

19th June 2025

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

Re: Proposed Variation No. 4 to the Wicklow County Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 4 (the proposed Variation) to the Wicklow County Development Plan 2022-2028 (the County Development Plan).

As Wicklow County Council (the Planning Authority) is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and (2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning

authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether it has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office welcomes the preparation of the proposed Variation and notes the overall approach of the Planning Authority to addressing the Revised National Planning Framework (2025) (Revised NPF) and the Eastern and Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) in accordance with section 13 of the Act.

Greystones – Delgany is identified as a Self-Sustaining Growth Town in the RSES and has undergone considerable growth in terms of housing delivery prior to and during the period of the County Development Plan, exceeding current core strategy annual targets¹. The Office recognises that the focus of the proposed Variation is on the provision of ‘catch up’ infrastructure to support this housing growth and on infill development and consolidation of the built up area, in terms of further residential development within the current policy framework.

Kilcoole is identified as a Self-Sustaining Town in the RSES and the Office recognises the zoning objectives set out in the proposed Variation play an important role in ensuring the sustainable development and expansion of the settlement over the forthcoming years.

The Office welcomes the focussed Specific Local Objectives (SLO) 1-3 for mixed use, community developments including commercial, tourism and amenity uses, with provision for active open space, green links and recreational areas, and SLO 4-7 for housing delivery and mixed use, including community facilities and amenities.

The Office also welcomes the identification of opportunity sites for town centre regeneration across the three settlements including the objectives for public realm improvements, which provide a clear policy basis for tourism development, heritage protection and the activation of town centre regeneration sites.

¹ [Link to Housing Delivery Tracker - Core Strategy Targets and Built Up Area Tracker](#)

The Office acknowledges the Planning Authority, with the support of the National Transport Authority (NTA), has commenced the process of preparing a Local Transport Strategy (LTS), which has informed the preparation of the proposed Variation. However, the Office is concerned that an Area Based Transport Assessment has not been carried out to support the preparation of a Local Transport Plan (LTP) for the area, as per NTA guidance, to ensure consistency with County Policy Objective (CPO) 12.3 of the County Development Plan and RPO 8.6 of the RSES.

With the exception of the specific concerns set out below, the proposed Variation otherwise sets out a clear zoning strategy and framework for the future development of the lands concerned. The issues raised below largely focus on supporting the delivery of the vision of the proposed Variation and building on the ambition of the County Development Plan to develop well serviced, well connected and sustainable neighbourhoods, and promote sustainable modes of transport.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out three (3) recommendations under the following key themes:

Key theme	Recommendation
Residential Zoning	Recommendation 1
Transport and Accessibility	Recommendation 2
Flood Risk Management	Recommendation 3

1. Residential Zoning

Context and Rationale for Recommendation

The Office welcomes the zoning objectives for New Residential Priority 1 lands which are well located and will facilitate the compact and sustainable growth of the town in a sequential manner and the clear policy approach in respect of phasing the development of zoned land in accordance with the sequential approach. In addition, the New Residential Priority 2 lands (47 ha) provide a supply of zoned lands consistent with the current core strategy.

Chapter 4 of the Development Plans, Guidelines for Planning Authorities (2022) outlines the approach for zoning that should be followed by planning authorities. The Office recognises

the focus of the proposed Variation is on the provision of 'catch up' infrastructure to support housing growth and on infill development and consolidation of the built-up area, in terms of further residential development in the Local Development Framework (LDF) area and acknowledges the infrastructure assessment implementation programme provided at appendix 6 of the proposed Variation.

In terms of delivering housing on New Residential Priority 1 and / or Priority 2 zoned lands, it is necessary that the lands are serviced or serviceable within the plan period. Further details should be provided to ensure the infrastructure capacity exists or will be delivered over the plan period, and to demonstrate a standardised tiered approach for these undeveloped lands consistent with NPO 101, NPO 102 and NPO 103 of the Revised NPF and RPO 4.2 of the RSES.

Recommendation 1 – Residential Zoning

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of housing delivery and infrastructure, and in particular to:

- NPO 101, NPO 102, NPO 103 of the Revised NPF to consider the serviceability of land zoned for development;
- RPO 4.2 of the RSES to align the settlement strategy to infrastructure investment; and
- section 6.3 of the Development Plans, Guidelines for Planning Authorities (2022) to integrate infrastructure planning with new development,

the Planning Authority is recommended to:

- (i) engage with the relevant statutory bodies and demonstrate that lands zoned for New Residential Priority 1 and / or Priority 2 are serviceable within the plan period; and
- (ii) review the zoning objectives to ensure that lands that cannot be reasonably or cost effectively delivered within the plan period are not zoned for development.

2. Transport and Accessibility

Context and Rationale for Recommendation

In its submission to the Issues Paper for the Greystones-Delgany and Kilcoole Local Area Plan the Office highlighted the importance of preparing an LTP for the area to inform land use zoning objectives based on accessibility by walking, cycling and public transport, sustainability mobility measures, delivery of an enhanced park and ride facility in Greystones and public realm enhancements.

The Office notes that the Planning Authority has commenced the preparation of an LTS with the support of the NTA, which has informed the preparation of the proposed Variation, and section A3.1 Sustainable Transportation and B7.1 Transport and Sustainability set out useful information and objectives regarding transport infrastructure. However, CPO 12.3 of the County Development Plan states that LTPs are to be prepared for towns, including Self-Sustaining Growth Towns, and should be prepared incorporating ABTA methodologies, to inform land use and investment decisions. How the proposed LTS relates to an LTP prepared in accordance with the ABTA methodology is not clear.

Given Greystones-Delgany's role as a Self-Sustaining Growth Town, having the main elements of an LTP integrated into the proposed Variation is critical to support the sustainable development of the area and the achievement of national climate action targets. A key function of LTPs, as set out under the RSES (RPO 8.1), is to ensure the integration of land use and transport planning at local level.

For these reasons it is critical that the Planning Authority continue to work with transport authorities, NTA and Transport Infrastructure Ireland, to prioritise the completion of the LTP.

While it would have been preferable if the LTP had been prepared in advance to support the policy and zoning decisions in the proposed Variation, the Office therefore recommends that, following the preparation of the LTP, the key provisions are incorporated into the LDF within the County Development Plan as a variation under section 13 of the Act, or any equivalent provision under the Planning and Development Act 2024.

The details of recommendations set out in the emerging LTS / LTP should be reflected on the Transport Strategy Map No. 5, and the proposed interventions mapped and prioritised as appropriate for implementation.

The Office welcomes Objectives GDK59 and GDK60 of the proposed Variation which identify specific active travel projects to be supported and facilitated within the framework area. However, section 7.1 Sustainable Transportation should also include an adequate focus on the connectivity needs of the emerging development areas and sites identified as SLOs and Opportunity Sites.

In this respect, the LTS / LTP should include an assessment of connectivity to the wider network and identify any deficiencies that may exist. Recommendations for improvements should be highlighted and illustrated on the Transport Strategy Map No. 5 to ensure that the SLOs and Opportunity Sites are connected to planned active travel infrastructure.

RPO 8.14 of the RSES supports the delivery of strategic park and ride projects in specific locations, including Greystones, and CPO 12.21 of the County Development Plan supports the facilitation and enhancement of the strategic park and ride at Greystones. To support the achievement of national climate action targets including the reduction of greenhouse gas emissions and more locally traffic congestion within the LDF area, the Office therefore considers that the LDF / proposed Variation should address the delivery of a new and / or enhanced park and ride project in Greystones.

Finally, the Office notes that mode share targets have not been included in the proposed Variation / LDF and it is recommended that ambitious but realistic mode share targets are proposed together with an effective monitoring programme.

Recommendation 2 – Integrated Land Use and Transport Planning

Having regard to the provision of a sustainable Transport Strategy and the transition to a low carbon and climate resilient society including the reduction of greenhouse gas emissions, and in particular to:

- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021);

- from the Revised NPF: NPO 37 for safe and convenient alternatives to the car, NPO 69 to reduce our carbon footprint, NPO 93 for improved air quality, NPO 107 and NSO 5 for sustainable mobility;
- RPO 8.1 and RPO 8.4 of the RSES for the integration of land use and transport planning; and
- RPO 8.14 of the RSES for the delivery of strategic park and ride projects,

the Planning Authority is recommended to:

- prepare the LTP in consultation with the NTA and TII, closely aligned with the Area Based Transport Assessment guidance, and incorporate the key provisions of the LTP, including mode share targets, into the LDF for Greystones-Delgany and Kilcoole within the County Development Plan as a variation under section 13 of the Planning and Development Act 2000, as amended (or any equivalent provision under the Planning and Development Act 2024);
- include details of recommendations set out in the emerging LTS / LTP on the Transport Strategy Map No. 5, and the proposed interventions mapped and prioritised as appropriate for implementation;
- include an objective to support and facilitate the delivery of a new and / or enhanced park and ride project in Greystones;
- include the location of a new and / or enhanced park and ride project in Greystones on Land Use Zoning Objectives Map No.1 and / or Transport Strategy Map No.5;
- include details of the delivery of a new and / or enhanced park and ride project in Greystones within appendix 6 Infrastructure Assessment and Implementation Programme; and
- illustrate measures on the Transport Strategy Map No. 5 to identify active travel and connectivity measures between the Specific Local Objectives, Opportunity Sites and the wider network.

3. Flood Risk Management

Context and Rationale for observation

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) and accompanying Plan Making Justification Tests (Justification Tests) as part of the draft LDF to inform zoning objectives, and the inclusion of flood risk mapping (Map No. 4A-D Flood Risk), as part of the proposed Variation.

In relation to the SFRA and coastal erosion, the Office considers the SFRA should include a review of National Flood Coastal Hazard Mapping and National Catchment-based Flood Risk Assessment and Management mapping alongside each other, taking account of the presence of defences and the extent of the coastal flood plain with regard to the definition of coastal flood zones.

As a flood relief scheme is proposed for Greystones and environs, as well as a potential scheme subject to further assessment for Kilcoole, the Office advises the Planning Authority to consider including an LDF objective to ensure that development proposals support and do not impede or prevent the progression of these schemes.

In relation to Sustainable urban Drainage Systems (SuDS), the Office considers that the SFRA should provide guidance on the applicability of different SuDS techniques for managing surface water run-off at key development sites, for example SLO 4, and identify where integrated and area based provision of SuDS are appropriate in order to avoid reliance on individual site by site solutions in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

Recommendation 3 – Flood Risk Management

Having regard to flood risk management, and in particular,

- NPO 53 of the Revised NPF to take account of the effects of sea level changes and coastal erosion;
- NPO 78 of the Revised NPF and RPO 7.12 of the RSES to avoid inappropriate development in areas at risk of flooding in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines);

- NPO 77 and NPO 79 of the Revised NPF to integrate and support sustainable water management solutions; and
- the Flood Guidelines,

the Planning Authority is recommended to:

- (i) amend the Strategic Flood Risk Assessment (SFRA) to consider National Flood Coastal Hazard Mapping and National Catchment-based Flood Risk Assessment and Management mapping alongside each other, taking account of the presence of defences and the extent of the coastal flood plain with regard to the definition of coastal flood zones;
- (ii) include a specific objective to ensure that development proposals support and do not impede or prevent the progression of planned future flood relief schemes; and
- (iii) amend the SFRA to provide guidance on the applicability of different Sustainable urban Drainage Systems (SuDS) techniques for managing surface water run-off at key development sites and identify where integrated and area-based provision of SuDS are appropriate.

The Planning Authority should liaise with the Office of Public Works regarding this recommendation.

Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within five working days of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the Variation in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, reading "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
