

11th December 2024

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

Re: Draft Blessington Local Area Plan 2025

A chara,

Thank you for your authority's work on preparing the Draft Blessington Local Area Plan 2025 (the draft Local Areal Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft Local Areal Plan.

As your 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 draft Local Areal Plan under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the Wicklow County Development Plan 2022-2028 (the County Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) area, and relevant section 28 guidelines. This submission makes six (6) recommendations and five (5) observations.

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, the Wicklow County Council (Planning Authority) is required to implement or address

recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The Planning Authority is requested by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The Planning Authority is requested by the Office to give full consideration to the advice contained in a submission.

Overview

The Office welcomes the preparation of the draft Local Area Plan and the approach taken by the Planning Authority to focus on the protection of the environment, sustainability and consolidation and regeneration of Blessington town to enhance compact growth, public realm and improve connectivity across the plan area and thereby reduce the car based dependency of the settlement.

Blessington is a Self-Sustaining Growth Town as identified in the RSES for the EMRA. As a Self-Sustaining Growth Town, which has experienced strong commuter focused growth in the past, Blessington has the potential to provide housing for people from across the county and region and to strengthen its employment base and develop it as an important centre of employment due to its strategic location, and the availability of a skilled workforce.

The policy framework set out by the draft Local Areal Plan plays an important role in ensuring the sustainable development and expansion of the settlement over the forthcoming years.

The Office welcomes the focused tourism policy objectives including the support of the future expansion of the Blessington greenway and associated infrastructure and the identification of Opportunity Sites for town centre regeneration including the objectives for public realm improvements, which provide a clear policy basis for tourism development and the activation of town centre regeneration sites.

The draft Local Area Plan includes the relevant statutory reports including Appropriate Assessment Screening, Strategic Environmental Assessment Report and Strategic Flood Risk Assessment (SFRA) as well as a Social Infrastructure Audit, which are welcomed by the Office.

However, the Office notes that additional fundamental supporting documents such as a Settlement Capacity Audit (SCA) for lands zoned for New Residential and Employment uses and a Local Transport Plan (LTP) have not been prepared.

The County Development Plan states:

Detailed 'Infrastructural Assessments' in accordance with NPO 72 and the methodology for a Tiered Approach to Zoning set out under Appendix 3 of the NPF shall be carried out for all lands proposed to be zoned and de-zoned in future Local Area Plans.

However, no such assessment has been included to support the land use zoning objectives proposed in the draft Local Area Plan. These documents provide the critical evidence-base upon which the draft Local Area Plan is underpinned, as well as supporting rationale for such decisions.

While the Office acknowledges the publishing of a Local Transport Assessment (LTA), as appendix 4 to the draft Local Area Plan, it is of concern that an Area Based Transport Assessment (ABTA) as per National Transport Authority guidance, has not been carried out to support the preparation of an LTP for the plan area, as required under CPO 12.3 of the County Development Plan.

In addition, the Office also considers that further consideration of the Poulaphouca Reservoir is required to ensure that the reservoir as a drinking water supply is protected and development will not negatively impact this drinking water source.

With the exception of the specific concerns set out below, the draft Local Area Plan otherwise sets out a clear 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 draft Local Area Plan 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.

It is within this context the submission below sets out six (6) recommendations and five (5) observations under the following themes:

Key theme	Recommendation	Observation
Consistency with Development Plan and Core Strategy	-	Observation 1
Residential Development Strategy	Recommendation 1	-
Transport and Accessibility	Recommendation 2	-
Flood Risk Management	Recommendation 3	-
Economy and Employment	Recommendation 4 and 5	-
Climate Action	-	Observation 2
Environment, Heritage and Amenity	Recommendation 6	Observation 3
Implementation and Monitoring	-	Observation 4
General and Procedural Matters	-	Observation 5

1. Consistency with the Regional, Spatial and Economic Strategy

Blessington is located within the Eastern and Midlands Region and is identified as a Self-Sustaining Growth Town in the RSES. The RSES recognises that Blessington is one of the towns which has recorded the highest growth rates in the country in the last ten years with lower levels of employment provision, which is nevertheless an important employment and service centre.

