growth in the County reflective of the graded approach within the settlement hierarchy.

Population growth in Level 4 towns overall is targeted to be in the 20%-25% range and it is stated that variation in future growth rates between towns is due to developments already underway in some towns (particularly Rathdrum and NTMK). It is noted that the projected growth rates for NTMK (+47%) and Rathdrum (+45%) are significantly in excess of higher tier settlements and also exceed the 30% threshold for significant growth set out NPO 9 of the NPF. It is acknowledged that Table 3.9 sets out the units that are constructed/under construction since 2016 in NTMK (837) and Rathdrum (269), which would account for a significant proportion of the proposed growth. Nevertheless, it is recommended that the Core Strategy should include an analysis and rationale of the proposed growth rates, based on past delivery and potential including extant permissions, that outlines the suitability, or otherwise, in accordance with NPO 9, of the proposed growth rates for NTMK and Rathdrum.

#### **2.4.4 Towns and Villages (Levels 5- 6)**

The RSES defines 'Towns and Villages' as providing local service and employment functions. The Wicklow County Hierarchy identifies Type 1 Small Towns (Ashford, Aughrim, Carnew, Dunlavin, Tinahely) have populations between 800-1500, and Type 2 Small Towns (Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh), which are more rural with populations of 400-900.

The Core Strategy provides for growth in these 11 small towns and villages from approximately 9,545 in 2016 to 11,555 in 2031, which equates to an increase of 2,020 (+21%) over 2016, or 6% of the total allocated growth in the County reflective of the graded approach in the settlement hierarchy.

While the overarching Settlement Strategy policies for Towns and Villages are found in the 'Small Town Plans' in Volume 2, the inclusion of supporting information in relation to population growth, the role and function of towns and housing occupancy controls in Volume 1 Chapter 4 – Settlement Strategy is a positive addition to the CDP. The Assembly also welcomes the statement in the Core



Strategy that all of the targeted growth in Levels 5-9 can be accommodated within the existing built-up footprint of these settlements, which will support achievement of compact sustainable growth.

#### **2.4.5 Villages and Rural Clusters (Levels 7- 9)**

The Settlement Hierarchy identifies 37 Rural Villages (12 Level 7 Large Villages and 22 Level 8 Small Villages) which are described as rural villages that have a moderate or limited level of existing infrastructural services with populations generally under 500 and 100 people respectively.

A further 29 no. Level 9 Rural Clusters are designated, and the stated purpose of this designation is to direct rural generated housing into rural clusters rather than the open countryside. Settlement Boundary Maps for these villages and rural clusters are set out in Chapter 4-Settlement Strategy

The Core Strategy provides for growth in rural villages and clusters (Levels 7-9) from approximately 33,327 in 2016 to 35,280 in 2031, which equates to an increase of 1,953 (+6%) over 2016 or 1% of the total allocated growth in the County reflective of the graded approach in the settlement hierarchy.

The Assembly consider the inclusion of housing policy CPO 6.31, which supports the 'Serviced Site Initiative', new homes in small towns and villages' as a positive addition to the Draft CDP. This is in keeping with RPO 4.78 which support the development of a 'New Homes in Small Towns and Villages' initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements to meet housing demand."

Notwithstanding the above, having regard to the high number of rural type settlements in the County Hierarchy, it is recommended that consideration be given to further rationalisation of the number of designations with particular reference to identified issues in Table 8.3 of the Strategic Environmental Assessment (SEA) Report in relation to environmental capacity and infrastructural deficits in certain Towns, Villages and Rural Clusters.

It is recommended that the Draft CDP be amended to ensure the designation of these settlements does not undermine National and Regional Strategic Outcomes in the NPF and RSES of compact growth and sustainable transport and the strategic environmental objectives in the Draft CDP, and to set out a rationale and evidence of same.

#### **2.4.6 Open Countryside and Rural Housing (Level 10)**

The Settlement Hierarchy defines 'Open Countryside' at Level 10 and the narrative in Chapter 4 – Settlement Strategy, defines this as all the rural area outside of the designated settlements.

The Core Strategy provides for a growth in rural population from approximately 33,327 in 2016 to 35,280 in 2031, which equates to an increase of 1,953 (+6%) over 2016 population, or 6% of the total allocated growth in the County.

The Assembly notes the inclusion of a rural housing policies in Chapter - 6 of the Draft CDP and welcomes the stated intention of the Council to support the sustainable development of rural areas in Wicklow by facilitating appropriate activities while protecting the natural environment and managing rural housing and other rural uses.

