**Strategic Environmental Assessment Screening Report**

County Development Plan (Proposed Draft Amendments)

Planning Division

Wicklow County Council

Station Road

Wicklow

24 May 2022

Dear Sir or Madam,

My name is Carina Holmes and I am a member of Wicklow Planning Alliance and Delgany Community Council. I fully agree with the submission of Wicklow Planning Alliance (WPA) requesting to adhere to sustainable planning guidelines and reject all the amendments that break these guidelines (these are listed in the submission from WPA).

I furthermore request that the County Development Plan (CDP) is amended to correctly designate Greystones-Delgany as a “Self-Sustaining Town”, not a “Growth Town”, in order to allow services, facilities, amenities and infrastructure to catch up with the substantial increase in population over the last three to four years. This has already been requested by Delgany Tidy Towns, Delgany Community Council, Greystones Tidy Towns, several other community groups, and the Eastern Midlands Regional Authority, based on official regional sustainable planning guidelines. This is also important feedback from local community and other groups/authorities which needs to fully considered by the Council and, where differences emerge in terms of plans, it would be very helpful if these are fully explained by the Council. Greenfield development leads to urban sprawl which is not sustainable, and the focus now, in line with Government policy, should be on the development of sustainable brownfield sites close to public transport, health and education services, connections to water, electricity and other utilities, community amenities and established retail outlets. This will also permit the exploitation of greater economies of scale and scope in relation to these facilities, services and amenities. This makes sound planning and economic sense.

In addition, I fully agree with the Environmental Protection Agency’s (EPA) submission on the current amendments to the CDP, and in particular, the following text:

**Sustainable Development**

**In proposing the Amendments, Wicklow County Council should ensure that the Plan, as amended,**

**is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.**

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**In considering the Amendments, Wicklow County Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans**

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**Wicklow County Council should also ensure that the Plan is consistent with key relevant higher**

**-level plans and programmes.**

**Specific Comments to be considered:**

**We note that the SEA has identified proposed alterations as having potential for likely significant environmental effects or which conflict with national environmental or planning policy, as set out in**

**Section 9.2 - Additional Mitigation for Proposed Material Alterations. Clear justification should be given for proceeding with those alterations as proposed.**

**The Plan, prior to its adoption, should also fully take into account and integrate the recommendations of the SEA. It should also remain aligned with the environmental commitments and objectives of the National Planning Framework and Southern Regional Spatial and Economic Strategy**

**Future Modifications to the Draft Plan:**

* **Where further changes to the Draft Plan are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. They should be subject to the same method of assessment applied in the “environmental assessment” of the Draft Plan SEA Statement**

**“Information on the Decision”**

* **Once the Plan is adopted, you should prepare a SEA Statement that summarises the following:**
  + **How environmental considerations have been integrated into the Plan**
  + **How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan**
  + **The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with;**
  + **and the measures decided upon to monitor the significant environmental effects of implementation of the Plan**

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**A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process. Guidance on preparing SEA Statements is available on the EPA website at the following link:https://www.epa.ie/publications/monitoringassessment/assessment/EPA\_Guidance\_web.pdf**

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**Environmental Authorities**

**Under the SEA Regulations, you should consult with:**

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* **Environmental Protection Agency;**
* **Minister for Housing, Local Government and Heritage;**
* **Minister for Environment, Climate and Communications; and**
* **•Minister for Agriculture, Food and the Marine.**
* **•any adjoining planning authority whose area is contiguous to the area of a planning**

**authority which prepared a draft plan, proposed variation or local area**

**plan.**

Within the Greystones Municipal District, there is also an urgent need for an appropriate and scalable Employment Plan. Without it, all past, current and future development will remain completely unsustainable. Putting active travel infrastructure in place without local employment options will render it less than effective and efficient (and possibly quite costly in terms of a Cost-Benefit analysis, in particular, if the environmental impact in terms of the removal of mature trees, hedgerows, wildlife habitat, etc is taken into account), and it will actively work against the achievement of local and national climate change objectives. Car dependent residential development needs to eliminated in the future. In order to achieve the UN’s Sustainable Development Goals, there is also an urgent need for joined-up/integrated policies and actions across all areas of local and national planning. Anything less than this will be totally sub-optimal.

The Council’s comments on submissions made on the first draft of the CDP would also be greatly supported by using plan-led evidence-based information and data in the replies section.

Thank you and please continue the further education of our Planners in Climate & Biodiversity Planning, in particular, given that Wicklow has declared Climate Action as an Emergency priority. This Declaration also provides an opportunity for the County to leverage in this area and to become a “best-in-class leader” in terms of climate actions.

Yours Sincerely,

Carina Holmes