As a Self-Sustaining Growth Town, the RSES prioritises contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.

Overall, the Office is satisfied that the provisions of the draft Local Area Plan are broadly consistent with the RSES.

2. Consistency with Development Plan and Core Strategy

Section 19(2) of the Act requires a local area plan to be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.

Section A.2 of the draft Local Area Plan sets out the vision and strategy of the draft Local Area Plan and how it complies with the core strategy of the County Development Plan. The core strategy allocates a projected population increase of 1,079 with a corresponding housing supply target of 514 units to 2031.

The Office considers that the strategy set out in the draft Local Area Plan in respect of the delivery of these targets is generally consistent with the County Development Plan, except where otherwise specified below.

The Office is also satisfied that the overall approach in the draft Local Area Plan promotes compact growth and sequential development, and regeneration within the town centre is generally consistent with the strategic objectives and Settlement Strategy Objective CPO 4.1 of the County Development Plan.

The Office recognises that the draft Local Area Plan relates to the lands within the Planning Authority's jurisdiction and that it is a priority of the County Development Plan and draft Local Area Plan to ensure that any plans prepared for the town are undertaken in consultation with Kildare County Council to provide a strategy for the sustainable development of the town and its hinterland as a whole, irrespective of county borders.

As such, the Planning Authority should consider illustrating the Blessington Environs lands on the maps accompanying the draft Local Area Plan to ensure that the strategy for the sustainable development of the town and its hinterland as a whole, irrespective of county borders, is understood and to ensure that supporting infrastructure delivery for the town and the immediate surrounding area is coordinated in a sustainable and comprehensive manner.

Observation 1 – Blessington Environs

Having regard to section 4.2 of the Wicklow County Development Plan 2022-2028 and section A2.2 of the draft Blessington Local Area Plan 2025 (the draft Local Area Plan), the Planning Authority is requested to consider illustrating the Blessington Environs lands on the maps accompanying the draft Local Area Plan to ensure that the strategy for the sustainable development of the town and its hinterland as a whole, irrespective of county borders, is understood and to ensure

that supporting infrastructure delivery for the town and the immediate surrounding area is coordinated in a sustainable and comprehensive manner.

3. Residential Development Strategy

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

The Planning Authority proposes to zone 49 ha for new residential development. In determining the land area required to accommodate projected growth, the Office notes that Residential Use is also considered an appropriate use on lands identified as Town Centre and Mixed Use zonings.

The Office welcomes the zoning objectives for New Residential Priority 1 lands which 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.

However, it is not clear whether infrastructure capacity exists or will be delivered over the plan period as no Infrastructure Assessment / SCA has been included in the draft Local Area Plan. It is critical that lands zoned as New Residential Priority 1 and / or Priority 2 are evaluated on this basis and to demonstrate either Tier 1 or Tier 2 status for these undeveloped lands consistent with RPO 4.2 of the RSES and CPO 4.1 of the County Development Plan to align the settlement / core strategy to infrastructure delivery.

Recommendation 1 – Co-ordination of housing delivery and infrastructure

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

- RPO 4.2 of the RSES to align the settlement strategy to infrastructure investment;

- Policy Objective CPO 4.1 of the County Development Plan to implement the core strategy having regard to the availability of services and infrastructure; and
- the policy and objective for zoned land to be informed by a Settlement Capacity Audit (SCA) under section 6.2.1 of the Development Plans, Guidelines for Planning Authorities (2022),

the Planning Authority is required to:

- (i) prepare an SCA and engage with the relevant statutory bodies to identify that the lands zoned for New Residential 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.

4. Transport and Accessibility

The Office recognises that the LTA, as prepared, sets out useful information and objectives regarding transport infrastructure and can form the basis for the main elements of an LTP to support the draft Local Areal Plan.

However, as outlined in CPO 12.3 of the County Development Plan, 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, including the preparation of local area plans.