To support this, it is recommended that criteria detailing the requirement for housing in the open countryside be included in the Core Strategy, with reference also to the requirement to manage urban generated growth in Rural Areas Under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas, and the inclusion of a map to demonstrate same. It is furthermore recommended that the Council demonstrate compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements, in line with RPOs 4.80 and 4.81, and NPO 19 of the NPF.

### 2.4.7 Housing occupancy controls

The Core Strategy sets out Housing Occupancy Controls for each tier in the settlement hierarchy. With regard to Level 7-10, rural villages and clusters have housing occupancy controls relating to the provision of new homes in a graded approach reflective of their position in the hierarchy.

Chapter 6 – Objective CPO 6.41 (rural housing policy) seeks to manage new development in the open countryside by applying criteria for a demonstrable social or economic housing need, which is considered to be consistent with the requirement to manage urban generated housing in rural areas.

It is noted that the Draft CDP also proposes for to apply a local needs criterion to Level 1- 6 settlements, specifically CPO 6.2, which states *“that for multi-house developments of 10 units or more that 25% of applicant’s purchasers of any new home must have lived for at least 3 years duration in County Wicklow, within 15km of the proposed development site, prior to purchasing a home. This does not include units delivered in accordance with Part V”*. The Assembly note that local needs criteria in development plans are generally applied in the context of rural areas and consider the application of such housing occupancy controls in higher order urban settlements may be overly restrictive and undermine the National and Regional Strategic Outcomes of compact growth and urban regeneration.

It is recommended that the Council ensure that related policy in this regard is consistent with NPO 19 of the NPF and the content of Circular Letter PL 2/2017 “Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans.”

## 2.5 Core Strategy

The Assembly welcomes the graded approach to the allocation of population set out in Table 3.5 ‘Settlement Hierarchy’ for the County, which is considered to be generally consistent with the settlement strategy and hierarchy in the RSES subject to the observations set out in this report.

The Assembly also welcome the evidence-based approach taken by the Council in the subsequent Tables in Section 3.4 – ‘Population and Housing Allocations’ and Section 3.5- ‘Zoning’ and the setting out of Zoning Principles for the location of new development that relate to the advancement of the plan and the preparation of new Local Area Plans (LAPs) that include delivery of:

1. Compact Growth, with targets of 30% of all new homes that are targeted in settlements within their existing built-up footprints, in accordance with NPO 3c of the NPF and RPO 3.2 of the RSES;
2. Population and Housing Targets, which are set out in the Draft CDP up to 2031;
3. Higher Densities, in accordance with SPPR 4 of the Urban Development and Building Heights Guidelines for Planning Authorities;
4. Sequential Approach, with a focus on town centre and infill/brownfield sites as part of a ‘Tiered Approach to Land Zoning’ set out in the NPF.

These principles are welcomed and could be further strengthened to include policies or objectives for monitoring of residential development permitted in settlements designated under the Settlement Hierarchy, including delivery of compact growth and residential development permitted for single rural houses, in line with NPO 36 of the NPF, in order to ensure compliance with the population allocations defined by the Core Strategy.

### 2.5.1 Population and Housing Allocations

In Section 3.4, Table 3.6 set out population allocations and Table 3.7 sets out housing allocations up to 2031 for each of the settlements in Levels 1-4, with aggregate growth targets for settlements in Levels 5-10 between 2016-2031. Table 3.8 provides further breakdown of ‘Settlement/Aggregate Housing Targets’ to 2026 and 2028, which is welcomed, and it is recommended that the Core Strategy should also set out the settlement/aggregate population targets for the plan period to 2028.



Table 3.9 (Section 3.4) sets out 'Housing development completed, underway and permitted' since 2016, which is a positive addition and could be further supported with a narrative on expected delivery rates for extant development, based on an analysis of past delivery and current trends in the County, and by inclusion of relevant information on residential development completed, underway and permitted in rural villages, clusters, and the open countryside. This is supported by NPO 20 of the NPF, which requires that development plans quantify the demand for rural housing to '*Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and County development plan core strategy processes.*'

### 2.5.2 Compact growth Targets

The Assembly welcome Objective CPO 4.2 to secure delivery of compact growth targets and Table 3.9 (Section 3.5) 'Compact Growth Housing Targets 2022-2031', which sets out minimum housing targets to provide at least 30% of all new homes on lands within the built-up area of higher order settlements, in line with the NPF and RSES.

This is a very positive addition to the Draft CDP and could be further strengthened to include a requirement for monitoring of compact growth permitted in settlements designated under the Settlement Hierarchy, in line with NPO 36 of the NPF, and supported by the Zoning Principles of 'Compact Growth' and a 'Sequential Approach' as set out in Section 3.5 of the Draft CDP. This is further reinforced by RPO 5.5 that supports a clear sequential approach for future residential development in the MASP and by RPO 4.2, which requires that development should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services, and so that the assimilative capacity of the receiving environment is not exceeded.

It is noted that Table 3.10 indicates the majority of higher order settlements Levels 1-4 (with the exception of Baltinglass and Rathdrum), have a surplus of zoned lands outside the built-up area (expressed in housing yield), and that this will be addressed in new LAPs following the adoption of the Draft CDP. For LAP towns, it is noted that this is estimated on current zoned lands excluding lands already developed or under construction and disregarding extant permissions as yet to commence.

While the Assembly notes the strategic intent of the Council to promote compact growth in the following statement in Section 3.4 of the Core Strategy "*there shall be no quantitative restriction inferred from this Core Strategy and associated Tables on the number of units that may be delivered within the envelope of the town*", it is nevertheless recommended that this statement be amended for clarity to ensure that future residential development is subject to the parameters set by the targeted population and housing growth within the County Settlement Hierarchy as set out in Tables 3.6 and 3.8 of the Draft CDP and is in line with regional and national population projections.

With reference to lower order settlements, it is stated that that "*all of the targeted growth in towns/villages at Levels 5-9 can be accommodated within the existing built-up footprint of these settlements*" and this is welcomed as an extremely positive statement in the Draft CDP.

### 2.5.3 Land use Zoning

Further to the above and notwithstanding the welcome evidence-based content of Tables 3.5 – 3.10, it is noted that there is no quantification in the Core Strategy of the Draft CDP of lands zoned for residential use or a mixture of residential and other uses, as required under Section 10 (2A) of the Act.

To this end, the Assembly recommend the inclusion in the Core Strategy of a table which clearly sets out the overall quantum of zoned residential lands that is required to provide for the targeted growth at settlement/aggregate level within the settlement hierarchy for the County.

The Council are directed in this regard to the 'Methodology for a Tiered Approach to Land Use Zoning' in Appendix 3 of the NPF for current development or area plans., As part of an infrastructural assessment to identify lands that cannot be serviced during the life of a development or area plan,

and to take into account any strategic land bank objectives in the current LAPs and Town Plans as part of a phased approach to the provision of serviced lands. It is noted that strategic land banks are identified in Level 4 and 5 Town Plans for lands where development may only be considered for detailed zoning and development after 2028. It is further noted that Section 1.2.1 Zoning Objectives for Level 5 Settlements indicate these lands may only be considered for development after 2027 and it is recommended that this be updated to reflect the plan period of the Draft CDP.

It is further highlighted that the land use zoning maps in Volume 2 of the Draft CDP proposes amendments to extend the plan boundaries and zoned land in Baltinglass, Newtownmountkennedy, Aughrim, Dunlavin, Roundwood and Shillelagh, and would potentially allow housing growth to exceed the Core Strategy growth target for these towns in conflict with NPO 9, with potentially significant adverse effects on the environment as highlighted in Table 8.3 of the Strategic Environmental Assessment (SEA) Report. It is recommended that the Council provide a robust and clear rationale, that outlines the suitability, or otherwise, of these land use zonings in accordance NPO 3c of the NPF and RPO 3.2 of the RSES and the recommendations of the SEA environmental report.

### **3.0 Towns and Villages**

The NPF and RSES place a strong emphasis on strengthening Ireland's urban structure by targeting compact growth in urban areas, facilitating access to services, protecting and enhancing the historic character and heritage to strengthen the sense of place and build healthy, attractive, liveable places.

The Assembly welcome the inclusion of dedicated Chapters on Placemaking and Regeneration, Town and Village Centres (Chapter 5) Housing (Chapter 6), Community Development (Chapter 7) and Built Heritage (Chapter 8) aimed at the delivery of improved public realm and physical and social infrastructure to create a vibrant network of towns and villages throughout the County, in line with the principles of Healthy Placemaking, which also underpins the RSES.

#### **3.1 Placemaking and Regeneration**

The Assembly welcome in particular the inclusion of a chapter dedicated to Town and Village Centres, which reference to the Framework for Town Centre Renewal, the undertaking of town centre health checks, the identification of placemaking and heritage projects and inclusion of settlement specific Objectives to support compact growth, regeneration and revitalisation of settlements as appropriate to their level in the County Settlement Hierarchy.

This is further supported by policies and objectives contained within Chapters 7 – Community Development, including guidance for social infrastructure audits and a community facilities hierarchy (Table 7.1), and in Chapter 8- Built Heritage, which supports actions in the County Heritage Plan, to promote Wicklow's built heritage, supported by the maps which identify sites and areas of archaeological and architectural importance, and the schedule of Protected Structures in Appendix 4.