Given Blessington's role as a Self-Sustaining Growth Town, having the main elements of an LTP integrated into the draft Local Area Plan will be critical to support the sustainable development of the plan area and the achievement of national climate action targets.

The Office therefore recommends that the LTA and the draft Local Areal Plan are revised to reflect the main LTP requirements of the RSES with respect to the items outlined below.

The tables presented in section 1 of the LTA highlight that active travel and public transport mode shares for travelling to work, have not shown any significant increase

from 2011 to 2022, with the overall number of people using active modes declining. For example, there is particularly low cycle usage among secondary school students in Blessington. The LTA notes this is concerning given the increase in investment in these modes over the last decade. It is recognised that a greater uptake of active and sustainable modes is needed to enable the achievement of mandatory climate action targets to reduce emissions by 51% by 2030, as required under national climate action targets and as set out in section 4.3 of the Wicklow Climate Action Plan 2024-2029 (Wicklow CAP).

Having clear modal shift ambitions will be important to achieving these targets. The Office notes however that mode share targets have not been included in the LTA nor the draft Local Area Plan and it is recommended that ambitious but realistic mode share targets are proposed together with an effective monitoring programme.

A key function of LTPs, as set out under the RPO 8.1 of the RSES, is to ensure the integration of land use and transport planning at local level. The Office is concerned that the LTA does not include an adequate focus on the connectivity needs of the emerging development areas listed as Specific Local Objectives (SLO). While the SLO Concept Plans do give indicative connectivity details at site level, there is no detail on connectivity to the wider network and any deficiencies that may exist. The LTA should include an assessment in this regard with recommendations for improvements highlighted and incorporated into the objectives of the draft Local Area Plan.

The Office welcomes the inclusion of the Active Travel Strategy Map No. 6 in the draft Local Area Plan, and recommends that the inclusion of key development areas on this map will assist in understanding the delivery of the emerging active travel network for the plan area.

The Office notes that the Transport Strategy Map No. 5 and SLO 3 and SLO 4 indicate that these lands would be accessed from the N81 / Blessington Main Street within the 80km/hour speed limit zone. It is important therefore to highlight that access associated with the development of these lands is required to comply with Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and all relevant Transport Infrastructure Ireland Publications.

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);
- RPO 8.1 and RPO 8.4 of the RSES for the integration of land use and transport planning;
- RPO 8.6 of the RSES to prepare a Local Transport Plan (LTP) for selected settlements in the region;
- sustainable mobility objectives CPO 12.1, CPO 12.2 and CPO 12.3 of the County Development Plan;
- cycling and walking objectives CPO 12.13, CPO 12.14, CPO 12.15, CPO 12.16 and CPO 12.17 of the County Development Plan;
- public transport objectives CPO 12.20 and CPO 12.21 of the County Development Plan; and
- national road objectives CPO 12.40 of the County Development Plan,

the Planning Authority is required to:

- (i) review the current Local Transport Assessment (LTA) in consultation with the National Transport Authority, to provide an LTP, closely aligned with the updated Area Based Transport Assessment guidance;
- (ii) revise the draft Blessington Local Area Plan 2025 (the draft Local Area Plan) to incorporate the measures and proposed modal networks of the LTA / LTP and include policy support for the proposed interventions together with

clear mapping of all measures on the Transport Strategy Map No. 5 and Active Travel Strategy Map No. 6;

- (iii) include key development areas on the Active Travel Strategy Map No. 6 assist in understanding the delivery of the emerging active travel network for the plan area;
- (iv) amend the draft Local Area Plan to include mode share targets and an effective monitoring programme; and
- (v) ensure that all future access proposals to serve zoned lands at SLO 3 and SLO 4 comply with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and are in compliance with all relevant Transport Infrastructure Ireland Publications.

5. Flood Risk Management

The Office welcomes the preparation of the SFRA and approach taken to the Plan Making Justification Tests (Justification Tests) to inform the policies and objectives of the draft Local Areal Plan which is of a very high standard.