The Assembly welcome that Town Plans for Levels 4 and 5 settlements include a land use zoning map, a heritage map, and a map showing renewal and regeneration areas where opportunities to use the Vacant Site Levy will be examined. The Town Plans also identify town centre opportunity sites and areas that will be subject to the preparation of Action Area Plans to manage their phased development. Also welcomed it the statement that only locations that are already served or have committed investment in water and wastewater infrastructure shall be identified for new development and that sustainable mobility will be promoted as part of any new development.

Further to the above, it is considered that the inclusion of specific objectives for the higher order Level 1-3 settlements in the hierarchy, in tandem with the timely preparation of Local Area Plans (LAPs) and existing Town Plans will benefit the Council in developing competitive bid proposals for Project Ireland 2040 - Urban and Rural Regeneration and Development Funds (URDF & RRDF), the Town and Village Renewal Scheme and other funding sources and will support the COVID-19 pandemic recovery.

### 3.2 Housing

The Assembly welcome the inclusion of a dedicated Chapter 6- Housing and the Housing Strategy in Appendix 3 of the Draft CDP and acknowledges the extensive work that has gone into the preparation of this chapter which sets out policies and objectives to cater for housing need in the County, the appropriate mix of housing types and sizes, provision of specialist and social and affordable housing, and policies to manage housing in rural settlements and in the open countryside.

The Assembly also welcomes the consolidation of rural housing policies in Chapter 6 supported by Appendix 2 – Single Rural Houses Design Guide, and the inclusion of Section 6.3, which sets out Key Housing Principles including sustainable communities, compact growth and active land management, ‘walkable’ neighbourhoods, quality design, application of a sequential approach and phasing of zoned/designated lands, and prioritisation of environmental considerations and climate action.

The Chapter also sets out compliance with Ministerial Guidelines, including Sustainable Residential Development in Urban Areas (2009), Sustainable Urban Housing: Design Standards for New Apartments (2018) and the Urban Development and Building Heights Guidelines (2020).

As stated above in Sections 2.3 and 2.4 of this submission, DHLGH, in December 2020, published ‘Housing Supply Target Methodology for Development Planning’ Section 28 Guidelines, and published the Housing Need Demand Assessment (HNDA) Ministerial Guidelines in April 2021 and it is recommended that the Draft CDP be updated to comply with these Guidelines, and any other relevant Ministerial Guidelines prior to the finalisation of the County Development Plan.

### 4.0 Economic Development

The NPF and RSES target both orderly population and employment growth in urban areas in accordance with the settlement hierarchy. The Assembly welcome that Economic Opportunity is identified as one of the cross-cutting themes in the Draft CDP, in alignment with the Key Principles underpinning the RSES and the Economic Strategy in the RSES.

Chapter 9- Economic Development sets out policies and objectives that outline where the Council will support new or expanded employment generating development, in accordance with the Settlement Hierarchy and Economic Development hierarchy designating the higher order towns of Bray, Wicklow-Rathnew, Arklow, Greystones-Delgany and Blessington as the key focus for economic growth. The Draft CDP also identifies strategic employment locations at Bray-Fassaroe and Greystones, which are set out in Table 5.1 of the Dublin MASP.

The draft CDP also proposes a small number of specific tourism and economic development zoning objectives, which are detailed on maps in Chapters 9 and 11, which should be tested against the Guiding Principles for the Strategic Location of Employment Development set out in Section 6.3 of the RSES and the Guiding Principles for Integration of Transport and Landuse in Section 8.3 of the RSES.

The Assembly welcome the inclusion of policies that support implementation of the Local Economic and Community Plan (LECP), in line with RPO 6.12 in the RSES the stated intention of the Council to work with Local Enterprise Offices (LEOs), the Enterprise Agencies, Higher Education Institutes (HEIs), Regional Skills Fora, and other stakeholders, and to build on the Mid-East Regional Enterprise Plan (REP) to support local economic development and respond to new opportunities and challenges such as Brexit, Climate Action, Digital Economy, and the Covid-19 pandemic economic impacts.

Also welcomed is the evidence-based analysis of Wicklow’s employment trends and economic profile in Section 9.2, which sets the context for the Council’s aim to increase the ‘Jobs Ratio’ to a sustainable level of 0.7 in the County by 2031. It is recommended that the evidence-based approach should be enhanced by the inclusion of information on the quantum of employment generating zoned lands in

the County, and any requirement for additional zoned employment lands that are proposed in the Draft CDP.