The Office welcomes the discussion on flood risk and climate change in section 5 of the SFRA, and the inclusion of future scenario extents on the flood zone mapping, and also acknowledges and supports the identification of flood risk zones on map no 4. However, these have not been overlaid on the land use zoning maps. It is difficult therefore to fully understand the implications of flood risk across the plan area, and the Planning Authority is advised to overlay the future scenario mapping on the land use zoning maps in order to provide clarity on areas at risk from climate change.

In line with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) the Office considers that the Planning Authority needs to give further consideration to three specific sites, as set out below.

Firstly, in consideration of future flood risks in the preparation of the draft Local Area Plan the Office notes that an area zoned for highly vulnerable New Residential – Priority 1 use at Oak Drive, Blessington Demense East, is shown as at risk in both the mid-range and high-end future flood risk scenarios. The Office considers that specific local objectives are necessary to be included in the draft Local Area Plan to provide detail on how risk to

this area will be mitigated, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.

Secondly, in respect of the portion of the site zoned as Tourism on the land use zoning objective map no. 1 and identified as site i(b) in the Justification Tests, the Office notes that the zoning objective provides for vulnerable and highly vulnerable uses such as tourism accommodation. Given that the site fails the Justification Tests, the Office considers that a specific local objective is necessary to limit appropriate uses to those compatible with the specific flood risk and Tourism zoning objective.

Finally, in applying the sequential approach to flood risk, undeveloped lands are zoned for Community and Education use within Flood Zone B at Oak Drive. This zoning objective allows for highly vulnerable development such as schools and nursing homes. As it is not clear if the sequential approach to flood risk has been applied i.e. the consideration of avoidance and substitution in the first instance, nor whether a plan-making Justification Tests has been prepared and passed. As such, the Office considers that the Planning Authority should provide an analysis of these lands within the SFRA.

Recommendation 3 – Flood Risk Management

Having regard to flood risk management, and in particular,

- RPO 7.12 of the RSES to avoid inappropriate land use zonings and development in areas of risk of flooding in accordance with the Flood Risk Management Guidelines;
- Strategic County Outcome SCO 7 to restrict development in areas that are at risk of flooding, and Policy Objectives CPO 14.06 of the County Development Plan to implement the guidelines of Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines), of the Wicklow County Development Plan 2022-2028; and
- the Flood Guidelines,

the Planning Authority is required to:

- (i) overlay the flood zones maps and future scenario maps with the land use zoning maps in the draft Blessington Local Area Plan 2025; and
- (ii) amend the draft Local Area Plan and / or Strategic Flood Risk Assessment to:
 - (a) include specific local objectives to provide detail on how risk to the area zoned for highly vulnerable New Residential – Priority 1 use at Oak Drive, Blessington Demense East will be mitigated;
 - (b) include a specific local objective for lands zoned Tourism at the lakeshore to limit existing development to minor development only as outlined in section 5.28 of the Flood Guidelines and new development to water compatible uses in Flood Zone A and less vulnerable uses in Flood Zone B; and
 - (c) apply the sequential approach to lands zoned for Community and Education use at Oak Drive, and if appropriate include a Plan Making Justification Test for lands which overlap with Flood Zone B. Where the Justification Test is not passed the lands should be rezoned for water compatible use or substitute for a land use appropriate to the level of flood risk.

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

6. Economy and Employment

The Office welcomes the economic development strategy set out in section B.3 of the draft Local Area Plan, which aligns with the role of the town as a Self-Sustaining Growth Town consistent with the RSES and County Development Plan policy objectives.

The County Wicklow Economic Development Hierarchy¹ identifies that Blessington's economic function is to attract inward investment through foreign direct and local investment and people and product intensive industries. To support and grow the

¹ Table 9.2 Wicklow County Development Plan 2022-2028

economic activity in the settlement, 44.2 ha of undeveloped land has been zoned for Employment uses in the draft Local Area Plan, of which the majority is identified as SLO 3 lands to the north of the settlement.

In terms of consistency with regional planning policy, the Office considers it critical that the draft Local Area Plan does not zone lands for employment uses which are not serviced and are poorly served by public transport consistent with RPO 4.2 of the RSES and SCO 5 of the County Development Plan.

In this regard, the Office is concerned that there is no robust rationale underpinning the location and extent of each zoned site in the draft Local Area Plan for employment purposes. As set out at section 6.2.5 of the Development Plans Guidelines, an evidence-based approach to zoning for employment development is a critical part of the County Development Plan preparation process.

It is also unclear that all of the lands zoned for Employment are serviceable within the plan period and/or that their development is integrated with the timely delivery of sustainable transport infrastructure connections to support the modal shift to active modes contrary to RPO 8.1 of the RSES and CPO 9.6 of the County Development Plan.

Finally, the draft Local Area Plan does not outline how it has applied the guiding principles to identify locations for strategic employment development as required by RPO 6.1 of the RSES and the guiding principles for the integration of land use and transport planning as required by RPO 8.1 of the RSES.

Recommendation 4 - Economy and Employment

Having regard to the provision of an evidence-based employment strategy, and the location of employment in areas that can support more sustainable transport options, and in particular to:

- RPO 4.2 of the RSES to require employment development to be planned in collaboration with infrastructure providers to ensure adequate capacity for services is available;
- RPO 6.1 of the RSES to apply the Guiding Principles to Identify Locations for Strategic Employment;

- RPO 8.1 of the RSES for the integration of transport and land use planning consistent with the guiding principles of the RSES transport strategy;
- SCO 5 of the County Development Plan to support the integration of land use and transportation to encourage a sustainable mobility;
- Objective CPO 9.6 of the County Development Plan to promote the development of employment generating uses at locations which comply with sustainable transportation objectives of the County Development Plan; and
- the policy and objective of the Development Plans, Guidelines for Planning Authorities (2022) under section 6.2.1 for zoning to be informed by a Settlement Capacity Audit (SCA), and section 6.2.5 for the provision of an evidence and rationale underpinning the zoning of land for employment purposes,

the Planning Authority is required to:

- provide robust justification and appropriate phasing for the extent and location of Employment zoned land and demonstrate that the criteria of the aforementioned national and regional policies have been satisfied specifically in respect of the following undeveloped Employment lands:
 - SLO 3 (current/former quarry lands)
 - N81 South (adjacent to the waste water treatment plant); and
- demonstrate by way of an Infrastructure Assessment / SCA that lands zoned for employment are realistically serviceable within the plan period.

Where an evidence-based rationale consistent with the above cannot be provided for these, or any other Employment zonings, the subject zoning objective should be removed from the draft Blessington Local Area Plan 2025.

6.1 Town Centre Regeneration

The Office welcomes the inclusion of Section B.1 on Town Centre Regeneration in the draft Local Area Plan for Blessington. The Opportunity Sites identified have the potential to act as a regenerative catalyst to increasing the residential, economic and leisure potential of the town centre, while also addressing vacancy, derelict buildings and enhancing the vibrancy of the town centre.

It is important that the draft Local Area Plan facilitates and prioritises the regeneration of the town centre through appropriate active land management objectives and policies, in accordance with the government's Town Centre First, A Policy Approach for Irish Towns (2022) (Town Centre First). It should also identify the critical measures and/or actions the Planning Authority will implement, having regard to public funding available under, among others, the Urban Regeneration and Development Fund and Town Centre First funds (e.g. Croí Cónaithe).