The Draft CDP supports the role of regional ports including Wicklow and Arklow, and existing rural industries, while promoting diversification of the rural economy, and growth in key sectors such as film, food, bioeconomy, wholesale/retail, transport, tourism and recreation, forestry, and the marine.

The Draft CDP also sets out Guiding Principles for the location of strategic employment development and to promote sustainable land use and transportation patterns, whereby ‘people intensive’ employment is located close to higher order centres and public transport routes, whereas ‘goods based’ employment types have good access to road transport corridors, also supporting the potential of developing remote working hubs and enterprise spaces in the County, which is welcomed and is consistent with the Economic Strategy in the RSES.

#### **4.1 Retail**

The Assembly welcome the inclusion in the Core Strategy of Section 3.7 setting out the County Wicklow Retail Hierarchy (Table 2.7), which is consistent with the Settlement Hierarchy and the Retail Hierarchy of the RSES (Table 6.1), and of a dedicated Chapter 10 – Retail, which recognises the importance of retailing in terms of employment and attracting people into town centres, and the challenges facing the sector from increased online retail and the impacts of the Covid-19 pandemic.

The stated objectives of the Retail Strategy are welcome, including, to promote access by walking, cycling and public transport, to strengthen retail cores by addressing vacancy and derelict/underutilised sites, provision of a diverse mix of uses including residential and living over the shop opportunities, and to promote the town centre first for expansion of retail floorspace as part of a sequential approach. The Strategy sets broad guidance as to the location and function of retail activity and a general statement of additional retail development requirement for higher order settlements in accordance with the Retail Planning Guidelines for Planning Authorities, and could be further strengthened by including information on the overall quantum of retail floorspace available and the need for additional retail floorspace, to support the settlement hierarchy.

Table 10.1 Retail Hierarchy and Strategy for County Wicklow and Table 10.2 Retail formats sets out guidance and criteria for the assessment of development proposals over the plan period. The Strategy supports the high order retail function of Bray and Wicklow Key Towns as Level 2 Major Town Centres. Level 3 Town/District Centres have been assessed as Tier 1 Towns serving a wide catchment (Arklow, Blessington), and Tier 2 Towns serving the immediate district (Greystones, Baltinglass, Rathdrum and NTMK). A further number of Level 4 and 5 Neighbourhood/Local and Village centres are identified, as appropriate to their level in the settlement hierarchy and local retail functions.

The Assembly welcome in particular the objectives to identify and develop key town centres opportunity sites and the inclusion of ‘Core Retail Area’ maps in the Draft CDP, which will support the diversity and vibrancy of town centre core areas and underpinned by policy objectives in Chapter 5 - Placemaking and Regeneration, which is in keeping with importance of placemaking as key to attracting and retaining talent and investment, and a number of RPOs in the RSES, including RPO 6.12.

#### **4.2 Tourism and Recreation**

The Assembly welcome the objectives in Chapter 11- Tourism and recreation to protect and enhance the natural and cultural assets and recreational amenities, which are key to the County’s tourism offer and which make a positive contribution to the economic and social wellbeing of the County along with the need to guide new proposals in the best locations.

The stated objectives of the Tourism Strategy are welcome, including to support the development of Wicklow-Rathnew as a recreation and tourism hub and destination town, and to develop the towns of Bray, Arklow, Greystones, Blessington, Baltinglass, Enniskerry, Rathdrum and Tinahely/ Shillelagh/

Carnew (South West Wicklow) as visitor hubs in collaboration with Fáilte Ireland, and to develop the recreation and tourism potential of rural areas.

The Strategy includes specific land use zoning objectives for a small number of tourism and recreation complexes in the County, and specific objectives to develop a network of walking and cycling routes and flagship greenways capitalising on key tourism and recreational assets such as the Wicklow Mountains National Park, the Wicklow Way and Glendalough and to develop the recreational use of the coastline, rivers and lakes, which will support the development of the Strategic Greenway Network including RPOs 7.24 and 7.25, in the RSES.

The Assembly welcome the inclusion of supporting information, including the Laragh - Glendalough Land Use and Tourism Plan in Volume 2 – Part 4 of the Draft CDP and the information contained in related Chapters that detail policy supports to protect, enhance and promote the natural and cultural heritage, and leisure and recreation assets which contribute to the County's unique tourism offer.

The Assembly also welcome the inclusion of Environmental Protection Objectives CPO 11.47 – 11.49 to ensure the potential environmental effects of new projects and increased visitor numbers are considered when progressing any projects that arise from the Draft CDP.

## **5.0 Sustainable Transportation**

The Regional Assembly welcome the Council's stated commitment in Chapter 12- Sustainable Transportation, to integrated transport and land use, and promoting walking, cycling and public transport to facilitate sustainable travel patterns, which is key to addressing climate change, supporting economic prosperity and improving the quality of life for those who live in County Wicklow.

The Assembly welcome the stated commitment of the Council to the use of Area Based Transport Assessments which integrate national and regional transport policies and objectives into local land use plans and significant development areas in the preparation of LAPs in the County.

The attention of the Council is further brought to RPO 8.6 of the RSES, which identifies a number of Local Transport Plans (LTP) to be prepared for selected settlements, including Arklow and Wicklow-Rathnew, in conjunction with the NTA. The Local Authority may also consider the identification of other settlements, in line with the County Settlement Hierarchy, that would benefit from a similar coordinated approach.

### **5.1 Transport Infrastructure and Services**

The Council's attention is brought to Tables 8.2 -8.5, which set out Rail, Bus, Road and Park & Ride Projects in the RSES including an appropriate level of commuter rail service in the South-East, improved DART services serving Bray and Greystones, improved bus services and expansion of the Local Link rural transport programme and upgrading of the N11/M11 road.

This is supplemented by Section 5.6 Key Transport Infrastructure in the Dublin Metropolitan Area, which supports the westward expansion of Bray to Fassaroe and Old Connaught linked to public transport improvements set out in the 'Bray and Environs Transport Study' (2019) including in the longer term the Luas Green Line Extension to Bray, to be carried out in collaboration between Wicklow and Dún Laoghaire Rathdown County Councils and the transport agencies, NTA and the TII.

It is noted that Public Transport Objectives in the Draft CDP to promote the Luas extension from City West/ Tallaght to Blessington, to upgrade the Dublin-Rosslare rail line, and the N81 to Blessington have not been identified in the RSES. These projects, or any other projects that have not been identified in the NTA Strategy for the Greater Dublin Area (GDA) 2016 -2035, will be subject to further assessment as part of the Review of the NTA Transport Strategy, which is currently underway. Such projects are considered to be premature pending the outcome of this Review, which will set the policy framework

for public transport investment and roll out of cycling infrastructure for counties of Dublin, Meath, Kildare and Wicklow.

It is therefore recommended that the Council review and update the transport objectives and land use maps in the Draft CDP accordingly, to ensure consistency with the Transport Investment Priorities in Section 8.4 of the RSES, and any update of the NTA Strategy for the GDA.

The Assembly notes and welcomes objectives to protect and improve access to Wicklow and Arklow port to facilitate offshore renewable energy development, and to ensure all new or upgraded transport infrastructure is climate resilient.

## **5.2 Sustainable mobility**

The Assembly welcome the inclusion of objectives to reduce the need to travel and reliance on private vehicles, and to increase the shift to sustainable transport by supporting investment in key public transport. This includes policy objectives to facilitate the roll out of electric vehicles (EV) charging infrastructure, and to apply maximum parking standards in locations where public transport and parking enforcement are available.

The Assembly also welcomes the progress that has been made in improving walking and cycling infrastructure in response to the COVID-19 pandemic and supports the continued roll out of public realm and active travel interventions, in line with the principles of universal design which should incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified.

The Assembly recommends early and ongoing engagement with the transport agencies to ensure the integration of transport and land use in the draft CDP and any upcoming local land use plans and to incorporate mode shift targets into the planning and design of future development with reference to the Government's Smarter Travel Policy or any update thereof, along with any future demand management measures to support modal shift to sustainable travel that may arise from the current Review of the NTA Strategy for the GDA

## **6.0 Environment and Infrastructure**

The provision of water and wastewater services (Chapter 13), waste (Chapter 15) and telecommunications and energy infrastructure (Chapter 16) is critical to sustain planned growth in the County and is linked to the capacity of the receiving environment.

The Assembly welcome the inclusion of a dedicated Chapter 14 - Flood Risk Management, Chapter 17 - Natural Heritage and Biodiversity, Chapter 18 - Green Infrastructure and Chapter 19 - Marine Planning and Coastal Zone Management, which recognise the supporting role of natural ecosystems to provide health and wellbeing and economic benefits to the County.

The Assembly also welcome the Council's commitment to the provision of high-quality infrastructure to ensure there is adequate capacity to support future development and will promote enhanced co-ordination between local authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan led manner, including through the fora of the RSES and MASP Implementation Groups.

### **6.1 Environmental Infrastructure and Flood Risk**

The Draft CDP sets out policy supports to provide adequate water supply, wastewater treatment, manage surface water, and minimise waste in accordance with the principles of the circular economy, and to promote sustainable development in terms of location and resource use and facilitate the provision of strategic energy infrastructure and telecommunications infrastructure, including broadband connectivity as part of the National Broadband Plan, within the County.



Chapters 13, 15 and 16 set out objectives to support climate action and achieve national obligations in relation to emissions and achieving good air and environmental quality, with reference to relevant policy and legislation including the EU Renewable Energy Directive, National Energy & Climate Plans, Regional Waste Management Plans, Guidelines on River Basin Management, the Climate Action Plan 2019 and 'National Adaptation Framework 2018' and any updates thereof.

The County Wind Strategy is set out in Appendix 5 and supports a plan led approach to maximise wind energy development, setting out suitable areas and guidance for assessing wind energy developments within the County. Prior to the finalisation of the Draft CDP, it is recommended that the Council ensure the Plan has full regard to the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in 2019, which are expected to be finalised in the near future.

The Draft CDP also recognises the range of renewable energy potential including wind, solar, hydro-energy, bioenergy and small-scale renewable electricity generation, which is welcomed.

Chapter 14 recognises the impact of climate change in relation to increased flood risk and coastal erosion and is accompanied by a Strategic Flood Risk Assessment (SFRA) in Appendix 8, which is informed by 'The Planning System and Flood Risk Management Guidelines'. Further to the SFRA, this Chapter sets out policy objectives that have been integrated into the Draft CDP, which will contribute towards both flood risk management in the County and compliance with the Flood Risk Guidelines.

The Assembly welcome the inclusion of policy objectives to deliver Flood Defence Schemes in the County in collaboration with the OPW and other agencies, to promote Sustainable Urban Drainage Systems (SUDS) and protect urban watercourse in line with the Guidelines 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland.

## 6.2 Green and Blue Infrastructure

The Draft CDP sets out policy and objectives to conserve and enhance biodiversity, protected habitats and species and to identify, protect and enhance Green Infrastructure and promote the sustainable management of natural heritage, including the marine and coastal zones, and consider these are reflective and supportive of the content of the RSES and in particular Chapter 7.

The Assembly welcomes in particular the inclusion of a dedicated Chapter 16 - Green Infrastructure (GI) and the recognition given to GI as a key strategic asset for the County, and of Tables listing the range of strategic GI resources and maps delineating natural and cultural assets, public rights of way, regional cycle/walkways and Strategic Green Belts and Buffer Zones.

The attention of the council is also drawn to RPO 7.2 of the RSES that supports the integration of an Ecosystem Services Approach Table, Section 7.7 of the RSES which sets out Guiding Principles for the preparation of local Green Infrastructure Strategies and Table 7.1, which lists strategic GI Assets and greenways including the Wicklow Way, Dublin Mountains Way, Coastal Greenway from Wicklow to Greystones (part of East Coast Trail), Arklow- Shillelagh recreational trail, and Blessington Greenway, subject to careful routing and design to ensure protection of environmentally sensitive sites.

Also welcomed is Chapter 17 which details policy and objectives to protect and enhance Natural Heritage and Biodiversity and sets out a suite of supporting maps including designated European sites, proposed Natural Heritage Areas, special views and prospects, landscape character areas, areas of outstanding natural beauty, Tree Preservation Orders and other areas of environmental sensitivity.

The Council is also to be commended for the preparation of a dedicated Chapter 19 - Marine Spatial Planning and Coastal Zone Management, which sets out policy objectives to guide spatial planning of marine areas in the County, which is supported by the recently published National Marine Planning Framework, and Coastal Zone Management objectives and accompanied by a series of mapped coastal

‘cells’ that will support further marine policy in this area, in collaboration with the DHLGH and other stakeholders and for the development of the marine economy.

## **7.0 Climate**

The Draft CDP sets out a detailed context and policy framework for the integration of Climate Action as one of three key overarching principles that inform the plan, in Chapter 2 – Overall Strategy. Thereafter the Draft CDP includes a section, where appropriate, that details climate considerations specific to the theme of individual Chapters, to ensure the holistic integration of climate considerations across and throughout the Draft CDP.

The Assembly welcome the stated intent of the Draft CDP to accelerate Climate Action and to secure a ‘just transition’ in line with the UN Sustainable Development Goals, to support achievement of the EU 2030 Climate and Energy Framework and 2050 Climate Neutrality objective, the National Climate Action Plan 2019 and Climate Action & Low Carbon Development (Amendment) Bill 2021. In 2019, Wicklow County Council declared a Climate and Biodiversity Emergency, adopted the Climate Change Adaptation Strategy and signed a Climate Action Charter. The Charter commits to monitor, evaluate and report on 23 specific action items, and the Council are currently working on an Energy Plan to deliver targets with regard to Council’s infrastructure assets.

Local authorities are also now required under Section 10 (2) of the Planning Act to include in their development plans measures to reduce anthropic greenhouse gas emissions and adapt to climate change. This is further reinforced by RPO 3.6 of the RSES that requires local development plans to undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress. EMRA are currently leading an ESPON research project QGasSP (Quantitative Greenhouse Gas impact assessment for Spatial Plans), the outputs of which may assist the Council in assessing and monitoring the impact of spatial policies in their statutory land use plans and to map decarbonisation pathways to Climate Neutrality.

The attention of the Council is also drawn to the requirement for local authorities to designate ‘decarbonising zones’ under Circular Letter LGSM01-2021- Local Authority Decarbonisation Zones, the Climate Action Plan 2019 during the lifetime of the CDP. The Assembly welcome the recognition given to the Eastern and Midlands Climate Action Regional Office (CARO), which will play a key role in supporting local authorities to develop and implement climate action measures as part of the implementation of their Draft CDP and local Climate Action Plans.

Section 2.2.2 of the Draft CDP sets out the sectors for the integration of climate considerations into the Plan and would benefit from the inclusion of a list of the relevant sections and/or CPO Objectives that relate to climate action and the establishment of a baseline to support monitoring. Integrating climate action into the Economic Strategy of the Draft CDP and any upcoming LECP will also help the Council to leverage European Green Deal opportunities and position climate as a driver for growth to support the transformative change that will be needed to achieve the Climate Neutrality Objective.

Further observations and recommendations of the Assembly in relation to Climate Action are contained within a number of other sections in this submission, reflective of the holistic approach taken in the development of the Draft CDP.

## **8.0 Implementation and Monitoring**

The Assembly welcome the inclusion of a dedicated Chapter 20 – Implementation and Monitoring, that will monitor progress in implementing the ‘Strategic County Outcomes’ and the ‘Core Strategy’ of the Draft CDP, as set out in Chapters 2 and 3, and which are broadly aligned with the National and Regional Strategic Outcomes of the NPF and RSES and the UN Sustainable Development Goals.

Also welcomed are the Development & Design Standards set out in Appendix 1 of the Draft CDP to be applied to future development proposals and are considered to provide a comprehensive framework for the assessment of planning applications in the County.

The Council is to be commended for the inclusion of monitoring to ensure effective delivery of the CDP and for greater transparency on the progress made in its implementation.

The attention of the Council is also directed to the development of an emerging Regional Development Monitor by the Regional Assembly, which may provide additional guidance in monitoring delivery, and to comments in relation to the monitoring of housing and compact growth delivery which are set out in Section 2.0 Core and Settlement Strategy, and in relation to environmental monitoring in the following Section 9.0 SEA, AA and SFRA

## 9.0 SEA, AA and SFRA

The Assembly welcomes the preparation of the Draft CDP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), which are set out respectively in Appendix 6 and Appendix 7.

The SEA environmental report sets out the iterative process to date including a description of the key environmental issues, an assessment of alternatives for the plan and an assessment of the environmental effects arising from the Draft CDP provisions.

By integrating the various recommendations and mitigation measures arising from the SEA, AA and SFRA processes into the draft CDP, which are detailed in the environmental report, it is stated that *“the Council have ensured that both the beneficial environmental effects of implementing the Plan have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset”*. Observations in relation to Motions that were advised against, subsequently agreed upon as amendments to the Chief Executive’s Draft Plan and that would have potential for likely significant negative environmental effects (identified in Table 8.3 of the environmental report), are set out in the above Section 2 Core and Settlement Strategy.

The attention of the Council is drawn to EPA Guidance on SEA Statements and Monitoring (Second Review of Strategic Environmental Assessment Effectiveness in Ireland), published January 2020, which provides best practice on devising monitoring measures, suitably detailed indicators and the frequency of monitoring and reporting. This guidance shall inform the iterative SEA process and preparation of the monitoring programme as part of the County Plan’s SEA statement.

The Draft CDP is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. It is concluded that the draft CDP is not foreseen to give rise to any significant effects on designated European Sites, alone or in combination with other plans or projects. The AA process is ongoing and will inform and be concluded at adoption of the CDP.

## Conclusion

It is considered that the Draft Wicklow County Development Plan 2021-2027, and in particular the Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the publication of the Wicklow County Development Plan, which marks the beginning of the alignment of planning policy at County and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and welcome further opportunities to engage in the statutory process of the making of the County Development Plan.

Regards,

A handwritten signature in blue ink, consisting of a large loop on the left and a horizontal line extending to the right with a small hook at the end.

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Jim Conway  
Director  
Eastern and Midland Regional Assembly  
July 9th, 2021