Recommendation 5 - Town Centre Regeneration

Having regard to the vitality, viability and regeneration of Blessington, and in particular to:

- RSO 2 of the RSES to promote regeneration by making better use of under-utilised land and buildings within the existing built up urban footprint;
- RPO 4.26 of the RSES to achieve compact growth;
- RPO 8.1 of the RSES to ensure the integration of land use and transport planning; and
- Policy Objectives CPO 4.9 and CPO 5.1 of the County Development Plan to target the reversal of town and village centre decline through sustainable compact growth to deliver sustainable regeneration outcomes and to protect and maintain the viability of town and village centres,

the Planning Authority is required to:

- (i) provide a framework for prioritising and phasing of the town centre Opportunity Sites with an emphasis on delivery during the lifetime of the plan and potential funding streams;
- (ii) provide additional guidance in relation to density and building heights via the Opportunity Site Objectives BLESS OP1- BLESS OP8 and / or on the Concept Parameters and Access Plans / Sketches Figures B.1.3.- B.1.11;
- (iii) include measurable targets for the reduction of vacancy for the plan period and a strategy for the monitoring of same; and

(iv) include permeability measures on the Transport Strategy Map No.5 and Active Travel Strategy Map No.6 to ensure that the Opportunity Sites are connected to planned active travel infrastructure.

7. Climate Action

The Office welcomes the strategic goals of the draft Local Area Plan with healthy place-making, climate change and economic opportunity at the core. Key features of a low carbon town include: land use, movement and transport, energy and natural heritage, and inclusive communities.

There is, however, an opportunity for the draft Local Area Plan to include more specific policy measures and actions to give effect to and complement the objectives and actions of the Wicklow CAP which are specific to Blessington and have a strong relationship to planning, such as transport and the built environment. For example, the inclusion of mode share targets and flood relief schemes.

Observation 2 – Integrating Climate Action

Having regard to:

- RPO 3.7 of the RSES;
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%; and
- the Wicklow Climate Action Plan 2024-2029 (Wicklow CAP),

the Planning Authority is advised to review and revise the draft Blessington Local Area Plan 2025 (the draft Local Area Plan) to:

- (i) provide for alignment between the draft Local Area Plan and the relevant climate adaptation and mitigation actions of the Wicklow CAP through the policy objectives; and
- (ii) include additional and more specific climate action policy objectives which relate to policy measures and actions in respect of transport and the built environment.

8. Environment, Heritage and Amenity

8.1 Water Quality (Poulaphouca Reservoir)

The Office notes that the draft Local Area Plan recognises the important environmental, amenity and tourism value of the Poulaphouca Reservoir, and includes associated objectives.

As the Poulaphouca Reservoir also supplies drinking water to a significant proportion of the Greater Dublin Area (GDA), the Office considers that protecting and enhancing the water quality of the reservoir is critical to managing this essential water resource. As such, this should be highlighted in the draft Local Area Plan to ensure consistency with RSES and County Development Plan policy objectives.

In this regard, while objective BLESS 42 provides for applications for development to demonstrate that they would not individually nor cumulatively affect a water body's ability to meet its objectives under the Water Framework Directive, the draft Local Area Plan does not provide specific protection nor recognition of the Poulaphouca Reservoir as a public drinking water resource.

The Office considers that the Planning Authority should include a new section and associated objective in the Local Area Plan to protect the reservoir as a drinking water supply and ensure development will not negatively impact this drinking water source. The new section should highlight the importance of Poulaphouca Reservoir as a major source of drinking water for the GDA, including reference to Uisce Éireann's statutory role in assessing risks to the reservoir, and how the implementation of nature based solutions will help to manage the water quality of surface water run off collected and discharged directly to the reservoir or to watercourses which drain into it.

In addition, reference should be made to the recently published Local Authority Waters Programme's Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents (2024).

Recommendation 6 – Poulaphouca Reservoir Water Quality

Having regard to the proximity of the Poulaphouca Reservoir and the provision of sustainable infrastructure and nature based water management solutions, in particular to:

- RPO 7.12 of the RSES to integrate sustainable water management solutions to create safe places;
- RPO 10.1 of the RSES to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment;
- RPO 10.15 of the RSES to improve storm water infrastructure to improve sustainable drainage; and
- policy objectives CPO 13.1, 13.9, 13.20, CPO 13.21, 13.22, 14.13, and 17.24 of the County Development Plan to ensure the implementation of the EU Water Framework Directive, surface water run-off is managed for maximum benefit, and to promote the use of green infrastructure,

the Planning Authority is required to:

- (i) include a new section of text to highlight:
 - (a) the importance of Poulaphouca reservoir as a drinking water resource for the Greater Dublin Area;
 - (b) the importance of protecting the reservoir as a drinking water supply; and
 - (c) the Local Authority Waters Programme's Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents (2024) relevant guidance; and
- (ii) include associated objective(s) to:
 - (a) protect the Poulaphouca Reservoir as a drinking water supply;
 - (b) ensure development will not negatively impact Poulaphouca Reservoir as a drinking water source;

(c) support and facilitate the improvement of the quality of surface water runoff that directly (or indirectly) will reach the Poulaphouca Reservoir; and

(d) support Uisce Éireann's statutory role in assessing risks to the reservoir.

The Planning Authority should consult with the Uisce Éireann regarding this recommendation.

8.2 Built Heritage

The Office welcomes the inclusion of the Blessington Architectural Conservation Area (ACA) in section B.6 of the draft Local Area Plan and Objectives BLESS 32 and BLESS 33 which offer protection to the architectural heritage of Blessington and resistance against any proposed demolition of protected buildings along Main Street / N81, Market Square and Kilbride Road.

With this in mind and having regard to the plans for regeneration of the town centre Opportunity Sites at section B.1 of the draft Local Area Plan, the Office would welcome the inclusion of a reference to the ACA and appropriate mapping in the Opportunity Sites section of the draft Local Area Plan.

Observation 3 – Architectural Heritage

Having regard to:

- RPO 9.27 of the RSES; and
- CPO 8.10 of the Wicklow County Development Plan 2022-2028,

the Planning Authority is advised to overlay the Blessington Architectural Conservation Area with the Opportunity Sites maps contained within the Town Centre section B.1 of Draft Blessington Local Area Plan 2025.

9. Implementation and Monitoring

Section 6.5 of the Local Area Plans, Guidelines for Planning Authorities (2013) states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effective

monitoring systems such as reviewing the progress in securing the objectives of the County Development Plan in accordance with section 15 of the Act.

In this respect, the Office considers that a more systematic approach to monitoring would better assist the Planning Authority in implementing the key objectives / actions of the draft Local Area Plan, by identifying lead responsibility, suitable indicators for measuring policy objectives and a timeline for implementation of actions / projects. For example, tackling dereliction and vacancy rates, as detailed above.

Guidance on monitoring and implementation is provided in chapter 10 of the Development Plans Guidelines. Further, the Carlow-Graigucullen Joint Urban Local Area Plan 2024-2030 and the Newcastle West Local Area Plan 2023-2029 both provide examples of good practice in this area.

Observation 4 – Monitoring and Implementation

Having regard to section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, the Planning Authority is requested to include a section on what the implementation and monitoring strategy will be and to provide a detailed systematic approach to monitoring the implementation of key objectives and / or actions of the Draft Blessington Local Area Plan 2025.

10. General and Procedural Matters

The Office notes that policy objective BLESS 7 sits within appendix 6 Infrastructure Delivery Schedule and Implementation of the draft Local Area Plan. The Planning Authority should consider including policy objective BLESS 7 in the main text of the draft Local Area Plan for ease of reference and to ensure equal weight is attributed to all policy objectives.

In addition, the Office notes discrepancies between the description of when permission will be considered for the development of New Residential Priority 2 lands at policy objective BLESS 7, Zoning Objectives at section B.8 Zoning and Phasing at section B.8 Zoning. The Planning Authority is advised to ensure that all descriptions of when permission will be considered for the development of New Residential Priority 2 lands are consistent with policy objective BLESS 7.

Observation 5 – Policy objective BLESS 7

The Planning Authority is advised to include policy objective BLESS 7 within the main text of the Draft Blessington Local Area Plan 2025 and address discrepancies in the description of when permission will be considered for the development of New Residential Priority 2 lands to ensure consistency with policy objective BLESS 7.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed.

Where your authority decides not to comply with the recommendations of the Office, made to the draft Local Area Plan, please outline the reasons for the decision in the Chief Executive's report.

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,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations