

Nora Earls

CSO

From: Nora Gyetvai  
Sent: 19 February 2016 14:46  
To: Planning - Development Plan Review  
Cc: John Considine; Conor Clarkson; Anna McNally  
Subject: Draft Wicklow County Development Plan 2016-2022 - Submission  
Attachments: 16.126-FRA-01 with App\_19.02.19.pdf; 16.126\_Powerscourt Arms-Response to DWDP-2016-2011\_19.02.16.pdf

Dear Sir/Madam,

We note that the Draft Wicklow County Development Plan 2016-2022 is currently on public display and is open to amendments based on public submissions. Please consider the attached letter and report, which have been compiled in relation to The Powerscourt Arms, Enniskerry, Co. Wicklow, as a response to the Draft Wicklow County Development Plan's Strategic Flood Risk Assessment (SFRA) section.

Should you require any further information, please do not hesitate to contact the undersigned.

Regards,

Nora Gyetvai

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Civil, Structural, Project Management

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Association of Consulting Engineers of Ireland Awards 2012  
President's Award Winner for Excellence in Design  
Student Accommodation, Wolverhampton



19<sup>th</sup> February 2016

Dear Sir/Madam,

It is our considered conclusion, as detailed in the enclosed Assessment, that the flood risk to the site is not significant and it is our request on the basis of this submission that the proposed Flood Zone designations of the site as 'A' and 'B' be removed and that the site and its surroundings, as indicated in our Assessment, should be included in Flood Zone 'C' i.e. where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding).

We trust that the above is satisfactory, however should you have any further queries, please do not hesitate to contact us.

Yours sincerely,

  
John Considine  
Chartered Engineer  
For Barrett Mather Consulting Engineers

Barrett Mahony Consulting Engineers  
Civil / Structural / Project Management  
Sandwich House, 52 - 54 Lower Sandwell Street, Dublin 2, Ireland  
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PROJECT: POWERSCOURT ARMS HOTEL SITE, ENNISKERRY, CO.  
WICKLOW

PROJECT NO: 16.126

DOCUMENT TITLE: FLOOD RISK ASSESSMENT

DOCUMENT NO: 16.126 - FRA - 01

Issue	Date	Description	Orig.	PE	PD	Issue Check
0	17/02/16	Issued as Response to Draft County Development Plan	NG		JC	

FLOOD RISK ASSESSMENT  
FOR  
THE POWERSCOURT ARMS HOTEL SITE, ENNISKERRY, CO. WICKLOW

barrett mahony

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## 1.0. INTRODUCTION

### 1.1. General Description

This Flood Risk Assessment has been prepared in relation to the designation of the area of land around The Powerscourt Arms, Enniskerry, Co. Wicklow, as being within 'Indicative Flood Zones A' and 'B' in the Draft Wicklow County Development Plan 2016-2022.

The Powerscourt Arms is comprised of a public house, restaurant and hotel on lands of **approximately 0.5 hectares zoned for 'TC' Town Centre development** in the Enniskerry Town Plan in the Draft Wicklow County Development Plan 2016-2022. It is located adjacent to the Glencullen River and currently a significant area of the land within the curtilage of the hotel site is designated **within Indicative Flood Zones 'A' (High Probability of Flooding) and 'B' (Moderate Probability of Flooding)** on Map 3 of the Enniskerry Town Plan and in the Strategic Flood Risk Assessment (Appendix 11) in the Draft Wicklow County Development Plan 2016-2022.

### 1.2. Scope of this Report

The purpose of this report is to analyse the flood risk to the site by identifying and analyzing potential sources of flooding- including coastal, fluvial, pluvial and groundwater flooding. Consequently, the aim of the flood risk assessment is to examine the **'Indicative Flood Zones' designated to the site** in the Draft Wicklow County Development Plan 2016-2022. Reference is made to the DEHLG/OPW Guidelines on the Planning Process and Flood Risk Management published in November 2009. Proposed solutions to flood risks, if required, will be recommended in order to mitigate the flood risks on the site as far as is reasonably possible. Any such proposals should not increase risk of flooding to adjacent structures or nearby areas.



Fig 1: Location of development

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

*Flood Zone B* – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding); and

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

As can be seen in the Maps from the Enniskerry Town Plan in the Draft Wicklow County Development Plan 2016-2022 in Appendix II, the land to the north and north-west of the Powercourt Arms Hotel is within 'Indicative Flood Zones A' and 'B'. The area in the immediate proximity of the southern bank of the Glencullen River is zoned "OS-Open Space" and "AOS-Active Open space" as part of 'SFRA Site No. 3', where the permissible development is 'water compatible' under land use zoning objective 'POS Passive Open Space'. However, the car park and garden area to the north and north-west of the hotel are identified as part of 'SFRA Site No. 4 and are subject to land zoning objective "TC-Town Centre". Due to the highly vulnerable to flooding uses permissible in the 'TC' zone, a 'Justification test' was undertaken to review the zoning objective's suitability and the following was recommended in the Strategic Flood Risk Assessment in the Draft Development Plan as per Appendix II:

*"These lands are currently developed for existing Town Centre uses. As such, it is considered appropriate to retain the TC zoning objective. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of uses be proposed, flood mitigations measures are required (refer to CDP (County Development Plan) Flood Objectives."*

However, it is also stated in the Strategic Flood Assessment that the following are the planning implications for developments within Flood Zones 'A' and 'B':

*"Flood Zone A: High Probability of flooding  
Most types of development would be considered inappropriate for this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as city or town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone."*

*Flood Zone B: Moderate probability of flooding  
Highly vulnerable development such as hospitals, residential care homes, Garda, fire and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure, would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met. Less vulnerable development such as retail, commercial and industrial uses, sites used for short-let for caravans and camping and secondary strategic transport and utilities infrastructure, and water-compatible development might be considered appropriate in this zone. In general*

*however less vulnerable development should only be considered in this zone if adequate lands or sites are not available in Zone C and subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can or will be adequately managed."*

The above indicates that while town centre uses should be retained in the area under land zoning 'SFRA No: 4', according to the 'Flood Management Objectives' detailed in the Draft County Development Plan, permissible uses under the zoning should also be avoided or restricted because of the designated indicative flood zones on the land.

The Eastern Catchment Flood Risk Assessment and Management Study (ECFRAMS) Flood Risk Review- Final Report by RPS (2011) for the OPW states the following in relation to Enniskerry, after reviewing the Probable and Possible Areas for Future Flood Risk based on the previous Preliminary Flood Risk Assessment (Appendix IV):

*"Enniskerry was originally included as a Probable Area for Further Assessment with a FRI (Flood Risk Index) score of 380. On review it was noted that the occurrence of out of bank flooding on the Glencullen River through Enniskerry was questionable due to the observed large in-channel capacity. The natural river banks are approximately 8m above the channel bed through Enniskerry. A basic channel capacity assessment indicates that the Glencullen River is likely to be able to convey a flow in excess of the 0.1% AEP flow through Enniskerry. While the channel capacity assessment is considered very approximate it does give an indication that the channel would be able to convey the 10% AEP flow and the 10% AEP flood damage should be removed from the FRI score. This reduces the FRI score from 380 to 74 and it is therefore recommended that Enniskerry should not be considered an AFA (Area for Further Assessment)."*

Based on the above findings, Enniskerry has been rejected for Further Assessment in the ECFRAMS due to a Flood Risk Index score below 250, which indicates moderate or low vulnerability to flooding established on past evidence. As the OPW flood risk map (given in Appendix I) shows no flood risks and considering the natural topography of the site where the river banks are approximately 6m above the channel bed at the Powerscourt Arms Hotel site, the probability of flooding from the rivers and the sea is low. The area in question should, therefore, be properly designated as 'Indicative Flood Zone C'.

In support of the above we attach a topographical survey of the site and sections through the Glencullen River and the site. The timber fence which follows the site boundary approximately is at +61.8 at its lowest point. The river bed level at +54.7 is 7.1 metres below this and the gradient of the river bed in the vicinity of the site is 1 in 34. The volume of the water in the river is controlled by the upstream bridge, the Knockink Bridge and by the bridge adjacent to the site, the Enniskerry Bridge. Both of these are smaller than the river channel and the crown of the bridge at +60.8 approximately is lower than the site. A Preliminary Flood Risk Assessment by Muir Associates for an adjacent site estimated the catchment area of the river and the 1 in 500 year flow at 240 cumecs/sec. The cross sectional area of the Enniskerry Bridge is 47.6 sq. meters and the estimated capacity in open channel flow is 933 cum/sec which is considerably in excess of the estimated flood flow as shown in the open channel flow calculation in Appendix V.

### 2.2.2 Vulnerability Class

The sequential approach describes the vulnerability classes as follows:

*Highly vulnerable development* – hospitals, schools, houses, student halls of residence etc.;

*Less vulnerable development* – retail, commercial, industrial, agriculture etc.;

and

*Water compatible development* – docks, marinas, amenity open space etc.;

The development on the subject lands is a hotel which is a highly vulnerable development.

### 2.2.3 Development Classification

The matrix of vulnerability as per "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" is reproduced in Table 4.1.

Table 4.1

	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water compatible development	Appropriate	Appropriate	Appropriate

Having regard to the finding of our Assessment that the lands at The Powerscourt Arms should be designated as 'Indicative Flood Zone C', the existing development on the site is therefore deemed appropriate and so no further flood assessment is required.

## 3.0. CONCLUSIONS

In summary the flood risk to the site has been assessed and considered not significant based on the above findings.

**The Draft Wicklow Development Plan includes the disclaimer that "(...) Indicative Flood Zones are based on current available information. All information may be substantially altered in light of future data and analysis."**

The Strategic Flood Risk Assessment in Appendix 11 of the Development Plan also states that "the Strategic Flood Risk Assessment is a live document which will be updated to take account of submissions made during the public consultation stages of the County Development Plan as well as any new information that arises throughout the process."

After analysing the flood risk to the site at the Powerscourt Arms Hotel, we would submit that the current Indicative Flood Zone designations of the site as 'A' and 'B' on Map No.3 of Enniskerry Town Plan and in the Strategic Flood Risk Assessment in Appendix 11 of the Draft Wicklow County Development Plan 2016-2022 be removed and that the site and its indicated surroundings be re-designated as Indicative Flood Zone 'C', i.e. where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding).

# OPW National Flood Hazard Mapping

## Summary Local Area Report

This Flood Report summarises all flood events within 2.5 kilometres of the map centre.

The map centre is at:

County: Wicklow

NGR: Q 220 173

This Flood Report has been downloaded from the Web site [www.floodmaps.ie](http://www.floodmaps.ie). The users should take account of the restrictions and limitations relating to the content and use of this Web site that are explained in the Disclaimer box when entering the site. It is a condition of use of the Web site that you accept the User Declaration and the Disclaimer.



Map Scale: 1:10,458

### Map Legend

- Flood Points
- Multiple / Recurring Flood Points
- Areas Flooded
- Hydroelectric Stations
- Rivers
- Lakes
- River Catchment Areas
- Land Commission \*
- Drainage Districts \*
- Benefiting Lands \*

\* Important: These maps do not indicate flood hazard or flood extent. Their purpose and scope is explained in the Glossary.

## 3 Results



1. The Soap Works Recasting  
County Wicklow

Cont Date:  
Flood Quality Code: 4

Add Local Information: Reports (1) Map Mapped Information



2. Kilmoney Lake Recasting  
County Wicklow

Cont Date:  
Flood Quality Code: 4

Add Local Information: Reports (1) Map Mapped Information



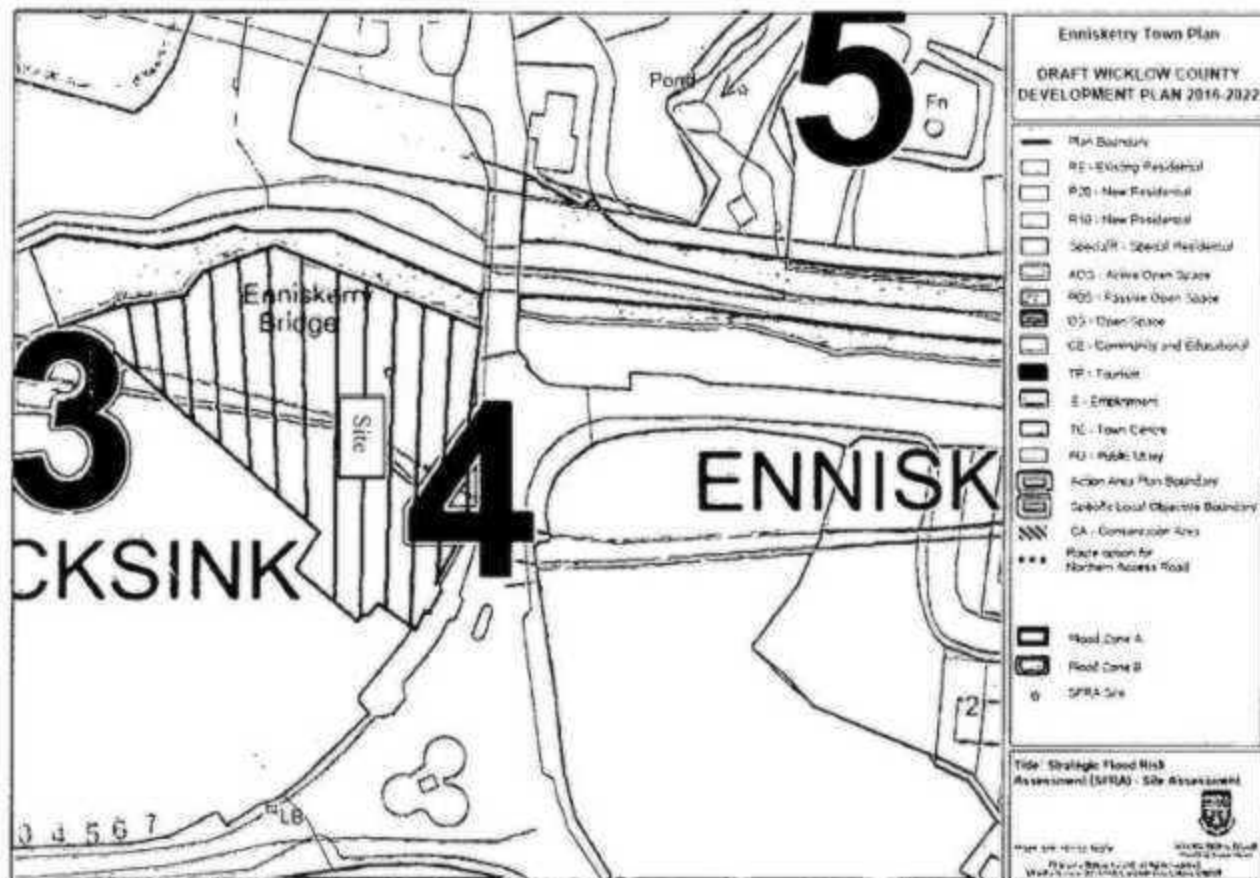
3. Pigeon Road Recasting  
County Wicklow

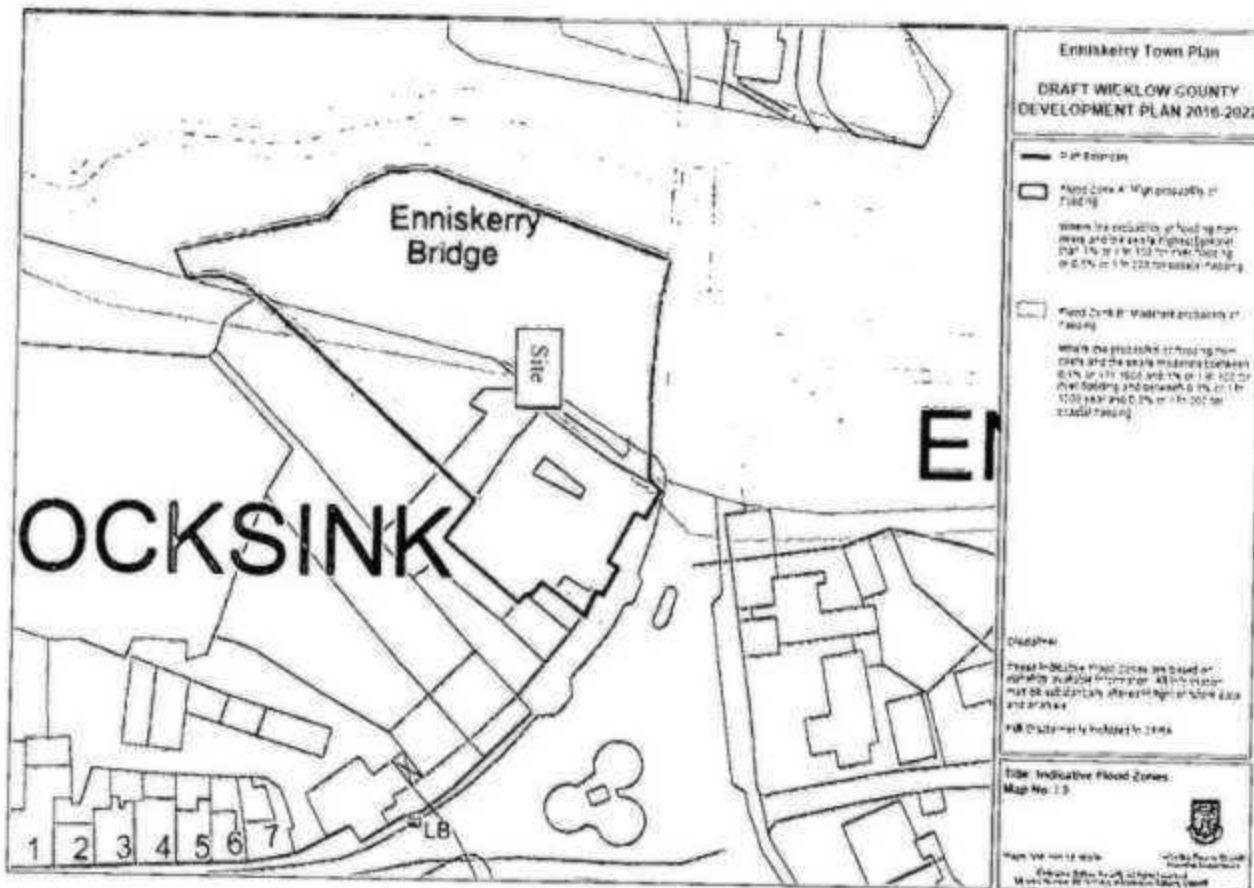
Cont Date:  
Flood Quality Code: 4

Add Local Information: Reports (1) Map Mapped Information

Report Produced: 10-Feb-2016 11:47

**APPENDIX II**  
DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022  
ENNISKERRY TOWN PLAN MAPS NO. 1 & 3 FOR SITE







**APPENDIX III**  
DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022  
ENNISKERRY TOWN PLAN- FLOOD RISK ZONES AND JUSTIFICATION TEST -  
STRATEGIC FLOOD-RISK ASSESSMENT (APPENDIX 11)

## ENNISKERRY TOWN PLAN

### Flood Risk Zones and Justification Test

The following is an analysis of the vulnerability of land uses on sites that fall within Flood Zone A and B, and where appropriate, the application of the Justification Test for plan making. All sites are indicated on the Flood Risk Assessment Map for each settlement, the map is located at the end of each town section here.

**Justification Test Note:** Where the justification test has been carried out it is important to note that a flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

#### Site No. 1

Land zoning	CA – Conservation Area
Flood zone A and/or B	A and B
Vulnerability of land use vrs.Flood Zone	Land use zoning appropriate
Requirement for Justification Test	No

#### Site No. 2

Land zoning	ADS – Active Open Space
Flood zone A and/or B	A and B
Vulnerability of land use vrs.Flood Zone	Land use zoning appropriate
Requirement for Justification Test	No

#### Site No. 3

Land zoning	POS – Passive Open Space
Flood zone A and/or B	A and B
Vulnerability of land use vrs.Flood Zone	Land use zoning appropriate
Requirement for Justification Test	No

#### Site No.4

Land zoning	TC –Town Centre
Flood zone A and/or B	A and B
Vulnerability of land use vs. Flood Zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

### Justification Test

1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	Under the Wicklow County Development Plan, Enniskerry is designated a Level 5 Small Growth Town. Under the 'Core Strategy' of the CDP, the population of Enniskerry is targeted to growth to 2,401 by 2025. Level 4 retail centres are defined as 'local centres / small towns' where the retail needs would be expected to include a newsagent, small supermarket / general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population. One supermarket / two medium sized convenience stores (up to 1,000sqm aggregate) and c. 10-20 smaller shops.
2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper and sustainable planning of the urban settlement and in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	No

(iv) Will be essential in achieving compact or sustainable urban growth;	No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are developed
<b>Conclusion</b>	Justification test failed.
<b>Recommendation</b>	These lands are currently developed for existing Town Centre uses. As such, it is considered appropriate to retain the TC zoning objective. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (refer to CDP Flood Objectives).

#### Site No. 5

<b>Land zoning</b>	RE – Existing Residential
<b>Flood zone A and/or B</b>	A and B
<b>Vulnerability of land use vs. Flood Zone</b>	Land use zoning not appropriate
<b>Requirement for Justification Test</b>	Yes

#### Justification Test

1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	Under the Wicklow County Development Plan, Enniskerry is designated a Level 5 Small Growth Town. Under the 'Core Strategy' of the CDP, the population of Enniskerry is targeted to growth to 2,401 by 2025.
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper and sustainable planning of the urban settlement and in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	No
(iv) Will be essential in achieving compact or sustainable urban growth;	No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are developed
<b>Conclusion</b>	Justification test failed.
<b>Recommendation</b>	These lands are currently developed for existing Residential uses. As such, it is considered appropriate to retain the RE zoning objective. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (refer to CDP Flood Objectives).

#### Site No. 6

<b>Land zoning</b>	RE – Existing Residential
<b>Flood zone A and/or B</b>	A and B
<b>Vulnerability of land use vs. Flood Zone</b>	Land use zoning not appropriate
<b>Requirement for Justification Test</b>	Yes

#### Justification Test

1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	Under the Wicklow County Development Plan, Enniskerry is designated a Level 5 Small Growth Town. Under the 'Core Strategy' of the CDP, the population of Enniskerry is targeted to growth to 2,401 by 2025.
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper and sustainable planning of the urban settlement and in particular:	

(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
(ii) Comprises significant previously developed and/or under-used lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	No
(iv) Will be essential in achieving compact or sustainable urban growth;	No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are developed
<b>Conclusion</b>	Justification test failed.
<b>Recommendation</b>	These lands are currently developed for existing Residential uses. As such, it is considered appropriate to retain the RE zoning objective. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (refer to CDP Flood Objectives).

#### Site No. 7

<b>Land zoning</b>	PU – Public Utility
<b>Flood zone A and/or B</b>	A and B
<b>Vulnerability of land use vs. Flood Zone</b>	Land use zoning not appropriate for flood zone A
<b>Requirement for Justification Test</b>	Yes

#### Justification Test

1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	Under the Wicklow County Development Plan, Enniskerry is designated a Level 5 Small Growth Town. Under the 'Core Strategy' of the CDP, the population of Enniskerry is targeted to grow to 2,401 by 2025.
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper and sustainable planning of the urban settlement and in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
(ii) Comprises significant previously developed and/or under-used lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	No
(iv) Will be essential in achieving compact or sustainable urban growth;	No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are developed
<b>Conclusion</b>	Justification test failed.
<b>Recommendation</b>	These lands are currently developed for existing Public Utility uses. As such, it is considered appropriate to retain the PU zoning objective. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (refer to CDP Flood Objectives).

#### Site No. 8

<b>Land zoning</b>	RE – Existing Residential
<b>Flood zone A and/or B</b>	A and B
<b>Vulnerability of land use vs. Flood Zone</b>	Land use zoning not appropriate
<b>Requirement for Justification Test</b>	Yes

#### Justification Test

1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	Under the Wicklow County Development Plan, Enniskerry is designated a Level 5 Small Growth Town. Under the 'Core Strategy' of the CDP, the population of Enniskerry is targeted to grow to 2,401 by 2025.
2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper and sustainable planning of the urban settlement and in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
(iii) Is within or adjoining the core of an established or designated urban settlement;	No
(iv) Will be essential in achieving compact or sustainable urban growth;	No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are developed
<b>Conclusion</b>	Justification test failed.
<b>Recommendation</b>	These lands are currently developed for existing Residential uses. As such, it is considered appropriate to retain the RE zoning objective. Applications for minor development (e.g. extensions) are unlikely to raise significant flooding issues. Should expansion of existing uses be proposed, flood mitigation measures are required (refer to CDP Flood Objectives).



**APPENDIX IV**  
**EASTERN CFRAM STUDY EXCERPT - A11.11**

A11.11 Enniskerry, Co Wicklow

Name: Enniskerry	County: Wicklow	Unique ID: 100116	PFRA Status: Probable AFA
<b>PFRA Review</b>			
Reason for inclusion in OPW database: Predictive & Historic			
<b>Historical Analysis</b>			
Historical Risk (0-4): 0		Historical Hazard (0-4): 0	
Number of flood impact locations on Roadmaps.ie: 1		Closest searchable town on Roadmaps.ie: Enniskerry	
LA comments confirm flood risk? Yes			
<b>Predictive Analysis</b>			
Predictive mapping indicates flooding? Yes		Flood Risk Index: 380	
<b>Historical Validation of Predictive Analysis</b>			
Historical Validation Risk (0-4): 2		Historical Validation Hazard (0-4): 1	
<b>Summary of LA Meeting</b>			
Has there been a history of flooding? Yes			
Has any works been undertaken? No			
Are there any dedicated defences? No			
LA comments:			
<b>Summary of Site Inspection</b>			
Site inspection observations: 15/07/11			
A large wc flows around Enniskerry. The wc is contained within a deep channel. At the location where out of bank flooding is shown to occur the banks are approx 6m high. While the water level will realistically reach a high level during a large flood event it is unlikely to go out of bank along the Enniskerry development.			
A local resident did highlight a small sub that causes flooding at the Mill Field housing estate. This has not been included in the PFRA predictive mapping.			
Size of Area: 6m x 6m	Channel vegetation: Mod veg with trees		
Channel condition: -	Structures: Road bridge		
Flood distances: -	Nature of flow: Low flow		
Nature of floodplain: -	Floodplain vegetation: -		
Properties: Residential and commercial	Evidence of flooding: None		



Photograph



Recommendation

Enniskerry was originally included as a Probable Area for Further Assessment with a FRI score of 380. On review it was noted that the occurrence of out of bank flooding on the Glenoulen River through Enniskerry was questionable due to the observed large in-channel capacity. The natural river banks are approximately 5m above the channel bed through Enniskerry. A basic channel capacity assessment indicates that the Glenoulen River is likely to be able to convey a flow in excess of the 0.1% AEP flow through Enniskerry. While the channel capacity assessment is considered very approximate it does give an indication that the channel would be able to convey the 10% AEP flow and that the 10% AEP flood damage should be removed from the FRI score. This reduces the FRI score from 380 to 74 and it is therefore recommended that Enniskerry should not be considered an AFA.

**APPENDIX V**  
OPEN CHANNEL FLOW CALCULATION FOR THE ENNISKERRY BRIDGE

 <b>Tetra Tech</b> Baren Monney Consulting Engineers 200001001 200001001	Project: Powerhouse Aids Hotel		Job No: 10.020	
	Location: PLOT 101, AGM/AGM/01		Client: Mr. R. R. R.	
	Drawn by: J.C.	Scale: 1:100	Checked by: J.C.	Reviewed by: J.C.

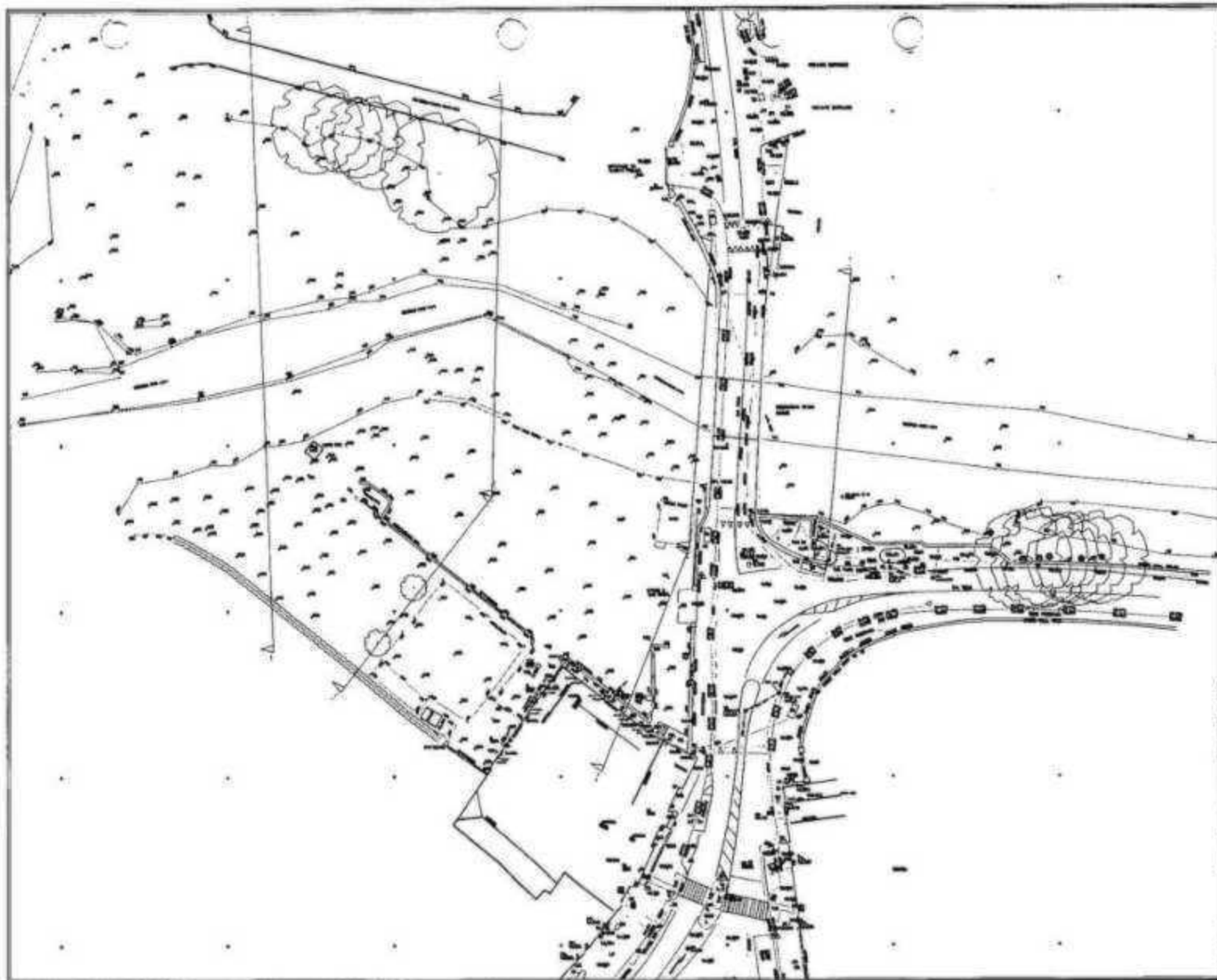
# STEADY FLOW IN OPEN CHANNELS

DATE: 10/10/2010

<b>Channel details</b>		
Bed slope	$S_b = 0.00000$	(1:1:24)
<b>Channel section 1</b>		
Water elevation	$P_1 = 26.000 \text{ m}$	
Area of flow	$A_1 = 47.800 \text{ m}^2$	
Hydraulic radius	$R_1 = 0.513$	
Discharge	$Q_1 = A_1 \cdot V_1 = 1.000 \text{ m}^3/\text{s}$	
Compound channel flow	$Q_{\text{comp}} = Q_1 + Q_2 = 1.000 \text{ m}^3/\text{s}$	
Bed discharge	$Q_{\text{bed}} = Q_1 = 1.000 \text{ m}^3/\text{s}$	

**APPENDIX VI**  
TOPOGRAPHICAL SURVEY PLAN & SECTIONS OF THE SITE





1. The first step is to identify the key components of the system. This includes understanding the hardware, software, and data involved.

**Initial**  
questionnaire about the respondent's sex and family size;  
current employment; knowledge of respondents

NO.	NAME	AGE	SEX	RELATIONSHIP

## Laser Surveys

Support is provided by the National Science Foundation, Grant Number 0080500.

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Customer 100

Powerplant Area, 1000  
Exhaustive Test  
Thoroughness Study

姓名	性别	年龄
职业	学历	健康状况
住址	联系电话	电子邮箱

Social Housing Submission

CSI

Submission

Mr. Edward Cullen,  
Rathmore House,  
Rathmore, Ashford,  
Co. Wicklow.

WICKLOW COUNTY COUNCIL

16 FEB 2016

RECEPTION

16 FEB 2016

Time.....

11<sup>th</sup> February 2016

Att: Ms. Sorcha Walsh,  
Senior Planner,  
County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town.

Dear Ms. Walsh,

Please find enclosed our submission for a 100 acres Folio numbers, WW 16589F & WW1650 situated at Rathmore, Ashford, County Wicklow, to be included in the new County Draft Development Plan re: Social Housing.

As you are aware, this site is ideally located and strategically positioned for this type of development.

In our opinion this application should be looked upon favourably, because of the Social Housing shortage and its key location.

After great consideration, and expert advice, we have decided to formally lodge this application because of the fundamental need in this Social Housing crisis.

I would respectfully suggest that while considering this application to be included in the forthcoming County Development Plan, that a unique opportunity is being presented to Wicklow County Council to giving a lead in this national crisis.

I would ask you to put minor considerations, in the overall context to one side, and face this national challenge with sincerity and a social conscience.

Please do not hesitate in contacting us for any further information in relation to this application.

This application without doubt will present a major challenge both to Wicklow County Council, and the elected representatives of the people, and it affords everybody the opportunity to give a responsible positive response in light of the current housing crisis.

Yours sincerely,

*Edward Cullen*  
Edward Cullen





CS2



Carrigacorra,  
Valleymount,  
Blessington,  
Co. Wicklow,

19/2/2016

Dear Sir or Madam,

I would like to make a Submission to the New Wicklow County Development Plan for the period 2016-2022. I propose to include the area marked inside the green line into the Settlement boundary of the Rural Cluster of Carrigacorra on the map attached. This site is in the middle of the townland of Carrigacorra with houses all around it. There is also an old original building on this site which with the proper planning permission could be renovated. Hoping this meets with your approval.

Yours sincerely

Caitriona Cullen

BALTYBOYS

BOLEYNASS

BARRANISKY

CARRIGACURRA

Settlement Boundaries  
Rural Clusters

DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2015-2022



SETTLEMENT BOUNDARIES



Wicklow County Council  
Planning Department

Map Not To Scale

© Copyright Survey Ireland  
All rights reserved  
2015/06/01 Wicklow County Council



19 February 2016.

Wicklow County Council

County Buildings

Wicklow

Dear Sirs,

Ref: Draft County Development Plan 2016 – 2022.

Re: Special Zoning Newtownmkennedy – HD24 – To provide for low density residential development with associated leisure, tourism and recreational facilities on lands measuring c. 28ha Ballinahinch lower, Co. Wicklow as shown on Map 04.01.

We, whose names are listed below are writing to notify you that we are alarmed at the zoning of such a large tract of land outside the town boundary.

- It is completely contrary to good planning and development.
- The land has been zoned against the recommendation of the Wicklow Planning Authority.
- The proposed roads are inadequate. Traffic on Trudder Road, which will inevitably attract vehicles coming from and going back to the South, would be a serious danger, and the access roads are totally insufficient to carry such car movements each day.
- The site is unserviced.
- This development will have a visual impact on a beautiful rural valley.
- There is already adequate land zoned in the Village to cater for the demands of the supply of housing.
- Zoning should be put forward for consideration in the next review of the Newtownmkennedy development plan and not the County plan.

We strenuously object to the zoning of this land for the reasons outlined above and now ask that the rezoning to this land be reversed.

Yours sincerely,

**Frank & Louise Fenelon**

"The Seven Acres"

Kilday

Newtownmtkennedy

Co. Wicklow

**Poul & Margaret Byrne**

"Windfield"

Trudder

Newtownmtkennedy

Co Wicklow

**Francis & Aisling Cunningham**

"Windy Gable"

Callowhill Lower

Newtownmtkennedy

Co. Wicklow

**Una Fenelon**

"Fendoo"

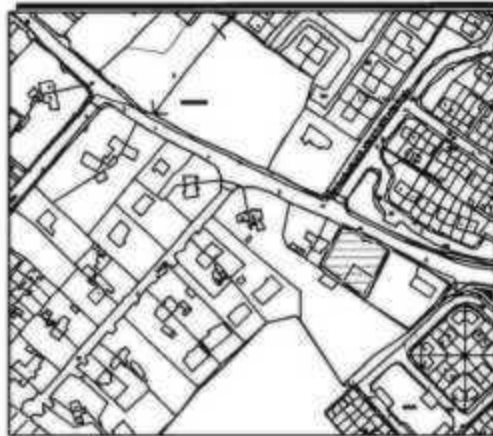
Newtownmtkennedy

Co. Wicklow

C54

SUBMISSION  
DRAFT WICKLOW COUNTY DEVELOPMENT PLAN  
2016-2022

ZONING OF COMMERCIAL SITE  
PARKMORE, BALTINGLASS



JAMES CURRAN

February 16th 2016

**FRANK O'GALLACHÓIR &  
ASSOCIATES LTD.**

*Professional Town Planning  
Consultants*



CS4

Our Ref: J13/040

County Development Plan Review  
Planning Department  
Wicklow County Council  
County Buildings  
Wicklow Town

Date: February 16th 2016

Draft Wicklow County Development Plan Submission  
Zoning of Commercial Site  
Parkmore, Baltinglass, Co. Wicklow

Dear Madam,

We act on behalf of James Curran of Baltinglass Hire and Sales, Parkmore, Baltinglass, County Wicklow. We wish to make a submission regarding the Draft Wicklow County Development Plan 2016-2022 for the consideration of the Council. Our submission seeks to clarify and confirm the appropriate local services zoning for this site. Our submission follows.

Please contact us if we can be of any further assistance on any of the matters raised. Please address all correspondence to the undersigned.

Yours sincerely,

  
Frank O'Gallachoir  
Dip. T.C.P., M.Sc., M.I.P.I.

Enc: Development Plan Submission

**DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022-  
SUBMISSION**

**ZONING OF COMMERCIAL SITE  
PARKMORE, BALTINGLASS, CO. WICKLOW**

**JAMES CURRAN**

**1. INTRODUCTION & SUBMISSION OBJECTIVE**

**1.1 Background**

James Curran is the owner of this site comprising of 1,400 sq.m. This site was originally used as a bus depot. We understand that this site has been in commercial use, since the coming into effect of the 1963 Local Government (Planning and Development) Act in October 1964. This site is currently used as a small local convenience goods shop at ground floor level. The first floor area is reserved for non-retail storage and warehousing of goods.

**1.1 Draft Wicklow County Development Plan 2016-2022 – Baltinglass Town Plan**

The Draft Wicklow County Development Plan 2016-2022 – Baltinglass Town Plan seems to zone this site MU – Mixed Use. We understand that this may be an error and that it was the intention of the planning authority to zone this site and the adjacent site LS for 'local shops and services' similar to the NS zoning used in the 2010 Baltinglass Plan.

We understand that the description of this LS zoning is *'To provide for small scale retail, retail services and other local service uses, that meet only the retail or service needs of residents in the immediate catchment and are not of such a scale or type that would detract or draw trade from the existing town centre'*.

**1.2 Submission Objective**

The objective is to confirm the zoning of this site as LS for *"local shops and services"*. See Figure 1.



Figure 1 Draft Baltinglass Town Plan



*Not to Scale*

## 2. SUBMISSION RATIONALE

We believe it is appropriate and sustainable, to zone these lands LS for 'local shops and services' for the following reasons.

1. This site has been used for commercial purposes from before the enactment of the 1963 Local Government (Planning & Development) Act 1963.
2. Because of the size and location, retail development on this site cannot be regarded as taking away from the vitality and viability of Baltinglass town centre.
3. It is the location of a small local shop catering for the local residential population in this part of Baltinglass.
4. By virtue of this location, it will facilitate sustainable modes of travel as motor vehicle trips are not necessary for local shopping trips. The site can accommodate appropriate car parking.
5. There is no extant planning permission granted for a neighbourhood retail development in this area.

6. This part of Baltinglass has expanded considerably in population and is deficient in local shopping. There is only one petrol filling station and general store between the subject site and the Square in the centre of Baltinglass.
7. Local convenience stores are provided for in the government's Retail Planning Guidelines provided they do not take away from the vitality and viability of the town centre. This site by virtue of its size and location can only serve the local area.

### 3 CONCLUSION

We request the Planning Authority to take this submission into account and to correct this apparent error in the Baltinglass Town Plan.

Regards

  
Frank O'Gallagher  
Dip. T.C.P., M.Sc., M.I.P.I.

Scott, Irishish

CSS

From: Scott, Irishish  
Sent: 05 January 2016 23:27  
To: Planning - Development Plan Review  
Subject: Rights of Way objective

From: Scott, Irishish  
Sent: 05 January 2016 23:27  
To: Planning - Development Plan Review  
Subject: Rights of Way objective

Hi,

Scott, Irishish

In relation to the draft development plan, I would like to suggest including a specific appendix with an objective to establish and maintain a list of recreational and other Rights of Way in the county. This is a very important point in terms of tourism potential and general public amenity.

Other county councils have already adopted similar objectives, for example in Dun Laoghaire Rathdown, the Draft Plan for 2016, Appendix 8 (Public Rights of Way and Recreational Access routes) lists a register of existing routes and also defines various objectives for establishing them. They also had a similar "Appendix G" in the previous 2010-2016 plan.

In certain geographical areas around Enniskerry and Glencullen where routes may traverse a county boundary and there is a need for the two county councils to co-operate and co-ordinate. Similarly with the relevant Dublin area council boundaries.

The Planning and Development Act 2000 put the onus on county councils to develop and maintain these policies. Please see <http://www.irishstatutebook.ie/eli/2000/act/30/enacted/en/pdf>

In Section 14 of the Act (on page 42 which is in Part II) there is a procedure described for the first time listing of Rights of Way.

In Sections 206 and 207 of the Act (on page 204 which is in Part XIII) there is a procedure described for establishing new routes where the council deems them necessary. 206 is by mutual agreement with the landowner, and 207 is by CPO.

In Schedule 1 Part IV of the Act (Environment and Amenities on page 258) there is a specific mention of objectives to preserve any existing Right of Way that is of scenic or recreational utility.

So all in all, it would be very remiss of WCC to omit this important aspect of the draft development plan, and especially in a county where recreation and tourism are of vital economic importance.

Kind regards,  
Mr. Clive Dalby  
Guaimhness  
Blackberry Lane  
Delgany  
Co Wicklow.

Leonora Earls

From: Clive Dalby  
Sent: 07 December 2015 22:00  
To: Planning - Development Plan Review  
Subject: Appendix 6, Wind energy Strategy

Hi,

Having read the proposed Wind Energy Strategy in appendix 6 of the draft development plan, I wish to make these submissions;

1. The strategy does not appear to take into account microgeneration, that is individual wind turbines of a smaller scale that people may wish to install on their own site.

Although the document does refer in places to restrictions for "wind farms" it should also include (as part of an overall strategy) a specific mention of microgeneration.

The restrictions as mentioned are not appropriate for microgeneration, ie the person who installs one small turbine on their own land. For example the requirement for shadow and flicker analysis; these could render any small project unfeasible. The fact that turbine rotor blade diameter are considered in only two size brackets (less than 50 metres, or more than 65 metres) is not taking account of microgeneration, which would be on a much smaller scale. It would be appropriate to insert a clarification clause here to say rotor blades of less than 10 metres diameter are exempt from the requirements.

2. On the subject of larger scale "wind farms," the objective to "Identify locations where low wind speed would not render exploitation viable" is appropriate. However the idea of basing a restriction on a simplistic wind speed map is not.

There are a whole range of localised factors affecting the suitability of any site. For example a small drumlin type hill in an area of "low wind speed" on the map may catch the wind, while also being particularly suitable due to its proximity to a settlement which will consume the power. Meanwhile, another site in an area of higher wind speed on the map may be unsuitable because of "being in a dip" or due to turbulence in the wind caused by trees or other localised topography.

Therefore it would be much wiser to ask for a years wind speed test data, gathered from an anemometer located at the particular site, and at the proposed height of the turbine. Such data to show a minimum average wind speed achieved at the site over the year (eg 7.5 metres per second as per the map). Even a person installing a small single turbine for microgeneration should be gathering this data in advance anyway, before committing their capital investment.

3. "Less favoured areas" and Views.

A lot of Wicklow is obviously upland and hill farms and considered a "high amenity area" for the purposes of PP for houses. However these upland areas are also very suitable for wind farms.

I think the mere fact that a wind farm is visible to the public does not mean that the scenic or amenity value of that area is spoiled. It may happen in the future that people become used to seeing wind turbines in the landscape and see them as another (and benevolent) part of the countryside. Even those who don't like the look of them will become more used to them. Nobody thinks the black plastic used on hill farms for silage bales and mulching is pretty, but we have become used to seeing it these days and we all appreciate that it has a function which ultimately benefits us all. Therefore the planning policy should not be so restrictive that wind farms can only be located out of sight.

I have no interest in developing a wind farm myself, but I am a Building Energy Rating assessor operating in North Wicklow and I generally encourage householders (especially farmers, or those on a bit of land) to invest in wind turbines and solar PV panels whenever feasible. This is in line with the policy of SEAI and the new Building Regulations policy to encourage energy conservation and also the production of renewable energy.

\* Kind Regards  
Clive Dalby  
Blackberry Lane  
Delgany Co. Wicklow  
(W \_\_\_\_\_)

CS6

2  
Catriona Earls

From: Denis Daly (mailto:denis.daly@wco.ie)  
Sent: 15 February 2016 16:58  
To: Planning - Development Plan Review  
Subject: RE: Submission to Draft Wicklow County Development Plan 2016-2022  
Attachments: Submission to -DRAFT Wicklow County Development Plan 2016-2022.pdf

Hello,

I have attached a PDF of our Submission in connection with  
Chapter 8 Community Development: Section 8.3.5 Open Space - Objective CD43  
of the DRAFT Wicklow County Development Plan 2016-2022.

Regards,

Denis & Catriona Daly

120010001  
120010001  
120010001  
120010001

120010001

120010001

120010001

120010001

7 Castlefield Terrace,  
Kilincarrig,  
Greystones,  
Co. Wicklow.

County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town,  
Co. Wicklow.

12<sup>th</sup> February 2016

Dear Sir/Madam,

**RE: Submission to DRAFT Wicklow County Development Plan 2016 – 2022**

As residents of County Wicklow we wish to make a formal submission to the Draft Wicklow County Development Plan 2016 – 2022 in relation to:

**CHAPTER 8 COMMUNITY DEVELOPMENT**

**Section 8.3.5 Open Space Objective CD43 of the DRAFT Wicklow County Development Plan 2016-2022**

Proposed wording of Open Space Objective CD43 as per Draft Wicklow County Development Plan 2016-2022

CD43 in existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development. Non-community uses on such lands will not normally be permitted.

It is our contention that Objective CD43 should state that these Residential Open Space lands should be assigned their own unique use zoning objective and delineation in the Local Area Plans.

The subsuming of the open spaces into the 'existing residential' use zoning objective in the recently reviewed Local Area Plans will lead to a diminishing of the status of these residential open spaces and to a muddying of the waters as to the actual boundaries of these plots.

The maintenance of these residential open spaces are by and large carried out at the expense of the residents committees within each estate and to this end it demonstrates how committed and proud the people are of these amenities. It is only proper that the Local Authority should continue to recognise this and have them zoned as such in the Local Area Plans.

The unique use zoning objective and delineation of these plots is critical to their preservation in that it provides clarity of curtilage and recognises the use zoning objective into which these amenity areas are best protected. The delineation and the recognition of independent use zoning objective of these plots also provides certainty for prospective purchasers of a property bearing in mind that these green areas in fact can often be the deciding factor as to where people choose to live.

Suggested wording to be inserted into

**CHAPTER 8 Section 8.3.5 Open Space  
Objective CD43 of the DRAFT Wicklow County Development Plan 2016-2022**

CD43 in existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will be assigned a unique use zoning objective and delineation in the Local Area Plans at initial preparation or at the next statutory review stage. Non-community uses on such lands will not normally be permitted.

Yours faithfully,

Denise & Catriona Daly,  
Tel:  
Email:

CS7

Desmond Davis  
10 Ballyloughan Court  
Bruckless  
Co Donegal

To whom it may concern

I would like to request that my house be taken off the listed buildings register, reference 13-18. Information below.

It was initially put on in the late 90's. I had been working in the garden at the time and somebody from Wicklow County Council asked me would I like to have the building listed, at the impulse of the time I thought that was a great idea. I realise now, it was not such a bright idea as it is a restriction for me to develop the house on the present site. Just to say there was no pressure to have it listed at the time; my impression was that it was very much a matter of my choice.

The house itself lies on 1.12 acres of land, this runs in a long strip behind the house.

I would like to make a few reasons for the lifting on restriction of the listing.

The house now is not recognised by the locals as an Old School house, most of that generation is now deceased.

The house now is situated on a very busy R761, it is proposed that the wall is to be bought back another metre and footpath put in place.

The house is now in bad repair and needs a facelift.

The house itself now has PVC windows, and fascia boards, the flat roofed part of it is not the original. It is of course now not recognisable in its original state because of the pebble dash. I suggest to you that it is barely recognisable as the original building would have been. Part of the original dwelling was also a teachers dwelling (two storey), which was demolished in the 70's.

There is also a problem with access to the land at the back; probably the flat roofed part would need to be knocked to gain access to the rear.

It should also be said that there is a crack where the old and the new have been joined. In fact this part of the building does not compliment the original.

There may be other things to add to this, but this will suffice for the moment

Yours sincerely

Des Davis

WICKLOW COUNTY COUNCIL

17 FEB 2016

PLANNING DEPT.

13- 18 13 Pretty Bush Former National School School, now a dwelling. Knockree Td A small National School of circa 1950. The building is gable-ended with painted, rough-cast walls, a flat-roofed porch at the north end and five windows to the front.



## DELGANY TIDY TOWNS

CSB

Lairi de Builéar  
Hillside House  
Delgany  
Co. Wicklow

Correspondence to:

14<sup>th</sup> Feb 2016

County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town

16 FEB 2016

### Draft County Development Plan

Dear Sir,

I appreciate that Delgany along with Greystones and Kilcoole has a separate Development plan. That LADP is, however, subject to the overarching plans of the County Development Plan, the Regional Planning Guidelines and the National Strategy.

The draft plan for the county has a strong statement regarding Delgany and Greystones in chapter 3. In that, it points to "high quality transport links". I am afraid this is a very false statement. This assumption coming from the Regional Planning Guidelines has resulted in overdevelopment of housing in the Delgany area. The same assumption is putting pressure on planners to approve what we regard as unsustainable development.

It is my considered opinion that the County Development Plan should flag up the current transport situation. Until transport links are considerably improved, (and unlikely to occur in the lifetime of the new plan) the Greystones/Delgany area should be excluded from the development objectives of the Dublin Metropolitan Area. Such a proviso would also enable the CDP to be in line with the weaknesses and threats expressed in the draft LECP and would enable the CDP to be more in harmony with the objectives of the LECP.

From my many years as chairperson of Delgany Tidy Towns, and supporting the protection of our local heritage, I strongly believe that any further development must be sympathetic and sustainable. Current higher level overarching objectives should be considered as unrealistic within the 2016-2022 period and that constraint should be noted in the CDP.

Is mise le meas

Lairi de Builéar

C59

Leonora Earls

From: Pauline Flynn  
Sent: 22 January 2016 16:59  
To: Planning - Development Plan Review  
Subject: Wicklow Development Plan 2016-22  
Attachments: Donard.docx

For the attention of Bernadette

Attached please find the submission of Donard/Glen Focus Group. You already have our submission of photos and other documentation.

Please add this paper to that submission.

Thanks Bernadette.

Yours, Pauline Flynn  
Donard/Glen Focus Group

**Donard/Glen Focus Group submission to Wicklow County  
Development Plan 2016-22**

The photographic submission shows in detail many of the problems facing the village of Donard and the documents attached to those photographs will give you more information regarding those problems.

Firstly we would like Donard to be referred to as a **VILLAGE** in the Development Plan Documentation going forward, **not a Rural Town**.

Two hundred people live here, there are two pubs, two churches, one shop, one school and a community hall. Your description of Donard as a Rural Town does not fit the profile of this village.

This is a **19<sup>th</sup> century village** and much of the fabric of that heritage is slowly being eroded by poor planning and dreadful neglect. **We have to protect what is left of that architectural heritage and prevent any more destruction.**

Donard is the gateway to the Wicklow Mountains and thousands of people travel through the village every year. Many are hill walkers and many more are foreign visitors. **We need to develop the image of Donard and West Wicklow as a 'destination', a Key Village**, then maybe a cultural centre will grow with good café's, crafts shops, local produce outlets etc

There are six derelict houses in the centre of the village and many more just on the edges. This has been allowed to continue unmonitored and needs to be addressed immediately.

We would like to develop walking pathways in the environs of the village and hope that in future planning for the village this will be incorporated. At the moment local walking groups that include older people and children have to

walk out the country roads and then turn back again. It is not safe. There are no circular routes on or off the public road.

This village has to be made habitable, its current stock of derelict houses repaired/rebuilt in the appropriate manner suitable to the style of the village. If the centre of the village becomes alive again with young and old people able to live in suitable houses then there is a positive future of us. If planning is only given to estates or single dwellings then the village will die.

We don't want 'laundrettes', fast food outlets, or other unsuitable enterprises that look good on a development plan but do not enhance or add value to the community and the good lives that are lived here.

We need to look at what we have, what is appropriate to the area **Heritage, Beauty and Uniqueness** and build on that.

Leonora Earls

From: Pauline Flynn  
Sent: 20 February 2016 14:38  
To: Planning - Development Plan Review  
Subject: Wicklow Development Plan - Donard Submission

To whom it concerns:

Please see further submission from Donard Focus Group in relation to the designation of Donard as a Rural Town.

Cc: Level 6 category and the actual physical character of the Donard village - the general criteria/characteristics of a level 6 rural town (the supermarket, 2 convenience shops, 10-20 smaller shops) Donard is a small village centre, two pubs, a shop, several derelict buildings and a handful of residences - and has consistently remained as such -

(1) simply neither reflective of a location for which the plans designated for level 6 rural towns are appropriate or realistic

The actual village itself - very small centre, narrow roads into and through which are pretty much lined by houses in every direction -

(2) there is NO WAY the forms of development (retail and economic) included in the plans for level 6 rural towns could be implemented without being in COMPLETE opposition to the protection and promotion of the most defining and consistently recognised resources stemming from Donard's heritage, historical, natural and environmental characteristics and resources of Donard - in fact such development could ONLY compromise or destroy them, thereby permanently mitigating against any form of development that is genuinely and effectively grounded in the inherent, already existing qualities of the location. (eg., widening roads would require knocking down stone walls which could not be properly re-instated; lack of parking etc); compared to towns like Blessington for example, there is no scope for widening the space of the small village - and given that there are already 3 such town centres in the immediate vicinity of Donard (Blessington, Dunlavin, Baltinglass) - two of which already have substantial retail and discount supermarkets etc, there would be no justifiable rationale for the massive and destructive physical reconfiguration that such development would necessitate

If the development plan truly is about safeguarding and promoting what is inherent to Donard then there should be some provision in the plan:

whereby the people of Donard are consulted about future:

with the urban regeneration politics and policies to give us some ideas...

(1) If the main criterion of the Level 6 Rural Town designation is a population range of 500-1000 how can Donard be included in this category?

From 2016-2022 Plan

Table 1 below sets out the key elements of the Wicklow County Development Plan Core Strategy, as it applies to Level 6 settlements:

Core Strategy of the Plan	Application to Level 6
Settlement Population & Housing Strategies	Level 6 settlements are designated 'Rural Towns' and generally have population targets in the range 500 - 1,500.
Economic Development Strategy	The economic function of Rural Towns is to be an attractor for local investment and to target investment in the form of product intensive industries particularly those related to rural businesses.
Retail Strategy	All Level 6 settlements are identified as Level 4 in the County retail hierarchy. Level 4 retail centres are defined as 'local centres / small towns' where the retail needs would be expected to include one supermarket / two medium sized convenience stores (up to 1,000sqm approx) and c. 10-20 smaller shops.

Comparative Populations of Level 6 Rural Towns

Plan Type	Settlement	Population 2011	Housing Stock 2011	Core Strategy Population Target 2022	Total Housing Unit Requirement 2022	Housing Unit Growth Requirement 2011-2022	Housing Unit Growth Requirement - 10yr
Level 6	Avoca	717	262	875	369	67	172
Settlement	Donard	176	92	257	114	22	37
Plan	Edencampoge	299	171	397	196	116	114
	Newcastle	817	323	1,065	471	158	191
	Roundwood	786	326	1,007	465	138	195
	Shinleigh	426	160	575	212	92	92

There are no other locations included that are less than 400 and the majority of locations in this category have populations of 700 or more.

(2) If, in the previous 2010-16 Plan, the Donard population had been projected to increase to 300 by 2016 and in 2016 the current population has virtually remained the same as 2006 Census levels, how can the Level 6 designation be allowed to stand? On what basis is this justified, appropriate, realistic, feasible, or useful?

From the 2010-2016 Plan

The County Development Plan includes targets for the future population growth of Donard. The targets indicate that the population of Donard can grow to a maximum population of 300 people by 2016 and a maximum population of 400 people by 2022.

Thank you.

Pauline Flynn



## Wicklow Development Plan Review 2016-22



### Village of Donard Heritage

On behalf of the Donard/Glen Focus Group I have already submitted ideas and concerns in relation to the village of Donard.

Please add this paper to that submission.

On February 8<sup>th</sup> I met with Ms. Deirdre Burns from WCC Heritage Dept. to take a walk around the village and make an assessment of the architectural heritage and discuss how it can be saved from further destruction.

At the moment the village is quite intact in terms of the 19<sup>th</sup> century design despite the unfortunate inclusion of an electronic gated dwelling with Chinese granite pillars and enormous arch right in the centre of the village. This house has just been sold.

Recently a row of cottages, beside this inappropriate gateway, have also been sold and we would like to see a sympathetic development in this location should the new owners choose to redevelop the site. These houses are in a very derelict condition and empty since at least the seventies.

There are also other derelict houses in the main street and on the near edges of the village.

We have made representation to the Council in relation to the dereliction of these buildings but they remain an eyesore and unsafe.

It is imperative that we safeguard the vernacular street scape and alignment going forward and stop the decay and dereliction as soon as possible.

We have many stone walls and street architecture that need to be preserved.

Donard is the gateway to the Wicklow Mountains and thousands come through the village to access the mountains and the Glen of Imaal. Horse riding is very common in the area and more and more tourists are looking for the type of unspoiled countryside that we have to offer.

### We need to save Donard NOW

Please see attached for more information.

Contact me Pauline Flynn at .....



*Pauline Flynn*



# DONARD

## 2

### MONASTIC SETTLEMENTS

#### Early Christian Settlement

The origins of village development in County Wicklow can be traced to the period between the eighth and tenth centuries AD, when communities of monks and nuns established monasteries all around Ireland. These early monasteries were for the most part oval or circular spaces enclosed by a fence. A track or roadway followed the line of the circular enclosure and the main approach came from an eastern direction. In time, a number of these monasteries developed into early settlements, where the enclosure acted as the religious core of the settlement. The eastern approach route retained its importance and the circular roadway acted as streets. In addition, a triangular market area developed at a point where the approach road met the curved boundary line.

Today a significant number of these Early Christian settlements survive in the form of towns and villages all around the country. The circular inner core survives as a church site and the cemetery has remained in active use into modern times. County Wicklow has a large number of this type of village where their monastic origins can still be identified. These include: Delgany, Donard, Hollywood, Kilcoole, Kilmacanogue, and Rathnew. Other possible examples include: Glencaly, Kiltegan, Kilquiggin, and Redcross. Of these, Delgany and Donard offer excellent examples where the monastic components clearly survive and can be appreciated.

#### Donard

Donard is one of the Wicklow villages that clearly display the four components of excellence in village design. These include a good plan, public open space, good architecture and integrated landscape. Historically, Donard can trace its origins to a monastic foundation that was established sometime around the eighth century and developed into an early settlement form. This early settlement must have been of some importance, as when the Norman baron, Jordan de Marisco, was granted the area in around 1190, he built a motte-and-bailey type castle immediately beside settlement site. Today the village has four significant ingredients that make up the historic centre. These include the remains of the monastic enclosure, parts of the motte-and-bailey, the triangular market area and the nineteenth-century architecture (Fig. 7).

Nowadays the monastic site is rectangular in shape and is made up of a graveyard and the ruins of a medieval church. The building dates from around the fifteenth century and consisted of a single chamber with a bell cote at the eastern end wall (Fig. 8). Immediately south of the enclosure, is the remains of de Marisco's motte-and-bailey (Fig. 9). This was a typical early Norman type of fort that consisted of an earthen mound, or motte, with a wooden tower on the top. Beside this, but at a lower level, a larger second mound, the bailey, was built. Both mounds were linked together and defended by a wooden stockade. The advantage of this type of structure is that it could be built quickly using available materials: earth and timber. The earth-built motte and part of the bailey survive, but naturally the wooden structures have long perished.

On the opposite side of the monastic enclosure is the triangular village green (Fig. 10). This triangular shape suggests that this may have been the market place attached to the monastery. If this is the case, it is the only example of the survival of the typical monastic triangular market place in County Wicklow. Alternatively, the triangle shape may be the result of an adjustment to the village plan in the sixteenth or seventeenth centuries. In any event it is a very significant element within the character of the village. Today the triangle is attractively landscaped. One element however stands out in historical significance. This is the Ogham stone located within the landscape near the road edge (Fig. 11). Ogham stones of this kind were Early Christian stone markers that were inscribed with a short message written in a script known as Ogham. This was a form of script in Gaelic with the individual letters represented by a sequence of short slashes along one of the edges of the stone. Such Ogham inscribed stones are regarded as dating from around the sixth century and are generally associated with monastic foundations. The Donard stone was originally located in a field just outside the village and was moved to the triangle in recent times. Unfortunately, the stone has weathered badly and it is difficult to decipher the stone's message. Despite this, it represents another of the village's links with its early monastery.

The eighteenth and nineteenth-century architecture of Donard is highly significant and consists of a range of standard estate type houses, cottages and

lodges. These survive in their original form to an impressive degree and they are arranged along the village streets in both terraced and individual forms, as well as the adjoining streets (Fig.12). An unusual feature, which adds considerably to the village character, is the number of single storey cottages with metal roofs. The significance of these is that the metal sheeting replaced thatch in the recent past (Fig.13).

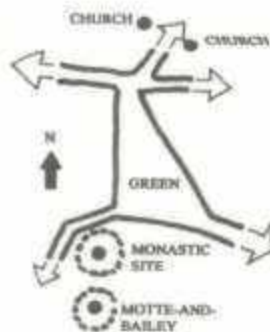


Fig.7: Historic Centre, Donard



Fig.8: Ruins of Medieval church, Donard



Fig.9: Remains of motte-and-bailey, Donard



Fig.11: Triangular green, Donard



Fig.10: Ogham stone, Donard

The village has two significant public buildings. These are the Church of Ireland and the Catholic (Fig.14) churches, standing across the road from one another, although both are positioned at the edge of the village, a little way outside the historic centre.

Landscape plays an important role in the character of Donard. This includes both the village green and the countryside surrounding the village. The interior of the green has been successfully landscaped with a range of materials. This includes planting, trees, dry stone work, and monuments. In addition, the surrounding wooded lands and the open landscape acts as an appropriate rural backdrop (Fig.15). Taking an overall view, the internal layout, the range of historic features, the street scape, and the village landscape combine to single the historic centre of Donard as one of the most significant in County Wicklow.



Fig.12: Terraced housing, Donard



Fig.13: Metal roofed cottage, Donard



Fig.14: Catholic church, Donard



Fig.15: Internal and background landscape, Donard

### **Footpath to Palladius Park and installation of Street Lighting in the newer section of houses**

En route to Palladius Park there is a section of uncompleted footpath along the front of a derelict house.

We believe the Council has approached the owner of the dwellings for permission to knock down the wall to complete the footpath but without success, but why has a Compulsory Purchase Order not been placed to make safe passage for the residents of Palladius Park.

As you can see from the photographs included this is a very dangerous road for the inhabitants and children of Palladius Park who have to leave the footpath, move out onto the road, into danger, and then join the footpath again beyond the boundary wall.

A brook also runs inside the wall but is paved over so it would be very easy to make a safe passage along this way to the village instead of having children and people step out onto the narrow busy road in order to complete their journey.

### **Street Lighting**

When the last phase of Council House was built in Palladius Park Street Lighting was never installed.

We ask that Street Lighting be put in to this section of the Development.

**Donard Focus Group who represents the people of the village of Donard is not satisfied with this situation.**

DANGEROUS  
FOR PEDESTRIANS



SCHOOL CHILDREN  
IN DANGER ON  
A DAILY BASIS



ROAD TO PALLADIUS PARK, DONARD  
NO FOOTPATH



### **Footpath between Donard National School and Playschool.**

This is a very **urgent** problem in our village. Every day during the school year children walk between the NS and the Playschool. Every day they are putting their lives in danger.

Mr. J. Conron, who build the Playschool building as a Garage has already paid 5,000 punts towards a footpath, yet it has never been built.

**There is a perfect solution to this urgent problem. Inside a lovely stone wall that links the two school flows a brook. This brook could be piped and paved and a very safe passageway made for parents and children.**

We are tired hearing there is no money for these things. The WCC Depot at the top of the hill where the Playschool and N.S. are located has cost thousands yet there is no money to construct a footpath.

Every day parents and children's lives are at risk, plus the regular motorists who use this narrow road into the village.

**Will it take the death of a child or a parent to have this situation rectified?**

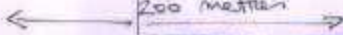
**Donard/Glen Focus Group who represents the people of the village of Donard is not satisfied with this situation.**



DONARD N.S.



200 METERS



DONARD PLAY SCHOOL



PERFECT LOCATION FOR FOOTPATH



CHILDREN ESCORTED DRIVING BETWEEN SCHOOLS



NO FOOTPATH



TRAFFIC AT SCHOOL



## **Derelict Houses in Donard Village**

For years Donard Village has been allowed to fall into dereliction.

Virtually the whole centre of the village is derelict. Roofs are falling in, windows broken, decay and rot abound.

**There is a constant danger of slates falling of these roofs where people walk every day.**

For years the Tidy Towns Committee has tended the village as best they can, yet the Council continues to turn a blind eye to the destruction of **"one of the most historic towns in County Wicklow"** (Donard Settlement Plan 2011)

In recent years we have seen unsuitable planning permission given the destruction of a 19<sup>th</sup> century wall opposite the Church of Ireland, a WCC Depot on the main entrance to the village and continued neglect of safe infrastructure for its citizens. Property owners have endeavored to obtain planning permission to up-grade to modern standards properties within the village but have been thwarted by planning guidelines and lack of parking.

Parking in a village main street cannot be branded with the same parking policy as new estate development.

The attitude of planners has restricted re-development within the village while granting permission for other development that is causing damage to the integral character and heritage of the village.

**Donard Focus Group who represents the people of the village of Donard is not satisfied with this situation.**



MAIN STREET

SLATES LOOSE

DONARD VILLAGE

DERELICTS



ROOF CAVED IN

LOOSE SLATES



### **Council Yard on main entrance from the N81 to the Village of Donard**

The development of a Council Depot on the main entrance into Donard is causing a lot of concern to the people of Donard Village.

It is located on the top of the hill, near a sharp bend in front of a wonderful view of the Wicklow Mountains. This road is the gateway to the Glen of Imaal for thousands of hill walkers every year and now there is an eyesore of a storage yard on the same road.

A long stretch of hedgerow and trees were pulled out to facilitate this yard and an ugly metal fence put up in its place.

**Was it necessary to destroy the entire hedgerow and trees? Why?**

Donard/Glen Focus Group want clarification as to whether the removal of the hedgerow was surveyed by an Ecologist, was one at the location when it was removed and is there a Report on this removal?

**We also want a suitable hedge planted to replace the destroyed hedgerow.**

The Playschool and National School are located at the bottom of the hill where the yard has been established. Many families bring their children to school on that road which is very dangerous now with the coming and going of big lorries and other big machinery. Dept. of Education policy is to encourage exercise through walking to school. This is impossible in Donard.

There is also no footpath between the Playschool and NS despite constant requests to WCC to establish one.

According to the WCC Development Plan 2010-1016 they have written:-

**"The roads that lead into the town are local secondary roads, which are generally of poor alignment and narrow width" and are "roads currently inadequately served by infrastructure (including footpaths, water services, public lighting etc."**

MAIN ROAD TO VILLAGE OF DONARD  
FROM N81

WCC DEPOT

VERY NARROW ROAD AND  
DANGEROUS BEND

EYESORE



VIEW OPPOSITE DEPOT ENTRANCE  
↓



## **Destruction of 19<sup>th</sup> century wall opposite Church of Ireland on Cow Hill, Donard.**

According to the WCC Development Plan 2010-16:

**"Donard is one of the most historic town in County Wicklow with an historic core comprising the remains of a Monastic enclosure,.... a triangular market area and 18-19<sup>th</sup> century architecture"**

To facilitate a planning permission the above wall was demolished in 2014 and has been replaced by a wire fence and a field gate.

This road was the most beautiful entrance into Donard and has now been totally destroyed.

In relation to the destruction of **"stone walls that impede sightlines for new developments, they require to be rebuilt along the required new line using the original materials"**

Donard Focus Group feel that the planned development may not go ahead for many years and request that the wall be rebuilt according to the stipulations of the planning permission as soon as possible.

**Donard/Glen Focus Group who represents the people of the village of Donard is not satisfied with this situation.**



COW HILL - DONARD

BEFORE



AFTER



Destruction of beautiful 19th Wall

C66

Leonora Earls

---

From: BRIAN DONNELLY  
Sent: 18 February 2016 22:05  
To: Planning - Development Plan Review  
Cc:

Sir/Madam

I wish to submit the following observations reference Enniskerry development in AA1 area.

Lack of Recreational green space for population at present already exists

Infrastructure and services  
road widening, water service improved, foot paths street lights

displacement of water from such a huge development.

☐ A height restriction to be put in place as to preserve the view.

A development in character with the surrounding area and existing dwellings

Efficient transport link to the LUAS at ballyogan.

Density of people and proposed dwellings is highly excessive and

Enniskerry is a village and not a town.

yours sincerely

Brian Donnelly

hillview

6 kilmolin

enniskerry

☐ Co. wicklow

C61

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow Town

31<sup>st</sup> January 2016



To Whom It May Concern

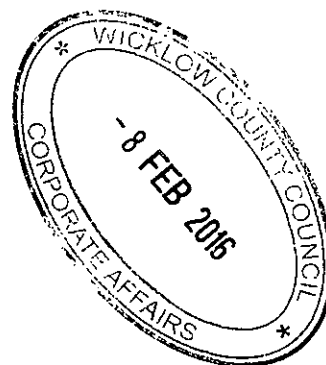
○ **Re: Sloan Terrace, Meath Road, Bray, Co. Wicklow REF:NIAH 16301032**

Sloan Terrace, Meath Road dates from c. 1880/90 and is a fine example of Victorian architecture. The properties have been in the same family ownership for over 60 years and together with the curtilage remain very much original to the period. In particular, the highly decorative, wrought iron gates and railings are one of the few original Victorian railings remaining in Bray. These should be retained and included on the Record of Protected Structures, as recommended by the Minister through the NIAH survey of Co. Wicklow.

Yours faithfully,

A handwritten signature in cursive script, appearing to read 'David Dooley'.

Glenard Villa  
Glenard Ave  
Bray  
Co. Wicklow



C63

Leonora Earls

---

From: Siobhan  
Sent: 12 February 2016 19:27  
To: Planning - Development Plan Review  
Subject: Enniskerry development AA1 Area

I wish to express my disappointment at the proposed development of Enniskerry/Parknasilogue area. Enniskerry is a beautiful Victorian village and attracts many tourists each year. It's a scenic area with a lot of wildlife and tranquility. With these very dramatic changes that are planned it will be devastating for tourism and the small local business that depend on this. As Enniskerry will no longer be a popular destination for tourists or day trippers. The traffic and congestion in the village will also cause problems for older residents to get to shops etc. Enniskerry is a beautiful village and it should stay that way and not be turned into a noisy overcrowded town. Nature and green areas are so important for health and wildlife. And preservation of our landscape is a must. Regards.Siobhan.

Sent from my iPhone



C64

# Wicklow County Council

DRAFT COUNTY DEVELOPMENT PLAN  
2016-2022

SUBMISSION FORM



Name/ Organisation: \_\_\_\_\_ Date: \_\_\_\_\_

Address: \_\_\_\_\_

I JOHN DOYLE, OWNER OF THE LAND ON THE ENCLOSED MAP APPLY FOR THE BOUNDRIES TO BE EXTENDED TO FACILITATE THE GROWTH OF THE CLUSTER. AS THE EXISTING LANDS WITHIN THE CLUSTER ARE AT RISK OF FLOODING.

*John Doyle* 8-2-16.  
SEE ATTACHED MAPS.



Express YOUR VIEWS on the future development of YOUR COUNTY



Write To:  
County Development Plan Review,  
Planning Department,



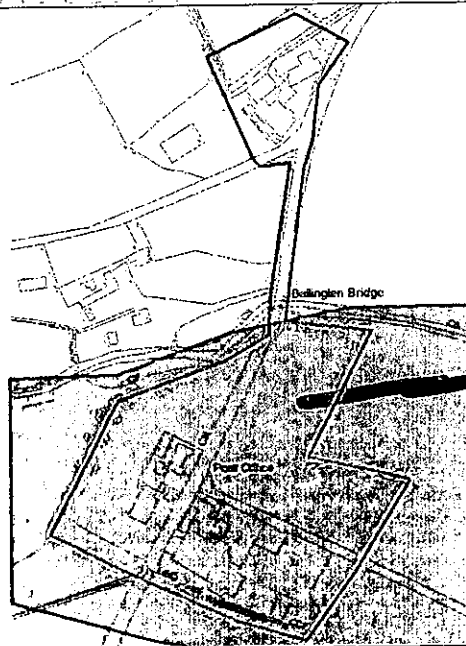
Email  
[planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

Submissions By:

February

# Rural Clusters FRIA Maps (Level 9 Settlements)

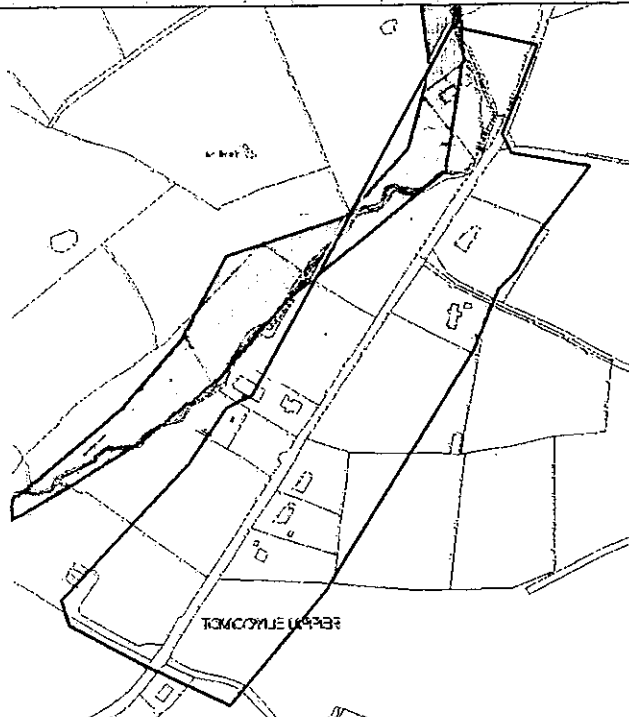
## Ballinglen



AREA  
IDENTIFIED  
TO BE AT  
FLOOD  
RISK.  
1.2.

FRIA TEST		ACTION REQUIRED
Land within Flood Zone A	YES	✓ YES
Land within Flood Zone B	YES	✓ YES
Land within Flood Zone C	YES	✓ May be required

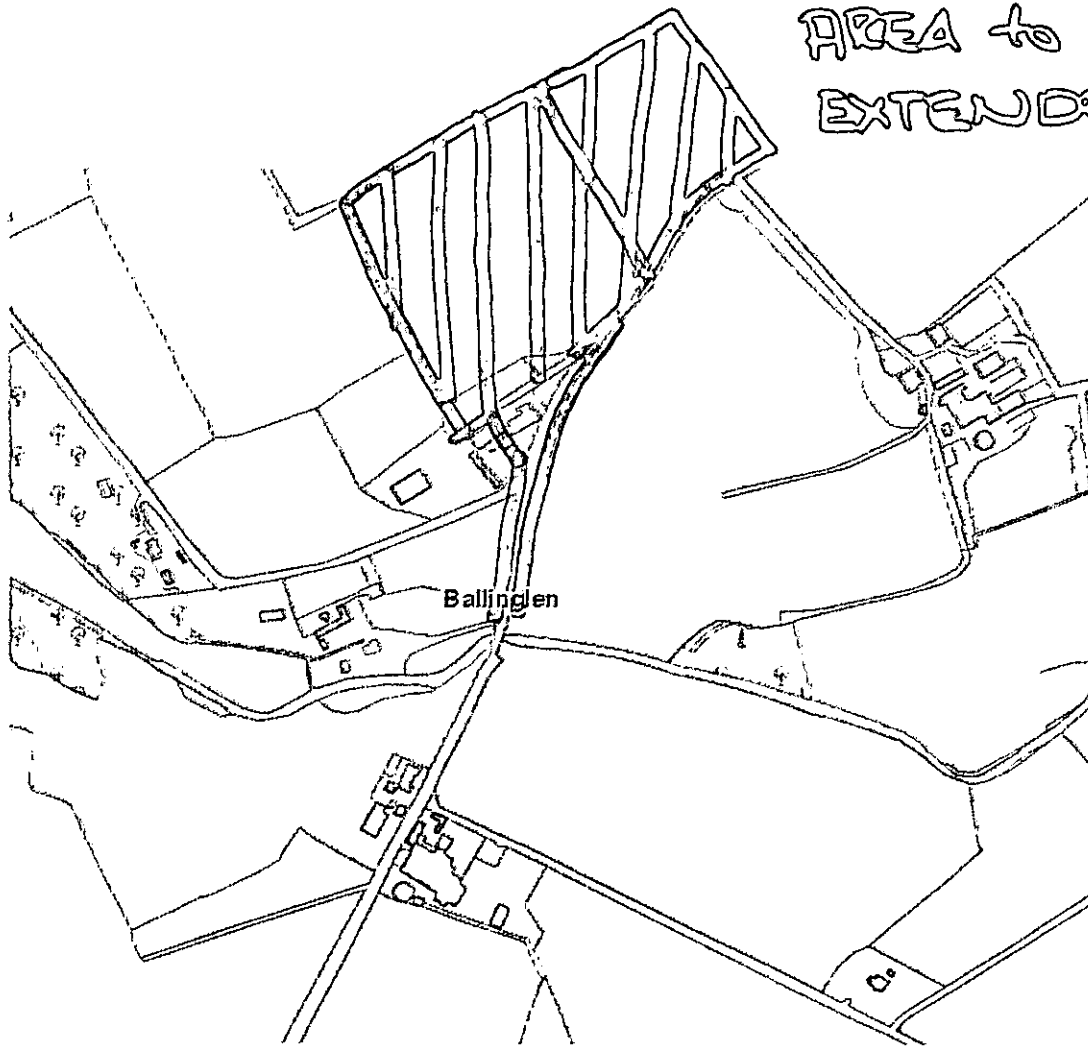
## Ballyduff



FRIA TEST		ACTION REQUIRED
Land within Flood Zone A	YES	✓ YES
Land within Flood Zone B	YES	✓ YES
Land within Flood Zone C	YES	✓ May be required

AREA to BE  
EXTENDED

1.2.

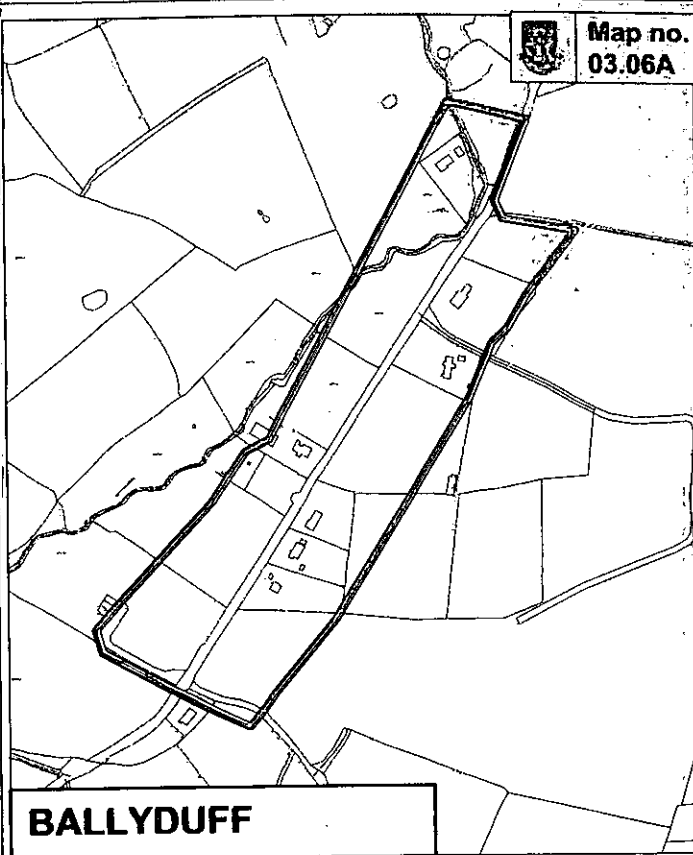




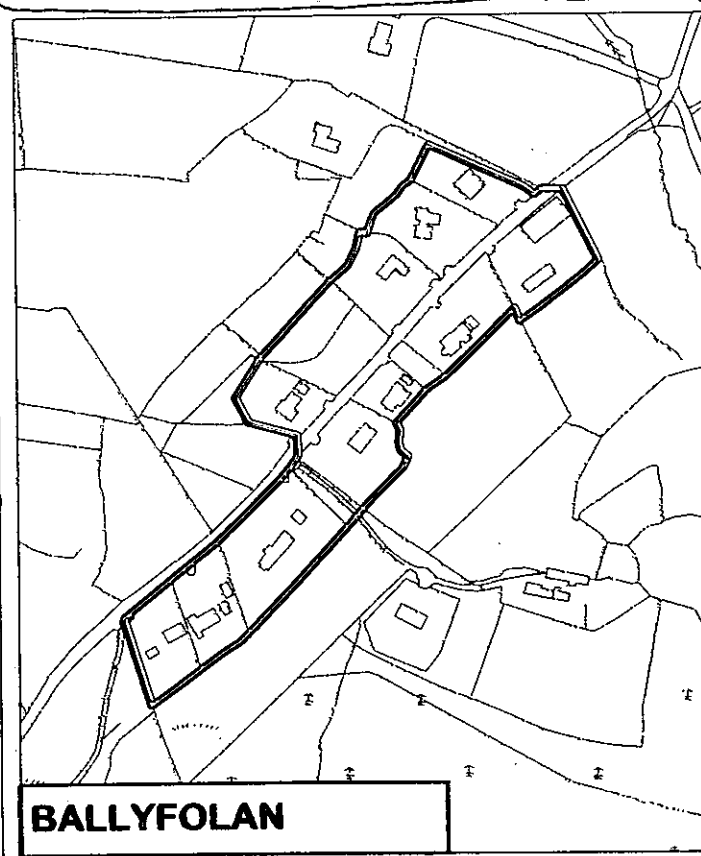
Map no.  
03.06A



**BALLINGLEN**



**BALLYDUFF**



**BALLYFOLAN**



**BALLYNULTAGH**

**Settlement Boundaries  
Rural Clusters**

DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2016-2022



SETTLEMENT BOUNDARIES

*Handwritten signature*



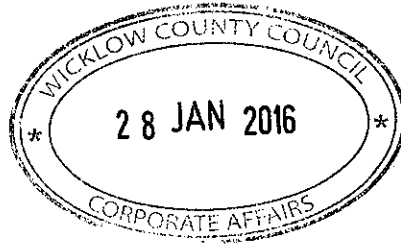
Wicklow County Council  
Planning Department

Maps Not To Scale

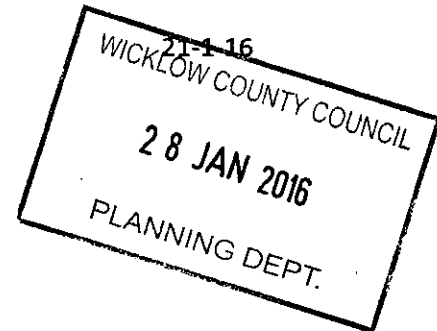
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2015/35/CCMA/Wicklow County Council

C65

Johnstown,  
Kilpedder,  
Co. Wicklow.



Wicklow Co. Co.,  
County Buildings,  
Wicklow.



Re: Development Plan 2016 - 2022

Dear Sirs,

Further to the Draft Development Plan 2016 – 2022 for the Kilpedder area we the undersigned would like to make a submission regarding the moving of the settlement boundary as shown on enclosed drawings ( three possible options).

Our request that the boundary be moved would mean that the four houses we reside in at present would go into the urban zone as would the four sites we own as marked on the plan.

This would facilitate our children being able to seek planning for these sites in the future, possibly before the Development Plan expires.

Yours Sincerely,

A handwritten signature in cursive script, appearing to read "Sinead Doyle".

Sinead Doyle

A handwritten signature in cursive script, appearing to read "Ronan Doyle".

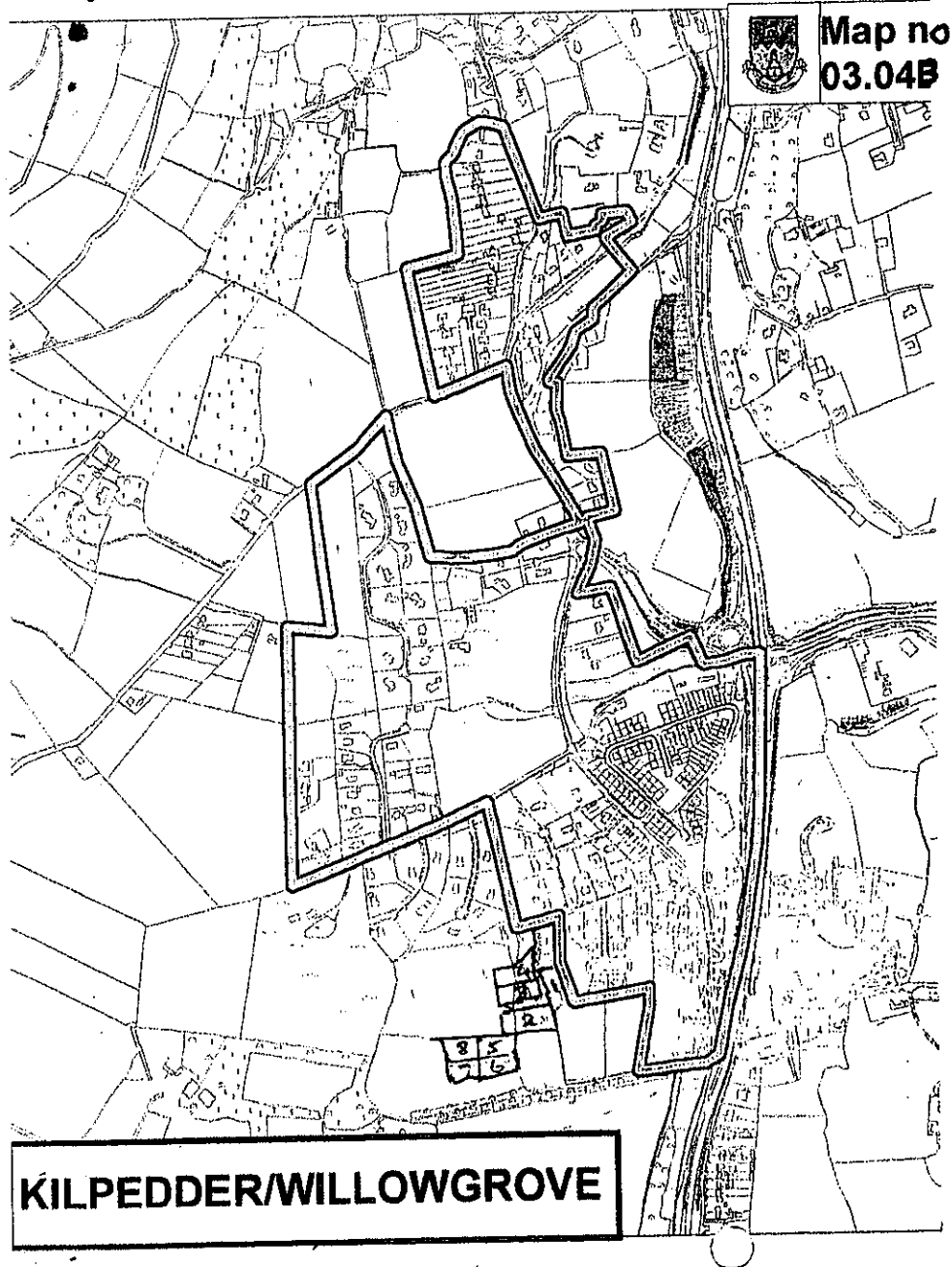
Ronan Doyle

A handwritten signature in cursive script, appearing to read "Colm Doyle".

Colm Doyle

A handwritten signature in cursive script, appearing to read "Kate Doyle".

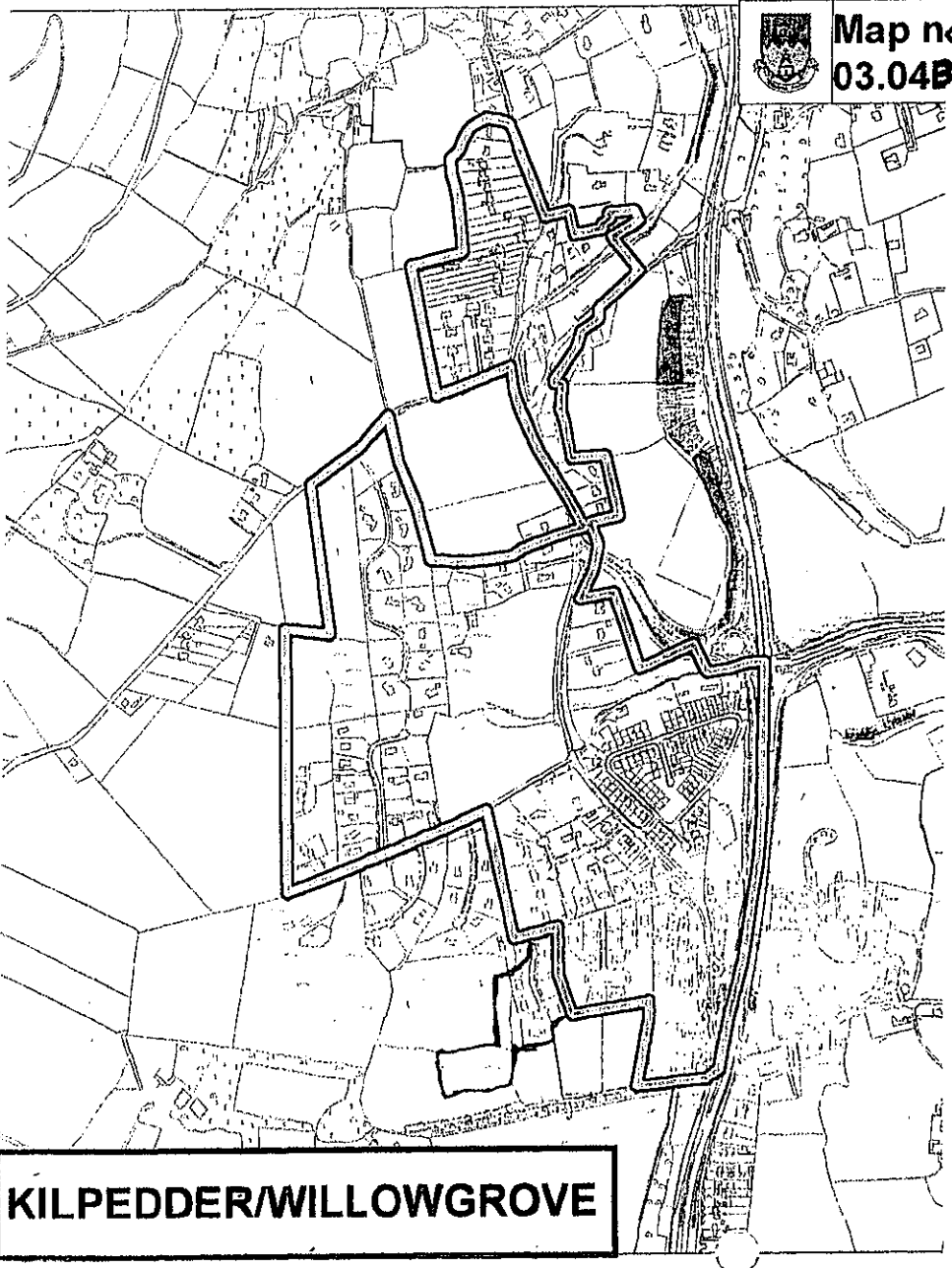
Kate Doyle



- SITE
1. SINEAD DOYLE PLANNING REG 0:
  2. RONAN DOYLE " 05/1
  3. COLM DOYLE " 05/1
  4. KATE DOYLE " 05/41
  5.  $\frac{1}{2}$  ACRE SITE OWNED BY RONAN D.
  8. " OWNED BY COLM DO
  7. " OWNED BY SINEAD D.
  6. " OWNED BY KATE DO

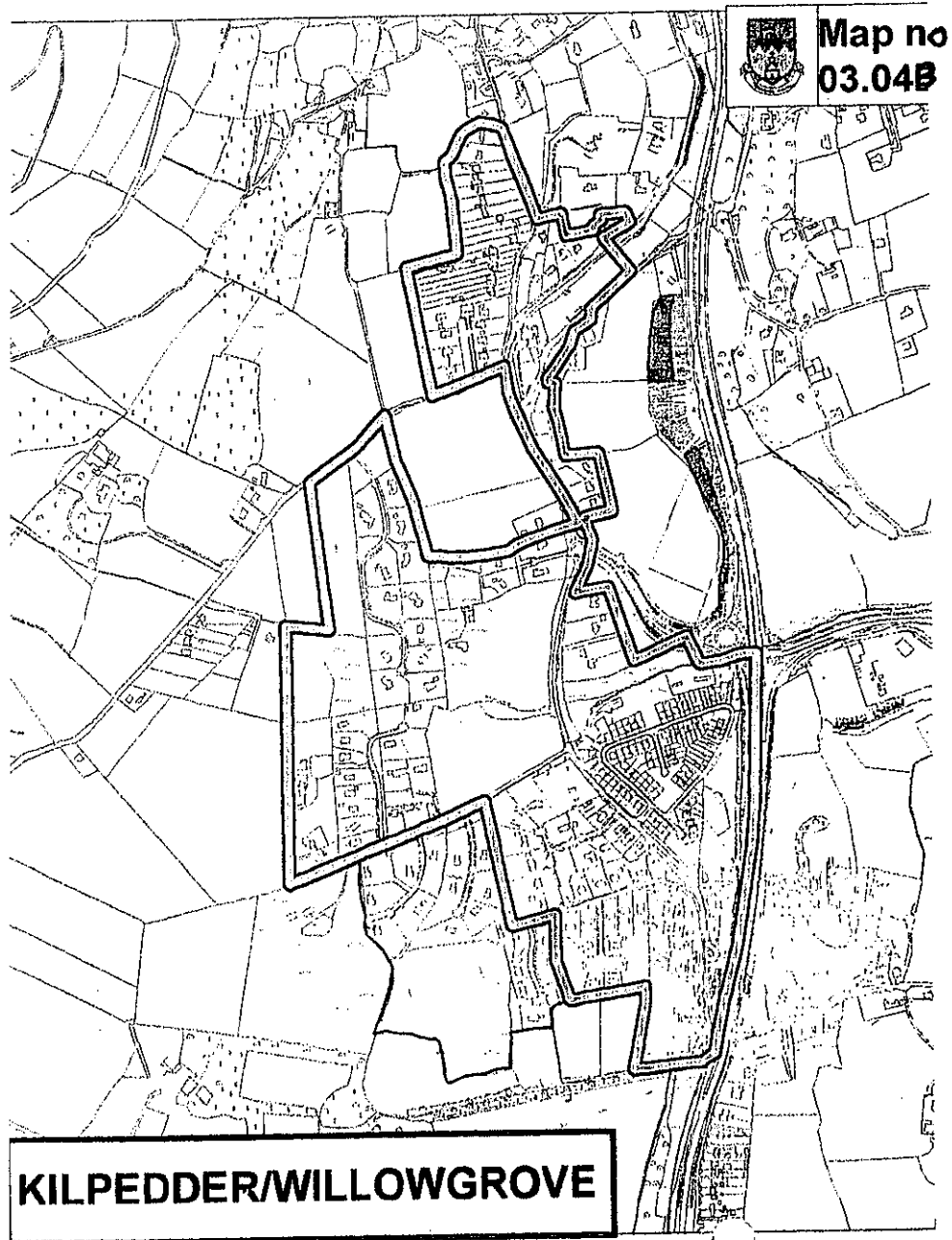


Map no  
03.04B



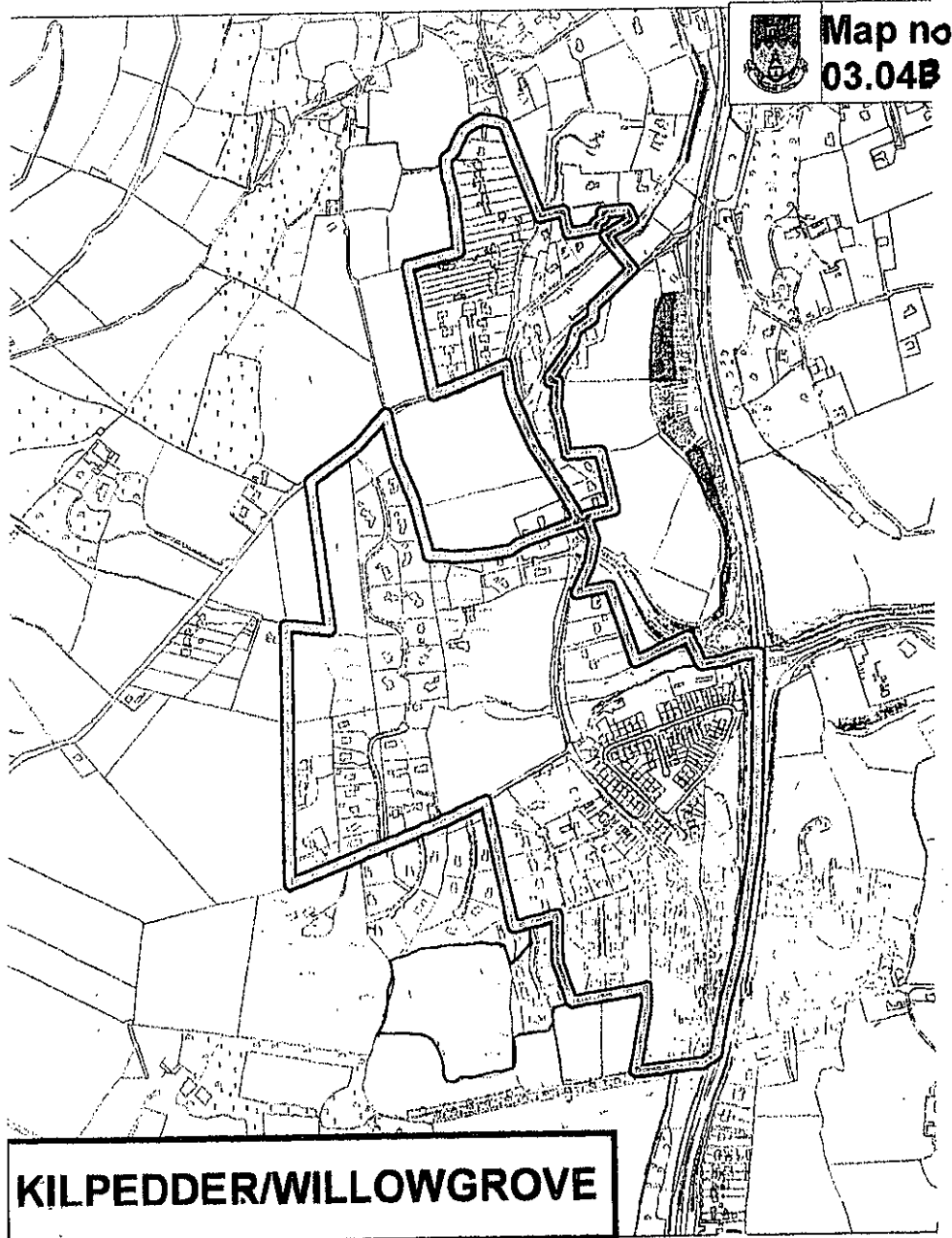
KILPEDDER/WILLOWGROVE

NEW  
SETTLEMENT BOUNDARY  
OPTION  
NO 1



NEW  
SETTLEMENT BOUNDARY  
OPTION  
No 2





Map no  
03.04B

NEW  
SETTLEMENT BOUNDARY

OPTION

NO 3

**C66**

**Leonora Earls**

**From:** Arc Design  
**Sent:** 18 February 2016 13:15  
**To:** Planning - Development Plan Review  
**Subject:** Submission for consideration in preparation of Draft County Development Plan 2016-2022  
**Attachments:** Submission 18.02.16.pdf

Dear Sir/Madam,

Please see attached our PDF document containing our submission for consideration in preparation of Draft County Development Plan 2016-2022.

My Client wishes to extend the Newcastle Town Plan boundary to encompass a parcel of his agricultural lands into new R1MD zoning.

We have attached maps which outlined in red the lands under my client ownership and we have shaded in blue lands we wish to be extended into the Newcastle Town Plan boundary and to be rezoned into R1MD

We trust that the foregoing information will prove useful in assessing this application and look forward to an early and favorable decision.

Kind Regards,

**Mark Davies**  
Managing Director

Chartered Architectural Technologist  
Registered Building Surveyor  
Chartered Building Engineer

**ARC DESIGN**

Willowgrove,  
Delgany,  
County Wicklow.

tel: 00353 1 876875448  
al: 00353 1 2010377  
fax: 00353 1 2010377  
email: [info@arcdesign.ie](mailto:info@arcdesign.ie)  
website: [www.arcdesign.ie](http://www.arcdesign.ie)

DAVIES ARC DESIGN LTD Registered in Dublin No. 451849 trading as ARC DESIGN Registered No. 359779  
Directors: Brian Davies and Mark Davies VAT No. IE 9675486C

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Willowgrove  
Delgany  
County Wicklow  
tel/fax + 353 1 2010377  
email: info@arcdesign.ie  
web: www.arcdesign.ie

County Development Plan Review  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town,  
County Wicklow.

REF: 16001

17<sup>th</sup> February 2016

**Re: Extending my client, Denis Doyle lands into the Newcastle Town  
Plan boundaries and rezoning these lands into R1MD zoning.**

Dear Sir/Madam,

Our client Denis Doyle wishes to extend the Newcastle Town Plan boundary to encompass a parcel of his agricultural lands into new R1MD zoning.

We have attached maps which outlined in red the lands under my client ownership and we have shaded in blue lands we wish to be extended into the Newcastle Town Plan boundary and to be rezoned into R1MD

We trust that the foregoing information will prove useful in assessing this application and look forward to an early and favorable decision.

Yours sincerely,

Mark Davies MCIAT

Enclosed: -Urban place map - 6inch  
-Newcastle Town Plan  
-Folio Map drawing

DAVIES ARC DESIGN LTD Registered in Dublin No: 451849  
trading as ARC DESIGN Registered No. 359779  
VAT No. IE 9675486C

Directors: Brian Davies  
Mark Davies



WICKLOW COUNTY COUNCIL

Wicklow County Council Planning Department  
County Buildings, Station Road, Wicklow  
Tel: (0454) 20100 Email: [planning@wicklowcoco.ie](mailto:planning@wicklowcoco.ie)

### Newcastle Town Plan

#### Legend

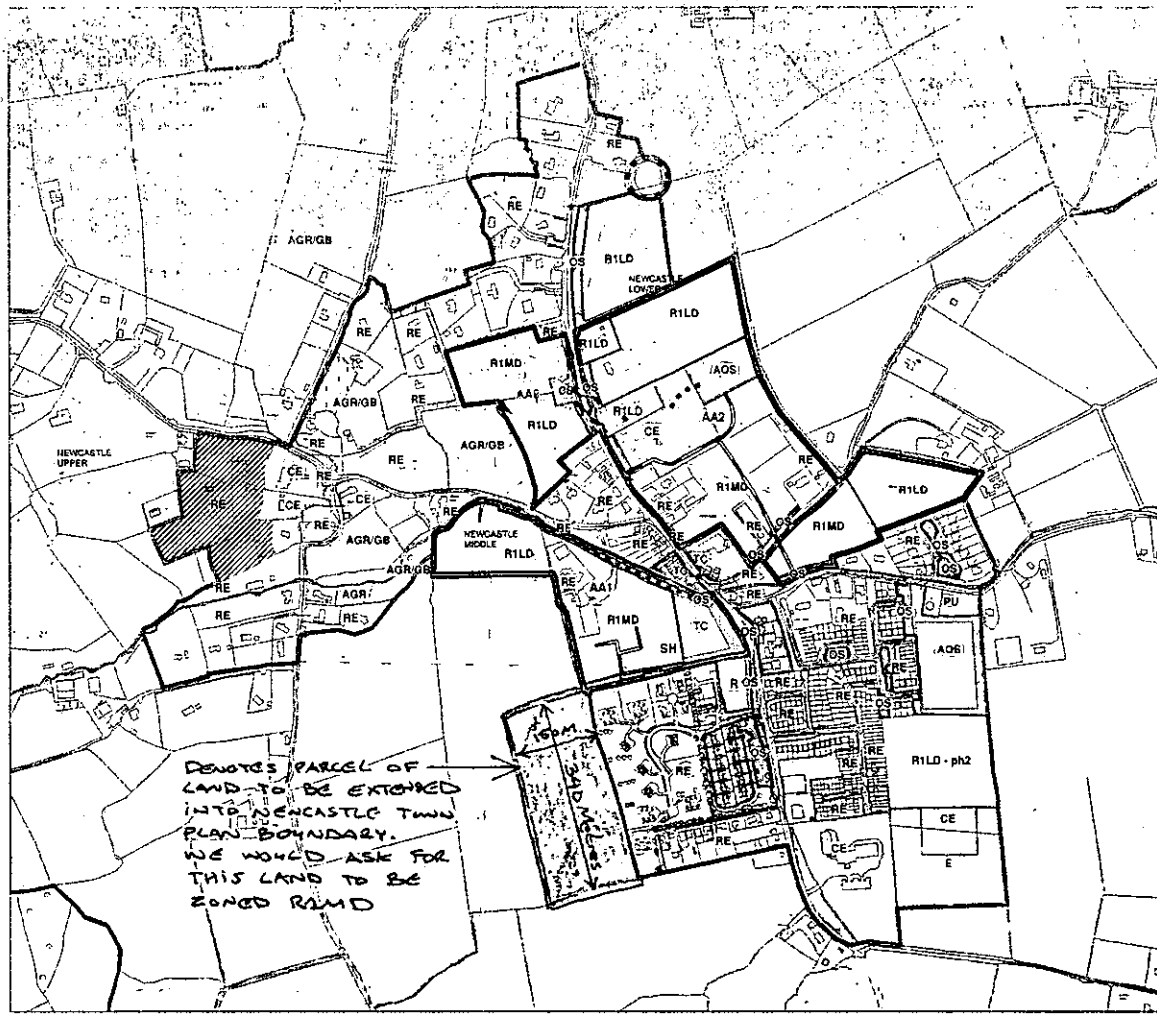
- RE - Existing Residential
- RE - Existing Residential Limited to 4 units
- R1 - Proposed Residential
- MU - Mixed Use
- TC - Town Centre
- PU - Public Utility
- CE - Community & Educational
- E - Employment
- AOS - Active Open Space
- OS - Open Space
- AGR/GB - Agriculture/Greenbelt
- AA - Action Area Plan Boundary
- Road objective
- Pedestrian/Cycling
- Plan Boundary
- Monument - HSB01

**R1MD - New Residential Medium Density**  
**R1LD - New Residential Low Density**  
**ph2 - Phase Two**  
**SH - Sheltered Housing**  
**R - Religious Purpose**

**Wicklow CDP 2010 - 2016**

Director of Services	Deputy G. Egan
Author: 11/10/2013	Date: 04/10/16
Drawn By: SW	Checked By: AH

Reference: Planning Department, Wicklow County Council  
Licensing Number: 2002/100000/Wicklow County Council



Surveyed 1836  
Revised 1908  
Levelled

# Record PLACE Map



ITM CENTRE POINT COORDINATES

729592.703970

DESCRIPTION

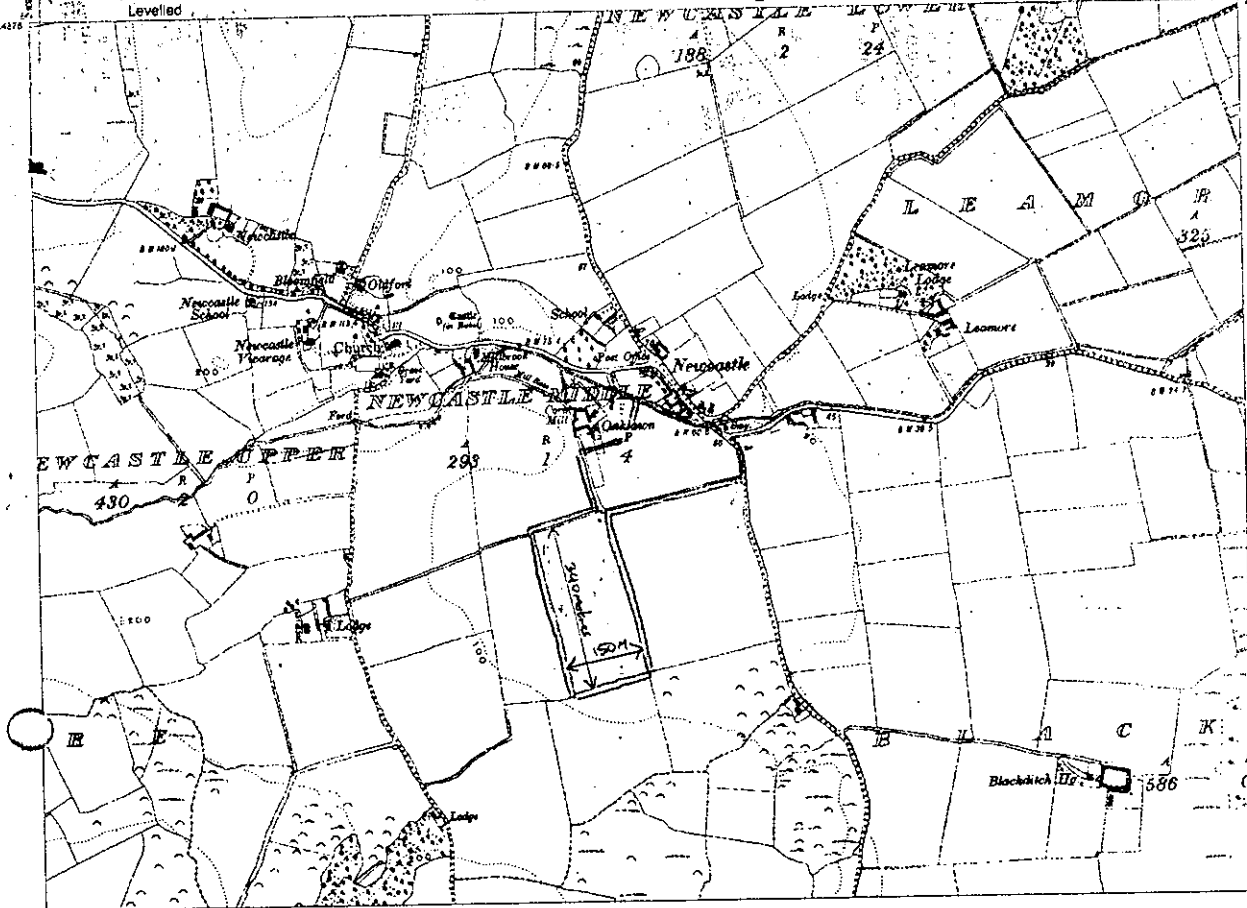
MAP SHEETS

8 inch  
WW019

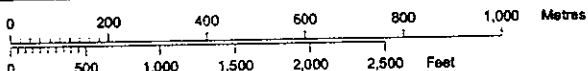
OSI  
Authorised  
Internet Map

All Ordnance Survey data is derived from the Ordnance Survey MasterMap product. This is a digital representation of the ground as it is, and is not a legal document. It is not intended to be used as a legal document. It is not intended to be used as a legal document. It is not intended to be used as a legal document.

© Ordnance Survey, 2012  
© Ordnance Survey, 2012



Scale: 1:10,560  
Scale: 1:10,560



Plot Ref. No. 19629987\_2  
Plot Date 12-DEC-2012

Folio Number: WNV35959F

Application Number: P2012LR008691J

The Property  
Registration Authority  
An tAidís  
Clárachán Eanáir



Folio: WNV35959F

This map should be read in conjunction with the folio.

Registry maps are based on OSI topographic mapping. Where registry maps are printed at a scale that is larger than the OSI published scale, accuracy is limited to that of the original OSI map scale.

For details of the terms of use and limitations as to scale, accuracy and other conditions relating to Land Registry maps, see [www.pra.ie](http://www.pra.ie).

This map incorporates Ordnance Survey Ireland (OSI) mapping data under a licence from OSI. Copyright © OSI and Government of Ireland.

(centre-line of parcel(s) edged)

Freehold

Leasehold

SubLeasehold

Burdens (may not all be represented on map)

Right of Way / Wayleave

Turbary

Pipeline

Well

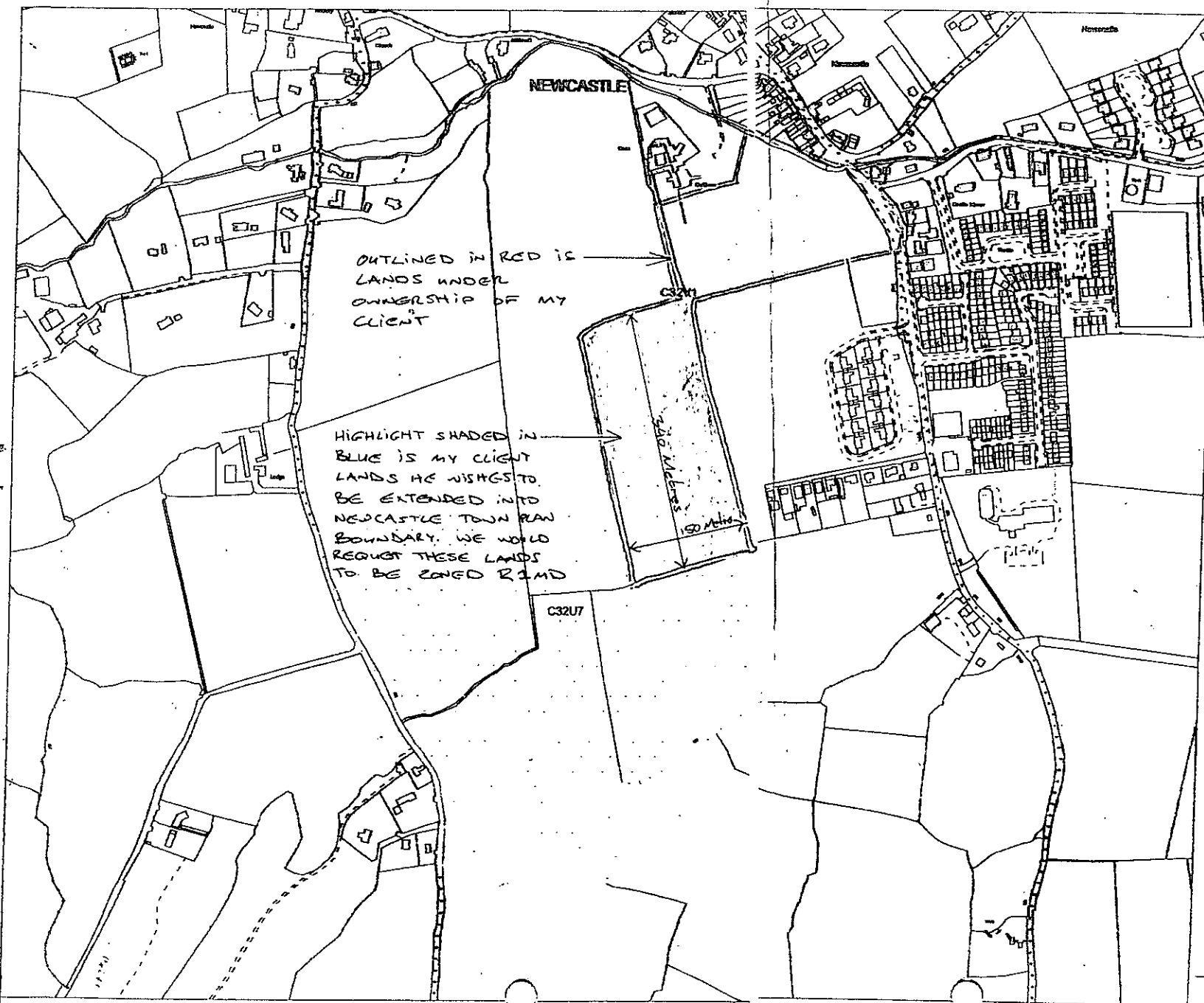
Pump

Septic Tank

Soak Pit

A full list of burdens and their symbology can be found at [www.pra.ie](http://www.pra.ie).

(see Section 85 of the Registration of Title Act, 1964). As inserted by Section 62 of the Registration of Deed and Title Act 2006.



C67

**Leonora Earls**

---

**From:** Theo Phelan  
**Sent:** 18 February 2016 15:47  
**To:** Planning - Development Plan Review  
**Subject:** Draft County Development Plan 2016-2022. Kilmacanogue Settlement Plan  
**Attachments:** CDP.pdf; Map (1).pdf; Submission to WCC.pdf

Good Afternoon.

Please find attached submission in respect of Kilmacanogue Settlement Plan on behalf of our client Denis Doyle

Kind regards,

Koryne  
Theo Phelan Design Ltd  
5 Wentworth Place  
Wicklow Town  
Co. Wicklow  
0404 68153

**THEO PHELAN DESIGN LTD**

**PLANNING & DESIGN CONSULTANTS.**

**5 WENTWORTH PLACE, WICKLOW, CO. WICKLOW**

**Phone: + 353(0)404 68153 Fax: 69875 Email: [info@phelandesign.ie](mailto:info@phelandesign.ie)**

*Theo Phelan Design Ltd.*

*Reg.-No: 342883*

*VAT No. 6362883P*

*Ref :- az\d\doyle\kilmacanogue*

County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town.

16/02/2016

Re:- **Denis Doyle - Lands at Kilmacanogue, Co Wicklow.**  
**Draft County Development Plan 2016 – 2022.**  
**Kilmacanogue Settlement Plan.**

Dear Sirs,

Our client is the owner of a plot of land comprising approx. 0.85 ha as identified on the attached drawing ref; MAP1.

This site is adjacent to existing dwelling houses to the north and south as shown on the map.

The map also indicates the proposed boundary for the tertiary development area of Kilmacanogue.

We are requesting that the proposed draft development boundary be extended to include the site which we have outlined in blue.

We believe this is the logical boundary for the development area as the adjoining lands are already occupied by residential units and the proposed site would be an infill within the overall existing residential settlement.

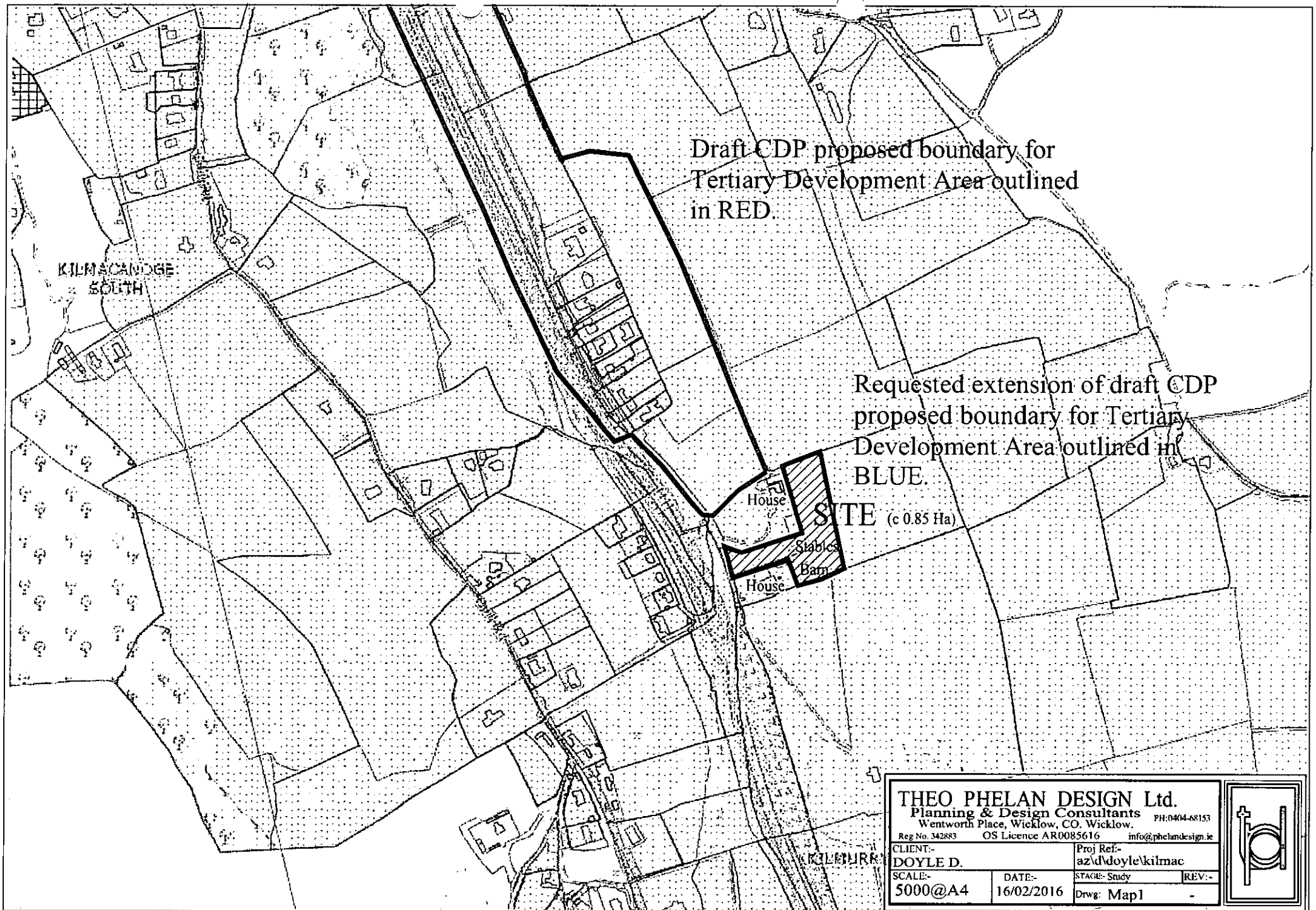
We also include an extract from the draft development plan ref:-CDP, land use zoning objectives, which identifies our site in relation to the draft proposed long term development plan for the area.

Yours faithfully,



Theo Phelan  
THEO PHELAN DESIGN LTD.



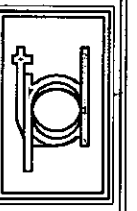


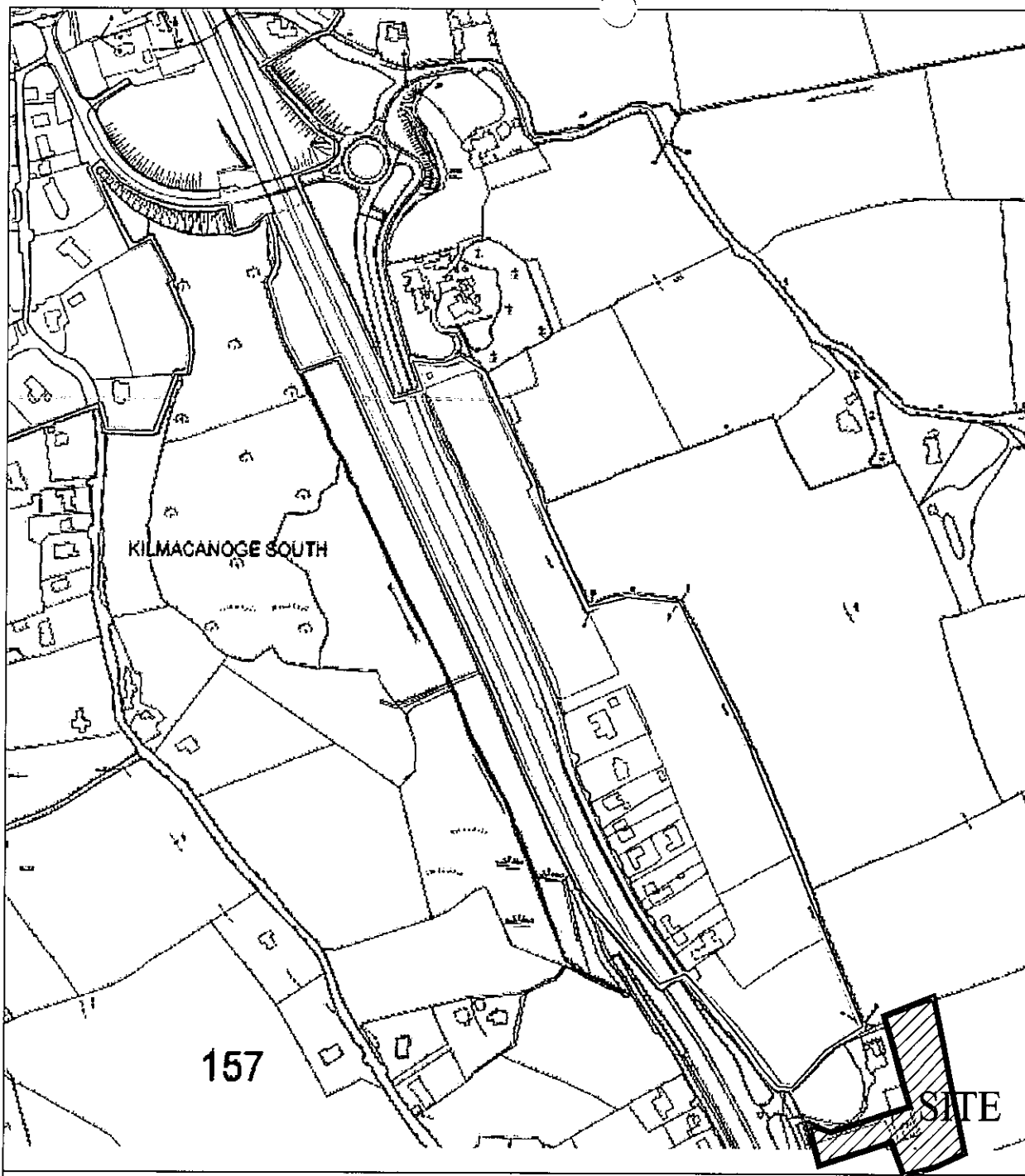
Draft CDP proposed boundary for  
Tertiary Development Area outlined  
in RED.

Requested extension of draft CDP  
proposed boundary for Tertiary  
Development Area outlined in  
BLUE.

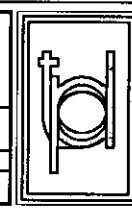
SITE (c 0.85 Ha)

<b>THEO PHELAN DESIGN Ltd.</b>			
Planning & Design Consultants			
Wentworth Place, Wicklow, CO. Wicklow. PH:0404-68153			
Reg No. 342883		OS Licence AR0085616 info@phelandesign.ie	
CLIENT:-		Proj Ref:-	
DOYLE D.		az/d/doyle/kilmac	
SCALE:-		STAGE:- Study	
5000@A4		DATE:- 16/02/2016	
		Drwg: Map1	





**THEO PHELAN DESIGN Ltd.**  
 Planning & Design Consultants PH:0404-68153  
 Wentworth Place, Wicklow, CO. Wicklow.  
 Reg No. 342883 OS Licence AR0085616 info@phelandesign.ie



CLIENT:- <b>DOYLE D.</b>	Proj Ref:- az\d\doyle\kilmac
SCALE:- 5000@A4	DATE:- 16/02/2016
STAGE:- Study	REV:-
Drwg: CDP	-

## Title: Land Use Zoning Objectives Map No.: 1



Wicklow County Council  
 Planning Department

Maps are not to scale

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 Licence Number 2015/35/CCMA/Wicklow County Council

C68

**Philip Flood** BSc (Hons) Surv. MSc (Hons) Real Estate.

**Surveyors**

Los Arcos, Rocky Road,

Wicklow. Co. Wicklow

Tel: 086 815 8223 Fax: 0404 67213

To/  
County Development  
Plan Review,  
Planning Department,  
Wicklow County Council  
Station Road,  
Wicklow

WICKLOW COUNTY COUNCIL

18 FEB 2016

PLANNING DEPT.

18<sup>th</sup> February, 2016

**Re: To change the outlined site in Red at Killadreenan, Newtownmountkennedy on the accompanying map referenced Folio Number: WW34264F. from un-zoned, rural area to Employment (E) – land use zoning.**

Dear Sirs,

Our client, D.P.M. Farms Ltd., have asked us to make this submission on their behalf to have the above outlined land re-zoned as Employment under the new Draft Wicklow County Development Plan 2016-2022.

We feel that this re-zoning is in-line with the current objectives in the new Draft Development Plan.

In *Chapter 2 – Vision and Core Strategy* the draft plan in part 2.4.7: 'Economic Development' states that while the Planning Act does not require the 'Core Strategy' of a development plan to address economic development explicitly, this is considered an essential element of the overall development strategy for the County. It continues to argue that a key economic aim of the National Spatial Strategy and the Regional Planning Guidelines is to enhance the competitiveness of the Greater Dublin Area and in order to achieve this aim, these strategies include the following objectives, which have relevance to the economic development of County Wicklow:

- A key aim of the RPGs is to promote a balance between jobs and population in settlements throughout the GDA region. It continues to assert that County Wicklow has a strong commuting pattern which is reflective of the imbalance that exists between the location of the labour force in the Dublin region and the location of jobs. It states that the best indicator of the imbalances that exist is the 'jobs ratio' which is a measure of the number of jobs in the County as a proportion of the number of Wicklow residents in the labour force. It strongly asserts that a key goal of the RPGs is to improve the jobs ratio in County Wicklow.
- It, also, states that it is to develop strategic reserves of land for enterprise development and adopt the least restrictive enterprise land use approach to the zoning of land.

Newtownmountkennedy as a settlement level 4, moderate growth town, under the draft plan economic function is an attractor for substantial investment with an investment target of 'people' and 'product intensive industries'. In 2011 the level 4 'jobs ratio' was 46% with

a target 'jobs ratio' by 2028 of 80% with jobs growth of 18,340 people. The RPGs indicate that a healthy jobs ratio would be around 70% but in level 1-4 towns (the growth towns) it will increase as above to 80%.

In *Chapter 5 Economic Development* the new draft plan in part 5.4: 'The Role of Land Use Planning in Economic Development' states that the County Development Plan shall aim to avoid policies and objectives that unduly restrict the growth of existing enterprises or the development of new enterprises, subject to the development complying with normal planning criteria, such as appropriate location, health and safety, protection of the environment and quality design. It states that it must ensure an adequate supply of zoned and serviced land for employment. It continues that in circumstances where certain uses are not suitable to locate in existing built-up areas, this growth will be targeted to occur in 'greenfield locations'.

In part 5.5: 'Objectives for Economic Development' General

In *EMP 18 Small and Medium Enterprises* the argument is to encourage and facilitate the development of small to medium scale indigenous industries and services at appropriate locations within all Level 1-8 settlements and that the Council acknowledges that the development of small scale projects with long-term employment potential are important in sustaining both urban and rural settlement in County Wicklow and the Council will adopt a proactive and flexible approach in dealing with applications on a case-by-case basis, (the term small enterprise refers to an individual business/enterprise, which employs less than 10 persons, and the term medium enterprise refers to those, which employ up to 50 persons).

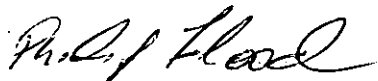
Reference should, also, be given to the definition of 'light industrial building' as set out in the Planning and Development Regulations 2001, i.e. a 'light industrial building' means an industrial building in which the processes carried on or the plant and machinery installed are such as could be carried on or installed in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke.

Other issues that have been highlighted by local opinion are:

- The change of use from current agricultural land to 'light commercial' use will create much needed jobs for Newtownmountkennedy.
- 'Light commercial use will have less impact on the location than agricultural use.
- It will be used solely for light industrial use which will have a low traffic impact as the road will be used solely by light commercial vehicles.
- Local knowledge is of the opinion that all the current industrial units in Newtownmountkennedy are too small for certain types of industrial use.
- The site has excellent access to the N11, arterial road, both North and South.
- It will form part of a cluster of adjoining indigenous businesses in the immediate area with: Gregory's Garage and Car Sales, Hanley's Removals and Storage and The Garden Centre, etc.
- As the use is 'light industrial buildings' as defined under the Planning and Development Regulations 2001, this re-zoning will not have any impact on the adjoining school and hospital.
- With excellent access to the N11 on the southern side of Newtown it will not impact the traffic flow through Newtownmountkennedy Main Street.

D.P.M. Farms Ltd. is a local business and is keen to add to the economic activity of Newtownmountkennedy and provide facilities for other local business to prosper and provide much needed employment. Given these circumstances, we would strongly urge the County Council to seriously consider this re-zoning submission.

Yours faithfully



P.P. D.P.M Farms Ltd.

Folio Number: WW34264F

Application Number: P2015LR08563U  
728250 mE, 705340 mN

**The Property**  
**Registration Authority**  
**An tÚdarás**  
**Clárúcháin Maoin**



Folio: WW34264F

This map should be read in conjunction with the folio.

Registry maps are based on OSI topographic mapping. Where registry maps are printed at a scale that is larger than the OSI published scale, accuracy is limited to that of the original OSI map scale.

For details of the terms of use and limitations as to scale, accuracy and other conditions relating to Land Registry maps, see [www.pra.ie](http://www.pra.ie).

This map incorporates Ordnance Survey Ireland (OSI) mapping data under a licence from OSI. Copyright © OSI and Government of Ireland.

(centre-line of parcel(s) edged)

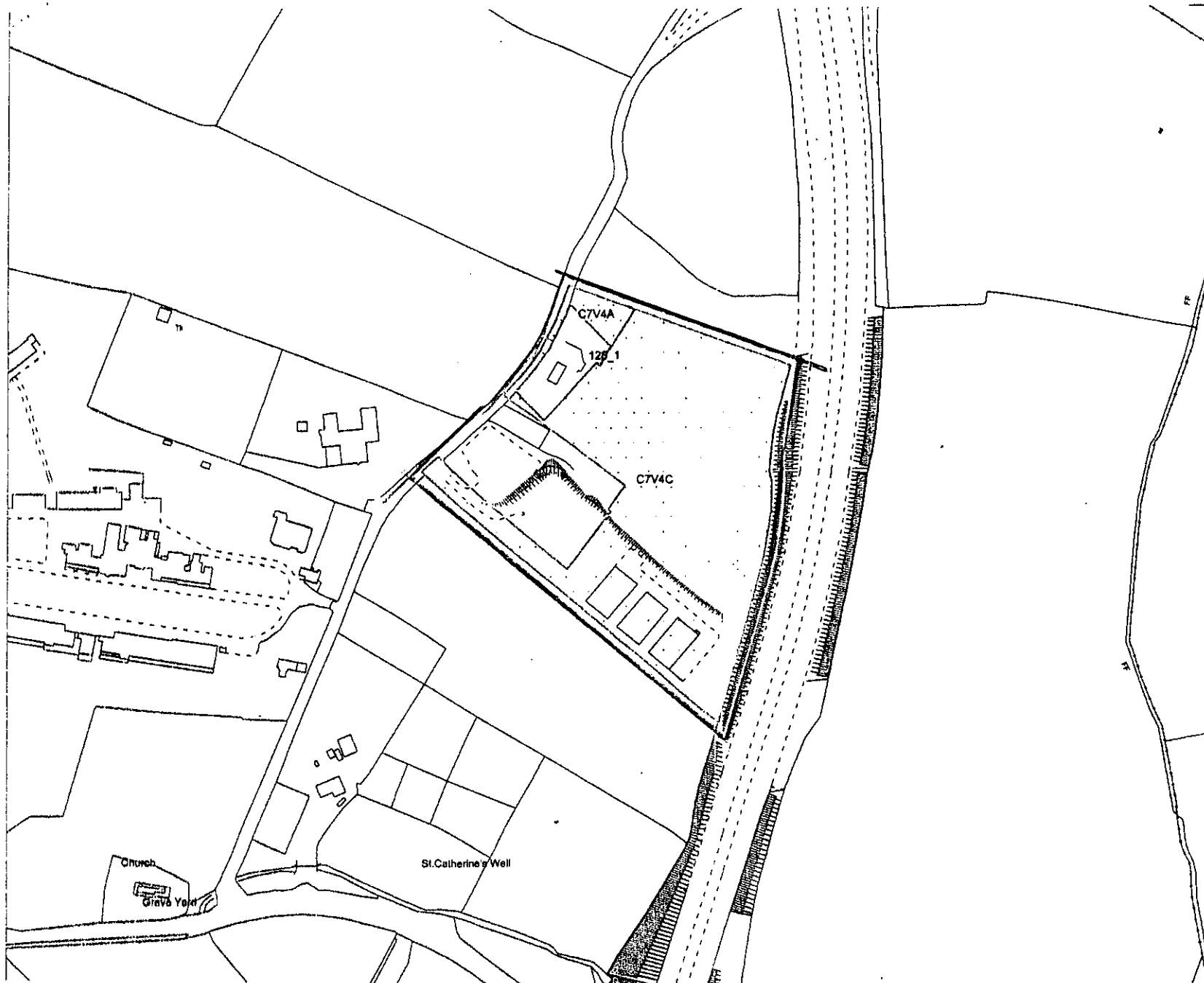
- Freehold
- Leasehold
- SubLeasehold

**Burdens** (may not all be represented on map)

- Right of Way / Wayleave
- Turbary
- Pipeline
- Well
- Pump
- Septic Tank
- Soak Pit

A full list of burdens and their symbology can be found at:  
[www.landdirect.ie](http://www.landdirect.ie)

The registry operates a non-conclusive boundary system. The Registry Map identifies properties not boundaries meaning neither the description of land in a register nor its identification by reference to a registry map is conclusive as to the boundaries or extent (see Section 85 of the Registration of Title Act, 1964). As inserted by Section 62 of the Registration of Deed and Title Act 2006.



C 69

Leonora Earls

**From:** Malcolm Lane [malcolm.lane@pdlane.ie]  
**Sent:** 19 February 2016 11:07  
**To:** Planning - Development Plan Review  
**Subject:** draft County Development Plan submission - DRAPER  
**Attachments:** submission to WCC 2016.pdf; dCDP 2016 Dev Sub Map.pdf; 2010-2016 Map.pdf; draft 2016-2022 map.pdf

FAO:

**County Development Plan Review**

Planning Department, Wicklow County Council

On behalf of **RICHARD DRAPER**, see attached submission for lands at Kilmurray, Kilmacanogue.

Yours Sincerely

Malcolm Lane  
D Lane Associates

BA MRUP MA(UD) MIPI MUDG  
Town Planner & Urban Designer

malcolm.lane@pdlane.ie  
T.direct +353 1 287 3630

1 Church Road	T	+353 1 287 6697	architecture
Greystones	F	+353 1 287 0109	urban design
Co.Wicklow	E	info@pdlane.ie	planning
Ireland	W	www.pdlane.ie	engineering

**Submission to:**  
**WICKLOW COUNTY COUNCIL**

**Review of:**  
**Draft WICKLOW COUNTY DEVELOPMENT**  
**PLAN 2016-2022**  
**KILMURRAY (KILMACANOGUE)**  
**RURAL CLUSTER**

**In respect of:**  
**LANDS AT KILMURRAY SOUTH**  
**KILMURRAY, KILMACANOGUE,**  
**CO. WICKLOW**

**Prepared on behalf of:**  
**RICHARD DRAPER**

**By:**  
**PD LANE ASSOCIATES**  
**ARCHITECTURE & ENGINEERING**  
**PLANNING & URBAN DESIGN**

**FEBRUARY 2016**



## GROUPS OF SUBMISSION

This report, prepared on behalf of Richard Draper, is made as a formal submission to Wicklow County Council on the review of the draft County Development Plan ('the draft Plan 2016-2022') in preparation of the Wicklow County Development Plan 2016-2022.

This submission relates to the lands in the ownership of Richard Draper encompassing the concrete products yard and commercial buildings that are within the Settlement Boundary of the Rural Cluster of Kilmurray (Kilmacanogue) – see map attached ('the Subject Lands').

Currently, the Subject Lands are designated in the County Development Plan 2010-2016 as an area '*restricted to the development of one dwelling only*' within the Settlement Boundary (see map attached). This hatched designation also refers to Richard Draper's dwelling and Robert Draper's dwelling (granted under Planning Reference: No. 12/6054).

The draft Plan 2016-2022 proposes to remove the Settlement Boundary around the Subject Lands, and the existing designation (which is no longer applicable). Removing the Settlement Boundary from around the Subject Lands is considered unacceptable by the landowner as there are two existing houses and a long-standing family business operation at this location. There is extensive landscape screening surrounding the existing concrete products yard and commercial buildings which mitigate any views to it from the surrounding area.

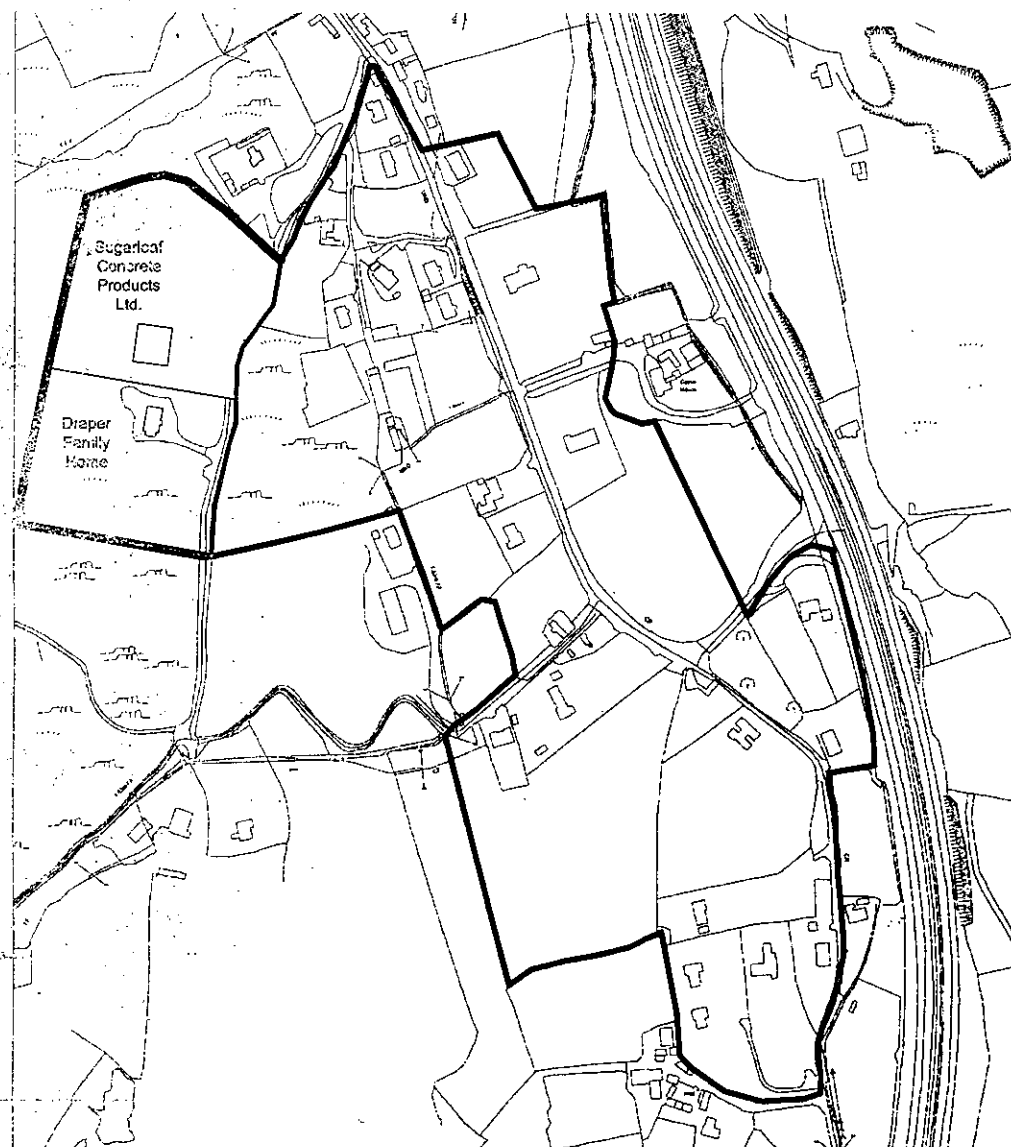
The Draper family operate the concrete supply business, Sugarloaf Concrete Products Limited on the Subject Lands, and live in the family homes adjacent to this business which has been operating for over 30 years now. It is an established commercial business providing building products mainly at a local level and is a local employer.

It is submitted that the Subject Lands should continue to be within the Settlement Boundary of the Rural Cluster of Kilmurray (Kilmacanogue) and the existing concrete products yard and commercial buildings be designated for Employment Uses - Light Industrial & Warehousing in the forthcoming Wicklow County Development Plan 2016-2022.

*Malcolm Lane*

---

Malcolm Lane  
BA, MRUP, MA (UD)  
**PD Lane Associates**



# LEGEND:

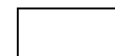
Kilmurray Rural Cluster edged green:



Draper Family Lands (subject lands) edged red:



Proposed employment uses zoning:



## KILMURRAY - KILMACANOGUE



**GENERAL NOTES**  
This drawing should be read in conjunction with all relevant documents. Dimensions are in millimeters unless otherwise stated. Do not scale off drawings. Use figured dimensions only. All work dimensions on site. Report discrepancies immediately. The copyright and right to use this document reserved to P.D. Lane Associates. All works are to comply with current building regulations. This drawing is for planning purposes only and is not to be used for construction purposes unless otherwise stated.

REVISION	DATE	DESCRIPTION

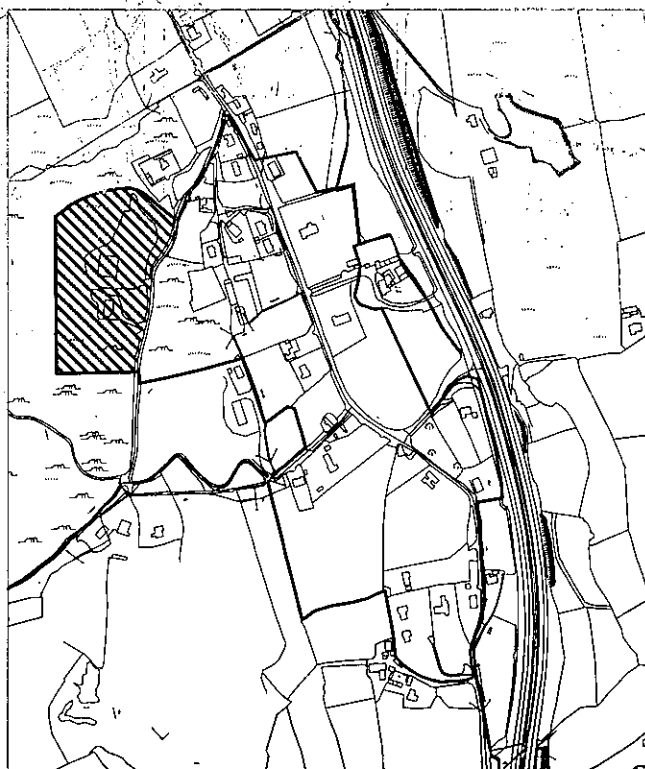
1 Church Road  
Greystones  
Co. Wicklow  
Ireland

T +353 1 287 6697  
F +353 1 287 0109  
E [info@pdlane.ie](mailto:info@pdlane.ie)  
W [www.pdlane.ie](http://www.pdlane.ie)

**pd lane**  
associates

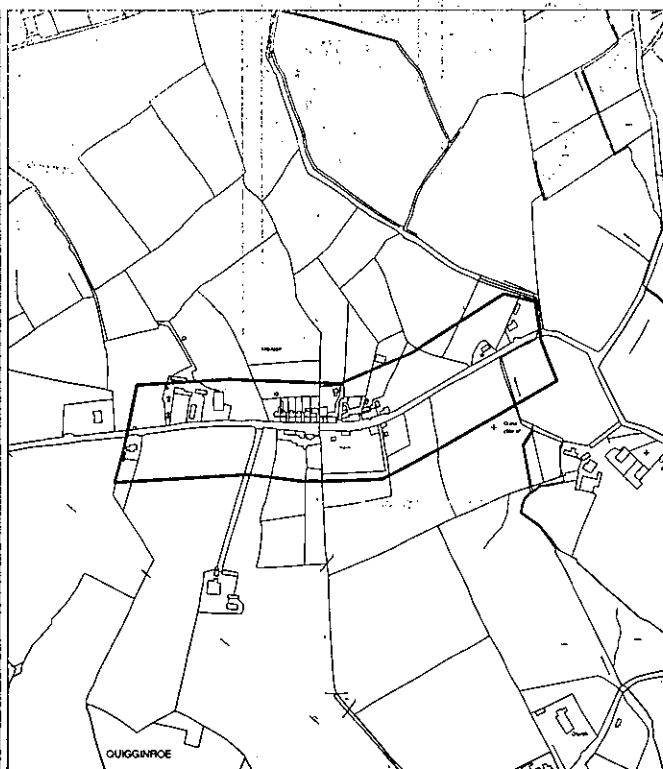
architecture  
urban design  
planning  
engineering

PROJECT	Lands at Kilmurray - Kilmacanogue	DRAWING NO.
CLIENT	Draper Family	REVISION NO.
DESCRIPTION	DRAFT DEVELOPMENT PLAN SUBMISSION 2016 - 2022	
STAGE	DATE	19-02-16
SCALE	not to scale	DRAWN BY gm

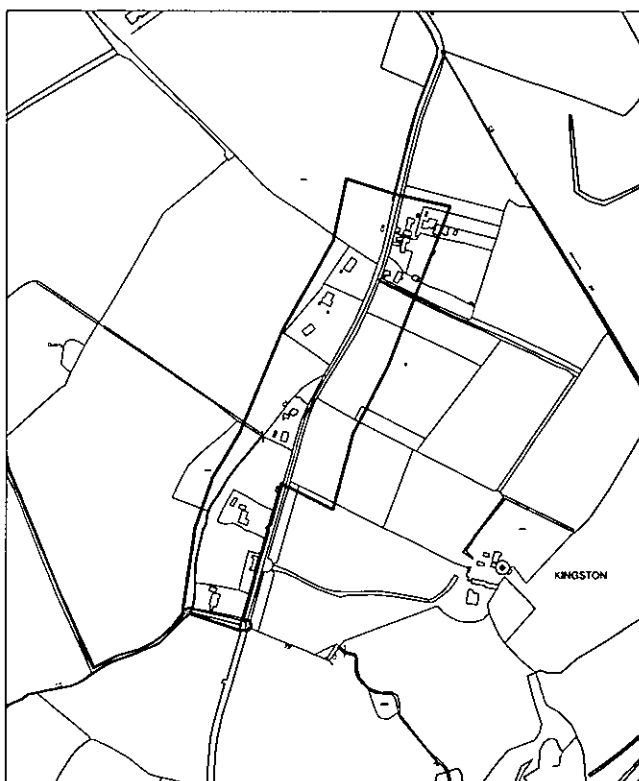


**Kilmurray (1:10,000)**  
(Kilmaçanogue)

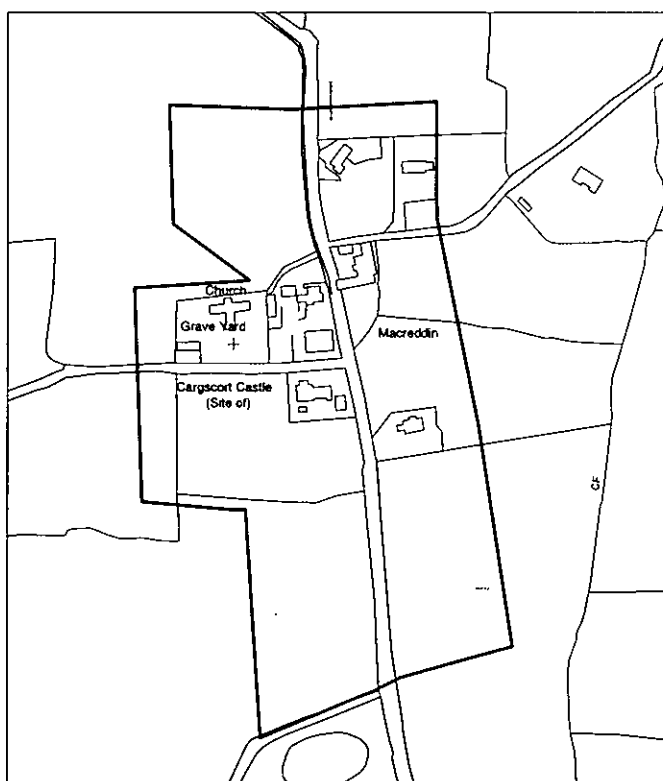
(Hatched area restricted to the development of one dwelling only)



**Kilquiggan (1:10,000)**



**Kingston (1:10,000)**

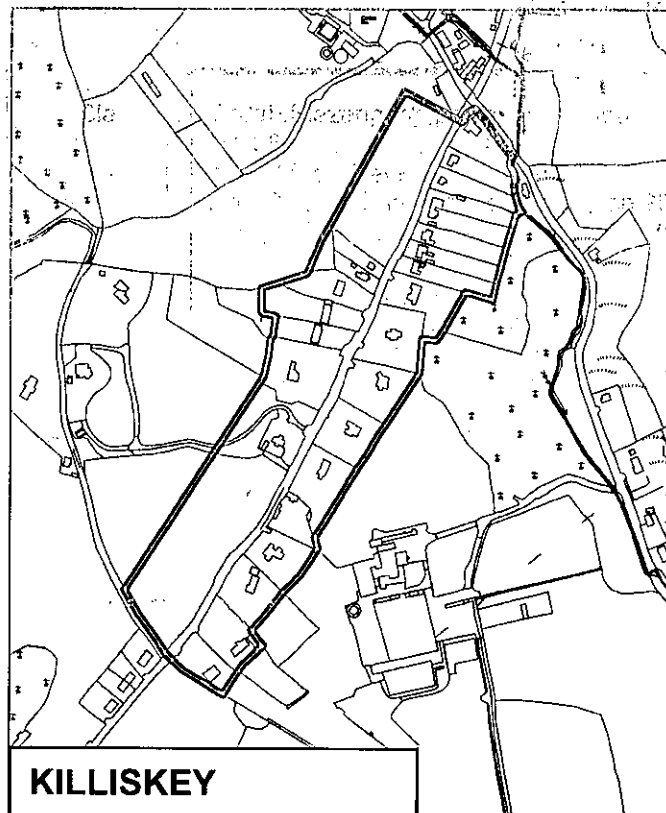


**Macreddin (1:5,000)**

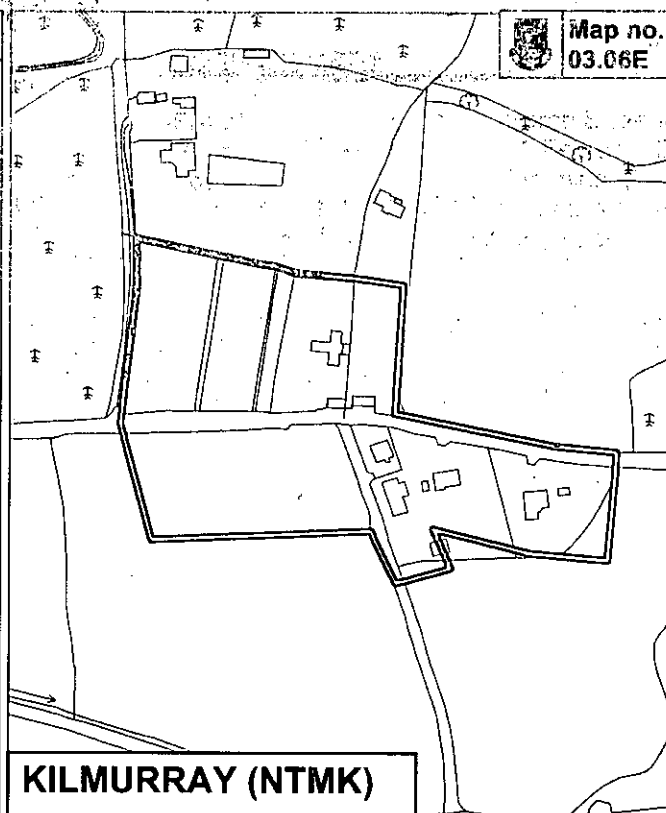
### LEGEND

**Development/Boundary**

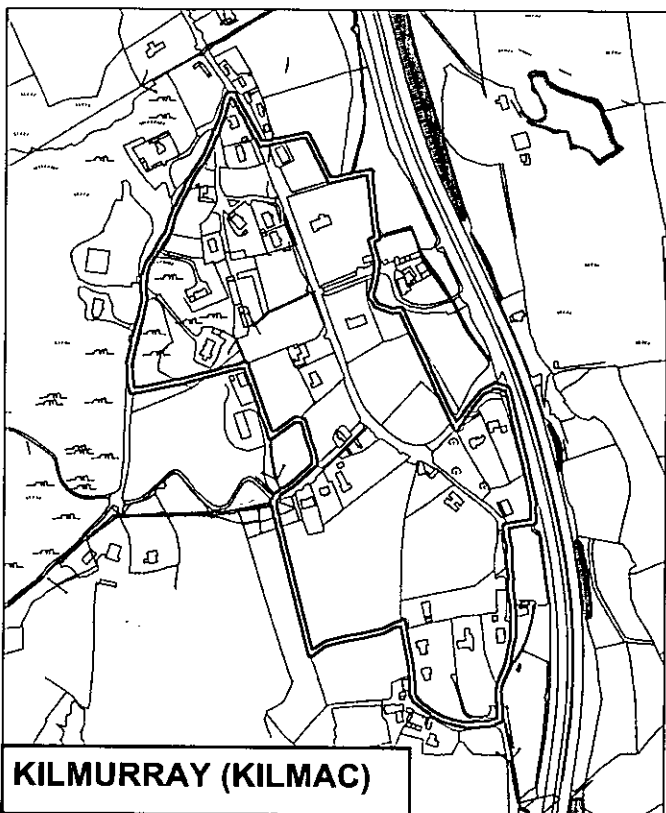
Wicklow CDP 2010 - 2016



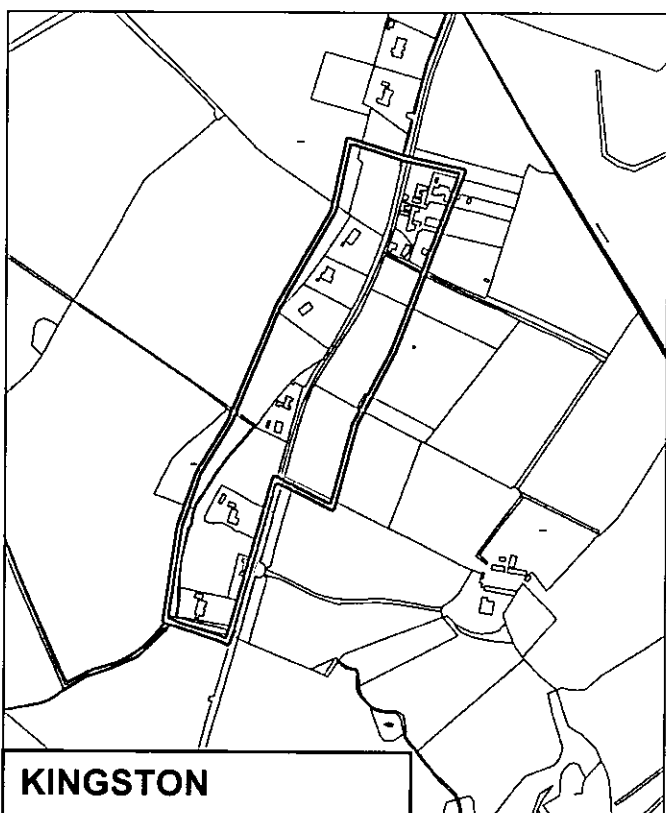
**KILLISKEY**



**KILMURRAY (NTMK)**



**KILMURRAY (KILMAC)**



**KINGSTON**

### Settlement Boundaries Rural Clusters

DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2016-2022



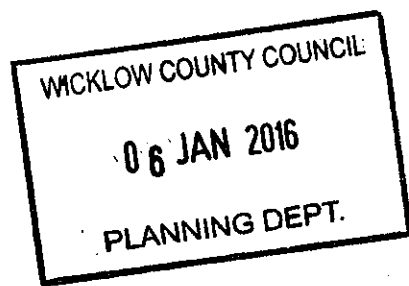
SETTLEMENT BOUNDARIES



Wicklow County Council  
Planning Department

Maps Not To Scale

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2015/35/CCMA/Wicklow County Council



Ballyfree West, No. 1,  
Glenealy, **C70**  
Co. Wicklow  
9.12.2015.

Re: Draft County Development Plan 2016-2222

To whom it may concern,

- In the interest of public health and safety and the safe preservation and protection of the environment we suggest that no further development be granted in Glenealy until such time as an efficient, functioning and sustainable public sewage system is constructed and maintained.
- 

Kind regards,

Emma Driver  
Ly. WDR

C71

# C. S. KELLY & CO.

Solicitors  
Commissioners for Oaths  
Notary Public

Market House,  
Buncrana,  
Co. Donegal.

Telephone: 074 9363111  
Fax No: 074 9361844  
DX 66 001 BUNCRANA

Our Ref: JPD/MB/13352  
Your Ref: County Development Plan Review

7<sup>th</sup>. January, 2016

Re: Lands at Tinnehinch and Cookstown, Enniskerry, County Wicklow.

Dear Sir,

The writer is the Personal Representative of the late Claire Duff, deceased who was the owner of the lands of Tinnehinch and Cookstown (Pt.), Enniskerry, County Wicklow.

The writer also acts for the beneficiaries of the Duff Estate.

It has been brought to the writer's attention that there may be certain proposals relating to or affecting the lands in question and, in particular, the private lane commonly and locally known as 'Lover's Leap Lane'.

It is not clear from the proposed development plan as to whether it is proposed to include or designate this private laneway as an amenity or otherwise.

This is a private laneway and it has been in the continuous ownership and control of the late Mrs. Duff and her predecessor's in title from time immemorial and indeed, as you may also be aware, the laneway in question was, at a period in time, tolled with the tollhouse and gates still evident on our client's lands.

Please confirm that there is no proposal to designate this private laneway in anyway. Please clarify exactly what is proposed, if anything, in relation to this laneway and confirm that nothing will be done without the express written consent of our clients.

---

Ciaran F. MacLochlainn B.C.L., Joseph P. Davies B.C.L. Notary Public.

---

Anne Marie McCrystal LL.B., Majella Lynch B.C.L.,  
Killian McLaughlin, B.Sc., Donna Crampsie B.A. (Hons.),  
Marie McConnell F.I.I.L.Ex. - Legal Executive.

143

If it is included in any plan as an amenity it should be immediately removed and or excluded.

As regards a related matter it has also recently come to the writer's attention that the Council, without the prior consent of the writer or indeed the Duff Estate, attended on the laneway in the course of the past year and proceeded to carry out unauthorized works and in doing so caused damage to the property in question.

On previous occasions, prior to the commencement of any works our clients were approached and their permission sought and granted before works commenced.

We are concerned that there may be some attempt to interfere with our clients' property rights by stealth or otherwise. Any such attempt will be strenuously contested.

You might please pass this letter to the appropriate Section with a request that they clarify the basis and authority for entering the property (without prior consent and approval) and for the carrying out such works which as stated above caused damage.

We would be obliged to receive a prompt and detailed response and we await hearing from you in early course.

Yours sincerely,

*Joseph P. Davis*  
C.S. Kelly & Co.

County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town

---

Ciaran F. MacLochlainn B.C.L., Joseph P. Davies B.C.L. Notary Public.

Anne Marie McCrystal LL.B., Majella Lynch B.C.L.,  
Killian McLaughlin, B.Sc., Donna Crampsie B.A. (Hons.),  
Marie McConnell F.I.I.L.Ex. - Legal Executive.

**Sorcha Walsh**

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
**From:** Joe (Office) [j...]  
**Sent:** 07 January 2016 07:07  
**To:** Planning - Development Plan Review  
**Subject:** (13352) Wicklow County Development Plan Review - Enniskerry Area  
**Attachments:** 2-L. Wicklow County Council (Development Plan) 070116.PDF

Dear Sir,

Please find attached letter.

Regards,

Joe

 Solicitor / Notary Public  
C. S. Kelly & Co.,  
Solicitors  
Market House  
BUNCRANA  
Telephone : 00353 74 9363111  
Fax : 00353 74 9361844  
Email ; [josephp.davies@cskelly.com](mailto:josephp.davies@cskelly.com)

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C72

**Leonora Earls**

---

**From:** John Dunne [mailto:john.dunne@wco.ie]  
**Sent:** 19 February 2016 09:09  
**To:** Planning - Development Plan Review  
**Subject:** Submission for Draft Wicklow County Development Plan 2016-2022  
**Attachments:** Aughrim Town Plan Appeal.pdf


**Importance:** High

Dear Sir/Madam,

Please find attached a submission lodged for consideration against the Draft Wicklow County Development Plan - with particular reference to Volume 2 Level 5 Town Plans, Section 2 - Aughrim Town Plan.

Can you confirm receipt and lodgement of this submission for my records and piece of mind.

Yours faithfully,

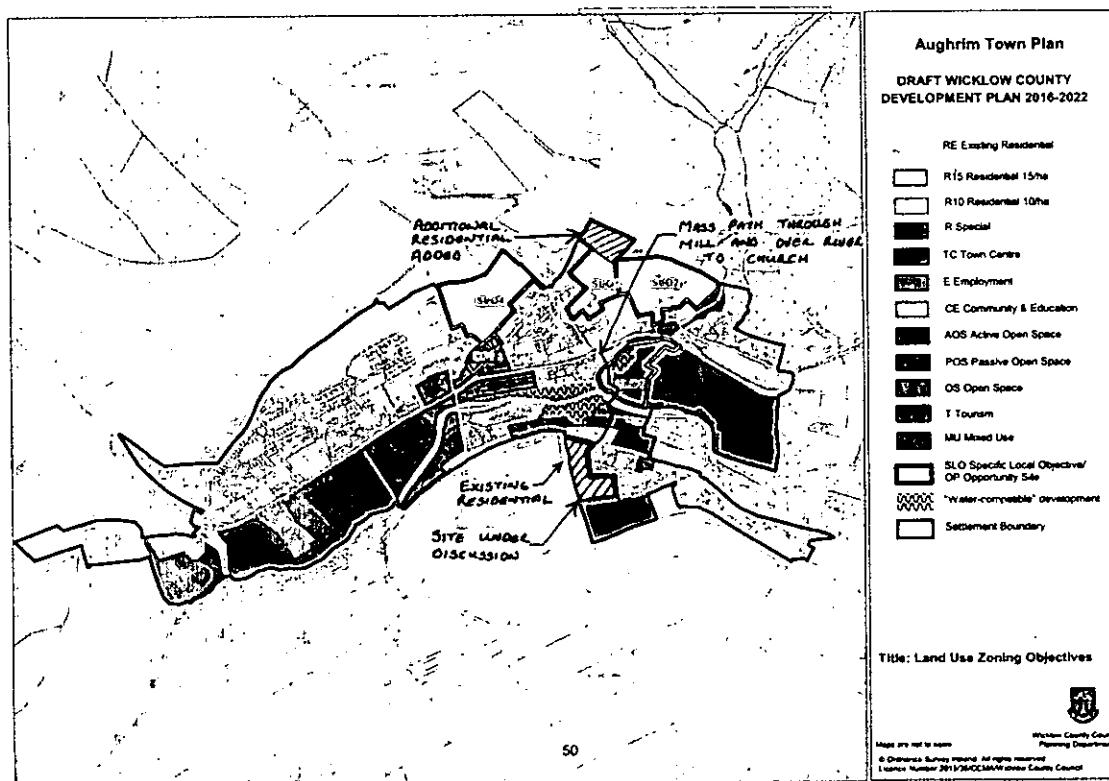
 John Dunne  
Hillview,  
Aughrim,  
Co. Wicklow

by **John Dunne**  
**Hillview,**  
**Aughrim,**  
**Co.Wicklow**

**Tel: +447521 174008**

## Introduction

This site has been zoned residential since the Wicklow County Development Plan c.2004 and forms an essential part of the development of the outlying townland of Killacloran. The site is bounded by existing residential developments to the East, proposed residential to the South, a mix of existing residential and agricultural to the West, and the R747 to the North. It acts as an infill section to the existing and proposed developments and the town core and neatly closes off the existing/proposed residential areas south of the river, see Fig.1 below.



*Fig.1 Excerpt from Draft Wicklow County Development Plan 2016-2022 – Aughrim Town Plan – Land Use Zoning Objectives showing site location.*

## 2.1 Context

It is stated in Aughrim Town Plan 2.1 Context, that development is restricted by the R747. However considering there are several existing residential developments to the south, and it is the link between the outlying townland of Killacloran and the village centre, this contradicts this claim. This development is on the R747 regional road which has been recognised as an important cross county regional road from Arklow and the south and west of the County. We have previously instructed a traffic impact assessment on the impact of developing this site and the report concludes that it would have only minor impact on the surrounding junctions, and indeed would improve the connectivity of the proposed and existing developments to the town core via development levies, and good design practise. This development would be immediately accessible to Arklow – the biggest town in the vicinity, and the biggest source of employment and commercial/retail facilities in the area.

There is an existing pedestrian “mass path” (historical right of way) through the Aughrim Mill with a bridge over the Aughrim river directly opposite the site. The Mill area of the town has been earmarked for development, along with the extension of the railway walk and the Aughrim River Amenity, this site is immediately accessible to all these via the mass path as mentioned above. So this site would complement these redevelopments.

## 2.2 Overall Vision and Development Strategy

In reference to Draft Wicklow County Development Plan, Chapter 2 – Vision and Core Strategy, 2.4.5 Zoning. It states that level 5 Settlement/Town Plans like Aughrim had “*a surplus of zoned land having regard to the population and housing targets set out in this plan. This was in the main due to the revised population targets included in this plan, as well as previous take up of land for housing development altering the headroom proportion. Where a surplus was identified, the surplus land has been either re-designated for an alternative, non-residential use.*” This can’t be true of Aughrim because an equivalent area of previously agricultural zoned land has been changed to R15 residential to the north-east of the village core as part of SL03. This site juts out of the settlement boundary to the north-east of SL03 on the old Macreddin local access Road which has been deemed unsuitable for residential development access. Therefore there was a recognised need for this level of residential zoned lands for Aughrim but it is biased towards the north side of the town, which is in contradiction to a good balanced approach to planning. Proposing all near future development towards the north of the river/town centre and developing further up the hill would appear to be in contrast to good planning practise, and this action of tagging on residential sites outside the traditionally accepted settlement boundary is at odds with the Development Strategy objectives.

The Aughrim town plan vision is stated as requiring increased connectivity between a revitalised town core and the existing and proposed residential areas. But this has been ignored for the south side of the river. It effectively isolates the existing residents in the townland of Killacloran from the village into the near future and adds yet more residential area to the already top-heavy northside of the village. There is an urgent need for pedestrian

access for existing/proposed residents in Killacoran which can be provided/improved by development levies on the site in the case of a new development. This is recognised by the town plan development strategy, which states that it *"requires developers to provide such facilities in tandem with new housing development where appropriate and to require the payment of development levies for the provision of such facilities by the local authority"*. This need for pedestrian access to the village is also recognised in the attached Traffic Impact Assessment Report prepared by Atkins Global Engineering Group, attached in Appendix.

This site falls within the appropriate land uses condition in that it is under-utilised, and located in an infill site between the existing village core and existing proposed housing, and is naturally falling towards the road with no risk of flooding, which is recognised in the Aughrim Town Plan Drawing – Indicative Flood Zones. The maintaining of the residential zoning status of this site would facilitate the development of Aughrim in a naturally balanced and sustainable fashion.

### **Service Infrastructure**

As stated above the site is naturally falling towards the road with no risk of flooding, which is recognised in the Aughrim Town Plan Drawing – Indicative Flood Zones, attached in Appendix.

The water services both wastewater and water supply would benefit from development levies from future development of this site. The site itself is located in close proximity to the existing aeration wastewater treatment plant which is situated between the river and the R747 on the Southside of the town.

The Vehicular Movement section is contradictory in that it states *"that no significant further development on the south side of the road can be supported unless there is significant infrastructural improvements"*, however the only way to provide for this facilities is as previously stated in the report is *"in tandem with new housing development....require the payment of development levies for the provision of such facilities"*. This is incredibly short-sighted for a 6 year development plan and signifies a step-back in the development strategy. Indeed it is contrary to Aug 4 in the plan which strives to improve pedestrian, cyclist and traffic safety and accessibility throughout the town, and makes particular reference to Aughrim bridge. We had previously provided a Traffic Impact Assessment Report undertaken by Atkins Global Engineering Group in support of a residential development of this site. This report (attached in Appendix) supports the development of this site, stating that these improved pedestrian links could be provided by development levies from this, and from adjacent proposed development sites. It also notes that *"the traffic flows and impacts generated by the proposed residential development will be small relative to the background traffic flow forecasts for the area."* It further concludes that *"the road junctions in the vicinity of the proposed development will operate well below capacity both with and without the development in place, and that there is sufficient capacity to accommodate future traffic growth well into the future."* Refer to the traffic report in support of this argument, attached in Appendix.

## Site History

The site has been in the ownership of the Dunne family, of which I am the representative, for several generations. My mother Elsie Dunne (nee Foxton) inherited it off Terence John Dunne, my father upon his death on the 18<sup>th</sup> February 1978. This formed part of his legacy to Elsie his wife and her children, daughter Linda, and I John, her son to provide for them in the future. Other land c.1.5Ha which was included in this legacy was taken from the family in the late 80's by Wicklow County Council by a Compulsory Purchase Order for nominal agricultural value. This now forms part of the existing residential beside the Catholic Church. The removal of the proposed residential zoning from this land in favour of a tag on area to the north-east of SL03 is a further letdown to the legacy of a dead father and his attempts to provide for his future generations, both of which have been through the actions of Wicklow County Council. I implore you to reconsider this rezoning and give proper cognisance to the arguments and reasoning's included in this submission.

### In summary:

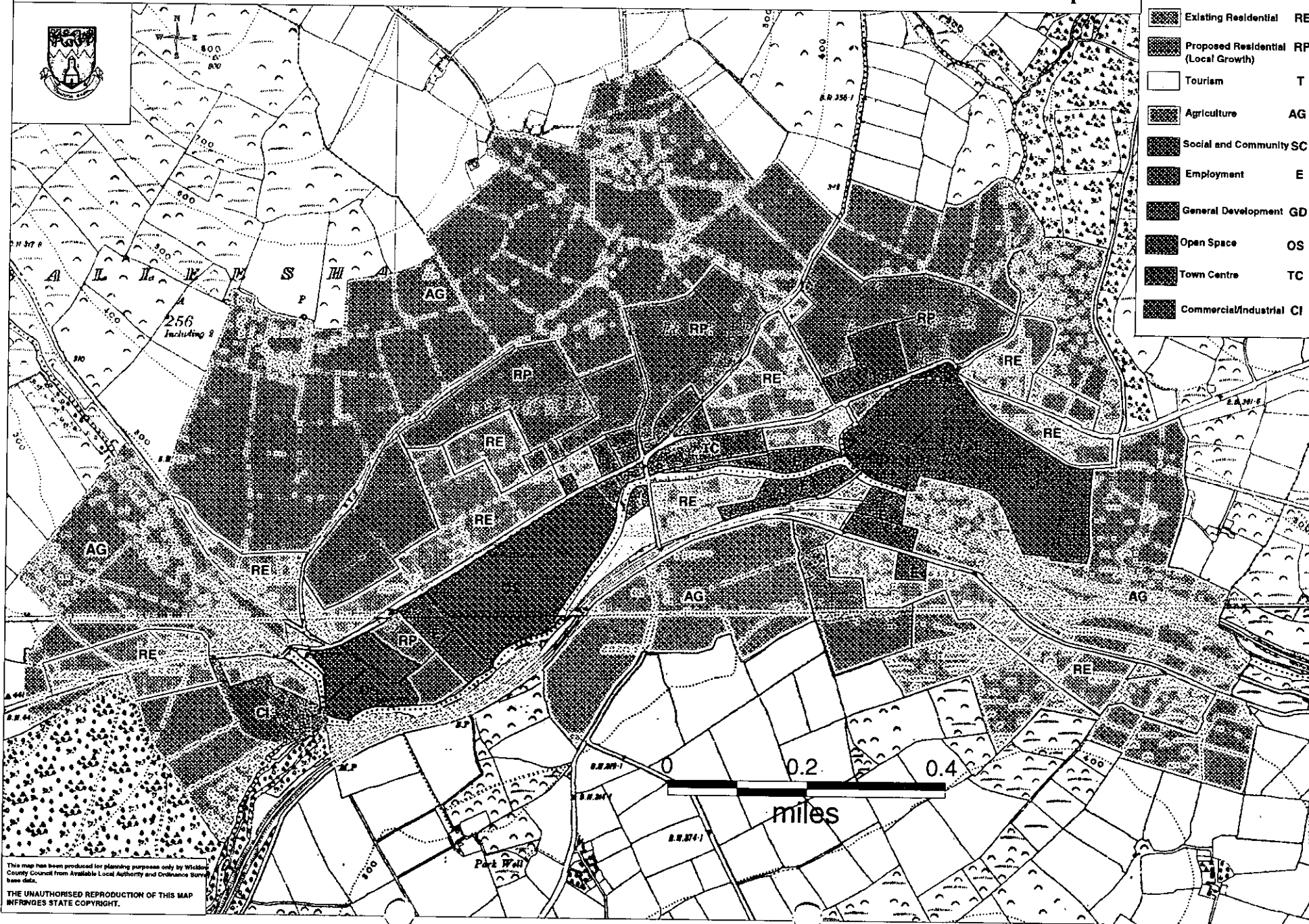
- The site falls within the appropriate land uses condition in that it is an infill and under-utilised site between the existing and proposed residential areas in Killacloran and the town core, and has been zoned residential since the Aughrim Land Zoning Objective Plan c.2004
- It is within easy access to the largest commercial/employment town in the area (Arklow) via the R747 regional road.
- It is immediately accessible to the proposed redevelopment of the Mill, the river walk and the Aughrim River Amenity.
- Its development would provide for the urgent need for pedestrian access to the town core via development levies in tandem with good design practise.
- The site is located in close proximity to the existing aeration wastewater treatment plant, and both it and the existing water supply would benefit from development levies from this site.
- An existing Traffic Impact Assessment has been produced by Atkins Global Engineering in relation to the development of this site and concluded that the traffic flows and impacts generated by a proposed residential development would be small relative to the background traffic flow forecasts for the area, and that the road junctions in the vicinity of the proposed development would operate well below capacity both with and without the development in place, and that there is sufficient capacity to accommodate future traffic growth well into the future.

## Appendix List

- Map 41 - Aughrim Land Zoning Objective Plan c.2004, showing the site zoned Proposed Residential (Local Growth)
- Aughrim Town Plan from Wicklow County Development Plan 2010-2016 showing the site zoned R1 – Proposed Residential
- Draft Wicklow County Development Plan 2016-2022 – Aughrim Town Plan: Land Use Zoning Objectives, showing the site no longer zoned residential but an additional equivalent area to the north-east of SL03 zoned R15 Residential.
- Draft Wicklow County Development Plan 2016-2022 – Aughrim Town Plan: Indicative Flood Zones, showing the site is not in a flood zone.
- Traffic Impact Assessment for Residential Development at Aughrim, Co. Wicklow produced by Atkins Engineering.

# Aughrim Land Zoning Objective Plan

Map 41





# WICKLOW COUNTY COUNCIL

Wicklow County Council Planning Department  
County Buildings, Station Road, Wicklow  
Tel: (0404) 20100 Email: [plandev@wicklowcoco.ie](mailto:plandev@wicklowcoco.ie)

## Aughrim Town Plan

### Legend

- RE - Existing Residential
- R1 - Proposed Residential
- MU - Mixed Use
- TC - Town Centre
- PU - Public Utility
- CE - Community & Educational
- E - Employment
- T - Tourism
- AOS - Active Open Space
- OS - Open Space
- AGR/GB - Agriculture/Greenbelt
- Plan Boundary

Wicklow CDP 2010 - 2016

Director of Services: Desmond O' Brien

Scale: 1:7,500@A3

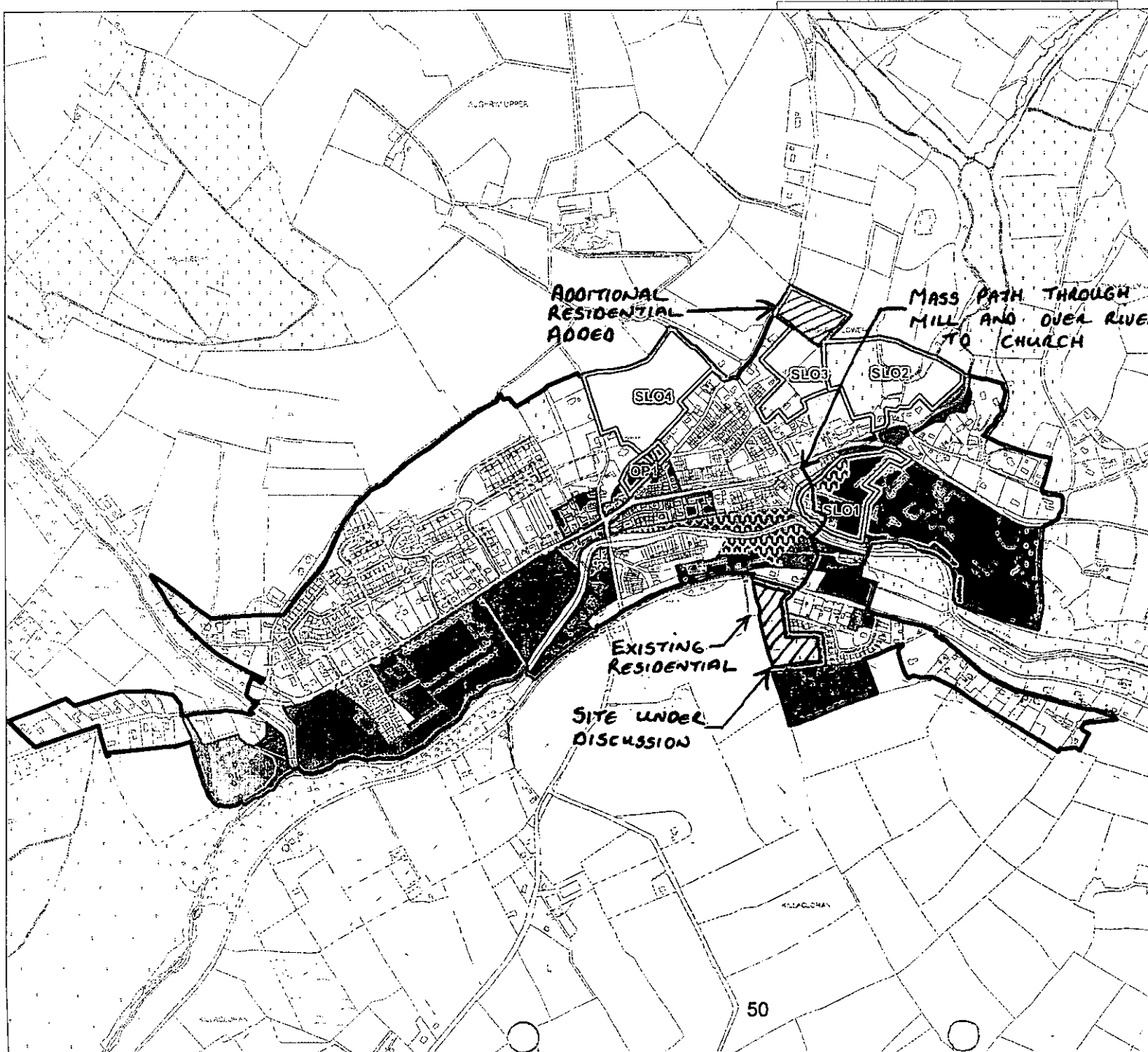
Date: 04/10/10

Drawn By: SW

Checked By: AM
















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## Aughrim Town Plan

### DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

-  RE Existing Residential
-  R15 Residential 15/ha
-  R10 Residential 10/ha
-  R Special
-  TC Town Centre
-  E Employment
-  CE Community & Education
-  AOS Active Open Space
-  POS Passive Open Space
-  OS Open Space
-  T Tourism
-  MU Mixed Use
-  SLO Specific Local Objective/  
OP Opportunity Site
-  "Water-compatible" development
-  Settlement Boundary

Title: Land Use Zoning Objectives



Wicklow County Council  
Planning Department

Maps are not to scale

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**John Dunne**

Residential Development at  
Aughrim, Co. Wicklow

Traffic Impact Assessment

12 May 2006

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## **1. INTRODUCTION**

- 1.1 This report details a traffic impact assessment conducted on behalf of John Dunne for a proposed residential development at Aughrim, Co. Wicklow. The study is to support a submission to Wicklow County Council.
- 1.2 The study assesses the traffic generating potential of the development, the parking requirements, the traffic impacts on the surrounding road network, the access requirements for the development, and any mitigating measures required.
- 1.3 The Report has been prepared with the benefit of past discussions that have ensued with the Local Authority. During the course of these discussions, their requirements in relation to the study have been established. The issues arising from these discussions have been addressed comprehensively as part of the Report.

## **2. EXISTING CONDITIONS**

- 2.1 Aughrim is an important agricultural, horticultural and timber processing village located in South Wicklow approximately 32km from Wicklow and 14km from Arklow. Aughrim is situated at the crossroads of the R747 and R753 regional roads and is linked to the N11 National Primary Road via the R747 at Arklow.
- 2.2 The site is located on the R747 south east of the village centre, and is currently zoned for residential use under the Wicklow County Council Area Action Plan. It is intended that the developed site would have it's own priority-controlled tee-junction access onto the R747. The location of the site is shown on Figure 2.1.

### **ROAD NETWORK**

- 2.3 The location of the proposed development site in the context of the surrounding road network facilities is shown in Figure 2.1. The development site is situated on the south side of the R747 Regional Road, which is a +/-6.0m wide single carriageway with no pedestrian facilities. The speed limit on the R747 in the vicinity of the development site is 60kph.

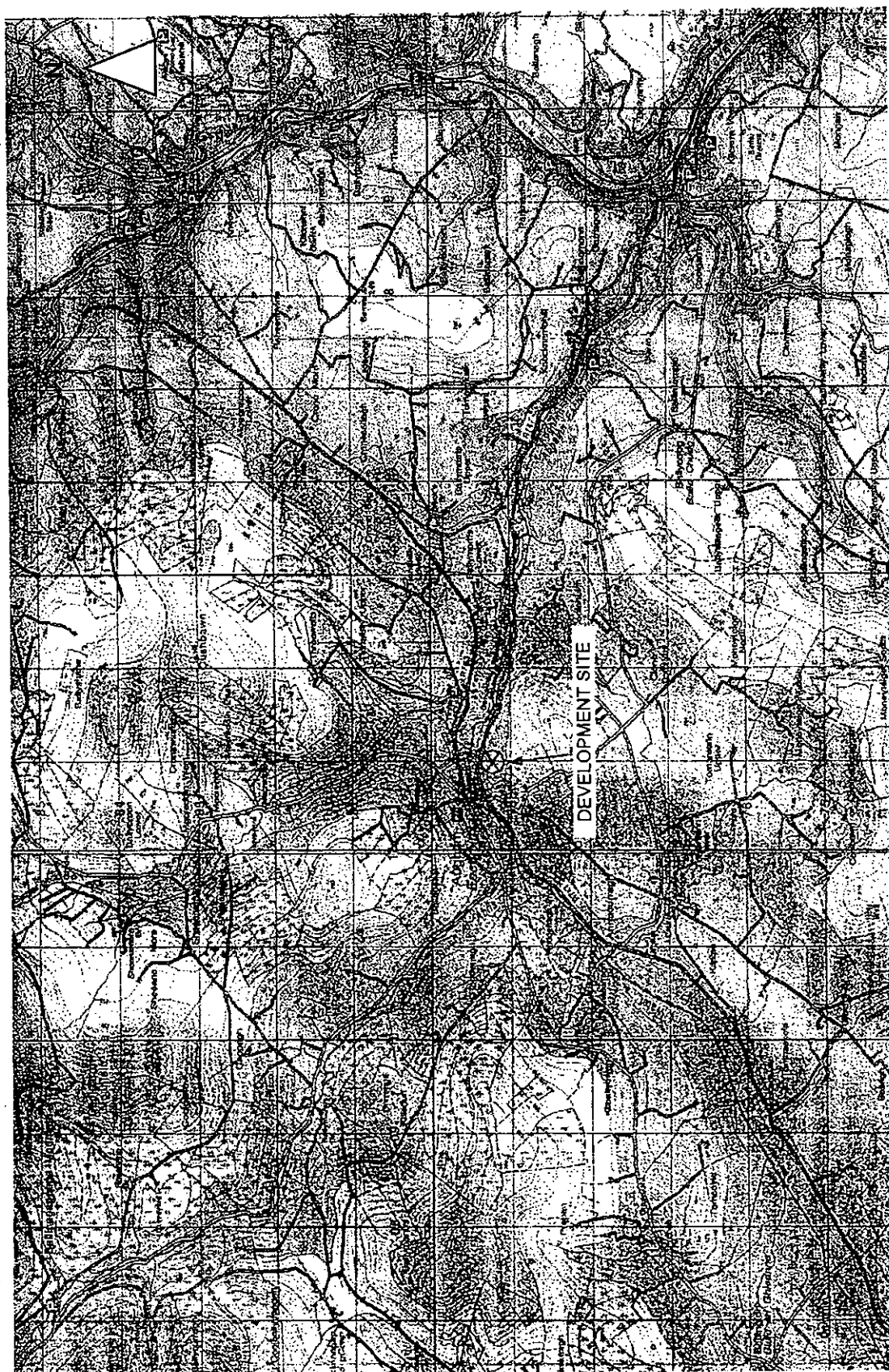
### **EXISTING TRAFFIC FLOWS**

- 2.4 Recent weekday peak hour background traffic flow levels on the surrounding road network were established by carrying out traffic counts at the junction of the R747 and R753 south of Aughrim Bridge. The resulting peak period background traffic flows are outlined in Figure 4.1.

### **EXISTING PUBLIC TRANSPORT**

- 2.5 Aughrim is not currently serviced by public rail or bus. However there are a number of taxi services operating in the area.

Figure 2.1 – Site Location Plan



SITE LOCATION FIGURE 2.1



### **3. DEVELOPMENT PROPOSALS**

- 3.1 The development proposal is to comprise 40 housing units on a 4.8 acre site immediately west of the existing housing development in Millwood, as shown in Figure 3.1.

#### **PARKING REQUIREMENTS**

- 3.2 The development site is contained within the area covered by the Wicklow County Development Plan. Therefore the parking provision for this proposed development should be in accordance with the parking standards as set down in that document.
- 3.3 The parking requirement set out in the development plan for dwellings is 1-2 spaces per unit. Using these car parking standards therefore between 40 and 80 new car parking spaces are required for the proposed development, unless otherwise agreed with the Local Authority.

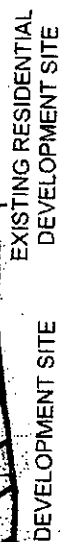
#### **DEVELOPMENT SITE ACCESS**

- 3.4 It is proposed to provide access to the proposed development from the R747 Regional Road via a priority controlled tee-junction at the location shown in Figure 3.2. The required sightlines at this location are also depicted in Figure 3.2.

#### **PEDESTRIAN AND CYCLE FACILITIES**

- 3.5 Careful consideration should be given to the needs of pedestrians and cyclists as part of this study. Drivers should be made aware on entry and throughout the layout that they are in surroundings where the needs of pedestrians and cyclists take precedence over the free flow of vehicles. Footpaths throughout the development are to have a width of not less than 1.5 metres.
- 3.6 At present there are no pedestrian facilities on the adjacent R747 to link existing developments along this route to Aughrim Village. Pedestrian facility proposals are discussed in greater detail in Chapter 4 under the heading 'Road Improvements'.

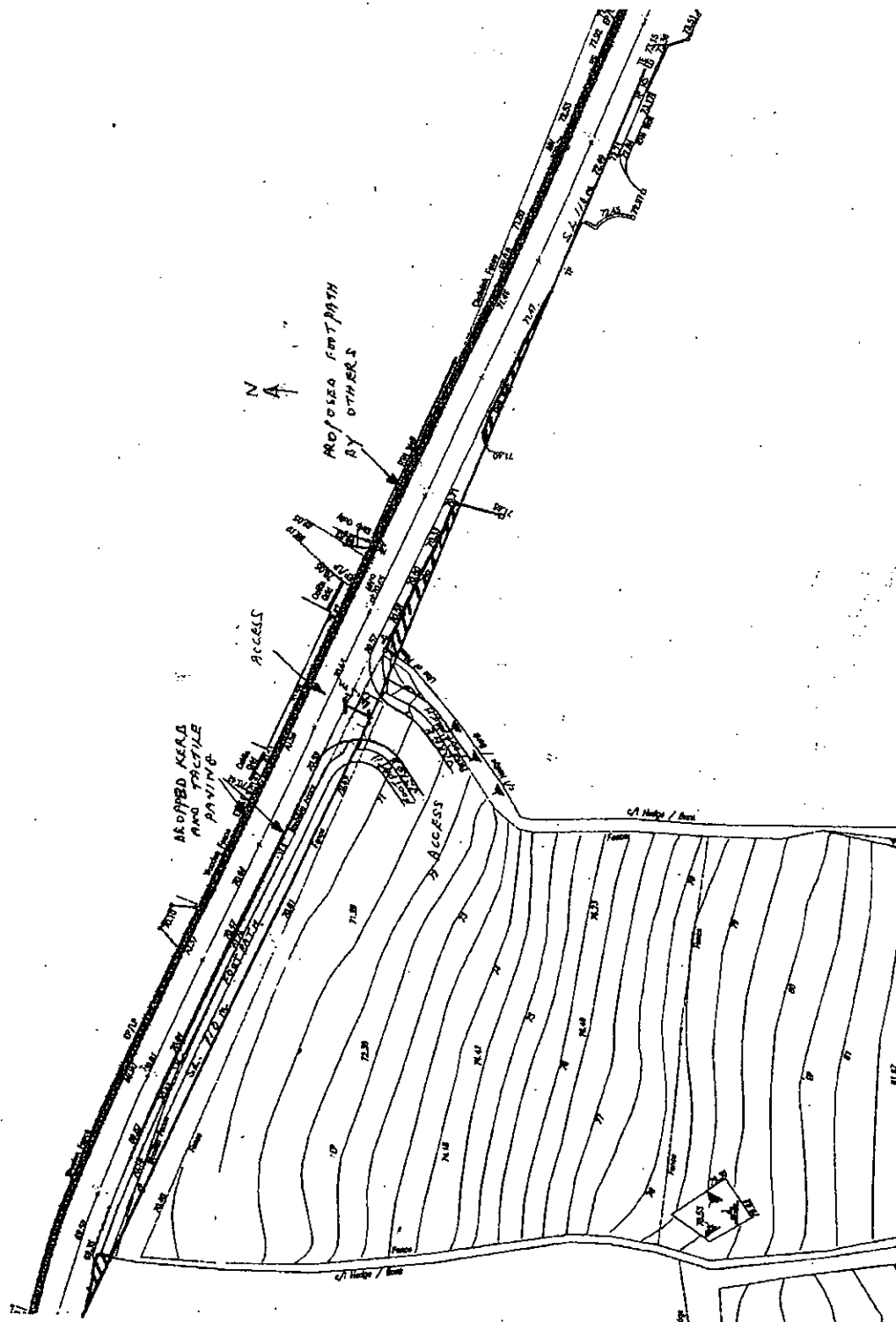
Fig 3.1



**FIGURE 3.1**

Fig. 3.2





DEVELOPMENT ACCESS

FIGURE 3.2

### TRIP GENERATION

- 3.7 The busiest period for the proposed development in terms of traffic generation will be during the weekday morning and evening peak periods. It has been assumed, for the purposes of providing worst-case conditions that these periods coincide with the periods when recurring peak background traffic activity occurs on the surrounding road network.
- 3.8 Trip generation rates for the proposed development, as outlined in Table 3.1 below, were established from the UK TRICS trip generation database, as well as from experience of similar-type developments elsewhere. The trip rates established were then used to assess the traffic generating potential of the proposed development.

**Table 3.1 –Peak Hour Trip Generation Rates**

No. of Households = 40	Peak Hour Trip Rates / Unit			Peak Hour Generated Trips (pcu's)		
	Arrival	Departure	2-Way	Arrival	Departure	2-Way
AM Peak	0.20	0.80	1.0	8	32	40
PM Peak	0.80	0.20	1.0	32	8	40

- 3.9 As shown in Tables 3.1, the total anticipated peak-hour operational traffic generated by the ultimate development is estimated to be of the order of 40 pcu's two-way during the morning and evening peak hours.

### TRIP DISTRIBUTION AND ASSIGNMENT

- 3.10 The likely distribution of the traffic generated by the proposed development (i.e. the direction of approach and departure of trips to and from the development) has been based on the road network arrangement, existing distribution of peak hour traffic on the surrounding road network and spatial distribution of surrounding developments both existing and planned. General directional splits for the development are shown in Table 3.2 below.

**Table 3.2 –Peak Hour Trip Distribution**

Location	From / To
R747 East (To Arklow)	40%
R753 North (To Aughrim)	40%
R747 West (To Tinahely)	20%

- 3.11 Having derived the traffic generated by the proposed development, as shown in Table 3.1, and the distribution pattern of this traffic, as outlined in Table 3.2, the development traffic was then manually assigned to the surrounding road network.

## **4. TRAFFIC IMPACTS**

### **2008 TRAFFIC FLOWS WITH AND WITHOUT DEVELOPMENT**

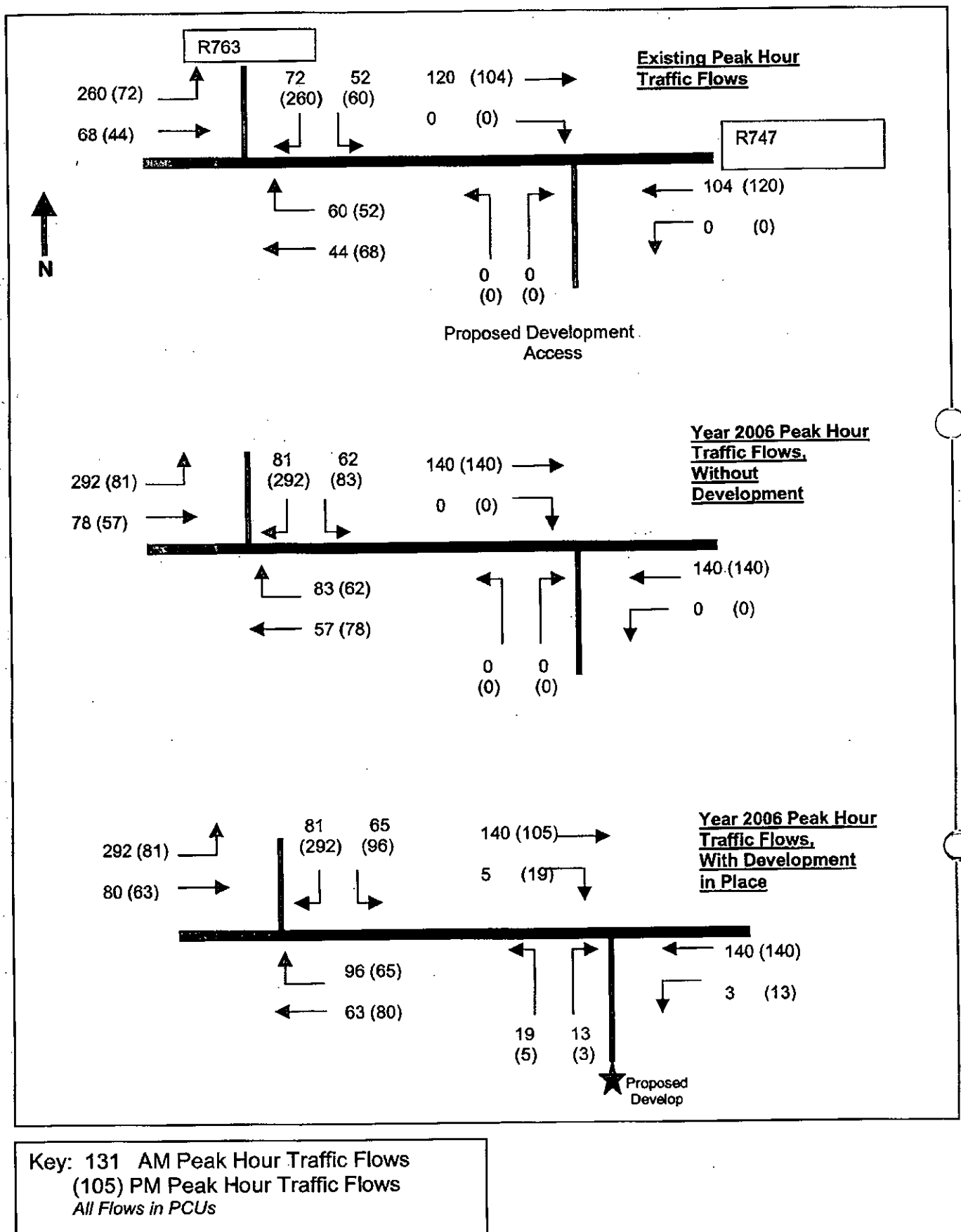
- 4.1 It is envisaged that the development will be operational by the year 2008. The traffic impact assessment was therefore carried out for year 2008 traffic flow conditions with and without the proposed development in place.
- 4.2 The recent background peak hour traffic flow levels on the surrounding road network as indicated in Section 2 were factored up by 2.5% per annum to 2008 levels to reflect overall background traffic growth and other new developments in the area.
- 4.3 The proposed development traffic was then added to the year 2008 forecast background traffic flows. The background traffic includes the traffic generated by the 22 existing residential units in Millwood immediately to the east of the proposed development site and the proposed 48 residential units by others to the south east and which would also use the existing Millwood access. The resulting year 2008 forecast traffic flows, with and without the proposed development in place, are shown in Figure 4.1.

### **2008 RATIOS OF FLOW TO CAPACITY**

- 4.4 The 2008 traffic conditions on the surrounding road network both with and without the proposed development in place were assessed by calculating the Ratios of Flow to Capacity (RFC) for the key junctions in the vicinity of the development. These calculations were based on the procedures adopted by the UK Transport Research Laboratory's PICADY computer simulation model for priority-controlled junctions.
- 4.5 The resulting RFCs for 2008 during the morning and evening peak periods, both with and without the proposed development in place, are outlined in Table 4.1.

**Figure 4.1 2006 AM and PM Peak Hour Traffic Conditions – With and Without  
Development**





Traffic Flows in Vicinity of Proposed Development

Figure 4.1

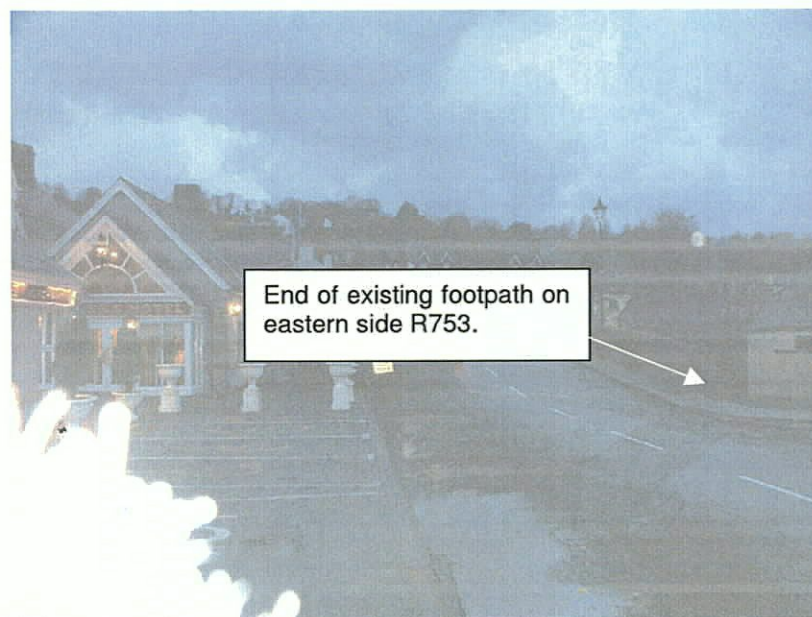
**Table 4.1 – Year 2006 Ratios of Flow to Capacity – Key Junctions**

Junction	Morning Peak Hour		Evening Peak Hour	
	No Dev	With Dev	No Dev	With Dev
R747 / R753	0.285	0.294	0.740	0.772
R747 / Development Access	0.033	0.107	0.033	0.079

- 4.6 As can be seen from the RFC's on the surrounding road network, the junctions in the vicinity of the proposed development operate well under capacity at present. With the additional flows added to the network the junctions continue to operate with spare capacity, indicating that the surrounding road network will be able to accommodate future background traffic growth, including the traffic generated by the proposed development, well into the future.

### ROAD IMPROVEMENTS

- 4.7 When designing or improving a road or junction the needs of all road users need to be taken into account. As outlined above the R747, R747/R753 junction and R747/Millwood Access Road junction can all accommodate vehicular traffic. However there are currently no existing facilities for other road users, pedestrians in particular.
- 4.8 A +/-1.5m footpath on the north side of the R747 is proposed by others as part of an adjacent development proposal. The proposed footpath is to run past the development site as far as the Aughrim Bridge and link into the existing footpaths as shown in the photographs below. A verge and footpath on the south side of the R747 along the proposed development site boundary is also proposed as part of this development proposal ( John Dunne's).
- 4.9 At the proposed development access onto the R747, dropped kerbs, tactile paving and additional street lighting as shown in Figure 3.2 should be provided so that all pedestrians in the area can cross the road under safer conditions.



- 4.10 To further increase safety for all users in the area it is proposed that high quality lighting at the development access junction be provided as part of the above measures.

**CONSTRUCTION TRAFFIC**

- 4.11 It is envisaged that construction traffic will not exceed operational traffic.

## **5. SUMMARY AND CONCLUSIONS**

- 5.1 This Traffic Impact Assessment is to support a submission to Wicklow County Council for a proposed 40 unit residential development at Aughrim, Co. Wicklow.
- 5.2 A detailed investigation has been undertaken into the impact of the proposed development on the adjacent road network. Current and future traffic flow levels have been established on the surrounding road network.
- 5.3 Junction analyses were carried out for the key junctions in the vicinity of the proposed 40 unit residential development, both with and without the development in place. The RFCs for these junctions were calculated using the junction analysis software PICADY for priority controlled junctions.
- 5.4 The traffic flows and impacts generated by the proposed residential development will be small relative to background traffic flow forecasts for the area. It has been shown in Chapter 4 that the road junctions in the vicinity of the proposed development will operate well below capacity both with and without the development in place, and that there is sufficient capacity to accommodate future traffic growth well into the future.
- 5.5 Parking spaces should be provided in accordance with the parking standards set out in the current Wicklow County Development Plan. The provision of adequate parking spaces will ensure that users of the proposed development will not encroach onto surrounding roads and cause obstructions on local roads.
- 5.6 Pedestrian facilities within the proposed development should to be provided as part of the proposed development. The proposed development as will existing developments in the area benefit from the improved pedestrian links to Aughrim village via the R747 as proposed by others in their adjacent residential planning application. These pedestrian facilities include a 1.5m footpath on the north side of the R747 as far as Aughrim Bridge, then continuing north over the bridge on the eastern side of the R753 to link up with the existing footpath in the village. It is also proposed as part of this planning application to provide a verge and footpath on the south side of the R747 along the development site boundary. Such facilities will benefit all pedestrian users along the R747.

Leonora Earls

C73

From: John C Dwyer [mailto:john.dwyer@wco.ie]  
Sent: 17 January 2016 19:21  
To: Planning - Development Plan Review  
Subject: Wicklow County Development Plan

I found the opportunity, y provided last week for Greystones residents to review the above plan, quite useful.

I discussed a number of transport related items with the Planning officers in attendance and have been requested to formalise these, which I am now doing.

As has been seen with the river Shannon debate, responsibility is fragmented and accountability unclear.

The key message which I took away on the day was that I was unclear as to where the roles of the NTA and Wicklow Co Co started and ended when it comes to transport planning. I don't believe this to be a 'black & white' situation but rather one where ongoing dialogue will inform the NTA of the key issues facing residents of Wicklow and beyond who use public transport.

1. Climate Change - recent events at the Murrough demonstrated yet again how fragile the railway line is against rising water levels and more frequent and severe storms.

Apart from the escalating cost to both Wicklow Co Co and Irish Rail in maintaining the route, this is an issue that is only going to get worse.

I believe strategic options now need to be considered in providing a long term solution including the identification of an alternative route to the present coastal line which serves a relative small catchment area.

Consideration should therefore be given to reserving an alignment through Charlesland before this new centre of population is developed further and then identifying route options that serve Killincarrig, Kilcoole and Newcastle.

The preferred option would also be double tracked and attractive to electrification in the medium term.

When the campaign to bring the DART to Greystones was active, Irish Rail costed and then agreed to including a halt with passing loop at Redford.

A vocal minority of Redford Park residents objected to the proposal - concern with commuters parking in their estate could readily have been overcome through the use of resident parking permits.

The proposal was visionary as it would have obviated the need of commuters in that expanding catchment area to drive down through Greystones to the Park and Ride car park.

Part of that proposal included a crossing loop which would have facilitated higher frequency DART services to and from Bray by allowing DARTs from Bray pass Greystones originating DARTs at that point.

3 The NTA has recently identified the extension of the LUAS Green line from Brides Glen along the former Harcourt Street alignment through Shankill to Shanganagh Junction where it would then run on the edge of the former Bray Golf Club onto Bray Daly Station.

I believe Wicklow Co Co should discuss with the NTA the option of extending this line further to allow it penetrate the town of Bray through street running of trams to, say Bray Civic Offices or even beyond.

Yours Sincerely

John C Dwyer

Leonora Earls

C74

**From:** Stephen Byrne [stephenbyrne@comcast.net]  
**Sent:** 18 February 2016 15:22  
**To:** Planning - Development Plan Review  
**Subject:** Wicklow Draft County Development Plan 2016 / 2022  
**Attachments:** SKMBT\_C55216021816170.pdf

Attached is a submission from Enniskerry Forum in respect of the above.

Stephen Byrne  
Nampara  
Kilgarron Hill  
Enniskerry  
Co Wicklow

086 0242995

**ENNISKERRY FORUM SUBMISSION TO WICKLOW  
COUNTY COUNCIL**

**WICKLOW COUNTY DRAFT DEVELOPMENT PLAN**

**PERIOD 2016 - 2022**

**PREPARED BY –  
ENNISKERRY FORUM  
C/O NAMPARA  
KILGARRON HILL  
ENNISKERRY  
CO. WICKLOW**

**19<sup>TH</sup> FEBRUARY 2016**

## **INTRODUCTION**

Enniskerry Forum are a voluntary community group that exists to support and work with the wider Enniskerry community including sports, social groups, clubs and individual residents. The Forum is making a submission in relation to the draft County Development Plan. This submission takes into account the following –

- The Forum is not anti - development and would not normally take a position on individual planning applications other than to reiterate or emphasize specific points in relation to preserving the character and ambience of the village.
- The Forum understands that there will be some development in the village environs to meet the requirements and population growth objectives of the plan.
- The Forum have reviewed the draft plan in detail and have taken external advice to ensure that we are conversant with the content and the implications of the implementation of the plan.
- The Forum have engaged with local public representatives to help us understand how the plan might be implemented.
- The members of the Forum have had extensive discussions on many aspects of the plan and we have also received comments and observations from the wider community all of which have been included in this submission.
- The Forum is community based and will try and represent the community views in the best possible way. Individual Forum members may have personal views that will be communicated to WCC in the member's personal capacity.
- The Development Plan states "**Landscape plays a large part in town's character and development**" It also states "**The County Development Plan also categorizes the landscape surrounding Enniskerry in all directions as an Area of Outstanding Natural Beauty**" In the plan the vision for Enniskerry confirms the necessity to "**protect the built and natural heritage of the area along with the its identity**"
- In the Development Plan 2016 – 2022 WCC CEO states as an objective "**to strengthen and enhance as appropriate all objectives of the existing town plan particularly those relating to heritage including views, traffic and transportation and community development**" This will be a recurring theme in this submission as the community wants these objectives to be met in any future decisions in relation to land use.
- There have been a large number of comments made to the Forum in relation to the number of housing units referenced in the plan – 470. There would appear to be a major inconsistency with this number when considered in conjunction with the planned population growth. According to the plan the population in 2011 was 1,940. This has probably not changed in any material way since. The projected population in 2028 is shown as 2,500; an increase of 560. We don't understand how you would need 470 housing units to service this increase which with current infrastructure deficits in Enniskerry would be difficult anyway. This would suggest that many of the housing units would be only single occupancy which is highly unlikely ( see appendix attached)



- The Forum support these objectives and the spirit and content of this submission reflects this. This means that the Enniskerry Community will be judging and assessing any proposed development based on these critical criteria. This was the overwhelming view from a widely attended public meeting held in Enniskerry on Monday February 15<sup>th</sup> 2016. Many of the comments and observations in this submission have been provided by the attendees at this public meeting and via direct contact with the Forum. WCC can therefore assume that this submission is broadly representative of the Enniskerry community.
- This submission is in respect of the wider Enniskerry environs including Kilmolin, Parknasillogue, Monastery, Cookstown Road and all other areas within 3/5 kilometres that could be impacted by this Development plan. Some of the issues and matters raised in this submission are specific to certain areas but the Forum as a community based organization represent Enniskerry residents as a whole not just those in the village or its immediate environs.

### **Submission Details**

The following are the matters and issues that The Forum wish to bring to the attention of WCC and which we request are recognized and taken into consideration in the final plan once issued –

#### **Unique Character of the Village**

Enniskerry is unique in being a "village" in an urban sprawl that will increase as development proceeds in Kiltiernan, Cherrywood and Fassaroe. This unique character is one of the prime attractions for visitors to the village which in turn supports local jobs and economic activity. Any material change in this character will have a negative impact on Enniskerry. An interesting media commentary (link below) encapsulates the importance of maintaining the unique character and ambience of Enniskerry village.

<http://lovindublin.com/sponsored/11-reasons-you-need-to-visit-wicklow-right-now>

A second media contribution that should be viewed and acknowledged is below. This underpins the attraction of Enniskerry in its current format and this has to be preserved and enhanced in any future development plans.

<http://enniskerry.ie/blog/641-terry-wogans-ireland-enniskerry>

<http://theculturetrip.com/europe/ireland/articles/the-10-most-beautiful-towns-in-ireland/>

One of the comments made in this video is "Enniskerry relies on Powerscourt and its tourism to this day". This emphasizes the need to preserve and enhance the village character and ambience.

Any development that expects to have wide community support will have to ensure that this is protected for the good of all stakeholders including current and future residents, business owners and visitors.

We would expect that WCC will liaise with the other adjoining local authorities in relation to wider regional development. The WCC plan acknowledges the unique nature and features of Enniskerry village and the importance of maintaining the character of the village. This would be seriously compromised by disconnected development in Fassaroe and areas under the control of Dun Laoire Rathdown.

The preservation of a green belt around Enniskerry is essential to the ongoing existence of Enniskerry as a Victorian village that is a major tourist destination in conjunction with Powerscourt. The economic value that this brings is acknowledged in the plan but is dependent on Enniskerry continuing to be a "village" albeit surrounded by an urban sprawl.

## **Preserving the Economic Benefits of a Unique Victorian Village**

Enniskerry has an interesting history and its role as a Victorian Estate village is something that the community values and wants to preserve. This includes a notable heritage, more details of which are detailed below. Powerscourt Estate is one of the major tourist attractions on the East Coast and many of their visitor's transit through Enniskerry. Many are taken by its old-style village layout and the architecture of many of the buildings. This is a major attraction for Enniskerry as is evidenced by the media reports above. Development that would compromise this must not be allowed under any circumstances. There will be opportunity for appropriate development that is undertaken in a sensible manner that should not undermine the future of Enniskerry as a traditional Victorian village that people want to visit.

## **Maintaining the Physical Structure of the Village**

The village must maintain its character and ambience preserving its physical structure and layout, particularly the centre and in all directions from the village centre. Whilst this may, at one level, go against an objective of developing from the centre out, any development within this area would compromise the overall character of the village. There are buildings and structures that are essential to maintain and which would be compromised in the event of such development. It is not in the interests of current residents, future residents, visitors and WCC that Enniskerry adds to what will be a surrounding urban sprawl. There are opportunities for sensible and considered development in various places outside of the village centre that could enhance the village and its environs not detract from it.

## **Heritage**

Enniskerry village has some unique heritage features that must be preserved for the long-term benefit of the village, its residents and visitors.

As part of the overall vision and development strategy set out in the plan reference is made to "protect the built and natural heritage of the area with the town's identity"

The major focal point of Enniskerry is its Town Clock, which was built in 1843 and is the core of the village built heritage. There is a committee that are putting significant time and effort into the restoration of the Town Clock. The long-term value of this restoration project is dependent on the surrounding character and layout of the village being preserved.

## **Traffic / Parking**

Traffic is a major issue in the village and is impacting on both business and resident activities. As a major tourist attraction Powerscourt Estate brings large numbers of visitors most of which pass through Enniskerry to get there. Most of these visitors arrive by either car or bus. In addition, the village is also the starting point for many hill walkers who park their cars in and around the village for extended periods particularly at the weekend. The residents and businesses in the village welcome these visitors as they bring important economic activity. Any additional development in Enniskerry will have to take into account the parking and traffic situation in the village so as not to compromise the experience that visitors should have.

Residents in and around Enniskerry have to rely on the car for their transport needs as the public transport facilities are inadequate. Most residents do not work in or near Enniskerry and therefore are largely reliant on a car to go to and from work and for other recreational purposes. It is unrealistic to impose additional development in the village centre that would result in more cars having to be accommodated. Residents in the village centre, Kilgarron Hill and Church Hill currently have to use street parking to a considerable degree.

### **Flooding**

There has been a history of flooding in Enniskerry in recent times. One area of particular concern is in and around the new school on the Cookstown Road. This has been investigated and reviewed by WCC on a number of occasions. The area is also one that is earmarked for future development. When flooding arises it creates an unsafe environment adjacent to a school with significant traffic flow. WCC are aware of the dangerous environment that this causes. In advance of any development in this locality a permanent and effective resolution will have to be identified and implemented. Whilst this may be costly it would have to be undertaken before introducing additional traffic and pedestrian movement in this area.

There is an issue on the road from the Texaco Garage to Knocksink that has been recently resurfaced. The shores for water runoff are blocked and this is causing flooding on the road and pooling on the bridge. Whilst this is not directly related to a land use plan it does illustrate that additional development will require upgraded infrastructure.

A wider flood impact study should be implemented in any area of potential development. This should include the excessive flow of water down Kilgarron Hill and in and around the Texaco garage on the Kiltiernan road. We acknowledge that the Development Plan is primarily dealing with current and future land use but issues such as flooding cannot be ignored if the correct decisions are to be made.

### **Additional Civil Amenities**

There is a deficit of amenities in and around the village at the moment. Any additional development must be accompanied by appropriate amenities. This is a fundamental requirement of the community in Enniskerry. It should also be noted that such amenities should be part of the initial development and not something that would be provided "after the event" Such amenities should include a playground located in an appropriate and safe location that would have broad community acceptance.

### **Water/Sewage**

The water/sewage service in the village and its immediate environs has been under considerable pressure in recent years. Various situations have been reported to and dealt with by WCC. This has caused some environmental problems with the potential for health implications. Any development in Enniskerry will have to come with significant investment in water/sewage infrastructure. This must be a mandatory requirement for any development and must be in place prior to any development completion.

We acknowledge that Irish Water now have responsibility for investment etc. under this heading. Any development in or around the village should involve detailed discussion and agreement with Irish Water in relation to the infrastructure.

## **Environmental**

We understand from our public representatives that there is no mandatory or statutory requirement for an EIS to be conducted in relation to all individual planning applications. Nevertheless due to the village location i.e. adjacent to the Dargle valley and its proximity to other areas of natural beauty the community request that an EIS is completed for all development involving multiple units. This is to ensure that trees, fauna, wildlife and other environmental aspects are fully catered for. Once any damage is done it is usually irreversible.

### **Action Area 1**

This makes reference to catering for up to 156 housing units. We would remind WCC that An Bord Plenala made a ruling on a planning application relating to this land (ref PL 27.237190, Wicklow County Council ref 10/2230) as follows: "Having regard to the location of the site between the road and an area of outstanding natural beauty and with excessive scenic views to the north and east as far as Bray Head and the Irish Sea, and to the bulky two-storey design of the proposed extension, it is considered that the design approach would not represent the most appropriate method of extending the house on this extensive site at this visually sensitive location"

This ruling confirms and emphasizes the necessity to maintain and enhance the visual sensitivity of this and other locations in and around Enniskerry.

### **Action Area 2**

This relates to the area behind the Fruit and Veg shop, the cottages and the stables on Kilgarron Hill. Apart from impacting and disturbing the natural structure and shape of the village any additional housing in this location will result in more traffic coming out onto Kilgarron Hill in what is already a dangerous environment. Kilgarron Hill has significant vehicle traffic up and down including heavy trucks. In addition recreational cyclists are major users of this access point into and out of the village. Any change of use of this location will impact negatively on the traffic and parking in the immediate area and will increase the risks in what is already a dangerous environment for pedestrians, cyclists and motorists. Cars are regularly parked a considerable distance up Kilgarron Hill and this forces pedestrians out on to the road and line of sight for residents exiting driveways is often impeded.

There is an assumption in the plan that any development will involve minimal vehicle traffic. This is unrealistic given the necessity for residents to have independent transport due to the absence of adequate public transport. Any development at this location should be preceded by a detailed and comprehensive safety analysis, vehicle movement study and assessment of pushing more traffic movement onto Kilgarron Hill. The current environment in this area is inherently unsafe. Most vehicles on Kilgarron Hill are parked illegally (opposite continuous white lines) resulting in traffic up and down the hill having to cross to the wrong side of the road.

### **Underlying Geology of Enniskerry**

Enniskerry is located in a deep valley surrounded by water - rivers, springs, boggy land, sand and gravel and has a unique topography and geology having been formed by a glacier. The location is inherently not stable geologically and should be the subject of environmental studies to determine its suitability before any significant development is permitted. We note the area behind the RC church has been dezoned for housing due to its failure to pass new environmental standards.

### **Conclusion**

The Forum have considered the Development Plan in detail and acknowledge the many positive features. We have many concerns, as set out above, that if not addressed would change the character of the village in a way that could not be reversed. That goes against many of the stated plan objectives. The Enniskerry community want to work with WCC to ensure that all our concerns are considered and dealt with. As stated at the beginning of this submission The Forum is not anti-development and understands that additional housing units will be required. However, as a community, we will do all we can to ensure that the unique character and ambience of the village and its surrounding areas is maintained for the benefit of all.

## Enniskerry Forum Submission - Appendix

### Overview of Housing Unit Requirements in Enniskerry – Wicklow County Draft Development Plan 2016 / 2022

There is an apparent anomaly on the number of housing units in the plan and the Forum have done some simple analysis to try and better understand the plan contents. The following table is from the draft plan but the red columns are new ones the Forum have added in. It appears that the plan uses a ratio of 1.03 (that's 375/362) occupants per housing unit for Enniskerry whereas the actual ratio is 3.02, the highest of all the Category 5 locations. If a consistent ratio was used, it would imply that in fact Enniskerry needs 120 additional housing units (or 150 inclusive of headroom), not 375 (or 470 inclusive of headroom). Therefore, the Forum believe there is a fundamental mathematical error in the approach which has given rise to distorted targets? A further point, this analysis excludes any housing units added from 2011 to date, so the actual "correct" target might be even less than 120.

	A	B	C	D	E	F	G	H	I	J	K
Settlement	Population 2011	Housing stock 2011	Occupancy ratio (A/B)	Core strategy population target 2022	Population growth (D- A)	Total housing unit requirement	Theoretical additional housing units required (E- C)	Housing unit growth requirement 2011-2022	Over/(under) provision for additional housing units (H-G)	Housing unit growth requirement + headroom	Over/(under) provision for additional housing units inclusive of headroom (J-G)
Ashford	1,484	531	2.79	2,675	1,191	1,182	426	651	225	858	432
Aughrim	1,315	592	2.22	1,758	443	777	199	185	(14)	278	79
Baltinglass	1,786	769	2.32	2,572	786	1,136	338	367	29	521	183
Carnew	1,145	491	2.33	1,698	553	750	237	259	22	365	128
Dunlavin	793	313	2.53	2,134	1,341	943	529	630	101	840	311
Enniskerry	1,940	642	3.02	2,302	362	1,017	120	375	255	470	350
Tinahely	956	419	2.28	1,308	352	578	154	159	5	231	77
<b>Total</b>	<b>9,419</b>	<b>3,757</b>	<b>2.51</b>	<b>14,447</b>	<b>5,028</b>	<b>6,383</b>	<b>2,005</b>	<b>2,626</b>	<b>621</b>	<b>3,563</b>	<b>1,558</b>

Leonora Earls

C75

**From:** Alice Feldman [mailto:afeldman@wco.ie]  
**Sent:** 19 February 2016 14:50  
**To:** Planning - Development Plan Review  
**Subject:** Submission to Wicklow County Development Plan  
**Attachments:** Donard Plan 20162022.pdf

Greetings,

Below please find my comments, concerns and suggestions in relation to the 2016-2022 Wicklow County Development Plan/Donard Settlement Plan.

Many thanks for your time and consideration.

☐ Alice Feldman

Alice Feldman

Broomfield Cottage

Broomfields

Donard

Co. Wicklow



Submission to Wicklow County Council, 2016-2022 Development Plan: Donard

Alice Feldman  
Broomfield Cottage  
Broomfields  
Donard  
Co. Wicklow  
0868223068

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Many thanks for your time and consideration.  
Alice Feldman

#### I. Inappropriate Level 6 Rural Town Designation

Both in terms of on-the-ground realities and the Council's own criteria, the designation of Donard as a Level 6 Rural Town is both wholly inappropriate and unfeasible.

##### Population numbers

The population of Donard now and well into the future will most likely never either require or prove able to realise or sustain the level of development that defines this category. The comparison table clearly shows the extreme difference between the current and projected population of Donard and the other locations in this category. Excluding Donard from the other five locations in this category, the average population among them in 2011 was 708 people (and this includes one location with 400+ people). At a population of 179 for Donard in the 2011, that of even Hollywood is substantially larger!

In the 2010-2016 plan, it was reported that the 2006 census showed a population of 182 people for Donard. That development plan was based on the rationale that Donard's population would increase to 300 in 2016 and then 400 in 2022. This projection has not only obviously proven to be an inaccurate and an unsupportable, it also fails to reach required level stated in the Council's own criteria: a population of 500-1500.

Given that this fundamental statistic - the defining feature of this designation - is so out of line with the criteria for this category, it would follow that all other plans and rationales would also be equally inappropriate (eg., the retail provision 'expected to include one supermarket / two medium sized convenience stores (up to 1,000sqm aggregate) and perhaps **10-20 smaller shops**') There are reasons and realities regarding why Donard has not and, most likely will not grow according to this rate, and the plans for a Level 6 Rural Town are therefore unrealistic and possibly counterproductive for what is ultimately really only a **village**, the people who live here, our quality of life, and the forms of development that would be genuinely positive for this area.

It seems as though Donard is being forced into this category and is therefore being subjected to unfeasible plans.

## **II. Protection and Appropriate Development of Heritage, Historic, Natural, Environmental, Touristic Resources**

The general development objectives for Level 6 Rural Towns, the Donard Plan 2010-2016 and that for 2016-2022 all place a significant emphasis on the protection and appropriate development of heritage, historic, natural, environmental, and touristic resources of Donard. The presence and value of these resources have always been major and already-existing elements of this location, requiring only proper care and thoughtful development. In fact, the general objectives of the 2016-2022 Level 6 Rural Town planning include the promotion of each location as both a destination as well as a gateway to other amenities. In every depiction of Donard, these characteristics are emphasised.

However, not only has the Council failed to fulfil its stated commitments and roles in these areas during the course of the 6 years of the 2011-2016 plan (there was little to no action, support or follow up in relation to these stated plans), but the Council has taken actions that have involved not only the *destruction* of a location key to this development area, but one which has significant, negative consequences for all of these plans and resources, and that is the clearing of the area at the top of the Blackmoor Hill for the Council yard – essentially the **gateway** to Donard and thus to one of the prime historic, heritage, natural and touristic areas in West Wicklow.

Coming off the N81, as one comes to the top of this hill, one used to see Lugnaquilla rising above the hills above Donard just before driving under a perfect canopy of old growth trees, dappled yellow and green from the sunlight passing through the trees. The right side of this canopy now looks like a complete and utter scar on the land, the scenic view, the whole effect of this 'gateway'; This perfect overlook now fixes on a desolate yard of piles of 308, pipes, containers etc. This is the first picture of Donard that a tourist, resident, outdoor or heritage enthusiast sees. And the worst of this is (1) the clearing of the old growth trees was completely unnecessary – the yard could have been built behind them and there is no evidence whatsoever that their removal was necessary in order to build the yard (2) that the Council – the entity charged with overseeing the proper care and development of this central resource for Donard – is the one who engaged in this seeming wilful destruction – it went ahead with development that would never have received planning permission if an ordinary citizen had proposed this; and if it had been subject to planning permission, it would have required community consultation, whereas it seemed as though the trees were cut down practically in the middle of the night. What now happens to our 'Heritage Mile'?

After what seems to be a truly unforgivable, unnecessary and deeply counterproductive (not to mention permanent) act, it is really hard to now be asked to sanction a development plan to be implemented by the same authority, and do this despite it contravening its own development plan? It is hard to trust that our best interests will truly be promoted and safeguarded, and I have to say that it makes me concerned that the Rural Town designation could simply turn into a free license to decimate this place and our quality of life in the name of development that will only benefit a certain few?

### **III. Issues not included in the plan**

Two issues of import are either not mentioned or figure as important in the plan: the safety of the roads for pedestrians and dogs running loose in the area and on the main roads into and through the village.

All the main roads into the village are heavily travelled by the elderly, families and children, dog walkers, cyclists and so on. The speeds at which people drive and the general recklessness given the blind bends, loose gravel and narrowness of the roads, the unpredictability of what lies just around the bend has rendered our roads near death traps, and this gets worse each year – and it should be noted that sharing the road with tractors is not an issue for pedestrians...). We are in dire need of traffic calming and other strategies, especially if there are plans to bring more drivers and commuters to the area.

Similarly, the place is often awash with loose dogs – this creates further dangers not just in terms of crashes but for pedestrian and cycling road users, both in terms of potential road-related accidents as well as unwelcome and often frightening (either inadvertent or unavoidable) incidents, on the roads and sometimes on private property. Owners seem to let their dogs run loose with impunity.

### **IV. Further Specificity in the 2016-2022 Plan**

In the 2010-2016 Wicklow Development, there was a specific plan for Donard that enumerated specific development actions under each of the categories of the plan. In the 2016-2022, the individual plans for each of the listed locations largely refer back to the generic goals and objectives attributed to the Level 6 Rural Towns category as a whole. There are only a few actions set out for Donard in our Settlement Plan. So, in contrast to the 2010-2016 plan, there are now only the vaguest of points and details regarding how the Council will actually go about achieving the stated development objectives. This makes it extremely difficult, if not impossible, to adequately evaluate, comment on – and participate in – and trust the content of the Donard Settlement Plan.

It would be a very welcome – not to mention incredibly productive and successful – thing, to further develop the specificities of the ideas, actions and projects – particularly in relation to the heritage, historical, natural and environmental resources – in conversation with the residents here – and at the very least, present any specific plans that affect these physical locations to the community before any decisions are made or work is commenced.

Lecra Earls

C76

**From:** Louise Gaskin [L]  
**Sent:** 19 February 2016 16:56  
**To:** Planning - Development Plan Review  
**Subject:** Submission to Draft County Development Plan 2016 - 2022  
**Attachments:** Submission to Draft County Development Plan 2016 2022.doc

Please find attached our submission to the Draft County Development Plan 2016 – 2022.

Your sincerely

Frank & Louise Fenelon

Paul & Margaret Byrne

Francis & Aisling Cunningham

Una Fenelon

19 February 2016.

**Wicklow County Council**

County Buildings

Wicklow

Dear Sirs,

**Ref: Draft County Development Plan 2016 – 2022.**

**Re: Special Zoning Newtownmtkennedy – HD24 – To provide for low density residential development with associated leisure, tourism and recreational facilities on lands measuring c 28ha Ballinahinch lower, Co. Wicklow as shown on Map 04.01.**

We, whose names are listed below are writing to notify you that we are alarmed at the zoning of such a large tract of land outside the town boundary.

- It is completely contrary to good planning and development.
- The land has been zoned against the recommendation of the Wicklow Planning Authority.
- The proposed roads are inadequate. Traffic on Trudder Road, which will inevitably attract vehicles coming from and going back to the South, would be a serious danger, and the access roads are totally insufficient to carry such car movements each day.
- The site is unserviced.
- This development will have a visual impact on a beautiful rural valley.
- There is already adequate land zoned in the Village to cater for the demands of the supply of housing.
- Zoning should be put forward for consideration in the next review of the Newtownmtkennedy development plan and not the County plan.

We strenuously object to the zoning of this land for the reasons outlined above and now ask that the rezoning to this land be reversed.

Yours sincerely,

**Frank & Louise Fenelon**

"The Seven Acres"

Kilday

Newtownmtkennedy

Co. Wicklow

**Paul & Margaret Byrne**

"Windfield"

Trudder

Newtownmtkennedy

Co Wicklow

**Francis & Aisling Cunningham**

"Windy Gable"

Callowhill Lower

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**Una Fenelon**

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Newtownmtkennedy

Co. Wicklow

**Leonora Earls**

C78

**From:** Aidan ffrench  
**Sent:** 19 February 2016 16:58  
**To:** Planning - Development Plan Review  
**Subject:** Wicklow County Development Plan 2016-2022

Dear Sir/ Madam

I'm making this submission on the Draft WW CDP 2016-22, in a personal capacity and as a Bray resident, as follows:-

#### Appendix 1- Development and Design Standards

##### **Open Space – Health, Schools and Nursing Homes**

Should include specific access, quantity and quality standards for provision of open spaces within the cartilage of buildings and facilities such as nursing homes, elder care centres, step-down facilities; primary health care centres and schools.

The standards should be designed to maximise the proven (evidenced research-based planning) of well-design private, communal and public opens space. This in in the interest of promoting health and well-being, sustainable place-making, inspiring environments

##### **Trees**

Standard DM conditions should include:-

- Council should insists as a standard, best practice that all tree survey and assessments for planning applications be undertaken in accordance with BS5837:2012 Trees in relation to design, construction and demolition (UK),; AT APPLICATION STAGE, by a qualified arboricultural consultant (not a tree surgeon)
  - A qualified arborists to be retained by developer during entire construction period, to supervise tree protection measures (fencing etc.) certify recommended tree works
  - Tree Bonds to be submitted prior to commencement, calculaterd on basis of Helliwell Tree Evaluation methd, plus notional 15% surcharge to take account of ecosystem services by trees (biodiversity, CO2 sequestration etc., etc)

##### **Green Roofs**

Development of a green roofs policy and minimum design standards which ensure that the multiple benefits (stormwater attenuation, energy conservation/building insulation, biodiversity, amenity etc.)

Threshold size for mandatory provision should be min. 200 sq.ms.

This should apply to all apartment, commercial, retail, office, industrial, education, developments

### **Appendix Green Infrastructure Strategy**

- Why no Spatial Framework included. One should be prepared as a key component of the Strategy, showing existing and proposed green corridors, hubs, links etc., upon which objectives and actions should be implemented, for conservation, development, enhancement of those corridor's G.I assets
- Lack of clarity about integration of GI Strategy and potential and actual synergies/links to other CDPlan elements and policies, such as health, community development, placemaking, water management, flood attenuation transport, biodiversity
- See Dlr CoCo's G.I Strategy (Appendix 14, CDP 2016-22) – sets a benchmark for comprehensive, high quality GI documents
- Trans-boundary issue to Dlr, Wexford, Carlow, Kildare largely unexplored

Sincerely,

**Aidan J. French MILI,  
Registered Landscape Architect  
Green Infrastructure Project Manager**

**Past President, The Irish Landscape Institute**

11 Swanbrook, Bray, Co. Wicklow

C79

**Leonora Earls**

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**From:** Pauline Flynn [  
**Sent:** 19 February 2016 15:58  
**To:** Planning - Development Plan Review  
**Subject:** Donard Development Plan 2016-2022  
**Attachments:** Donard Plan 20162022.pdf

To Whom It Concerns.

I wish to state that I fully endorse the submission of Ms. Alice Feldman in the relation to the above plan.

Please see attached.

Thank you.

Pauline Flynn  
Malthouse Garden  
Donard,  
Co. Wicklow

Submission to Wicklow County Council, 2016-2022 Development Plan: Donard

Alice Feldman  
Broomfield Cottage  
Broomfields  
Donard  
Co. Wicklow

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The general development objectives for Level 6 Rural Towns, the Donard Plan 2010-2016 and that for 2016-2022 all place a significant emphasis on the protection and appropriate development of heritage, historic, natural, environmental, and touristic resources of Donard. The presence and value of these resources have always been major and already-existing elements of this location, requiring only proper care and thoughtful development. In fact, the general objectives of the 2016-2022 Level 6 Rural Town planning include the promotion of each location as both a destination as well as a gateway to other amenities. In every depiction of Donard, these characteristics are emphasised.

However, not only has the Council failed to fulfil its stated commitments and roles in these areas during the course of the 6 years of the 2011-2016 plan (there was little to no action, support or follow up in relation to these stated plans), but the Council has taken actions that have involved not only the *destruction* of a location key to this development area, but one which has significant, negative consequences for all of these plans and resources, and that is the clearing of the area at the top of the Blackmoor Hill for the Council yard – essentially the **gateway** to Donard and thus to one of the prime historic, heritage, natural and touristic areas in West Wicklow.

Coming off the N81, as one comes to the top of this hill, one used to see Lugnaquilla rising above the hills above Donard just before driving under a perfect canopy of old growth trees, dappled yellow and green from the sunlight passing through the trees. The right side of this canopy now looks like a complete and utter scar on the land, the scenic view, the whole effect of this 'gateway'; This perfect overlook now fixes on a desolate yard of piles of 308, pipes, containers etc. This is the first picture of Donard that a tourist, resident, outdoor or heritage enthusiast sees. And the worst of this is (1) the clearing of the old growth trees was completely unnecessary – the yard could have been built behind them and there is no evidence whatsoever that their removal was necessary in order to build the yard (2) that the Council – the entity charged with overseeing the proper care and development of this central resource for Donard – is the one who engaged in this seeming wilful destruction – it went ahead with development that would never have received planning permission if an ordinary citizen had proposed this; and if it had been subject to planning permission, it would have required community consultation, whereas it seemed as though the trees were cut down practically in the middle of the night. What now happens to our 'Heritage Mile'?

After what seems to be a truly unforgivable, unnecessary and deeply counterproductive (not to mention permanent) act, it is really hard to now be asked to sanction a development plan to be implemented by the same authority, and do this despite it contravening its own development plan? It is hard to trust that our best interests will truly be promoted and safeguarded, and I have to say that it makes me concerned that the Rural Town designation could simply turn into a free license to decimate this place and our quality of life in the name of development that will only benefit a certain few?

### **III. Issues not included in the plan**

Two issues of import are either not mentioned or figure as important in the plan: the safety of the roads for pedestrians and dogs running loose in the area and on the main roads into and through the village.

All the main roads into the village are heavily travelled by the elderly, families and children, dog walkers, cyclists and so on. The speeds at which people drive and the general recklessness given the blind bends, loose gravel and narrowness of the roads, the unpredictability of what lies just around the bend has rendered our roads near death traps, and this gets worse each year – and it should be noted that sharing the road with tractors is not an issue for pedestrians...). We are in dire need of traffic calming and other strategies, especially if there are plans to bring more drivers and commuters to the area.

Similarly, the place is often awash with loose dogs – this creates further dangers not just in terms of crashes but for pedestrian and cycling road users, both in terms of potential road-related accidents as well as unwelcome and often frightening (either inadvertent or unavoidable) incidents, on the roads and sometimes on private property. Owners seem to let their dogs run loose with impunity.

### **IV. Further Specificity in the 2016-2022 Plan**

In the 2010-2016 Wicklow Development, there was a specific plan for Donard that enumerated specific development actions under each of the categories of the plan. In the 2016-2022, the individual plans for each of the listed locations largely refer back to the generic goals and objectives attributed to the Level 6 Rural Towns category as a whole. There are only a few actions set out for Donard in our Settlement Plan. So, in contrast to the 2010-2016 plan, there are now only the vaguest of points and details regarding how the Council will actually go about achieving the stated development objectives. This makes it extremely difficult, if not impossible, to adequately evaluate, comment on – and participate in – and trust the content of the Donard Settlement Plan.

It would be a very welcome – not to mention incredibly productive and successful – thing, to further develop the specificities of the ideas, actions and projects – particularly in relation to the heritage, historical, natural and environmental resources – in conversation with the residents here – and at the very least, present any specific plans that affect these physical locations to the community before any decisions are made or work is commenced.

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**Leonora Earls**

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**From:** Friends of the Murrough  
**Sent:** 18 February 2016 20:47  
**To:** Planning - Development Plan Review  
**Subject:** WCDP draft submission by Friends of the Murrough  
**Attachments:** WCDP submission.zip

A cara,

Please find attached a copy of Friends of the Murrough's written submission to the draft county development plan. Also included are maps. I am sending photographs to support the written submission in a separate email as previous emails failed to deliver due to size of attachment.

Below are my contact details for acknowledgment of same.

Thank you,

Margaret Coen (Secretary, Friends of the Murrough)  
15, Wicklow Heights Court,  
Wicklow Town.





18<sup>th</sup> February 2016.

Submission to Wicklow Council regarding the draft County Development Plan.

Friends of the Murrough note that the time line for population projections has been moved out to 2028 and the proposals for Wicklow town increased to 25,000 – the limit of the design capacity of the Sewage Treatment Plant which, in light of frequent smells along the Murrough, already appears to be struggle with unexpected surges in rainfall.

The local road infrastructure will also struggle to accommodate this scale of growth without further enhancement. Traffic is already congested in the town during rush hour, and the railway line is under serious threat from erosion.

We trust that objectives that require necessary infrastructure to be in place prior to development will be adhered to: necessary infrastructure includes sewage, roads and public transport but also includes access to open space.

Whilst land has been zoned for recreation and active sport this does not meet the need for space to walk and engage with the natural environment. Research has shown that access to quality green space protects from illness, both mental and physical, particularly for children and those living in deprived areas. European public policy focusses on the social determinants of health, including environment. Population-based health promotion and prevention sited at the environmental level takes account of the interaction of the individual with their social and cultural context and may be more effective in ameliorating health outcomes by reducing risk for all.

To date the Murrough to the north and the cliff walk south of the town has met this need for contact with nature and Friends of the Murrough have been making submissions for over a decade in the vain hope of protecting these assets.

On behalf of townspeople we have organised regular clean-ups, heritage walks and small interventions to facilitate walking but we have failed to persuade the council to adopt appropriate policies or to allocate necessary funds or time to undertake necessary protection works. Predictably both the Murrough and the Cliff walk are now under threat.

It is critical that management plans be put in place to ensure best practice in mitigating the effects of climate change and storm damage and maintaining public access. Such plans would of course also benefit businesses currently sited along the Murrough: businesses that, if willing, could positively contribute to enhance the area.

**PROPOSAL TO AMEND CHAPTER 11 Coastal Zone Management TO INCLUDE AN OBJECTIVE TO APPLY FOR A SPECIAL AMENITY AREA ORDER (SAAO) FOR PART OF THE MURROUGH.**

Considerable work was undertaken by Friends of the Murrough in preparing for a Special Amenity Area Order in 2008 however following opposition from the council and a change in government this never came to fruition. It is still our submission that such a designation would significantly contribute to the protection of the Murrough and provide an appropriate forum for valuable public participation in necessary works. In the interest of expediency we would concede that an SAAO could proceed more rapidly if the area covered was reduced from our original aspiration and we now propose the County Development Plan be amended to include an SAAO for the land to east, seaward side of the railway plus council land behind and beside the Sewage Treatment Plant bounded by Broadlough and the Avenue. See attached map.

We would dispute many points raised by the Planning Department in 2010.

1. The Council referred to potential conflict and adverse impact of recreation activities on Natura 2000 sites. However there is no inherent conflict as is evident from Howth and Bray Special Amenity Areas. The Special Amenity Area Order Management Plan would moreover provide an improved framework for management of recreational and other pressures on designated sites.

2. We acknowledge the need for Appropriate Assessment but alternative sources of funding for this are available from a number of sources. The costs of adopting this policy need to be assessed against the costs of doing nothing and as we have seen following this winter's storms, the costs of doing nothing can be extremely high.

The Council say they are unaware of any pre-existing reports on the area but we would refer to the 'Broadlough Nature Park: A Feasible Study' prepared in 1996 for WCC and NPWS by Richard Nairn, the comprehensive submission by Friends of the Murrough, and the report by John Monaghan from The Irish Sports Council.

3. The Council's report in 2010 referred to private farm land that offers no recreational opportunities. Apart from a narrow path along the eastern shoreline of Broadlough and access down the Avenue we were never looking for recreation use across most of the land. However one benefit of a Special Amenity Area Order is to ensure that development cannot be exempted from the planning process. We maintain that there is value in requiring landowners in this area submit proposals for development to the council for permission to maintain the visual amenity and conservation value of the area, nevertheless, in the interest of expediency we would be willing to concede that private land to the west of the rail line be excluded.

It is our understanding that a Special Amenity Area Order is designed to improve the management of an area to conserve its natural and cultural assets, and realise the exceptional potential of a place for informal recreation, tourism and environmental education. A Special Amenity Area Order will protect the special amenity of the Murrough and ensure that the environmental and cultural resources are used in an effective and sustainable manner. A clear list of objectives have been proposed and would be very much in line with other Special Amenity Areas around the country, for example Howth and Bray Head.

**PROPOSAL TO AMEND Table 10.3 TO INSERT RIGHTS OF WAY AS FOLLOWS:**

1. Broadlough Loop Walk: starting from the waste treatment plant parallel to the train track heading north as far as the Avenue, take a left down to Broadlough and return south along the shore of the lake to an old wall jutting out into the lake and back to the starting point. This is all on a well established path on council land and so there would be no conflict from local landowners.
2. An extension of the river walk to pass under the railway bridge, under the new Port relief bridge and along the east bank of Broadlough to meet the walk above.
3. From Killoughter Lane to the beach, thus ensuring continued access at Ballybla in line with the objective CZ6 point 3 in the section on coastal zone management.: *To maintain and improve points of vehicular access to the coast at Six Mile Point, Five Mile Point and Ballybla.*

**THE CLIFF WALK**

The cliff walk could also benefit from being part of an SAAO but it would be possible to manage the route using a different approach and restoration of this ancient walkway is within easy reach. Cooperation from the neighbouring golf club would be much appreciated.

Extensive research has been commissioned by FoM including a report from the National Trails Office, costings for small scale remedial work needing professional expertise, and professional advice regarding potential solutions to problems of erosion on that stretch of coast.

Again, we dispute many of the points raised by the Planning Department in their response to the Department in 2010 and are pleased that the Community Service Department have been helpful with advice regarding funding and other matters, as the economic benefits accruing from the promotion of local walking routes in highly scenic areas becomes more vital to the local economy.

**WE WISH TO PROPOSE AMENDMENTS TO THE DRAFT COUNTY  
DEVELOPMENT PLAN TABLE 10.3 TO INCLUDE THREE FURTHER RIGHTS OF  
WAY COVERING THE CLIFF WALK:**

1. From the Black Castle to Glen Turn Beach: In recent years this part of the cliff walk has become increasingly difficult mainly due to developments in the Golf Club and their negative attitude to sharing access to the coast line. However, newly available aerial photography clearly shows the line of the path that has been walked for generations - evidence of continued use by the public. This path meets all the conditions of a right of way and it should be registered as such.

2. The loop walk from Lime Kiln Bay towards Light House road: The first part of this walk from Glen Turn Beach to Lime Kiln Bay has been registered as a right of way on previous development plans. The route which we are currently proposing as shown on the attached map picks up the path from Lime Kiln Bay, includes the short length of track that was created by the council to avoid crossing unused farmland, and swings back again - all on council land - to create a circular walk without incurring legal conflict with local landowners with a different agenda.

It is not true, as stated in the Planning Department's comments back in 2010 that the paths are not accessible, as people of all ages currently use this path. Again aerial photography clearly shows a well worn route. Many Councillors and

council officers themselves regularly walk the path and a minimum of intervention and maintenance is now required to ensure the good condition of the path. There are car parking spaces for at least 50 cars at Dunbur Glen Turn. This is ample parking to facilitate looped walks to Wicklow Head and back and we would not seek to facilitate vehicular access at the access route currently serving Wicklow Head. There are no requirements for amenity facilities at Wicklow Head. Wicklow town is just 2 kilometres away.

The first section of this route at Glen Turn beach is not now easily accessible due to coastal erosion however Friends of the Murrough are currently negotiating a viable resolution to this problem. Ultimately cooperation from the golf club will avoid additional expense for this project but it is trusted that this will be forthcoming when considered plans are submitted for their appraisal.

3. The lighthouse road links the cliff walk to the Old Dunbur Road loop walk which leads back into the town. The first stretch of this walk meanders in between the two housing estates Seapoint and Seacliff and is currently registered as Right of Way in the County Development Plan. We submit that the continuation of this path at the back of Seafield (which is in much better condition to walk on) also needs to be registered as a right of way in order to continue this historic loop walk which used to be the old Dunbur Road out to the Lighthouse. Indeed, there is a beautiful herringbone stone wall which can still be seen adjoining the Nun's land (above Seafield) and also the old well further down towards the Town on the steep hill coming back into Wicklow Town (on Glenside Road) which has historic significance too.

**PROPOSAL TO AMEND SECTION 10.3.9 and table 10.4 Wicklow Landscape Categories. Coastal Areas of Outstanding Natural Beauty. 2b Southern Coastline.**

Insert a reference to the cliffs from Glen Turn to Wicklow Head.

END

Margaret Coen (Secretary, Friends of the Murrough)

15, Wicklow Heights Court,

Wicklow Town,

County Wicklow.





Ruler

Line Path Pro

Distance between multiple points on the ground

Length: 3.16 Kilometers

Location

Save

Clear





Ruler

Line Path Pro

Measure the distance between multiple points on the ground

Length: 1.42 Kilometers

☒ Mouse Navigation

Save Clear

© 2016 Google  
Image © 2016 DigitalGlobe

Google earth





















































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**Leonora Earls**

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**From:** Jim Egan [mailto:jim.egan@hpdc.ie]  
**Sent:** 18 February 2016 15:40  
**To:** Planning - Development Plan Review  
**Cc:** Kaz Balinski; Jason Tyler; Kevin Hughes  
**Subject:** Draft WCC Development Plan - Submission in respect of lands at Glendalough House, Annamoe, Co. Wicklow  
**Attachments:** Glendalough Estates Ltd\_WCC Draft Development Plan Submission.pdf

Dear Sir/Madam,

Please find attached a submission on the draft Wicklow Development Plan 2016-2022 prepared on behalf of Glendalough Estates Ltd. in respect of lands at Glendalough House, Annamoe, Co. Wicklow.

I would be obliged if you could confirm receipt of this submission by reply.

Regards

Jim Egan MIPI MRTPI  
**Senior Planner**

Hughes Planning & Development Consultants  
The Mash House  
Distillery Road  
Dublin 3

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# Town Planning Submission

**Lands at Glendalough House, Annamoe, Co. Wicklow**

**Draft Wicklow Development Plan 2016-2022**

18th February 2016



**Hughes Planning & Development Consultants**

The Mash House, Distillery Road, Dublin 3  
+353 (0)1 533 4211 - info@hpd.ie - www.hpd.ie



## 1.0 Introduction

Hughes Planning and Development Consultants, The Mash House, Distillery Road, Dublin 3 have been instructed by Glendalough Estates Ltd., GHED, Glendalough House, Annamoe, Co. Wicklow to make a submission in respect of the Draft Wicklow Development Plan 2016-2022. This submission relates to lands at Glendalough House, Annamoe, Co. Wicklow.

We request that the recommendations of this submission be given full consideration in preparation of the forthcoming Wicklow County Development Plan 2016-2022.

The submission lands subject of this submission comprise some 1,500 acres (c. 600 hectares) and, as shown in the aerial photograph in Figure 1.0 below, are generally contained between the settlements of Annamoe to the south and Oldbridge to the north, the River Inchavore to the east and ridge line of Scar Mountain to the west.

In summary, this submission requests the following:

- The 'Strategy for Tourism and Recreation' in the Wicklow County Development Plan 2016-2022 be extended to make reference under Policy T20 to the potential for an Integrated Tourism/Leisure / Recreational Complex on the Lands at Glendalough House, Annamoe

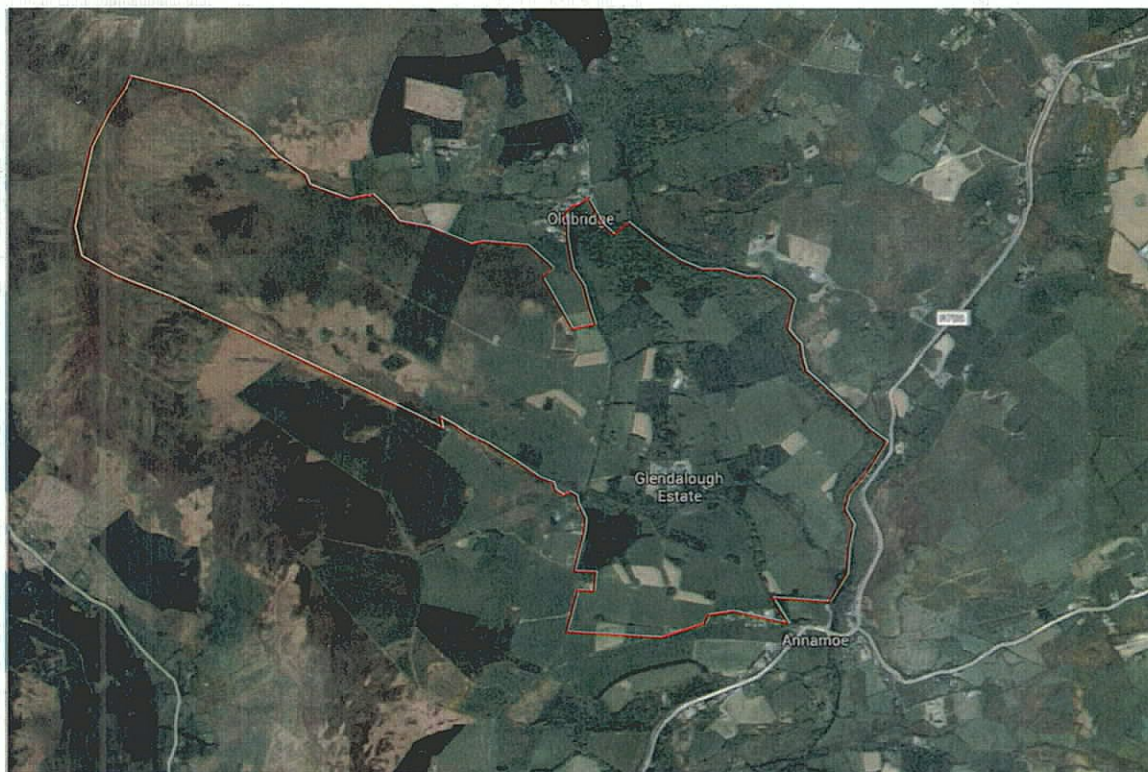


Figure 1.0 Aerial view showing the approximate extent of the submission lands outlined in red

## 2.0 Planning Context

### 2.1 Wicklow County Development Plan 2010-2016

The importance of tourism as a key economic driver for Wicklow is recognised in the development plan, and acknowledges the significant positive contribution tourism makes to the economic and social wellbeing of the County.

In terms of tourism resources, the development plan states:

*The County's tourism and recreational attractions are important assets, which form the basis of the County's tourism industry and which are fundamental to the enjoyment of the County by both visitors and residents. Attractions range from areas of scenic beauty, which provide attractive natural bases for outdoor pursuits, such as the Wicklow mountains, which comprise mountain peaks, valleys, rivers and lakes, the coastline with long stretches of sandy beaches and dunes and the numerous woodlands. The County has a rich heritage of archaeological and historical sites, manor homes and gardens, and attractive towns and villages. In addition, there are a number of golf and resort hotels, and adventure centres, which are within driving distance of Dublin which are attracting increasing numbers and visitors and business related events.*

The development plan recognises that with a reduction in full time employment in agriculture, farm diversification through Alternative Farm Enterprises (AFE) has been identified as a means of diversifying the rural economy. The main alternative enterprises covered under the Rural Development Advisory Programme (Teagasc) include a range of schemes for the purposes of diversification including organic farming, equine husbandry, deer and goat farming, rural tourism, artisan food, and commercial and free range poultry, renewable energy production and forestry.

It is considered that the lands at Glendalough House, given the location, topography, landscape and built heritage has the potential to evolve into a significant tourism asset in the County.

The development plan does however recognise the sensitivities of the rural environment and states that although the County must continue to provide for the positive development of tourism and recreational assets, *it is necessary that these facilities are managed in a sustainable manner so as to protect against any potential detrimental impacts on the environment and local communities... The relationship between tourism / recreation and the environment must be managed in a way that continues to support local communities and remains viable in the long term.*

The development plan sets out the following Strategic Objectives for Tourism and Leisure:

- *To secure the tourism and recreation sectors as key economic drivers which will contribute to balanced economic development across the County;*
- *To increase the number of tourists visiting the County;*
- *To increase the length of stay of tourists, and in particular, encourage day-trippers to stay overnight within the County;*
- *To protect the environmental quality of the County;*
- *To preserve the character and distinctiveness of scenic landscapes that are of high amenity value;*
- *To protect Wicklow's principal strengths and capitalise on the distinct tourism and recreational attractions that are on offer – scenic beauty, woodlands and waterways, coastal areas and beaches, and built and natural heritage;*
- *To ensure a focus on high quality tourism and recreation products;*
- *Improve tourism and recreation infrastructure;*
- *Promote tourism and recreation development in co-operation with relevant tourist agencies, including Bord Failte and the Wicklow County Tourism.*

The development plan goes on to state that *'Subject to the proper planning and sustainable development of an area, and subject to compliance with all other objectives of this plan, it is the objective of the Council to favourably consider development proposals that contribute towards the achievement of these strategic objectives'.*

In this regard, the above objectives would, at a strategic level, support the improvement, enhancement and development of further tourism facilities on lands at Glendalough House.

General Objectives in the development plan for Tourism and Leisure are as follows:

- TR1 To promote, encourage and facilitate the development of the tourism and recreation sectors in a sustainable manner. This means that the Council will permit the development and*

*maintenance of tourism and recreation developments which help generate income and employment for locals, so long as the development is in a manner and at such a scale that it remains viable over an indefinite period and does not degrade or alter the natural and built environment or the local culture in which it exists.*

- TR2 *To ensure that all tourism and recreation developments are designed to the highest quality and standard.*
- TR3 *To generally require tourism and recreation related developments to locate within existing towns and villages, except where the nature of the activity renders that impossible. Within existing towns and villages, the Council will promote and facilitate the development of tourist related uses at appropriate sites on land zone for tourism, commercial or mixed use development. The scale, size and use of a proposed development shall be appropriate to the area. Developments will only be permitted subject to the protection of residential amenity, maintenance of the vitality of settlements, and protection of the character and heritage of settlements.*
- TR4 *To only permit the development of a tourism or recreational facility in a rural area in cases where the product or activity is dependent on its location in a rural situation and where it can be demonstrated that the proposed development does not adversely affect the character, environmental quality and amenity of the rural area or the vitality of any settlement and the provision of infrastructure therein. The natural resource / tourist product / tourist attraction that is essential to the activity shall be located at the site or in close proximity to the site, of the proposed development. The need to locate in a particular area must be balanced against the environmental impact of the development and benefits to the local community.*
- TR5 *The Council recognises that certain tourist facilities that are located in rural areas, may be provided as standalone development, and that ancillary uses (e.g. club house, café, restaurant, shop etc) may be required in order to ensure the long term viability of the tourist facility. Additional uses will only be permitted in cases where the additional use is integrated with and connected to the primary use of the site as a tourist facility, and in cases where the Planning Authority is satisfied that the additional use is ancillary to the primary use of the site as a tourist facility. The additional use shall be located adjacent to the tourist facility.*
- TR6 *To ensure that tourism and recreation related developments are appropriately located in the County. Subject to the following exceptions, all tourist and recreation related developments are 'open for consideration'<sup>1</sup> in all landscape areas:*
- The following tourist uses will not be permitted in the Zone of Outstanding Natural Beauty (both the Mountain Uplands Zone and the Coastal Zone): Static caravans and mobile homes;*
  - Holiday homes will not be permitted in any zone other than urban zones except where they comply with objectives TA4, TA5 and TA6 below.*
- TR7 *To favourably consider proposals for tourism and recreation related development, which involve the reinstatement, conservation and/or replacement of existing ruinous or disused buildings. This shall be subject to all other objectives being complied with, and subject to the proper planning and sustainable development of the area. In all areas, preference will be given to the conversion and adaptation of existing buildings rather than the provision of new development on greenfield sites.*
- TR8 *To facilitate the provision of tourist information / interpretive centres and cultural venues at appropriate locations where they can be integrated with existing settlements or existing tourism facilities.*
- TR9 *To facilitate the development of tourism facilities and infrastructure related to the film industry, including film trails / routes, signage and visitor attractions.*

**Accommodation**

The current development plan recognises that the provision of 'accommodation' is central to the success of rural tourism ventures and as such provides the following policies to guide such development.

- TA1 To facilitate the development of a variety of quality accommodation types, at various locations, throughout the County.
- TA2 To positively consider the development of new hotels in all parts of the County, with particular preference for locations in larger settlements (Levels 1-6 of the County settlement hierarchy). In other, more rural locations (villages / rural areas), it must be demonstrated that - the area proposed to be served by the new development has high visitor numbers associated with an existing attraction / facility; - a need for new / additional hotel type accommodation for these visitors has been identified having regard to the profile of the visitor and the availability and proximity of existing hotels in the area; - the distance of the location from a significant settlement is such that visitors to the area / attraction are unlikely to avail of existing hotel facilities.
- TA3 To positively consider the (part) conversion of existing dwellings to Bed & Breakfasts (B&Bs) and Guesthouses to be operated by the owner-occupier of the dwelling. Applications for new build B&Bs / guesthouses will in the first instance be evaluated as private dwellings and the objectives and standards applicable in that area type (e.g. large town, rural town, rural area etc.) will be applied.
- TA4 To require new holiday home / self-catering developments to locate within either established settlements or at established tourism / recreation facilities, other than those developments involving the renovation / conversion of existing buildings.
- TA5 To require the developers / owners of new holiday homes / self-catering developments to enter strict legal agreement (under Section 47 of the Planning & Development Act) with the Planning Authority specifying that
- the units may only be used for tourism purposes and shall not be allowed to be used as a permanent residences;
  - in the case of small-scale developments , the entire development, including all buildings, land and any on-site tourist facility, shall be held in single ownership and shall not be subdivided. All units shall be available for short term letting only of a maximum duration of 4 weeks;
  - in the case of larger scale developments
    - a) all lands, including any on-site tourist facility shall be held under the management of a single Estate Company (including all lands included in the site boundary and land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application) and
    - b) in the event that any unit is sold or leased, the owner/lessee shall enter a legal agreement with the Estate Company stipulating that the purchaser, lessee and any successors in title be, and remain, members of the Estate Company, and stipulating that the unit may only be used by the owner/lessee for holiday use for a maximum of 3 months in any year and shall at all other times be used/leased/marketed by the Estate Company for short term (maximum 4 weeks) tourism use.
- TA6 Holiday home / self-catering developments on a farm holding shall be provided by farmhouse extension or by the utilisation of other existing dwellings / structures on the property. Only where it has been demonstrated that these are not viable options, will permission be considered for new build development. Any new build development shall be in close proximity to the existing farmhouse.
- TA7 To facilitate the development of hostels along established walking / hiking routes and adjacent to existing tourism / recreation facilities.

- TA8** To encourage touring caravan and camping sites to locate adjacent to or within existing settlements or established tourism facilities (subject to the exclusion set out in Objective TR6), having due regard to surrounding land uses and proper planning and development of the area.
- TA9** To give sympathetic consideration to the improvement of, and extension to, existing tourist accommodation related developments, subject to the proper planning and sustainable development of the area, and subject to compliance with all other objectives of this plan.
- TA10** To provide for a holiday home developments (subject to objective TA5) at the following locations:
- Baltyboys Golf Club, up to 4 units on a site of 1.3ha as shown on Map 9.09
  - Annamoe Fish Farm, on a site of 1.2ha as shown on Map 9.10

### **Integrated Tourism/Leisure/Recreational Complexes**

The development plan also makes provision for 'Integrated Tourism/Leisure/Recreational Complexes', being medium to large-scale leisure and recreational developments that will often include accommodation facilities. The development plan recognises that the development of a limited number of exceptionally high quality integrated tourism, leisure and recreational complexes at appropriate locations, particularly untraditional tourist locations, can have positive results in terms of realising the creation of new tourism products and in terms of promoting tourism growth. They will normally include some of the following uses: Hotel and associated facilities, Restaurants / cafes, conference centre, golf course, equestrian centre, trekking centre, fitness centre, indoor/outdoor water facility, fishing facility, indoor/outdoor ski centre, museums/art galleries, nature trails, walking routes and associated facilities. They may also include tourist related residential and retail facilities that are ancillary to the main tourist attraction.

Development plan policy on 'Integrated Tourism/Leisure/Recreational Complexes' is as follows:

- ITLR1** To support development at existing / proposed integrated tourism / leisure / recreational complexes at the following locations:
- Druids Glen Golf Club, Woodstock Demesne (Map 9.01);
  - Norpark (ski slope) site,
  - Newtownmountkennedy (Map 9.02);
  - Ballynattin, Arklow (Map 9.03);
  - Brook Lodge, Macreddin West, Aughrim (Map 9.04);
  - Rathsallagh House, Dunlavin (Map 9.05);
  - Castletimon, Brittas Bay (Map 9.06).
- ITLR2** To consider applications for the development of further ITLR facilities having regard to:
- Accessibility from the east and west transport corridors;
  - Accessibility to major towns and/or centres of population;
  - Proximity to designated tourism/visitor areas;
  - The existence of other such facilities or major tourist accommodation sites in the vicinity;
  - The adequacy of the site area and site features to accommodate a range of integrated tourist / leisure / recreational activities;
  - The Council will support the development of integrated tourism/leisure/recreational complexes on estate holdings with large estate houses that are directly attached to villages or towns.
- ITLR3** To require all applications for development at identified or new ITLR sites to comply with the following requirements:
- Development shall be carried out on the basis of an integrated, comprehensive master plan and business plan, to be agreed at the outset of the development with the Planning Authority;
  - The development as a whole shall be held in the single ownership of the developer. In the event that certain elements of the development will require to be sold / leased



- to make the project viable, this shall be stated at the outset and measures proposed to operate / manage / market the entirety of the facility as a single entity;*
- *Any holiday home / self-catering type accommodation proposed as part of the facility shall accord with Objective TA5;*
  - *All development shall be so designed to respect the character of the area and any existing heritage features on the site, including demesne houses or other protected features.*

## 2.2 Draft Wicklow Development Plan 2016-2022

Council's strategy on 'Tourism and Recreation' is covered under Chapter 7 of the draft development plan. The draft plan recognises that in 2013, income from tourists and visitors to Wicklow was in the region of €105m, with over 65% of this income coming from overseas visitors. It also notes that the increase in income from domestic visitors rose by over 15% between 2010 and 2014, the highest rate of increase in the region. In recognition of the importance of the tourism sector to the economy, the draft development plan further develops the tourism strategy for the County.

Of particular note is the addition of the following strategic objectives for tourism:

- *To identify strategic sites capable of accommodating new tourism ventures while also ensuring the preservation of the natural landscape of the area.*
- *To facilitate the development of alternative tourism products within the County such as eco-tourism, craft / artisan centres.*

Relevant policy for Integrated Tourism/ Leisure / Recreational Complexes are as follows:

**T20** *To support development at existing / proposed integrated tourism / leisure / recreational complexes at the following locations:*

- *Druids Glen Golf Club, Woodstock Demesne (Map 07.03);*
- *Ballinahinch Lower, Newtownmountkennedy (Map 07.04);*
- *Brook Lodge, Macreddin West, Aughrim (Map 07.05);*
- *Rathsallagh House, Dunlavin (Map 07.06);*
- *Castletimon, Brittas Bay (Map 07.07);*
- *Jack White's Cross (Map 07.08)*

**T21** *To consider applications for the development of further ITLR facilities having regard to:*

- *accessibility from the east and west transport corridors;*
- *accessibility to major towns and/or centres of population;*
- *proximity to designated tourism/visitor areas;*
- *the existence of other such facilities or major tourist accommodation sites in the vicinity;*
- *the adequacy of the site area and site features to accommodate a range of integrated tourist / leisure / recreational activities; and*
- *the Planning Authority will support the development of integrated tourism/leisure/recreational complexes on estate holdings with large estate houses that are directly attached to villages or towns.*

**T22** *To require all applications for development at identified or new ITLR sites to comply with the following requirements:*

- *Development shall be carried out on the basis of an integrated, comprehensive master plan and business plan, to be agreed at the outset of the development with the Planning Authority;*
- *the development as a whole shall be held in the single ownership of the developer. In the event that certain elements of the development will require to be sold / leased to make the project viable, this shall be stated at the outset and measures proposed to operate / manage / market the entirety of the facility as a single entity;*
- *any holiday home / self catering type accommodation proposed as part of the facility shall accord with Objective T14; and*

- *all development shall be so designed to respect the character of the area and any existing heritage features on the site, including demesne houses or other protected features.*

It is noted that the policy framework for Integrated Tourism/ Leisure / Recreational Complexes under the draft development plan is broadly similar to that under the current plan save for a number of additions to and deletions from the list under Policy T20 (known as Policy ITLR1 under the current development plan) of locations where existing or proposed integrated tourism / leisure / recreational complexes are supported.

### ***Laragh-Glendalough Settlement and Tourism Plan***

This document, which was introduced in the Wicklow County Development Plan 2010-2016 by way of Variation No. 2(ii) and now form part of the draft development plan, provides a comprehensive snapshot for Glendalough and Laragh. The most important aspect of the plan is that it identifies issues affecting the ability of Glendalough achieving its potential with regards to tourism.

**The plan recognises that Glendalough is one of Ireland's prime tourist attractions, however it is** considered that the economic benefit that should be resulting from the nearly 1 million visitors that come to the area every year, is not being fully realised.

*The settlement and tourism vision of the area includes that it will be a prime high quality and long-stay tourist destination. The area will be renowned for the natural beauty of the area and the exceptional quality and setting of its unique natural, archaeological and built heritage. Laragh will be a strong, vibrant and attractive rural village that provides a good range of the essential day to day service and community needs of the local village population and its hinterland, and also provides a full range of infrastructure and services for the needs of visitors.*

**While the submission lands aren't** located within the boundary of the Laragh-Glendalough Settlement and Tourism Plan, we would submit that the delivery of an Integrated Tourism/Leisure/Recreational Complex **would support Council's tourism strategy for the area.**

### **3.0 Submission Request**

It is considered that the location and characteristics of the subject lands present a viable opportunity to develop a high quality integrated tourism/ leisure/ recreational complex, fully compliant with current development plan policy ITLR2 and draft development plan policy T21.



In this regard, our client has already appointed a design team and a preliminary masterplan is currently being prepared. It is envisaged that this concept masterplan will be ready for presentation at a pre-planning meeting with Wicklow County Council in March 2016. The preliminary masterplan will seek to promote and expand the rural recreational pursuits currently on offer at Glendalough Estate and complement these pursuits with a high quality accommodation offer including the refurbishment of Glendalough House (a Protected Structure), in addition to further visitor facilities including a visitor interpretive centre.

As such, our client would ask Council to recognise the potential of the Glendalough Estate by extending the Tourism and Recreation Strategy in the Wicklow County Development Plan 2016-2022 to make

reference under Policy T20 to the potential for an Integrated Tourism/ Leisure / Recreational Complex on the submission lands.

We request that this submission be considered in the preparation of the Wicklow County Development Plan 2016-2022.

Should you require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'KH', followed by a horizontal line.

Kevin Hughes MIPI MRTPI  
Director  
For HPDC



Leonora Earls

C82

From: Claire Harrison [mailto:claire.harrison@wck.gov.ie]  
Sent: 05 February 2016 16:23  
To: Planning - Development Plan Review  
Subject: DONARD submission

5 February 2016

Dear Wicklow Development Plan team

RE: DONARD

I have lived in the Donard area for almost 25 years and am keen to contribute to the ongoing discussions about how to best support this special area.

#### VILLAGE

I understand that Donard is listed as a Rural Town and request that it now be listed as a VILLAGE, which is the more accurate description.

#### DERELICT BUILDINGS

Over the years, the centre of Donard Village has become more down at heel as buildings fall derelict and there seems to be no redress on the owners to maintain them or sell them to people who would bring them to life again. What practical steps can you recommend to encourage repair and regeneration in this area?

#### WALKING

This is an area of outstanding natural beauty, but there are very few places to actually walk in safely. Road walks become dangerous with fast cars passing, no one is sure which fields are OK to walk in (if any), so it would be helpful to open up short, circular routes around the village to facilitate community building walks and encourage fitness levels.

#### DEVELOPMENT

We have a first class daycare centre, a wonderful shop/post office, a terrific school and all sorts of community initiatives. I'd love to see a modest, appropriate housing development near the village to ensure its continued, sustainable growth. I have no idea if any applications are in the pipeline, but it would bring new people and energy to the area.

#### HEDGES

I'd like to passionately support planting of native hedging when development occurs. We had the shock of seeing a council yard being developed (with very little prior warning that we were aware of) and old hedging being ripped out. This needs to be replanted with the same visual "stock" rather than laurel or leylandii which are unsympathetic to the natural surroundings.

#### TOURISM

We have a camping & caravan park in the village and it would be lovely to see more developments to encourage tourism to our village. I wonder whether there might be any

522  
...support the plan to develop a community coffee and craft shop? A non-profit initiative  
...which could open modest hours and provide a focal point both for locals and visitors.  
...There is at least one premises in the village fully equipped to carry out this idea...subject to  
...the owner agreeing.

...We live in a treasure of an area. I'm concerned that without attention and some financial  
...support from the the village may gradually fade and sink.

...Would you be willing to include some or all of these considerations in your Development  
...Plan?

Yours faithfully  
CLAIRE HARRISON

Knockaderry, Donard, Co Wicklow

Leonora Earls

C&S

**From:** Ashley Hayden  
**Sent:** 11 February 2016 11:32  
**To:** Planning - Development Plan Review  
**Subject:** Proposal to Create a Marine Protected Area Between Bray Head and Wicklow Head.  
**Attachments:** Development & Marketing of Ireland's Tourism Angling Product 2015.pdf; Irelands Recreational Sea Angling Charter Fleet Delivers a Politically Unrecognised Rural Dividend.pdf; Recreational Sea Angling - An Economic Case for National Recognition.pdf; Outline Proposal for the Establishment of a Marine Protected Area off the Coast of North County Wicklow between Bray Head and Wicklow Head.pdf

To whom it may concern,

Further to meetings with Tom Murphy, Lorraine Gallagher and correspondence with Christine Flood regarding a proposal for Wicklow County Council to adopt and support the vision of establishing a Marine Protected Area between Bray Head and Wicklow Head as an element of resource management ownership which will benefit both the county and by extension the nation, please find attached four submission documents which will explain further the background to my proposal and how to further its development.

Each covers a particular aspect of the overall proposal but should be included as one submission.

My background as discussed is promotion of tourism angling which I do through my website [www.anirishanglersworld.com](http://www.anirishanglersworld.com).

As discussed with both Tom Murphy and Lorraine Gallagher I believe the vision warrants a presentation to both the Council Chamber and the Wicklow Chamber of Commerce.

Yours sincerely,

Ashley Hayden

# **Development and Marketing of Ireland's Tourism Angling Product 2015 & Beyond**



**A Proposal to Appoint Four Regional Business Development/Area  
Sales Managers armed with a Commercial Brief Specific to Angling.**

**N.A.D.P. Public Consultation**

**Submission Document produced by Ashley Hayden © 12/03/2015**



**An Irish Angler's World**

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## Background to Proposal

What motivates non resident anglers to decide to book a fishing holiday in Ireland or resident anglers to travel, fish, and overnight in another part of Ireland are key questions fundamental to the development of any future marketing/business development plan, as is the need to understand who these people are, their socio economic background, and most importantly their requirements and expectations.

Historical (*Whelan and Marsh, 1988*) and recent (*Tourism Development International, 2013*) studies establishing the economic value of recreational angling to Ireland tend to focus on both resident and visitor anglers who engage in angling with a view to an overall picture of Irish anglings socio-economic contribution, in principal taking into account all persons who picked up a rod and cast a line.

This approach is fine when looking to establish the worth of angling to the Irish economy as a whole however the focus needs to be more defined when considering the effective promotion of tourism angling. By definition tourist anglers are experienced, have more money invested in equipment, and have different motivations, (*Ditton, Holland, Anderson, 2002*) indicating that those who travel with the primary motive of fishing are specialists (*Radford, Riddington, Gibson, July 2009*). Whelan and Marsh, 1988 concur narrowing down the then 188,000 visitors to Ireland who participated in angling to 54,000 "specialist" anglers.

*In 2013, twenty seven years after Whelan & Marsh was published Ireland attracted 61,000 less anglers to its shore, equating to a loss of revenue based on current tourist angler spend matrices of €49.million. To counteract this decline while also maximising the return on future development and marketing spend directed towards tourism angling, effort must become more consumer focused, concentrating on what motivates resident and non resident specialist anglers from the key target markets of Great Britain, Holland, France, Northern Ireland and Ireland travel to fish.*

*Ashley Hayden, BA MSc*



*"This plan calls for a new direction for Irish Tourism and radically different approaches to marketing Ireland"*

Tom. P. Haughey, Chairman of I.T.I.C. February 2011.

## **Overview**

- Circa 2015 neither Failte Ireland nor Tourism Ireland presently employ a category manager specific to developing Irish tourism angling.
- Angling as a tourism product is worth nationally €280 million in direct and indirect spending (*TDI 2013*).
- Tourism angling creates 36 FTE's for every €1.million spent (*TDI 2013*).
- 41% of destination recreational anglers have taken a holiday in a country other than Ireland within the last three years – 72% of European visitors chose another country to have a fishing holiday with 48% of UK holiday anglers doing likewise (*TDI 2013*).

## **Current Tourism Angling Market Statistics (Domestic & Export)**

- Overseas anglers – 127,000 – value €100 million in 2013 (*Failte Ireland 2013*).
- Great Britain 39%, Mainland Europe 51%, USA 8% (*Failte Ireland 2013*).
- 56% of overseas anglers specifically came to fish (*Failte Ireland 2013*).
- 33% of overseas anglers stay 6 – 8 bed nights (*Failte Ireland 2013*).
- 62% of overseas anglers were repeat business, while 24% were first time visitors (*Failte Ireland 2013*).
- Dominant region: south west with 27% over nighting (*Failte Ireland 2013*).
- Accommodation: self catering 29%, friends and relatives 36%, B/B 11%, Hotel 4% (*Failte Ireland 2013*).
- Main route of entry 44% by sea from UK, Air from mainland Europe 31% (*Failte Ireland 2013*).

## Introduction

Tourism angling is currently worth a direct €100 million plus to the Irish economy. Presently Ireland has all the components necessary to create a world class “consumer orientated” angling product to include a diverse variety of marine and freshwater habitats and associated species, a charter boat fleet, angling guides, bait suppliers, tackle shops, accommodation providers, nearness to receptive markets, strategically located national points of entry, scenery, pubs, eateries and extra curricular activities.

However business opportunities are being lost primarily due to both regional and national fragmentation of the diverse elements which collectively make up the national angling product in tandem with a commercial skills deficit allied to financial constraints within the broader small to medium size enterprise (SME) sector which serves angling tourism. Ireland needs to prioritise its key angling products, collaboratively engage the diverse elements which constitute them and consolidate the components nationally.

*There is a lack of cohesion among stakeholders which leads to a fragmented industry.* (Griffin and Carty, Tourism Research Centre D.I.T. October 2006).

*The Irish tourism sector is dominated by SME's which lack the sales, marketing, and management skills to innovate and create new product, marketing, and financial opportunities.* (Failte Ireland, Competing Through People, 2005).

An approach to correcting this anomaly is for Ireland on a regional basis to appoint up to four Business Development/Area Sales Manager professionals with international marketing, sales and project management experience to drive the development and sales of activity tourism. Armed with a commercial brief their role will be to coordinate the development, marketing and selling of an integrated activity tourism product.

*A fundamental weakness is that much of the existing product in both private and public ownership is not packaged, presented, and made accessible or marketed to best*

*effect either internationally or domestically. (Final progress report of the Tourism Action Plan Implementation Group, P.19, March 2006).*

It is proposed that the Regional Business Development/Sales Manager Appointments will run for an initial two year period on a fixed term contract basis, reviewable based on agreed deliverables and will be collaboratively funded and monitored through participating counties leader programmes.

*At a national level Failte Ireland advocates that cooperative marketing opportunities are the most effective means of accessing overseas markets in a more cost effective manner (Dr. Catherine O’Gorman, D.I.T, 2005).*

### **Tourist Angler Profile and Motivations**

*For a person to cross a border whether it be a national, state, or county line with the sole purpose of fishing in an area other than ones home territory, then that person in effect can be classified a tourist angler, (Ditton, Holland, Anderson, March 2002).*

*Tourist anglers are more experienced to the point of being specialised, and have invested more money in equipment than the average angler (Ditton, Holland, Anderson, 2002).*

*Good fishing (88.4%), Fishing better than at home (53.8%), Species variety (65.3%), Group travel (88.4%), Cost (61.5%), Holiday duration one week (84.6%), Mode of travel car (80.76%), Repeat visitor (46.15%), Age 35-55 (42.3%), An Irish Anglers World Tourist Sea Angler Survey, 2013.*

*61.5% of respondents cited word of mouth from a trusted individual as the key arbiter governing their booking/travel decision, An Irish Anglers World Tourist Sea Angler Survey, 2013.*

## **Factors which encourage anglers to go fishing:**

- Access: 23%.
- Improved fish stocks: 14%
- Promotion of angling: 13%
- Better facilities for anglers: 10%
- Someone to go fishing with: 45%

Ref: UK Environmental Agency (EA), *Public Attitudes to Angling*, 2010.

## **Current Market Situation**

*Holiday visitor numbers from the key United Kingdom market have declined by 60% since 2007 (Irish Tourism Industry Confederation, I.T.I.C. 2011).*

*The successful Gathering Initiative only generated a 4% increase in holiday visitor numbers from the United Kingdom however momentum continued into 2014 with year end statistics showing an overall 8% increase in visitor numbers from the UK (Irish Tourist Industry Confederation, I.T.I.C. 2014).*

*Year ended 2013, 127,000 tourist anglers visited Ireland from overseas contributing €121 million directly to the national economy (Failte Ireland, Activity Product Usage among Overseas Visitors, 2013).*

The dramatic fall off in holiday visitor numbers especially from the key United Kingdom market which declined by 60% post 2007 (*I.T.I.C. 2011*), although improving post the Gathering 2013 initiative have still a way to go, a situation which points towards a radical shift in how Ireland should develop and promote its overall tourism product, to include angling, into the future.

Adding weight to the previous statement with particular reference to the development and destination marketing of angling is the rise in competition from countries such as Norway, Iceland, The Faroe Islands, and Scotland who have developed and are aggressively marketing their own international standard angling products.

*41% of tourist anglers have taken a holiday in a competitor country as against Ireland. Broken down further, 72% of European visitors chose another country other than Ireland to have a fishing holiday with 48% of UK holiday anglers doing likewise (TDI 2013).*

### **Solution to Increasing Tourist Angler Numbers**

Notwithstanding the variety of countries to include Great Britain, France, Holland and the United States from which Ireland's overseas anglers currently emanate, due to limited funding but still conscious of keeping the ball rolling to some degree globally future effort should in the main be concentrated on the key markets of Great Britain, Holland France, Northern Ireland and Ireland, with specific reference to coarse, pike and sea angling.

The following list of points gives both direction to and qualifies the above recommendation:

- Develop a marketing/sales strategy which is consumer centric. "A core rule of marketing is to listen to the customer then tweak/create/produce and deliver a product they desire, so matching consumer expectations to what is being sold."
- Develop a focused marketing/sales strategy, where particular market groups are identified and presented too in a coordinated fashion, prioritised by comparative "product category" advantage relative to consumer demand – in a European context Ireland holds a comparative advantage in both sea, pike and coarse angling.
- Tourist sea anglers currently hold a 28% market share with tourist coarse anglers registering a 19% market share, a combined 47% of Ireland's €100 million tourist angling market, (*Failte Ireland/CSO, 2009*).
- Initially target and win back lost visitor numbers from the United Kingdom. 45% of Ireland's tourist angling market traditionally emanates from the UK a percentage which has currently dropped to 39% of a markedly reduced post economic crash figure (*Failte Ireland, 2013*).

- Focus promotional effort on the 150,000 “specialist” sea anglers currently residing in the UK who travel to fish spending up to eight bed nights outside their country of residence (*Drew and Associates, 2004*) and the 146,000 “specialist” UK based coarse anglers (*UK Environmental Agency (EA), Public Attitudes to Angling, 2010*) who also like to travel, the combined markets of which based on current overseas angler spend matrices amount to €240 million per annum.
- One million rod licences, predominantly coarse, sold in UK: (*Radford, 2007*).
- UK freshwater anglers (Game and Coarse) fished for 30 million rod days of which 26 million were devoted to coarse fishing, (*Radford 2007*).
- Five million rod days devoted to coarse fishing within east midlands region alone. (*Radford, 2007*).
- UK coarse fishing activity increased by 26% between years 2000 – 2005. (*Radford, 2007*).
- Develop consumer familiarity and trust in the messenger as it is these “basic emotions” which rubberstamp the decision to travel. The best way to achieve this is by “direct contact”.

The traditional approach to promoting tourist angling, a general umbrella message created by the state within which predominantly rural based SME’s sell themselves, has past its sell by date evidenced by recent dramatic declines in overseas angler numbers. Small to medium size rural enterprises by their nature are fragmented, in a lot of cases provide a seasonal rather than a yearly income stream, can lack a vision or direction of the sector they are trading in, can lack expertise in the sales and marketing function, in most cases have limited promotional funding, and often perceive similar operations within their community as competition.

This parochial phenomenon which is not unique to Ireland, (*Fishing for Answers, Chapter 5.3, Increasing the Impact of Angling Tourism*), is easily countered by the state taking responsibility and employing or contracting on a regional basis tourism business development professionals who will liaise and work on behalf of all stakeholders to include service providers (existing and potential), state agencies, and landowners.



Their brief regarding angling, centred on a private sector business approach, would include development and prospecting of fisheries and fisheries infrastructure, liaising with and providing consultancy services to related SME's, prospecting and engaging with customers in the field, helping to convert enquiries into solid business, while generating and providing specific key fishing information relating to species, methods, bait, and tackle so enabling tourist anglers not only commit to travel but hit the ground running when they arrive.

### **Regional Business Development/Area Sales Manager Composite**

The Regional Business Development/Area Sales Manager would be a specialist in the promotion and development of angling/activity tourism, initially employed on a two year reviewable fixed term contract collaboratively funded by participating counties through their leader programmes, or as an alternative employed on a fixed term contract by either Inland Fisheries Ireland, Waterways Ireland or Failte Ireland.

The person(s) employed would be expected:

To develop Ireland's angling product to international standard across all disciplines sea, game, coarse and pike through liaising with and working alongside potential customers and stakeholders to include service providers (existing and potential), local authorities, state agencies, Government departments and landowners.

To also engage with learn from and sell to indigenous and overseas customers, generating in the process specific key information which can be used to positively transform Ireland's marine and freshwater resources into an Internationally accepted destination angling product while broadcasting a message both nationally and internationally through all the relevant channels that Ireland has a world class rod and line product and is open for business.

### **Key competencies:**

- A business development/sales/marketing professional with a proven industry track record and a full understanding of the tourism angling sector both at home and abroad.
- Possess sound Commercial acumen.
- Ability to work on own initiative while also being a team player.
- Self starter with a broad vision of Ireland's tourism angling sector and an ability to bring ideas and projects from the table to fruition.
- Experienced in Area Management to Key Account Level.
- Objective in approach.
- Good Verbal/Written Communication and Presentation skills.
- Ability to capture, assimilate and process information into usable forms.
- Working knowledge of relevant communications channels.
- Digital Marketing experience.
- Working knowledge of key angling consumer segments.
- Working knowledge of how Government Departments and Agencies operate.
- Working knowledge of sources of funding.
- Project management experience.
- Computer literate ideally with some web design experience.

### **Costings and Budget:**

- Salary within the region of €50,000.
- Car - (Leasing example, [www.carleasingireland.ie](http://www.carleasingireland.ie), Ford Focus: €6,240.00 per annum inclusive of tax, servicing, tyres) (Fuel costs (Diesel) approximately €4000.00 per annum based on 25,000 miles @ €1.30 per litre).
- Travel & Events (presentation road shows, trade shows, €10,000 approx').
- Mobile phone (€960.00 per annum – "Three" package to include 240 UK and International minutes).
- Microsoft Office and CRM cloud packages, "Enterprise 360" package from €1915.00 per annum.

- Computer/laptop, web hosting and design, administration costs (minimal as the candidate could either work from home or use available office space through a County Council and avail of in house secretarial services where required).
- Journalist visits could add in the region of €4000 to the costings.
- Advertising, Postage, Stationary, Brochures, Equipment.

Above is a sample budget formulated round tangible key requirements. While certain items have not as yet been quantified, the annual budget for a contracted Business Development/Area Sales Manager would be in the region of €80,000 to a maximum of €100,000 per annum to include salary which divided between three to four collaborating counties is a small amount to fund through their respective Leader Programme allocations relative to the return on investment (ROI) which will most definitely accrue.

The contract offered should run for an initial two years (reviewable and renewable based on agreed productivity matrices), be fully accountable and target driven. Results can be monitored in a variety of ways, for example increased bed nights, charter boat and guide bookings, enquiry records, journalist visits, articles and brochure publication, competition entries, new festivals, events and completed infrastructural projects all providing a verifiable picture.

## **Conclusion & Recommendations**

Selling is a people game, to increase tourist numbers and subsequent revenue streams Ireland needs to get out and physically meet its customers, listen to their needs and deliver what they want in terms of information, services and infrastructure.

Within each of its four provinces Ireland has the raw material to develop and market an integrated International standard sea, coarse and game angling product.

In terms of attracting angling tourism, initial target consumer markets to focus on are specialist anglers residing in the UK, Holland, France, Ireland and Northern Ireland. These consumers in the main like to travel by car, in groups, see Ireland as easy to get to, stay between 4 and 7 days, are aged between 35 – 55, and want mixed species fishing.

To illustrate the potential return on investment if a focused approach is implemented, currently the total contribution to Ireland's economy from overseas tourist anglers amounts to €100 million give or take, whereas the combined market for specialist UK coarse and sea anglers alone who like to travel amounts to €240 million based on current tourist angler spend matrices.

Collaborative development and marketing of niche activity tourism products to include angling is the most productive and cost effective way of generating future revenues from Ireland's natural capital.

Incorporating a more innovative public/private approach where professional experts in their field are contracted to act as a conduit between customer, tourism service providers, landowners, state departments/agencies and local authorities, is the future in terms of developing and selling Irish activity tourist opportunities to the satisfaction of all interested parties both indigenous and overseas.

The above submission and recommendation is predicated on actual experience while working as Marketing Coordinator for the Eastern Regional Fisheries Board on a fixed term contract between September 2008 and April 2010. A private sector

business development approach was considered and subsequently implemented to great effect in designing, initiating and following through on the Lough Muckno Project, Castleblaney, Co. Monaghan where an International standard coarse angling venue was created with managed vehicular access to accommodate the needs of potential tourist coarse anglers. Generating £527,000 sterling in EU funding and costing €486,000 to build, in its first year of operation the infrastructure generated €2.4 million (Figures supplied by Irish Anglers Development Alliance endorsed by Monaghan Co. Council) while increasing angler related bed nights in the Castleblaney area from 600 pre development to 12,000 post.

Further research of peer reviewed academic literature relating to tourism angling while studying for a business masters degree (conferred by Waterford Institute of Technology with honours, January 2015) allied to recommendations in recent Government commissioned reports, all referenced within this submission, endorse the recommendation to employ or contract Business Development professionals with marketing, sales and project management experience as the most cost effective way to progress Irelands tourism angling product and by extension increase overseas angler numbers into the future (*Blue Sail, 2012*).

Ashley Hayden © March 2015

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- .....



## **Irish Politics has to Recognise the Recreational Sea Angling Euro**

Charter skipper Kit Dunne works two 10.5 metre "Offshore 105" angling vessels out of Wicklow harbour, 26 miles south of Dublin city centre on Ireland's east coast. Commencing operations in 2012 Dunne had spotted a demand in the Irish recreational sea angling market for an offshore sport fishing product targeting non quota species to include tope, smooth hound, bull huss and ray. Initially focussing on the domestic scene to establish a customer base the innovative skippers net subsequently widened in 2013/2014 enticing overseas anglers from the UK and Holland to travel and wet a line in the shallow inshore fishing grounds off north Co. Wicklow.

Kit Dunne, trading as Wicklow Boat Charters, based on figures derived from the Irish Charter Skippers Association website is one of 78 licenced charter skippers plying their trade around the coastline of Ireland. Their presence provides a social infrastructure which not only creates jobs and funnels much needed tourism income to isolated rural areas, but also generates a positive "free gratis" promotional tourist message highlighting Ireland's green outdoor environment through exciting photographic images of specimen fish and word of mouth from satisfied customers, 62% of whom make return visits.

The Inland Fisheries Ireland commissioned "Socio Economic Study of Recreational Angling in Ireland" produced by Tourism Development International (TDI) and published in 2013 made it abundantly clear that recreational angling is big business nationally to the tune of three quarters of a billion from direct and indirect spending. Specific to sea angling, the population of domestic sea anglers was placed at between 50 - 70,000 and when the 113,000 holiday visitor angler figure is broken down one finds that the percentage of overseas visits devoted to general sea angling = 24% with bass fishing claiming another 25% (*TDI, 2013*). Given a definite overlap between the two disciplines it is probable that sea angling in total still represents to Ireland its traditional 33% of overall tourist angler numbers, which is a significant percentile, represented in 2012 by 37,290 overseas sea anglers.

According to the TDI, 2013 report overseas anglers stay an average of 4.2 days per trip and in 2012 deposited €106 million in Ireland. In 2014 Wicklow Boat Charters and by extension businesses in Wicklow Town enjoyed paying custom from the UK, Holland, France, Germany, Canada and the USA. These customers stayed a combined total of 166 bed nights in Wicklow contributing in the region of €19,674.95 to the local

economy, a figure derived from a metric which will be expanded upon below. They also departed with happy memories to share.

This writer is friends with a group of Welsh tourist sea anglers who make regular visits to Kilmore Quay, Co. Wexford for a spot of charter boat fishing. In June 2013 a party of twenty one anglers, *seven of whom had not fished within Ireland before*, travelled from south Wales to reef fish off Kilmore Quay with skippers Eamonn and Dick Hayes. The group stayed at the Quay House B/B for four bed nights, dining mainly in Kehoe's and The Wooden House public bars of an evening followed by a few pints. Analysis of their average spending patterns revealed the following.

*Revenue generated exclusive of travel and sundry expenses:*

<b>P.A.K.A South Wales, Angling Trip to</b>	<b>Kilmore Quay, June 23<sup>rd</sup> – 28<sup>th</sup> 2013</b>
B/B, €40.00 x 21 x 4	€3360.00
Charters, €400.00 x 2 x 3	€2400.00
Fresh Bait (ragworm)	€200.00
Terminal tackle, and frozen bait.	€630.00
Lunch (€10.00 x 21 x 3)	€630.00
Evening meal (Average €25.00 x 21 x4)	€2100.00
Pints (average over group 4 per night @ €4.00)	€336.00
Bus collection/return from ferry port	€300.00
<b>Total</b>	<b>€ 9956.00</b>

The average spend per angler exclusive of Ferry Travel was € 474.09 based on a four bed night stay or €118.52 per day, by translation that spend equates to €711.14 per angler for a week (6 x bed nights) long trip.

In terms of employment contribution, every one million spent on tourism creates 36 full time jobs (*Failte Ireland metric*). Taking the charter boat sector as it currently presents the following exercise reveals:

78 skippers are members of the Irish Charter Skippers Association implying that 78 licenced boats are available for hire nationally on any given day. Taking into account the short season and based on conversations with a random selection of skippers it would appear that they strive to make at least 100 sailings per season weather permitting.

Taking an average passenger group number of 10 and extrapolating: – 78 boats x 10 passengers = 780 anglers per day x 100 days at sea = 78,000 angler days per season x €118.52 “average daily spend per tourist sea angler” = €9,244,755 directly spent in rural areas nationally by tourist sea anglers availing of charter boats. Based on Failte Ireland’s metric of 36 full time equivalents (FTE’s) per one million spend on tourism, Ireland’s charter boat infrastructure enables 333 full time rural jobs.

Is official Ireland doing enough to support, maintain and expand on the sea angling charter boat sectors ability to create both gainful employment and a destination marketing message? Absolutely not!

When it comes to sea fisheries management the Irish Government only recognises commercial fishing activities relating to the catching, processing and trading of seafood products, to all intents recreational angling is an add on that receives the crumbs left over from the commercial sectors table. This is a remarkable oversight given the current emphasis on maximising Irish resource investment. Taking a management accountants view with regard to return on investment (ROI) from fisheries, recreational angling can no longer be ignored if Ireland indeed is to fully maximise the financial return from its marine resource.

Referencing just two of the target markets Kit Dunne and his fellow charter boat skippers tap into, figures for the UK show that there are 150,000 specialist sea anglers (those who fish at least twice a month) who travel to sea fish annually outside the UK staying up to eight bed nights, (*Drew Associates, 2004*). Dutch sea anglers generate €700 million turnover nationally and want “appealing fishing adventures both at home and abroad”. In 2013 650,000 Dutch residents went sea angling, 90,000 of which targeted bass, with 19% going fishing 10 – 50 times a year, this cohort like their UK counterparts deemed specialists. In Ireland’s favour 59% go charter boat fishing while 38% shore fish (*Sportvisserij Netherlands Annual Report, 2013*).

Based on the above info relating to Holland there are 130,000 resident specialist Dutch sea anglers of which approximately 76,700 go charter boat fishing. If one assesses the potential financial return to Ireland from a focussed marketing effort at what is a receptive (specialist) target audience resident in the UK and Holland alone; Taking the above participation figures multiplied by the average tourist charter boat sea angler weekly spend derived of €711.14, the UK worth “€107 million” and Dutch worth “€54.54 million” combined specialist target sea angler markets equate to a €161.54 million financial cake which Ireland currently is only cutting slivers off.

The TDI report of 2013 attributed a direct economic contribution of €121 million to out of state anglers, approximately 33% or €40 million derived from sea fishing across all disciplines. The above figure of €161.54 million only takes into account those interested in charter boat fishing who reside within the UK and Holland, clearly the potential is huge and Ireland currently is not doing enough to attract this business.

In fact the country is shooting itself in the foot on two fronts, primarily by not truly recognising at Government level the socio – economic potential of recreational sea angling and secondly through severe public service rationalisation depriving itself of employing experienced international marketers/business developers with a deep understanding of the needs and wants of tourist recreational sea anglers.

Presently charter skippers, many of whom are practicing on an increasing basis “catch and release” have to share the inshore fishing grounds with commercial operators who target with fixed and mobile gears the same fish that tourist sea anglers want to catch. When charter skippers advertise on social media channels their good returns, within a short period these fish often disappear, hunted down by commercial interests many of whom would be friends and neighbours of the charter skippers.

Non quota sport fish much loved by sea anglers such as smooth hound and ray are not immune to this practice, captured in tangle nets for use not as food but as pot bait. Given the investment Irish charter skippers have made, for some in excess of €100,000, this situation is unacceptable and has to be reviewed by Government in light of the information presented within this piece. Ireland’s inshore waters and their limited fish resources have to be managed more productively.

Regarding promotion, there are enough reports which clearly show that a fundamental weakness in Ireland’s approach nationally to marketing its tourism product is that much of the existing product in both private and public ownership is not packaged, presented, and made accessible or marketed to best effect either internationally or domestically. (*Final progress report of Tourism Action Plan Implementation Group, P.19, March 2006*).

Charter boat operations are seasonal with many skippers working two jobs, the boat and an off season occupation, they have limited time and money to invest in marketing. Relative to tourism centred small to medium sized enterprises (SME’s) Failte Ireland recognised this fact as far back as 2005 (*Failte Ireland, Competing Through People, 2005*). To make matters worse SME’s involved in tourism tend to compete against

rather than work with each other which leads to a fragmented industry (*Griffin and Carty, Tourism Research Centre D.I.T. October 2006*).

It should not be left up to independent SME's involved in tourism to sell Ireland as at best they will sell themselves well, however in terms of a national message the end result ends up being disjointed and singularly weighted creating a confusing picture for any potential tourist, and confusion limits decision making. "At a national level Failte Ireland advocates that cooperative marketing opportunities are the most effective means of accessing overseas markets in a more cost effective manner" (*Dr. Catherine O'Gorman, D.I.T., 2005.*)

Only 15% of charter skippers when surveyed were positive about the support they get from Inland Fisheries Ireland (IFI), (*TDI, 2013*). The agency could redress this by fighting the sea angling charter boat sectors corner harder in Government. An area to focus on could be a breakdown of individual investment within the sector inclusive of EU capital grant aid. Government investment of taxpayers' money implies a duty of care to protect and maximise the return. Formal recognition of recreational sea anglings contribution, both existing and potential, within the Dept of Food, Agriculture and the Marine and subsequently within the Marine Institute and collaboratively within Born Iascaigh Mhara would enable this while also progressing the sentiments expressed within the "Our Ocean Wealth" integrated marine plan document.

Investment in charter boat infrastructure creates sustainable jobs, enables Ireland to be marketed abroad in a good light through the provision of aesthetic images and stories of clean seas, outdoor activity, beautiful scenery and people having a nice time. The current state of affairs where recreational sea angling plays second fiddle to commercial interests mitigates against recreational sea anglings potential to contribute on a national level, parity between the two sectors and a collaborative, inclusive management plan for inshore sea fisheries needing to be worked towards.

Currently the Irish charter boat sector helps sustain 330 full time jobs, skippers such as Kit Dunne have invested serious money not just in there own businesses but in Ireland incorporated, they are a major element of Ireland's tourist infrastructure and need to be recognised and treated as such. The tourist sea angling market within the UK and Holland alone is worth €161.54 million and these people want to travel in particular to Norway, Iceland and Ireland (*Radford, Riddington, Gibson, July 2009*), a trait that Ministers Coveney (Fisheries) and Donohoe (Tourism) should

be made fully aware of, responsibility for that action ultimately resting with Inland Fisheries Ireland.

As a national investment, taking into account financial turnover, placing recreational sea angling on a par with commercial sea fishing is a no brainer. Sea angling in a depressed world market turned over €40 million nationally in 2012, correspondingly and allowing for quota restrictions Ireland's whitefish fleet only contributed €52 million (B.I.M online). By value the combined UK and Dutch recreational sea angling markets worth €161.54 million create the opportunity for even more tourism based jobs and a positive international marketing message to be developed. In contrast, commercial overfishing of inshore whitefish stocks which directly affect EU quota allocations limits the ability of the commercial whitefish sector to expand. Irish Politics can no longer turn a blind eye to this fact, recognition of and investment in recreational sea angling returns big, especially in rural areas, official Ireland needs to finally understand this fact, recreational sea angling can be a king maker.....

Ashley Hayden © January 2015



## **Recreational Sea Angling – No Longer the Poor Relation**

Interested in how Ireland's sea angling product has been marketed and developed since my early teens, close on forty years later careful analysis of the Inland Fisheries Ireland commissioned report entitled; "*Socio-Economic Study of Recreational Angling in Ireland*", researched, surveyed, produced, and finally delivered over a twelve month period by Tourism Development International puts to bed once and for all the notion that recreational sea angling in economic terms is an add on benefit enjoyed because Ireland has a marine resource on its doorstep.

The evidence circa 2013 has never been more clear at both political and Government department level, the commercial fishing sector can no longer lay claim to how the marine resource is managed and developed with nothing more than a cursory input at best from stakeholders in the domestic arena in particular those who make their living wholly or in part from tourism, recreational sea fishing, or the tackle trade.

Sea angling contributes as this piece will show €127.5 million in domestic and tourism receipts directly to the Irish economy before the multiplier effect is taken into account. Converted into jobs utilising an accepted tourism industry figure of 36 jobs per one million of turnover, that's 4590 full time equivalents (FTE's) supported by the recreational sea angling sector alone which more than holds its own against domestic commercial sea fishing industry figures inclusive of the multiplier effect of €700 million turnover generating 11,000 FTE's.

When one takes into account the landed value of commercially caught fish to Ireland the need to include representatives of recreational sea angling in the decision making process becomes even harder to ignore, with the direct value of Irish fleet landings to include whitefish and pelagic quotas negotiated by Minister Coveney for 2013 amounting to €213 million. The commercial sector could argue that EU quota restrictions limit the upward potential of this figure; however a similar argument can be put forward by recreational sea angling interests, that greatly diminished fish stocks brought about by commercial over fishing equally hamper rod and line sea fishing's capability.

In June 2012 two minutes after stepping off a charter boat in Kilmore Quay, Co. Wexford this writer became one of the 692 face to face interviewee's surveyed by agents of Tourism Development International (TDI). Very comprehensive covering all the various socio-economic aspects of angling across the particular disciplines sea, coarse, game, and pike, to include degrees of participation, domestic contribution, tourism spend, and motivations. With the addition of further online

results a final tally of 903 interviews was achieved enabling an accurate picture of Irish anglings socio-economic contribution to be constructed.

From that day on eagerly awaiting the finished report it eventually was placed in my letter box sometime in late July 2013. At a total cost to the state of €110,700 the document on analysis is money well spent given the quality and depth of information contained and furthermore stands up to scrutiny very well. For the sceptics valuing recreational angling inclusive of the multiplier effect at €750 million may seem like a figure too far, however when the methodology used and their subsequent findings is compared with similar international studies and cross referenced with domestic indicators such as the wholesale value of the domestic tackle trade the figures stack up.

For this project TDI utilised four approaches, a survey of recreational anglers, an Irish household survey, a survey of angling stakeholders, and desk research to eventually through data verification and analysis derive their conclusions. Having through my own website [www.anirishanglersworld.com](http://www.anirishanglersworld.com) conducted a very much smaller but indicative sea angler motivations survey allied to desk research of peer reviewed journal articles on recreational angling and recently published international reports on the value of angling from the likes of Northern Ireland, Scotland, and the United Kingdom without question the figure for Irish recreational anglings economic value of three quarters of a billion stands up. More importantly the total can actually be further increased through applying a strategic approach to both angling related infrastructural development and focused marketing of its tourism potential.

The big ask now has to be will the country utilise this information correctly in developing future strategic planning specifically with regard to tourism, or will the report become like so many others a dust collector whose only value was to the people paid to research and produce it. Overseas anglers contribute €100 million to the Irish economy, however domestic anglers are tourist anglers too especially when they overnight and fish in a different county, the revenue from this activity presently being counted as domestic spend. It is quite clear from the TDI report that overnight fishing trips are a common feature in the domestic angler's calendar.

Referencing sea angling for the remainder of this article, without question it is the dominant branch of the sport within Ireland coming tops in domestic day fishing trips at 71,000 or 32%, with bass which for the TDI report was treated exclusive of general sea angling accounting for 33,000 or 10% of day fishing trips.

Viewed in terms of species targeted on domestic overnights again sea angling shines with 22,000 representing 42% of trips ahead of 17,000 or 31% of coarse angling (excluding pike) trips in second place. Combining domestic day and night

fishing trips sea angling accounts for 93,000 journeys, once again ahead of the posse.

When one considers that sea angling (general and bass) is the dominant tourist angler attraction holding a 33% market share, the sport/activity based on current evidence appears to be not considered a priority brief of any relevant Government department or agency to include the Department of the Marine, Inland Fisheries Ireland (IFI), and the Sea Fisheries Protection Agency (SFPA). It is self evident from even a cursory perusal of the TDI report that sea angling as a recreational/tourism activity needs to be taken far more seriously if the state wants to realise sea anglings full socio-economic potential.

Taking the TDI reports total for average domestic annual expenditure on angling by category (TDI, *Figure 3.9, Page.22*), general sea anglers excluding bass spend €1331.00 per annum on their hobby. Multiplying this figure by the minimum estimated volume of domestic recreational sea anglers excluding bass (TDI, *Figure 5.3, Page.35*) at 71,000 puts the total average contribution of domestic sea anglers directly to the economy at €94.5 million per annum. Combined with average annual visiting tourist sea angler receipts of €33 million one arrives at a grand total of €127.5 million representing sea anglings direct contribution to Ireland's economy, much of which is spent in rural areas.

For the above exercise this writer worked on the minimum number of general sea anglers and didn't take into account bass anglers as viewed by TDI on the principal, based on a clear understanding of the sea angling sector, that general sea and bass anglers overlap to a very large degree. Therefore one could hypothesise that the total contribution of sea angling to Ireland's economy could be more. Wanting a more balanced view the figure of €127.5 million arrived at cross references well with previous reports and can be accepted as a realistic total.

Which opens up the debate for "what are we going to do next"? Primarily, make sea angling a priority business development and environmental brief within relevant Government departments and agencies combined with direct representation at political level. Measured against product category totals supplied by Bord Iascaigh Mhara for 2012, whitefish inclusive of prawns yielded €49.2 million and pelagic to include blue whiting, herring, and mackerel realised €213.8 million.

The evidence is beyond question sea angling by value before any social considerations are taken into account is a marine product category third in line behind the jewel in the crown pelagic fleet (€213.8 million in 2012) and the shellfish growing sector (€148.1 million in 2012), outstripping by over 50% in

both cases the salmon aquaculture industry (€60.7 million in 2012) and the whitefish fleet (€49.2 million in 2012).

Marine protected areas, both inshore and offshore, in conjunction with workable management plans have to now go on the agenda along with real improvements in fish stock management, not the fudge put forward by recent CFP reforms, and certainly not the debacle which at the time of writing surrounds our north east Atlantic mackerel stock.

Decision makers have to be clear, the TDI document states on page 73 that there is a 45% dissatisfaction with fish stocks, and within the executive summary reports that 72% of visiting continental and 48% of visiting UK anglers had taken an angling holiday to another country other than Ireland. The preferred destinations for sea anglers in both these categories being Scotland and Norway two countries which have direct overland connections to both the UK and continental Europe respectively. Ireland needs to take a more pro active business led approach as to how the sea angling product category is developed, marketed and sold in light of this level of competition.

Sea angling, directly valued at €127.5 million, is no longer a bridesmaid marine product category, the Tourism Development International *Socio-Economic Study of Recreational Angling in Ireland* burying that moniker for ever. To realise the full socio-economic potential of the activity though radical decisions need to be made immediately. A starting point has to be employment on a fixed term or contract basis by the state, to compliment the few existing staff with key field experience, business development professionals who understand the sea angling tourism product category and have a vision, not only for its future, but how sea anglings potential can best be realised. After correctly spending €110,700 on establishing where recreational angling fits within the greater scheme, it behoves that decision makers employed by the state should bite the bullet and move fast to the next level.....

Ashley Hayden © August 2013

C84

# ALPHAPLAN DESIGN

## ARCHITECTURAL SERVICES

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Tel : (0404) 64123 (086) 2461269

E Mail: [eugene@alphaplandesign.com](mailto:eugene@alphaplandesign.com)

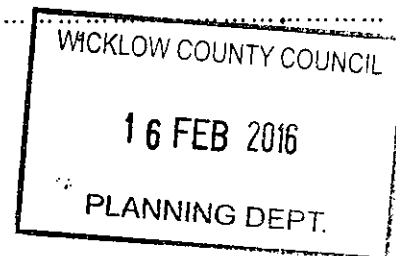
Website: [www.alphaplandesign.com](http://www.alphaplandesign.com)

Reg. Vat. No. IE3212037H

RE: Zoning application at Carnew, Co. Wicklow.

Applicant: Michael Healy

Dear sir / Madam,



Enclosed please find a zoning map indicating the Carnew Town Plan with the proposed zoning displayed thereon. My client is Michael Healy who is the owner of a plot of land indicated on the map as "Plot A". The plot consists of two acres and enjoys direct access from the public road via a private lane which is in the ownership of Mr. Healy. The lane is wide enough and the levels are within the parameters of the requirements as set out in the NRA Guidelines in order to access and exit the site to standard. The lane zoned C-Community / Educational/ Institutional and also Strategic land Bank.

The site is located adjacent to land where a primary health care centre has just been constructed, a strategic land bank, land zoned for employment and also existing residentially zoned land. In this case Mr Healy seeks zoning commensurate with the existing zoning in the immediate area such as a Nursing Home, or residential retirement housing development with the ancillary services attached to this type of development.

This is felt to be the ideal location for such a serviced development as it is located in an area which is accessible to the main road while remaining private from the traffic movements along the road, and also its proximity to the primary care health centre.

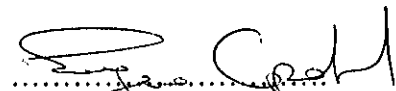
The site is easily serviced with on site treatment utilities and mains services at the main road.

I trust this application will be taken into account when finalising the development plan for this area.

Please keep me informed of the status of this application.

Thanking you,

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Eugene Copeland', written over a dotted line.

EUGENE COPELAND  
Architect / Project Manager

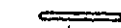
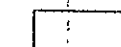
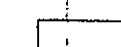
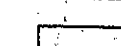

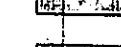
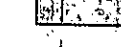



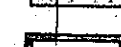



15<sup>th</sup> February 2016





# Carnew Town Plan

## DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

-  Plan Boundary
-  RE - Existing Residential
-  R20 - New Residential
-  TC1 - Town Centre
-  PU - Public Utility
-  C - Community/Educational /Institutional
-  E - Employment
-  OS - Open Space
-  AOS - Active Open Space
-  SLO - Specific Local Objective
-  AA - Action Area
-  Pedestrian Route Objective
-  Road Objective  
(Exact route subject to detailed assessment and design)
-  Strategic Land Bank

**Title: Land Use Zoning Objectives**  
**Map No. : 1**

Maps are not to scale



**Wicklow County Council**  
**Planning Department**

# ALPHAPLAN DESIGN

## ARCHITECTURAL SERVICES

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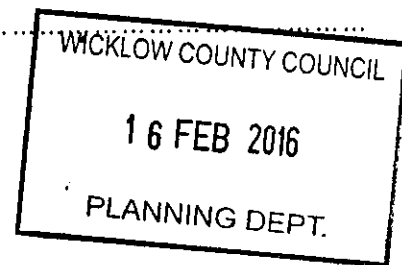
Reg. Vat. No. IE3212037H

C85

RE: Land Zoning at Killacoran, Aughrim, Co. Wicklow.

Applicant: Michael Healy

Dear Sir / Madam,



Following examination of the proposals for zoning and re-zoning in the proposed County Development Plan I note with interest that some land located at Killacoran Lane has been de-zoned from residential use to rural status.

This is a plot of land of four acres in area located at Killacoran at the end of a cul de sac road which is served by cottage and single dwellings on relatively large sites. The road serving this land is a public road in the charge of the local authority and surfaced to current standards. The land in question and the road leading to it is serviced by watermain, main sewerage and public lighting. The junction at the main road was renovated and improved to standard in 2012.

The four acre plot in question is in the ownership of Michael Healy who is a local farmer in the area. Mr. Healy owns 30 acres in the area and this four acre plot is the only residentially zoned land in his entire holding. This four acre zoned plot has historically held important equity relative to the remaining land holding. Mr Healy has in the past made sites available to local people for single houses on his land. The equity that this 4 acre plot holds has been offered as security in his borrowings with lending institutions and this de-zoning of this plot will affectively leave Mr. Healy in an untenable position with his lending institutions. Mr. Healy has extensive borrowings with the EBS and AIB who have issued substantial loans on the strength of the equity of the zoned land and not on any land zoned rural or agricultural usage.

It is important to note that there have been planning permissions granted along this lane in recent years and as recently as 2014 a new dwelling was constructed on the lane. Another dwelling was constructed further down the lane past this land in the recent past. This lane has traditionally been part of Aughrim Village and sites have been made available for local needs at Killacoran Lane since the first development plan was introduced. Mr. Healy was able to purchase this plot as part of other lands in the

knowledge that there was a zoning attached to this land. The zoned land was set at a higher price because of its status. It now appears that the Planning Authority is set to de-value the land by removing its zoning status. This will leave the Aughrim Village area with no land for private site development. I note it is policy for the planning authority to allow for private site development for local people to build single dwellings at locations at the edges of towns and villages. This is the land most suited to this type of development which will help to take the pressure off rural ribbon development. Please note that it is not being proposed that this land is for high density development.

Mr. Healy now requests that this plot of land be included in the County Development Plan 2016-2022 as residential as it has held this zoning status previously and should be allowed to continue.

I enclosed a map of the area indicating the plot of land in question hatched in red. I also include a map of the existing County Development Plan for the Aughrim Area indicating the plot zoned RE (Existing Residential) for ease of reference.

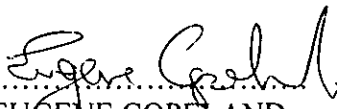
The site is zoned RE in the current Local Area Plan which is *"To protect, provide for and improve residential amenities of adjoining properties and area while allowing for infill residential development that reflects the established character of the area in which it is located"*.

The applicant is simply requesting that the existing zoning attached to part of his land remains in place for the future development of this area.

Please keep me informed of the status of this submission.

Thanking you,

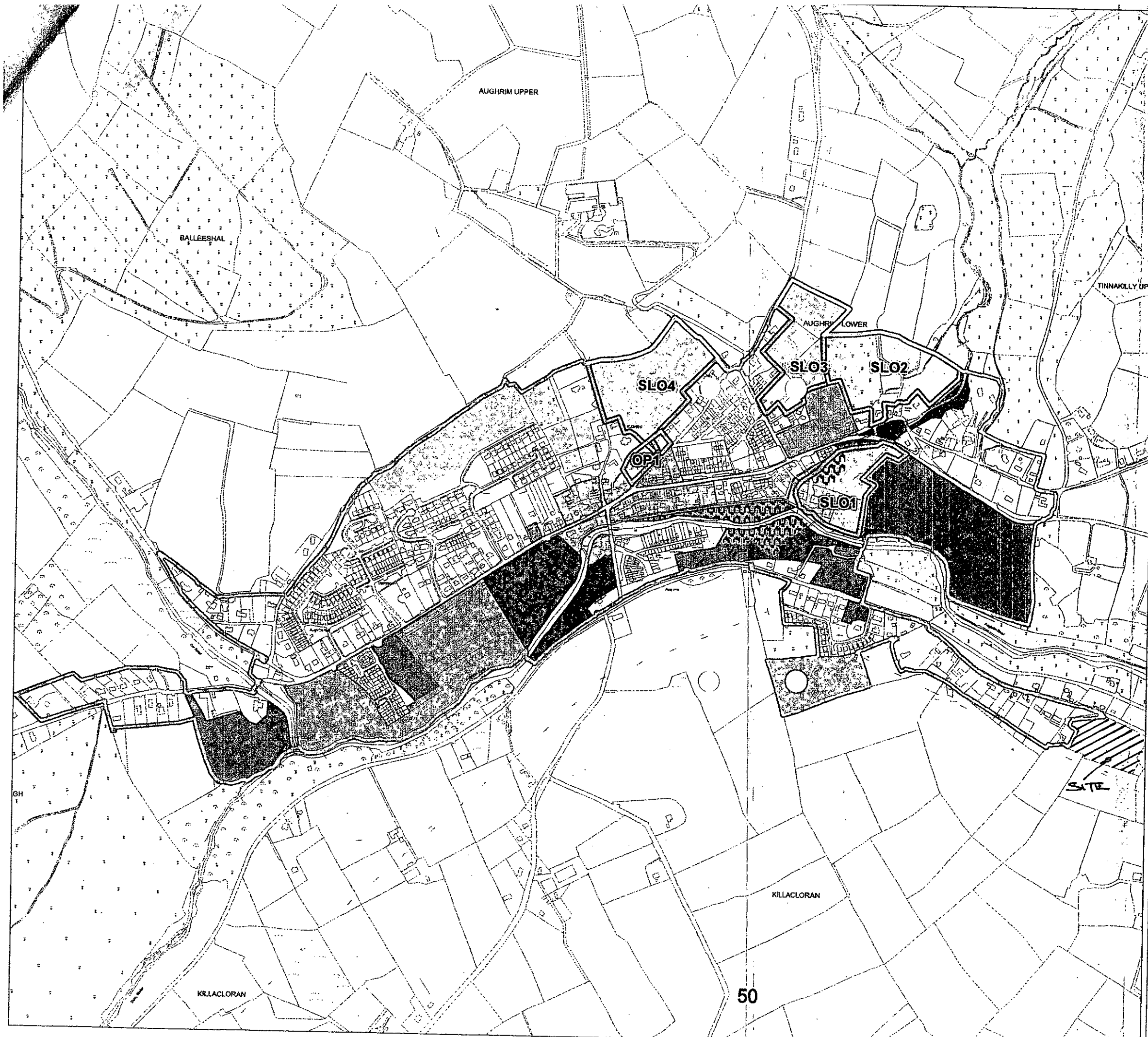
Yours sincerely,

  
EUGENE COPELAND  
Architect / Project Manager

15<sup>th</sup> February 2016

# Aughrim Town Plan

## DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022



RE Existing Residential

R15 Residential 15/ha

R10 Residential 10/ha

R Special

TC Town Centre

E Employment

CE Community & Education

AOS Active Open Space

POS Passive Open Space

OS Open Space

T Tourism

MU Mixed Use

SLO Specific Local Objective/  
OP Opportunity Site

"Water-compatible" development

Settlement Boundary

**Title: Land Use Zoning Objectives**



Wicklow County Council  
Planning Department

Maps are not to scale

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# Aughrim Land Zoning Objective Plan



Map 41

## Legend

Existing Residential	RE
Proposed Residential (Local Growth)	RP
Tourism	19T
Agriculture	AG
Social and Community	SC
Employment	E
General Development	GD
Open Space	OS
Town Centre	TC
Commercial/Industrial	CI

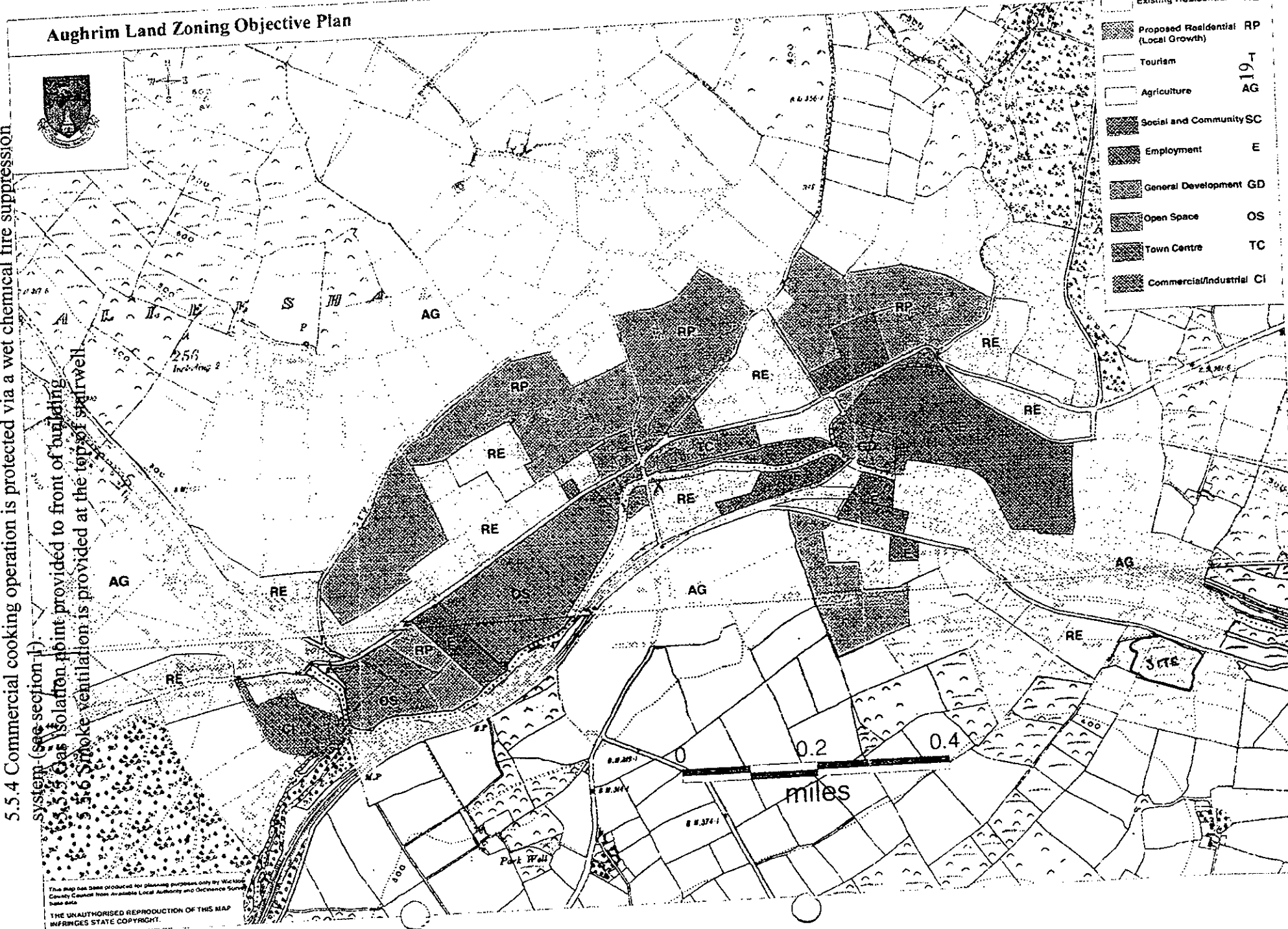
5.5.4 Commercial cooking operation is protected via a wet chemical fire suppression system (see section 4).

5.5.5 Gas Isolation point provided to front of building.

5.5.6 Smoke ventilation is provided at the top of stairwell.

X  
Beidge  
House

This map has been produced for planning purposes only by Wicklow County Council from Available Local Authority and Ordnance Survey data.  
THE UNAUTHORISED REPRODUCTION OF THIS MAP INFRINGES STATE COPYRIGHT.



C86

Leonora Earls

---

From: [rob.goodbody@historicbuildingconsultants.ie]  
Sent: 16 February 2016 22:58  
To: Planning - Development Plan Review  
Subject: Draft Wicklow County Development Plan 2016-2022  
Attachments: 2016-02-16-WicklowDraftPlan-Submission.pdf

I attach my submission to the draft development plan.

With thanks,

Rob

--  
Rob Goodbody  
BA(mod), Dip. Environmental Planning, Dip.ABRC, MA, MUBC, MIPI  
Historic Building Consultant

Old Bawn, Old Connaught, Bray  
Email: [rob.goodbody@historicbuildingconsultants.ie](mailto:rob.goodbody@historicbuildingconsultants.ie)  
Tel: 01 282 3508  
Mob: 087 689 9708



# HISTORIC BUILDING CONSULTANTS

OLD BAWN  
OLD CONNAUGHT  
BRAY

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rob.goodbody@historicbuildingconsultants.ie

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow Town  
County Wicklow

18<sup>th</sup> February 2016

## Re: Draft Wicklow County Development Plan 2016-2022

I wish to lodge a submission in relation to the Record of Protected Structures as set down in the draft Wicklow County Development Plan, 2016-2022. Just two points:

### 1. Bridge at Ballyteige

The Record of Protected Structures as set down in the present development plan and in the draft development plan includes Ballyteige Bridge as a protected structure under reference 34-04, with the description "The only jack-arch bridge in County Wicklow".

According to the labelling on the Ordnance Survey maps Ballyteige Bridge is on the southern boundary of the townland of Ballyteige and crosses a small mountain stream. This appears to be the bridge depicted in the photograph in the Record of Protected Structures. However, this is not a jack-arch bridge, but a conventional masonry-arch bridge.

On the eastern boundary of the townland of Ballyteige another bridge crosses the Ow River. This bridge is not named on the Ordnance Survey maps. This appears to be the bridge that it was intended to include in the Record of Protected Structures, as it is a jack-arch bridge. Photographs of these bridges are shown overleaf.

The description of this bridge is not correct, as it is not the only jack-arch bridge in the county; in fact, the railway bridge at Milltown, Dunlavin, which is a protected structure under reference 14-02, is a jack-arch bridge. There are several others within County Wicklow along this stretch of disused railway line.

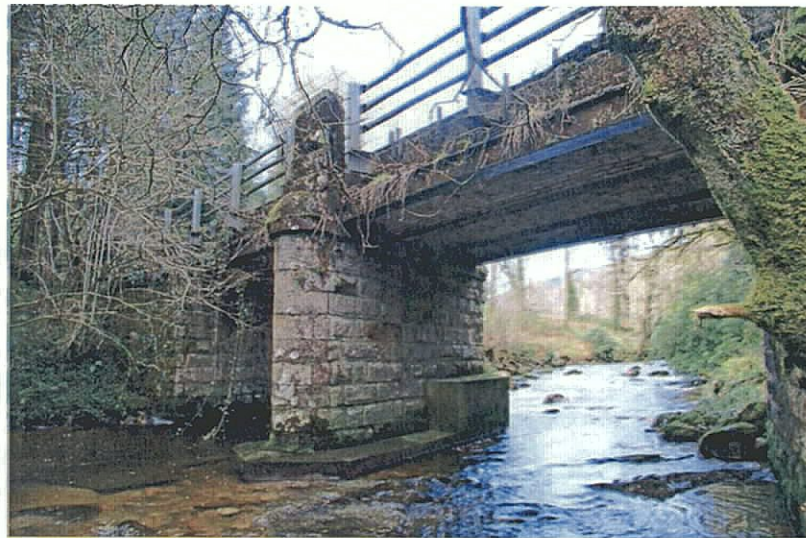
### *Recommendation:*

I recommend that entry 34-04 in the Record of Protected Structures be amended such that the building address reads "Ballyteige, north-west of Aughrim" and that the description reads "Jack-arch bridge". I would also recommend that the photograph be changed.

**Rob Goodbody BA(mod), DipEP, DipABRC, MA, MUBC, MIPI**



*Plate 1: Ballyteige Bridge – masonry arch*



*Plate 2: Jack-arch bridge at Ballyteige*



*Plate 3: Jack-arch bridge at Ballynure, Grangecon*



## 2. Pillar box at Church Road, Greystones

I note that about six letter boxes in the Greystones area are included in the Record of Protected Structures. I also note that the oldest, and rarest, letter box in Greystones is not included in the Record of Protected Structures. This box stands on the south-western side of Church Road, about 150 metres to the south of the junction with Church Lane, Greystones.



*Plate 4: Pillar box at Church Road, Greystones*

This is a pillar box of a type known as an *Anonymous* box, as it does not bear the monarch's cipher, as would be found on the other letter boxes that are protected structures. Anonymous boxes were made for a short period from 1879, after which the policy of incorporating the VR cipher was brought back. A small number of anonymous boxes have a raised ring on the cap, the purpose of which is not known. This pillar box in Church Road is, therefore, one of a small number of pillar boxes dating from around 1880, and of the even smaller number that bear the raised ring. The early anonymous boxes had a high aperture, while most have a lower aperture. The high aperture on the Church Road letter box shows that it dates from the period 1879 to 1883.

### *Recommendation*

I recommend that the pillar letter box at Church Road be added to the Record of Protected Structures with the description "Anonymous pillar letter box dating from c.1880".

I trust that the above is helpful, and I apologise for having to know such esoteric things as part of my job.

If you chose to follow my recommendations I would be glad to supply photographs for the Record of Protected Structures and suggest that you contact me on the email address given in the letter head.

With thanks,

A handwritten signature in black ink, reading "Rob Goodbody", with a horizontal line underneath.

Rob Goodbody

C87

**Thornvale Sunnybank Kilpedder Co Wicklow**

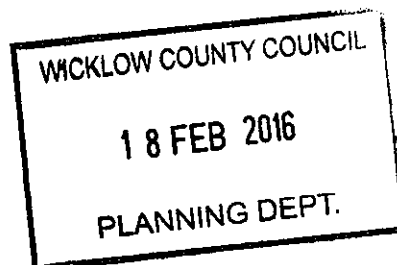
County Development Plan Review

Planning Department

Wicklow County Council

Station Road

Wicklow Town



17<sup>th</sup> February 2016

Dear Sir/Madam

**Submission to Request the Inclusion of Sunnybank Kilpedder within the existing village of Kilpedder/Willow Grove**

With reference to the Draft Wicklow County Development Plan 2016-2022 I hereby submit a request that the area known as Sunnybank situated at Kilpedder West be included within the village area of Kilpedder/Willow Grove.

Please find enclosed a map which outlines in red the areas currently included within the village of Kilpedder/Willow Grove. Highlighted is the area known as Sunnybank as referred to above.

Sunnybank comprises a commercial car showrooms and ancillary workshops operating as Derek Burtons together with its adjoining residential slip road (cul de sac) comprising of some 23 residences.

Sunnybank was originally constructed in 1938 and formed part of the main village of Kilpedder until a number of CPO's dating c. 1988/89 facilitated the widening of the N11 North & South carriageways. This effectively severed this established residential settlement from the main village. In more recent years there have been additional road layout changes, together with the installation of a pedestrian footbridge (c. 2008) which have all served well to re-establish safe and direct links with the village for both motorists and pedestrians alike.

The existence of the infrastructural services mentioned above, in addition to the location of the Kilpedder Southbound Bus Stop (Dublin Bus, Bus Eireann & all school buses) on the Sunnybank side of the N11, provide both a strong and positive argument for the inclusion of Sunnybank in its entirety as part of the Kilpedder/Willow Grove village area.

I hope that this submission will meet with the approval of all parties and would welcome any requests for additional information in this regard.

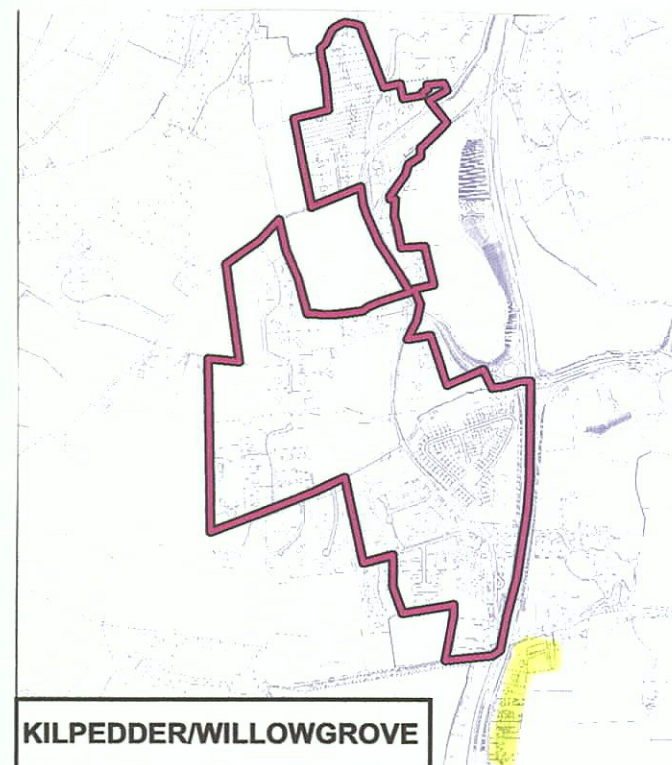
Yours faithfully



Michael J Hogan

Encl.





Leonora Earls

688

**From:** Malcolm Lane [malcolm.lane@pdlane.ie]  
**Sent:** 19 February 2016 10:55  
**To:** Planning - Development Plan Review  
**Subject:** draft County Development Plan submission - HOLFELD  
**Attachments:** Kilmac Submission dCDP 2016.pdf; 2016 dCDP Sub Map.pdf; 20160205134951946.pdf

FAO:

**County Development Plan Review**

Planning Department, Wicklow County Council

On behalf of **EDMUND HOLFELD**, see attached submission for lands at Kilmacanogue.

Yours Sincerely

Malcolm Lane  
D Lane Associates

BA MRUP MA(UD) MIPI MUDG  
Town Planner & Urban Designer

malcolm.lane@pdlane.ie  
T.direct +353 1 287 3630

1 Church Road	T +353 1 287 6697	architecture
Greystones	F +353 1 287 0109	urban design
Co.Wicklow	E info@pdlane.ie	planning
Ireland	W www.pdlane.ie	engineering

**SUBMISSION TO:**  
**Wicklow County Council**

**Review of:**  
**Draft WICKLOW COUNTY DEVELOPMENT**  
**PLAN 2016-2022**  
**KILMACANOGUE SETTLEMENT PLAN**

**ON BEHALF OF:**  
**EDMUND HOLFELD**  
**CO. WICKLOW**

**BY:**  
**PD Lane Associates**  
**Architecture & Planning**  
**Urban Design & Engineering**  
**1 Church Road, Greystones,**  
**Co.Wicklow**

**February 2016**

## • GROUNDS OF SUBMISSION

This submission, prepared on behalf of Edmund Holfeld, is made as a formal submission to Wicklow County Council on the review of the draft County Development Plan ('the draft Plan 2016-2022') in preparation of the Wicklow County Development Plan 2016-2022.

The lands the subject of this submission are in the ownership of Edmund Holfeld, located to the rear of his existing commercial premises which are within the Settlement Boundary of the Kilmacanogue Settlement Plan – see map attached (“the Subject Lands”).

The Subject Lands should now be included within Settlement Boundary and zoned accordingly as Secondary Lands in the upcoming Wicklow County Development Plan 2016-2022. This would be a natural extension to the remainder of the landholding which is being used for employment and light industrial purposes. The Subject Lands have full access to services inclusive of public roads, drainage and water supply and is outside the area designated for potential flood risk in the draft Plan 2016-2022.

Secondary Lands are designated as Mixed Use Zones: *'To provide for the sustainable development of a mix of uses including residential, employment, community and recreational uses that provide for the needs of the existing settlement and that allows for the future growth of the settlement.'*

Wicklow County Council proposed a new Distributor Road traversing the Subject Lands in 2011, to accommodate the employment uses at this general location (on the east side of the N11) so that they could connect directly to the existing bridge over the N11 to the south. Wicklow County Council issued a Notification of a Decision to Grant Permission in 2000 (Ref: 99/1493) for a warehouse of 4142sq.m on the Subject Lands, subject to the building being built into the hillside and adequate screening (see attached Site Layout).

It is contended that the Subject Lands are critical for the existing operators (on the remainder of the landholding) to expand their operations, without having to re-locate off-site in light of future potential expansions of their businesses as the Irish economy grows.

Furthermore, the Subject Lands are located at Kilmacanogue North, which is within the 'Metropolitan Area' designated in the Regional Planning Guidelines for the Greater Dublin Area 2004-2016. The National Spatial Strategy ('NSS') advocates the importance of consolidation of growth within the Dublin Metropolitan Area.

The draft Plan 2016-2022 sets out a 'settlement strategy' policy which aims to locate population growth and channel development in line with the principles of the National Spatial Strategy and the Regional Planning Guidelines. This includes the promotion of local growth within the existing settlements of Co. Wicklow, particularly large and small settlements. The inclusion of the Subject Lands within the Settlement Boundary for Kilmacanogue will contribute positively to the achievement of this policy objective.

Therefore, we respectfully request Wicklow County Council to include the Subject Lands within the Settlement Boundary of the Kilmacanogue Settlement Plan as part of the Wicklow County Development Plan 2016-2022 for future potential expansion of employment/light industrial uses at this location.

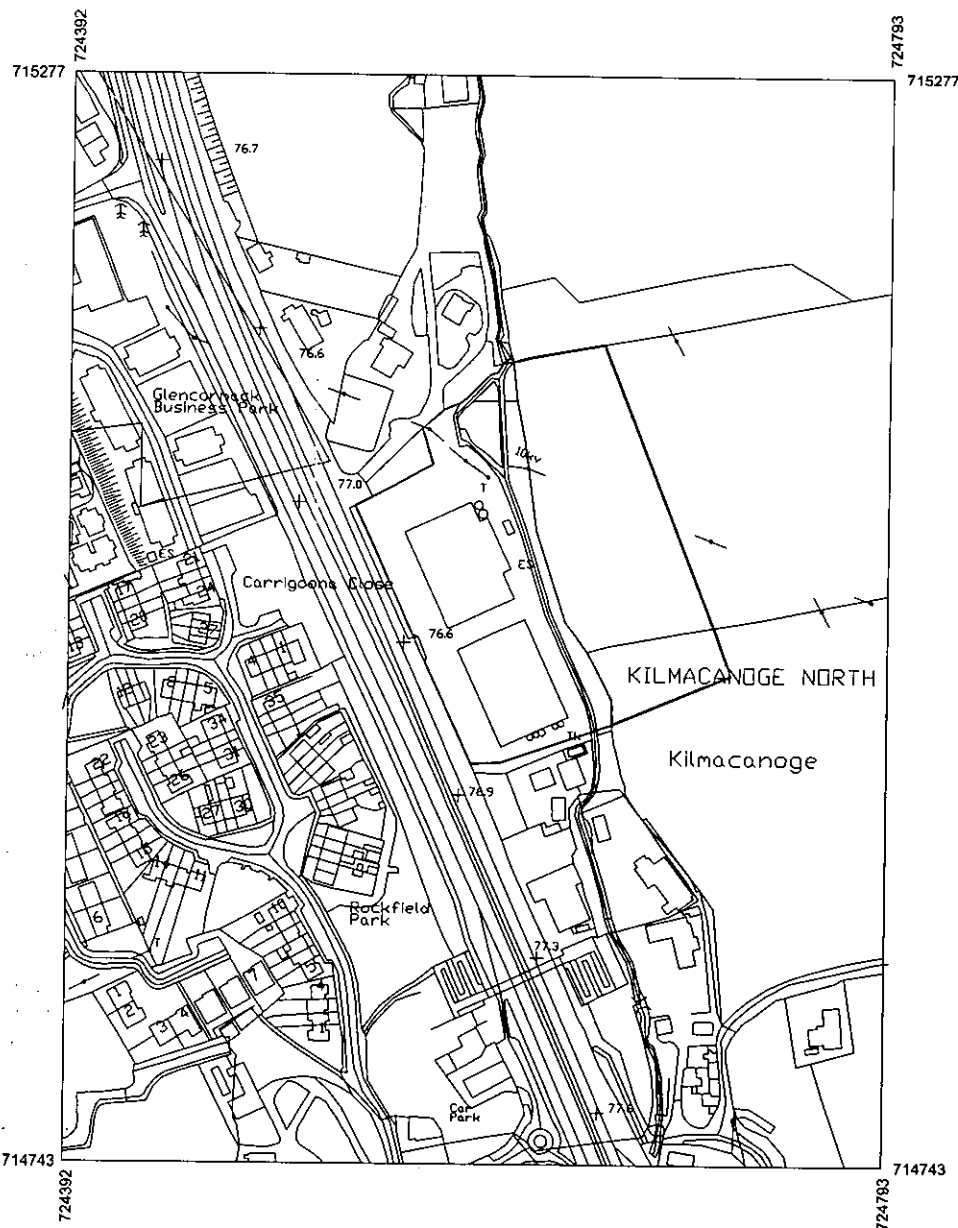
*Malcolm Lane*

---

Malcolm Lane  
Town Planner & Urban Designer  
BA, MRUP, MA (UD)  
**PD Lane Associates**  
Date: February 2016

**Appendix:**

Site Location Plan  
2000 Site Layout Plan



Output Format:  
=====

Output File:  
=====

Map Series:  
=====

3617-C  
REVISION DATE = 27-Mar-2015  
SURVEY DATE = 31-Aug-2001

Clip Extent:  
=====

Projection:  
=====

ITM Centre Point Co-ordinate:  
=====

Extraction Date:  
=====

Copyright:  
=====

Copyright:  
=====

OWNERSHIP SHOWN WITH RED LINE

PROPOSED SECONDARY LANDS ZONING

ORDNANCE SURVEY IRELAND LICENCE NO. AR 0002116  
© ORDNANCE SURVEY IRELAND / GOVERNMENT OF IRELAND



GENERAL NOTES

REVISION	DATE	DESCRIPTION
REVISION	00-00-00	DESCRIPTION

1 Church Road  
Greystones  
Co. Wicklow  
Ireland

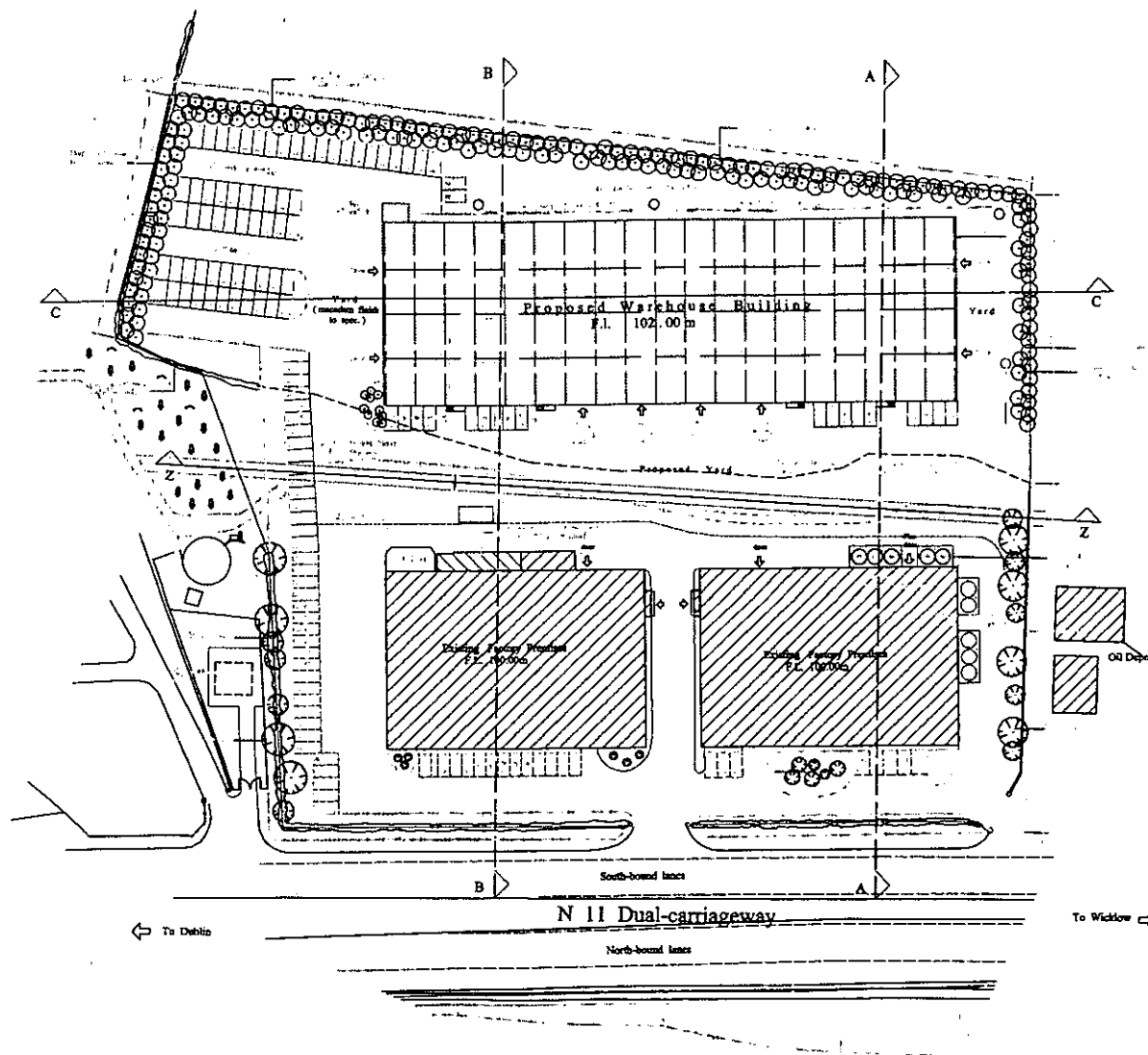
T +353 1 287 6897  
F +353 1 287 0109  
E info@pdlane.ie  
W www.pdlane.ie

**pd lane**  
associates

architecture  
urban design  
planning  
engineering

PROJECT	LANDS AT KILMACANOGE, WICKLOW	DRAWING NO.
CLIENT	EDMOND HOLFELD	REVISION NO.
DESCRIPTION	DRAFT DEVELOPMENT PLAN SUBMISSION 2016 - 2022	
STAGE		DATE
SCALE	1/2500 (A3 page 1)	DRAWN BY





# LEGEND

Existing Buildings shown

Proposed Warehouse shown

Proposed mixed planting shown

Existing Trees shown



SCALE : 1/500  
DATE : 15/9/99  
DRWG NO. : H-21-66

TITLE : SITE LAYOUT  
TEL : 2876697  
DRN BY : A.C.

## REVISIONS :

NOTE  
This drawing is for planning purposes only  
Not to be used for construction purposes  
All works are to comply with current building regs.

JOB : PROPOSED WAREHOUSE AT KILMACANOGUE  
NORTH, KILMACANOGUE, CO. WICKLOW.

CLIENT : HOLFELD PLASTICS LTD.



P.D. Lane Assoc., Planning Consultants,  
Architects & Consulting Engineers  
1 Church Road, Greystones, Co. Wicklow.

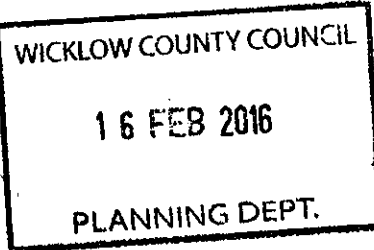
C89

Cronakip,

Redcross,

Co. Wicklow.

16<sup>th</sup> Feb. 2016



Dear Sirs,

I would like to propose the re zoning of some of my lands at Cronakip, Redcross, Wicklow. This has been a family farm since 1959; I have been farming these lands since 1982.

The plot is 5.8 acres. Folio number 11819F. It is presently for sale by private treaty as it went to auction in October 2015 but there were no bids.

The land is currently zoned "corridor". This is evidently going to change as the road frontage is now the R772 previously the N11. There are no further road works planned for the area and there has been a virtual planning ban in the area for the last 25 years.

My farming enterprise as a sheep farmer has failed. As from January 14<sup>th</sup> 2016 I have signed on for welfare which comes in at 158 euro per week as a couple. I need to sell some of my lands to pay my own way. But it is unlikely I will be able to sell it with a blanket ban on planning by Wicklow County Council in this area.

On the last development plan I went to a County Councilor to ask for his help in getting some of my lands re zoned, he recommended that I gift the County Council some of my lands as an itinerant encampment as the county council had a requirement for such lands and he would then fight my case for re zoning. I found these terms unacceptable and still do.

I would like the land to be re zoned "housing".

Yours faithfully,

A handwritten signature in black ink, appearing to read "Ken Hudson".

Ken Hudson.

Surveyed 1838  
Revised 1908  
Levelled

# Rural PLACE Map



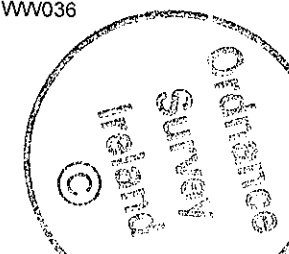
ITM CENTRE PT. COORDS.

727979,682037

DESCRIPTION

MAP SHEETS

6 inch  
WV036



Arna thaispeáin agus arna thabairt ag Suirbhéireacht Ordánais Éireann, Pláin an Píonómair, Sálaíocht 6. Éire. Comhairle agus foilsíodh ag Ordnance Survey Ireland, Póirín, Páirc, Dubháin 4, Éire.

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Gach cead ar coimeáil. Ní ceadmhach aon chuid den shuíbhéireacht seo a chloí, a ailtéiríocht nó a thabairt in aon bhoim ná ar aon bhealach gan cead i scríobhán róláir nó ó úinéir an chloí.

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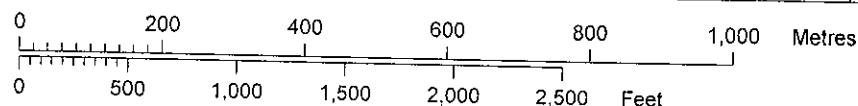
Ní léiríonn bhealach, bealach nó cúlú a bheith ar an t-ádh eile agus a bheith ar chead sli. The representation on this map of a road, track or footpath is not evidence of the existence of a right of way.

Ní thaispeáin na rianúirí de chuid Ordánais Shuirbhéireacht na hÉireann na rianúirí de chuid na rianúirí, ná de chuid na rianúirí de chuid na rianúirí. Ordnance Survey maps never show legal property boundaries, nor do they show ownership of physical features.

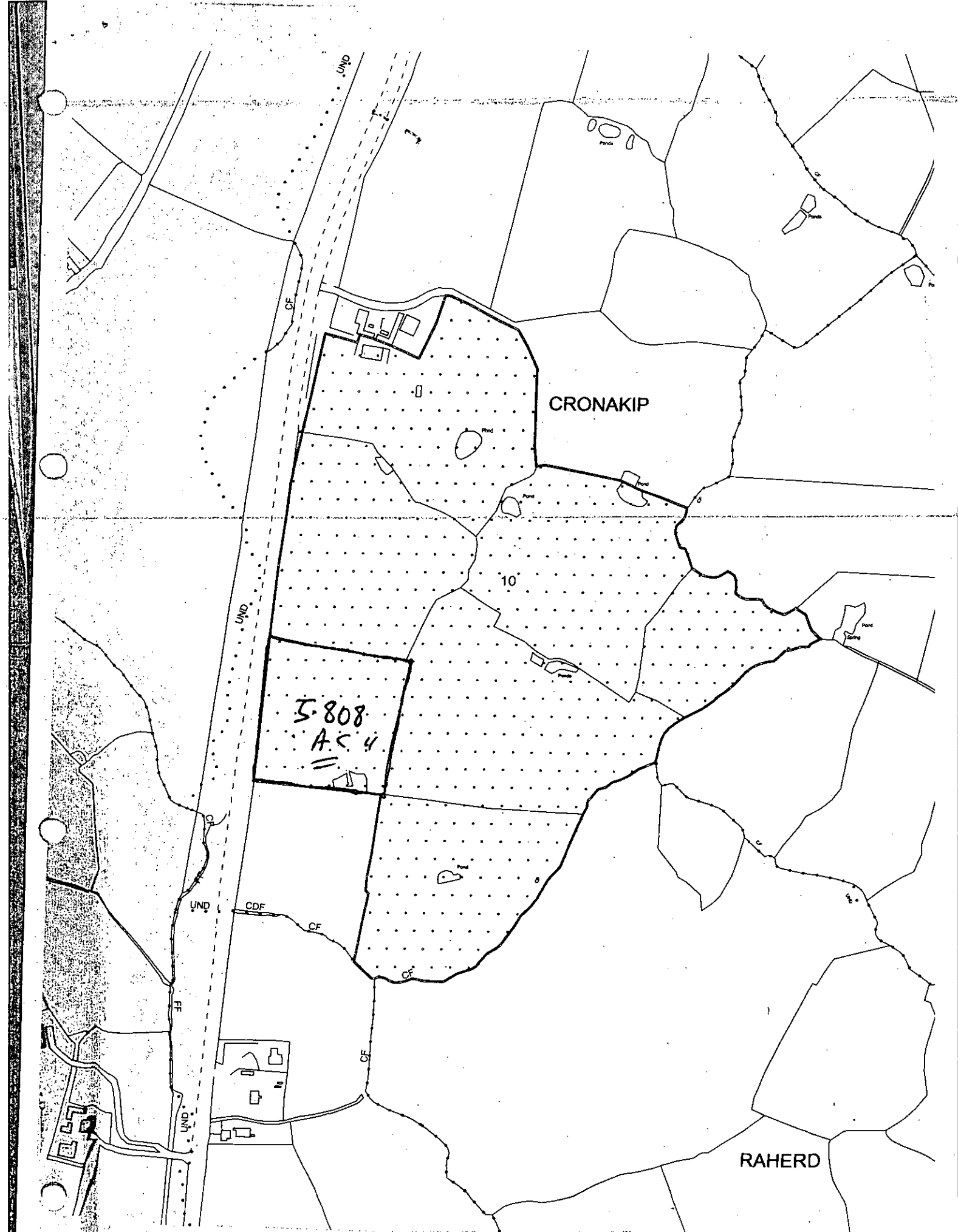
© Suirbhéireacht Ordánais Éireann, 2011  
© Ordnance Survey Ireland, 2011



Scale:- 1:10,560  
Scála:- 1:10,560



Plot Ref. No. 25072746\_1\_3  
Plot Date 15-FEB-2011



C90

Leonora Earls

**From:** Cliona Loughnane (McCORMACK)  
**Sent:** 15 February 2016 11:40  
**To:** Planning - Development Plan Review  
**Subject:** IHF submission re Wicklow County Development Plan  
**Attachments:** FINAL IHF Submission to Wicklow County Development Plan - February 2016.pdf

Hi,

Please find attached our submission to the Wicklow County Development Plan.

If you have any queries please don't hesitate to contact me.

Regards,  
Cliona

**Cliona Loughnane | Policy and Research Manager**

**Irish Heart Foundation**

50 Ringsend Road, Dublin 4

Tel: | Heart & Stroke Helpline: Local 1890 432 787

[www.irishheart.ie](http://www.irishheart.ie) | [www.facebook.com/irishheartfoundation](https://www.facebook.com/irishheartfoundation) | [www.twitter.com/irishheart\\_ie](https://www.twitter.com/irishheart_ie)  
[www.stroke.ie](http://www.stroke.ie) | [www.facebook.com/StrokeAction](https://www.facebook.com/StrokeAction) | [www.twitter.com/StrokeAction](https://www.twitter.com/StrokeAction)

Thanks to all who went 'On The Dry' this January!

**On The Dry.** One Month. No Alcohol.

Visit <http://www.onthedry.ie/> to send in your donations today.

The Irish Heart Foundation is committed to best practice in fundraising and adheres to the Statement of Guiding Principles for Fundraising promoting transparency, honesty and accountability. This message and any attachments belong to the Irish Heart Foundation and are intended for the addressee only. They may contain information that is confidential and private. Unless you are the named addressee you may not copy or use it or disclose it to anyone else. If you have received it in error, please notify the sender immediately and delete it from your system. The views contained in this message may not be the views of the Irish Heart Foundation. The Irish Heart Foundation does not permit or encourage the sending of offensive or inappropriate material. If you find the contents of this message offensive or inappropriate, please contact the sender immediately and also, e-mail [info@irishheart.ie](mailto:info@irishheart.ie) While the Irish Heart Foundation has taken reasonable precautions to reduce the risk from software viruses, we cannot accept liability arising from same. You should carry out full virus checks before opening attachments The Irish Heart Foundation is committed to respecting your privacy and to complying with all applicable data protection and privacy laws. In order to communicate with you effectively, we may record your contact details on a secure database and update as needed. See our full data protection statement here <http://www.irishheart.ie/iopen24/data-protection-statement-t-997.html?textsize=1>



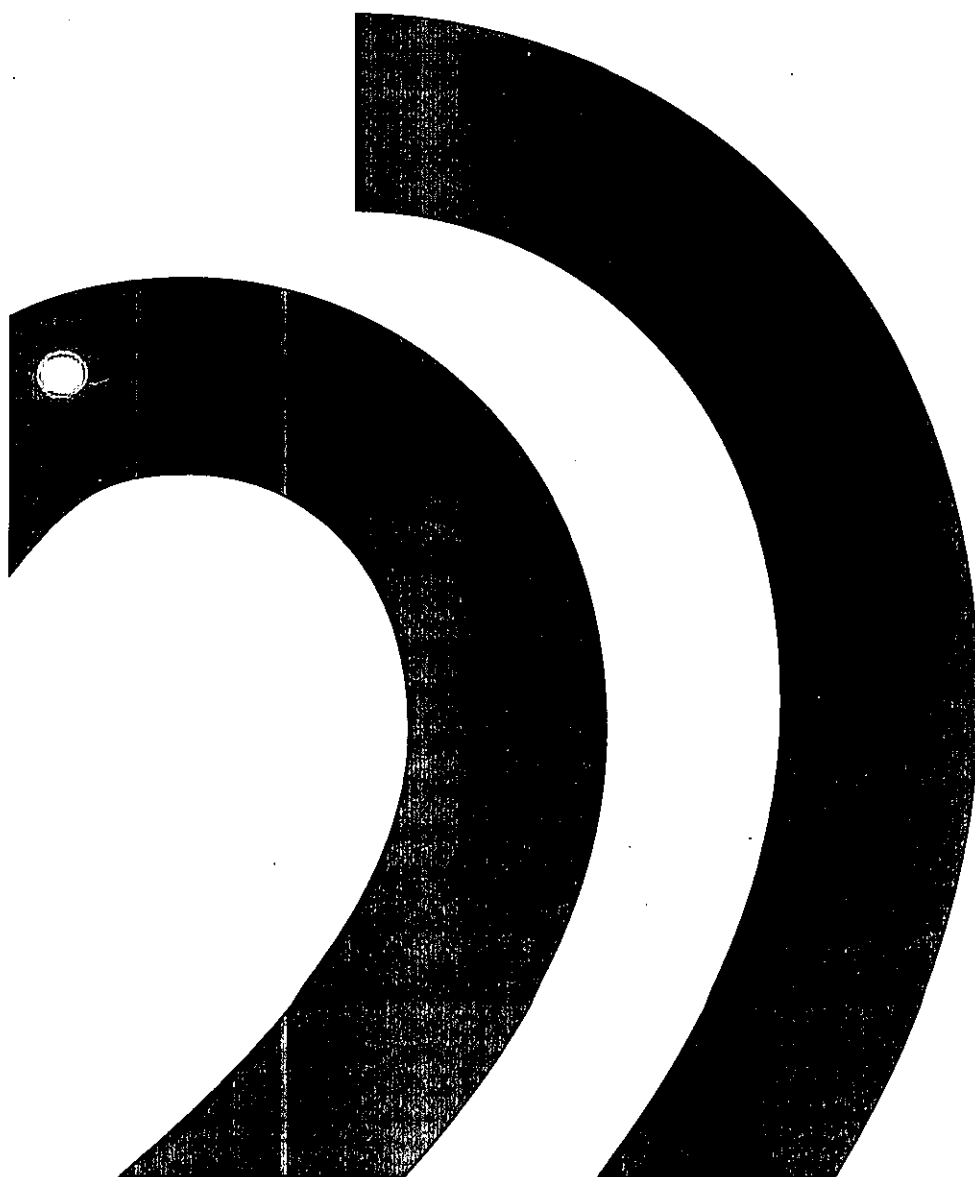
**IRISH HEART  
FOUNDATION**  
Fighting Heart Disease & Stroke

[www.irishheart.ie](http://www.irishheart.ie)

## **Irish Heart Foundation**

**Submission on the  
Wicklow County Development  
Plan 2016-22**

**February 2016**







## About the Irish Heart Foundation

The Irish Heart Foundation is the national charity dedicated to fighting heart disease and stroke. Today in Ireland more people die from heart and stroke-related illnesses than from any other cause of death. Against this background we work to bring hope, relief and a better future to families all over Ireland. We give vital patient support through our Heart & Stroke helpline and we provide high quality public information for all.

We support pioneering medical research, campaign for improved patient care, and promote positive public health strategies. We work in hospitals, schools and workplaces to support, educate and train people to save lives. As a charity we are dependent on the generosity of the public to continue our vital good work. You can fund our work by making a donation, give of your time to volunteer or learn the skills needed to save a life through our courses.

## **SUBMISSION TO WICKLOW COUNTY COUNCIL**

### **Draft Wicklow Development Plan 2016-2022**

**February 2016**

The Irish Heart Foundation (IHF) welcomes the opportunity to input into this second consultation on the Wicklow Development Plan. Following the IHF's initial submission in December 2014, this submission will focus on three core elements: including a specific 'promotion of healthy environments' objective in the Development Plan; introducing restrictions on fast food outlets in close proximity to schools (no-fry zones<sup>1</sup>); and the provision of allotments.

The IHF is focused on how the Development Plan could be used to improve the public health of people living in Wicklow and in particular to ensure that children and young people are healthy and active. Having reviewed the 'Draft Wicklow County Development Plan 2016 – 2022' (Draft Plan) provided for this consultation the IHF:

1. Welcomes the inclusion of a no-fry zone adjacent to schools (RT 17) and recommends that the proposed exclusion zone around schools be widened to 1km. The IHF further recommends that maps showing the exclusion zones around each school be provided with the final Development Plan.
2. Welcomes the support for allotments (CD44) as a means of providing better access to healthy food.
3. Recommends the inclusion of 'Promotion of healthy environments' as the 12<sup>th</sup> goal of the Development Plan (2.3 Vision and Goals).

---

<sup>1</sup> IHF uses the terminology 'no-fry zone' to exclusion zones for fast food/takeaways close to schools.

## **1. No-fry zones (RT17)**

The IHF welcomes the inclusion of a no-fry zone adjacent to schools (RT 17) and recommends that the proposed exclusion zone around schools be widened to 1km. The IHF further recommends that maps showing the exclusion zones around each school be provided with the final Development Plan.

---

### **Draft Plan-- RT17 (p.123)**

Conscious of the fact that planning has an important role to play in promoting and facilitating active and healthy living patterns for local communities, the following criteria will be taken into account in the assessment of development proposals for fast food/takeaway outlets, including those with a drive through facility:

- Exclude any new fast-food outlets which offer foods that are high in fat, salt or sugar from being built or from operating within 400m of the gates or site boundary of schools, parks or playgrounds, excluding premises zoned town centre;
- Fast food outlets/takeaways with proposed drive through facilities will generally only be acceptable within Major Town Centres or District Centres and will be assessed on a case-by-case basis;..

---

The IHF supports this effort by Wicklow County Council to use its authority for land zoning and land use to limit access to fast food and the promotion of unhealthy foods in the vicinity of schools.

Health organisations and the public are increasingly concerned about the impact on children of the number of fast food outlets located in close proximity to schools. The need for action to protect Irish children is strong. Prevalence of obesity in Ireland has increased significantly in the last two decades. Depending on the cut-off points used, there has been a two-to-fourfold increase in obesity in Irish children aged 8–12 years since 1990.<sup>2</sup> Between 1990 and 2011, obesity rose from 8% to 26% in men, and from 13% to 21% in women.<sup>3</sup> The Growing Up in Ireland study shows that social inequalities increase the risk of overweight and obesity from an early age. At 9 years of age, children from disadvantaged areas are much more likely to be obese.<sup>4</sup>

---

<sup>2</sup> O'Neill JL, McCarthy SN, Burke SJ et al (2007). Prevalence of overweight and obesity in Irish schoolchildren, using four different definitions. *Eur J Clin Nutr*:61(6);743-51.

<sup>3</sup> Irish Universities Nutrition Alliance (IUNA) (2011). National Adult Nutrition Survey.

<sup>4</sup> Layte, R. and McCrory, C. (2011) *Growing up in Ireland - Overweight and obesity among 9-year olds*. Dublin: The Stationary Office.

#### *Increase the exclusion zone to 1km*

A body of research links over-concentration of and/or proximity to fast-food outlets and obesity.<sup>5</sup> Studies also indicate that in order to buy something from a fast food outlet after school or at lunch time, it needed to be located close by (on the way to school or a short walk). The IHF believes that the effectiveness of RT17 would be further strengthened by increasing the exclusion zone from 400m to 1km (which approximately equates to a 10-minute walk).

Fast food is readily available beside Irish schools. Currently, 75% of Irish schools have at least one and almost 30% have at least five fast food outlets within 1km.<sup>6</sup> In the absence of proper regulation this situation can only deteriorate further given the business value to fast food outlets of being sited near schools.

#### *National level guidance on no-fry zones*

The Chief Executive's report, which responded to our initial submission in December 2014, indicated that current guidance on no-fry zones (contained in the Ministerial guidelines on Local Area Plans, June 2013<sup>7</sup>) do not provide sufficient detail:

There is no further guidance from the Government on this issue, in particular what 'careful consideration' might mean, how 'appropriateness' might be assessed and what 'in the vicinity' might mean. In the absence of clear guidelines or what the Minister is suggesting, it is not known if any objectives adopted by individual Local Authorities would be legal and not discriminatory or contrary to EU laws in any way... As it is not clear what kind of controls are being suggested by the guidelines, it is not clear what 'exemptions' or 'conditions' might be appropriate

(First Chief Executive's Report, p. 116).

As referenced in the Chief Executive's report (quoted above), the planning guidance on no-fry zones for local authorities is open to broad interpretation. The IHF believes it is inappropriate to continue to address the issue of new fast food outlets beside schools on a case-by-case basis at local level, requiring parents / schools to organise to appeal planning applications. A co-ordinated, national approach to protect the health of children and young people across the country is required. To support the work of Wicklow County Council and other local authorities, the IHF is advocating for national level guidance for all local authorities on the introduction of no-fry zones adjacent to schools. Such guidance could be provided through a specific Department of Environment guideline addressing fast food outlets<sup>8</sup>, such as a 'Guideline for Planning Authorities on Fast Food outlets'. This

<sup>5</sup> For example, see Currie, J., DellaVigna, Moretti, E. And Pathania, V. (2009) 'The Effects of Fast Food Restaurants on Obesity.' *American Association of Wine Economics* and Davis, B. and Carpenter, C. 'Proximity of Fast Food Restaurants to schools and adolescent obesity'. *American Journal of Public Health*, 99 (3), 1541-8.

<sup>6</sup> Callaghan, M., Molcho, M., Nic Gabhainn, S. and Kelly, C. (2015) 'Food for thought: analysing the internal and external school food environment'. *Health Education*, 115(2), 152-170.

<sup>7</sup> 'Regardless of the physical or locational context for local area plans, planning also has an important role to play in promoting and facilitating active and healthy living patterns for local communities. For example, the local area plan can promote active and healthier lifestyles by ensuring that:

- exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced such as the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks.'

<sup>8</sup> See a list of current guidelines at See list of planning guidelines at:

<http://www.environ.ie/en/DevelopmentHousing/PlanningDevelopment/Planning/PlanningGuidance/>

is the means which has guided other planning issues of national importance, such as the provision of childcare facilities in new developments, through the *Guidelines for Planning Authorities – Childcare Facilities*<sup>9</sup>.

The IHF is aware that taking action on fast food outlets is only part of the solution, and there is a need to address the food available to students in schools, as well as the food available in shops near schools. Research by the IHF shows the high penetration of unhealthy food stuffs in Irish schools<sup>10</sup>, including a 2015 survey<sup>11</sup> of 39 post primary schools which showed that while 37% of schools offered full hot meals and 37% offered cold snacks like sandwiches, nearly 70% of schools offered hot snacks including sausage rolls, pizza slices and paninis, many of which are high in fat and salt. A quarter of schools had tuck shops and 47% had vending machines. The IHF is currently developing a Healthy Catering Award scheme to support schools to provide healthy food.

## **2. Allotments (CD44)**

The IHF welcomes the support for allotments (CD44) as a means of providing better access to healthy food.

---

### **Draft Plan - CD44, p. 159**

To facilitate the development of allotments of an appropriate scale on lands which meet the following criteria:

- Lands situated within or immediately adjacent to the edge of towns/villages;
- Lands that are easily accessible to the residents of a particular town or village;
- Where an adequate water supply can be provided;
- Where adequate road infrastructure and access exists/can be provided; and
- Where adequate parking facilities can be provided.

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Allotment growing can provide access to healthy food, have wider environmental and social benefits for local people and improve the aesthetic appearance of unused land. The IHF recommends that the Development Plan also include actions to support private and public landholders to loan unused land to community groups to cultivate.

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<sup>9</sup> Government of Ireland (2001). Available at:

<http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownload,1601,en>.

<sup>10</sup> Kelly, C. and NicGabhaunn, S. (2007) *Marketing of Foodstuffs in Post-Primary Schools in Ireland*. [www.irishheart.ie](http://www.irishheart.ie)

<sup>11</sup> Irish Heart Foundation (2015) Food provision in post primary schools. School survey, scoping exercise and pilot.

### 3. Specific goal of 'Healthy environments'

The IHF recommends the inclusion of 'Promotion of healthy environments' as the 12<sup>th</sup> goal of the Development Plan (2.3 Vision and Goals).

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#### Draft Plan 2.3 Strategic goals, p. 12

Consistency; employment; transport; housing; vibrant settlements; enhance the rural area; infrastructure; communities; heritage; climate change; and quality design.

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Development plans are a central means of implementing national policies in communities across Ireland. For this reason it is crucial that the Wicklow Development Plan reflects the Government's 2013 health and wellbeing framework, *Healthy Ireland 2013-25* which is seeking cross-sectoral working to achieve a healthy population. *Healthy Ireland* has made improving and protecting health a responsibility for all Government Departments, Local Authorities and all sectors of society. Under this national framework, planning authorities have a responsibility to promote healthy communities. The timeframe of the Wicklow Development Plan runs almost concurrently with the *Healthy Ireland* framework and will be one of the critical ways that the framework can be rolled out in Wicklow. In policy at local level, under the *Local Area Plans - Guidelines for Planning Authorities* issued under section 28 of the Planning and Development Act 2000-2012, there is also an onus on local authorities to incorporate a focus on active and healthy living in their communities.

In our initial submission to the Wicklow Development Plan in 2014, the IHF recommended that promotion of healthy environments / public health should be included as one of the Development Plan's strategic goals. In responding to this recommendation, the Chief Executive's report stated:

While the consideration of issues relating to health are not explicitly set out as mandatory objectives that a County Development Plan must include, the plan currently contains a number of goals and objectives which, when combined, aim to create a sustainable and healthy environment in which to live, work and visit. It is considered these goals and objectives promote healthy living from a land use perspective and it is intended the new County Development Plan will aim to strengthen these goals and objectives where possible...

While the plan may not explicitly make reference to the term public health, the overall goals and objectives of the plan in determining the shape and direction of the built and natural environment play a key role in influencing determinants of health. In the absence of specific guidance on the issue of public health and the introduction of health impact assessments it is intended that in formulating goals and objectives for the new plan that the issue of public health will be implicitly linked to the overarching goals of the plan

(First Chief Executive's Report, p. 115).

The IHF continues to believe that it is insufficient to have public health and the creation of health environments as an implicit objective within the Development Plan. Currently, the Wicklow Development contains 11 strategic goals. The IHF recommends an additional goal 'to promote a



healthy environment' be included to ensure that public health is prioritised within the Development Plan. Such an objective would ensure that the subsequent Local Area Plans will include a focus on promoting good health for local communities. Including a specific health objective would ensure that land use decisions, the planning process, etc within the draft strategy will be 'health checked'. This 'health checking' should include a commitment to invest money in infrastructure which promotes public health and reject proposals which will negatively impact the health of the community in Wicklow.

The IHF believes that given the increased emphasis on public health in national and local policy the Wicklow Development Plan should more fully recognise the wide potential for planning to improve health outcomes and to reduce health inequalities within the community. To-date the development planning process seems to have adopted a relatively narrow view of public health, primarily limited to the promotion of active travel and the provision of open spaces. The physical and built environments, including infrastructure planning, availability and accessibility of healthy foods, transport networks and the design of streets, can all affect the health and well being of individuals and communities.

The IHF recognises that the national guidance on including health priorities in development plans is relatively weak. The Chief Executive's report (p.115) also refers to the lack of guidance on public health and health impact assessment within development plans. We will continue to advocate at a national level for clear guidelines for local authorities to follow in this regard.

## **Conclusion**

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The IHF welcomes this second opportunity to comment on the development of the Wicklow Development Plan 2016 – 2022.

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### **For further information contact:**

Cliona Loughnane, Policy and Research Manager  
Irish Heart Foundation, 50 Ringsend Road, Dublin 4.  
[cmccormack@irishheart.ie](mailto:cmccormack@irishheart.ie) (01) 6685001

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C91

**Leonora Earls**

**From:** Edel Barry  
**Sent:** 18 February 2016 16:36  
**To:** Planning - Development Plan Review  
**Cc:** Deirdre Burns  
**Subject:** Submission to Wicklow County Development Plan 2016-2022  
**Attachments:** IMG\_1226.JPG; Vartry Reservoir Submission.docx

A chara,

Please find attached a proposal for inclusion in the upcoming county development plan, on behalf of the Irish Post Medieval Archaeology Group.

Kind regards,

Edel Barry (IPMAG secretary )



Edel Barry IPMAG Secretary  
Clogher, Kilfenora, Co. Clare  
[ipmag2008@gmail.com](mailto:ipmag2008@gmail.com)  
[www.ipmag.ie](http://www.ipmag.ie)

17<sup>th</sup> February 2016

Mr Bryan Doyle, Chief Executive, Wicklow County Council, County Buildings, Whitegates, Wicklow Town.  
Ms Deirdre Burns, Heritage Officer, Wicklow County Council  
cc: [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

RE: Proposed addition of structures at Vartry Reservoir to Wicklow County Development Plan, 2016-2022

A Chara,

The Irish Post-Medieval Archaeology Group (IPMAG) was founded in 2001 to promote the cultural study and protection of post-1550s historical archaeology in Ireland. The period from 1550 to the present day is exceptionally rich in archaeological materials and built heritage relating to major events and transformations in Irish history, not least plantation, industrialisation, warfare, the Great Famine, emigration, and the twentieth-century struggle for independence. IPMAG seeks to promote awareness in and protection of all aspects of this cultural heritage and it is in this capacity that we write to you now in relation to Lough Vartry Reservoir, located at Roundwood, Co. Wicklow. While some of the industrial buildings at Vartry are listed in the National Inventory of Architectural Heritage, not all of them are. IPMAG would therefore strongly recommend that all associated buildings at Vartry Reservoir be included as protected structures, reflecting their importance as an industrial archaeological complex, in Wicklow County Council's list of protected structures and that the proposed Local Area Development Plan take account of the historical and post-medieval archaeological importance of these group of buildings both individually and cumulatively.

Lough Vartry Reservoir was constructed as a gravity supply of water for Dublin City, to replace the wells, streams and canals from which public water had been drawn until the latter decades of the nineteenth century. Construction on the 1,640 ft-long earthen impounding dam and reservoir was undertaken between 1962 and 1967, creating a 410-acre reservoir with a capacity of c.2,500 million gallons. A second phase of construction saw an additional 310-acre reservoir, with a capacity of c.1,200 million gallons, built between 1908 and 1925.

The structures of note at this site include a draw-off tower, constructed c.1865, to give access to underground draw-off tunnels, drawing water through the dam to the treatment plant. An iron lattice girder bridge, supplied and installed by Edington & Son of Glasgow (Cox,2013:174), and which provides access to the tower and is itself accessed by a gate tower, similar in design to the draw-off tower. The architecture employed in this structure is characteristic of that employed by water supply companies, which sought to utilise architecture as a public expression of 'purity, improvement, safety and reliability to their customers' (Palmer, Nevell & Sissons, 2012: 303). The use of gothic elements enlivened with granite detailing, and an iron lattice girder bridge reflected the prevailing styles of architecture in the 1860s.

A bell-mouthed overflow shaft, constructed in ashlar granite with a diameter of 72ft and a depth of 39ft, facilitates the movement of excess water from the lower reservoir and is one of the most visually striking elements of the complex. Several causeways intersect the reservoir, facilitating the passage of roads. These stone and earthen structures are worthy of consideration for inclusion in their own right, and a three-arch bridge, known as 'Waters Bridge', is found to the north of the early part of the reservoir.

This reservoir and its ancillary structures remain integral to the supply of water to Dublin city and as such attest the skill, ingenuity and expertise that were employed in civil engineering in Ireland in the nineteenth century. The large scale of the complex creates a striking presence in the landscape, and the individual elements are enhanced by decorative touches and high quality stonework, lending artistic merit to the site. A comprehensive survey of the site should be carried out in order to obtain a record of each structure and which in turn can inform on the full industrial importance of Vartry Reservoir complex of buildings.

Vartry Reservoir is a very popular walking route and the highlighting of and promotion of awareness in the industrial archaeological significance of this complex of structures would serve to attract even more visitors, feeding into the cultural tourism of the areas in a positive way.

IPMAG strongly encourages Wicklow County Council to consider including the full complex of buildings at Vartry Reservoir in its list of protected structures and to include in its proposed LDP the requirement to protect and preserve it for its historical and archaeological value and future value to the cultural tourism of the region.

Is mise le meas,

---

Edel Barry  
(IPMAG Secretary)

**Sources utilised:**

Corcoran, M. (2007) 'Water, Drainage, People and Heritage' Engineers Ireland.

Cox, R., & Donald, P. (2013) *Ireland's Civil Engineering Heritage* The Collins Press, Cork.

Palmer, M., Nevell, M., and Sissons, M. (2012) *Industrial Archaeology: A Handbook* Council for British Archaeology, York.

<http://www.buildingsofireland.ie/niah/search.jsp?type=record&county=WI&regno=16401801>

<http://www.buildingsofireland.ie/niah/search.jsp?type=record&county=WI&regno=16309007>

[www.buildingsofireland.ie](http://www.buildingsofireland.ie)

[www.ihai.ie](http://www.ihai.ie)



Pump House  
at Stillorgan  
Reservoirs,  
Dublin



**D24. Vartry Aqueduct and Stillorgan Reservoirs** (O 215014 to O 200268). The original Vartry water supply scheme, built between 1862 and 1867, included one large service reservoir at Stillorgan at the end of an aqueduct from Roundwood in County Wicklow. The aqueduct is 33 miles long. It begins as a 6ft high by 5ft wide tunnel, which was driven in solid rock for 2½ miles, and continues as a twin pipeline. Two different early tunnelling machines were used for driving part of the tunnel but the rock was found to be too hard and the tunnel was largely dug by hand and is unlined.

The aqueduct is carried over the Dargle and Cookstown rivers on ornamental iron-latticed truss bridges of 65ft and 45ft span respectively. A valve house and screen chamber were built at the northeast corner of the service reservoir, but these are no longer used. The extension of the Vartry supply during the period 1908 to 1925 included the provision of two new reservoirs at Stillorgan and a new valve house. The Stillorgan reservoirs were created partly by excavation, partly by earthen embankments, the highest embankment being about 26ft above the general ground level. The Lady Gray reservoir at Stillorgan, completed in 1923 has a capacity of 90 million gallons.

The original valve house, which contains the screen chamber, is an octagonal-shaped building with sides of 18ft. The building rises about 15ft above ground and extends to 50ft below ground. There are some fine decorated iron trusses supporting the roof. The design of the original scheme was the responsibility of the Dublin City Engineer, Parke Neville. The pipework, valves and other ironwork were supplied and erected by Edington & Son of Glasgow. (HEW 3022 and 3023)

**D25. UCD Water Tower** (O 178312). A very striking reinforced concrete water tower was built on the Belfield campus of University College Dublin (UCD) in 1969–70. The tower was provided to ensure an adequate supply at a pressure higher than what could, at the time, be provided from the public mains. The tower is no longer used for this purpose.

Facing page: Water tower on campus of University College Dublin



**Leonora Earls**

**From:** Brian Dawson [b]  
**Sent:** 18 February 2016 15:53  
**To:** Planning - Development Plan Review  
**Cc:** Stella Burke  
**Subject:** IWEA submission to the Draft Wicklow County Development Plan  
**Attachments:** IWEA Wicklow Draft CDP PDF 18022016.pdf

Dear Wicklow County Council Forward Planning Team,

Please find attached a submission on behalf of the Irish Wind Energy Association (IWEA) to the Draft Wicklow County Development Plan 2016-2022.

Our sincere thanks for the opportunity to contribute to this important process and we are available to discuss any element of our submission further with you.

It would be appreciated if you could please acknowledge safe receipt of this submission, and please let us know of any further consultation periods for the CDP.

Best wishes,

Brian

Brian Dawson  
Head of Communications  
Irish Wind Energy Association  
Tel: +353 (0)45 899341  
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Irish Wind Energy Association

Irish Wind Energy Association,  
Sycamore House,  
Millennium Park,  
Osberstown,  
Naas, Co. Kildare.

County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town.

By email to [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

18th February 2016

**Re: Submission to the Draft Wicklow County Development Plan 2016-2022.**

Dear Wicklow Forward Planning Team,

The Irish Wind Energy Association (IWEA) welcomes the development of the Draft Wicklow County Development Plan 2016-2022 as a strategic planning framework for Co. Wicklow. This submission follows on from our previous submission to the Issues Paper dated 23<sup>rd</sup> December 2014.

IWEA is Ireland's leading renewable energy representative body and as such has an active interest in the potential for renewable energy, and in particular wind energy, in County Wicklow. As this variation will inform the vision, objectives and policies for the entire county, IWEA would like to make the following comments which we request the planning authority take into consideration in the finalisation and adoption of the Development Plan.

We would kindly ask that the planning authority make IWEA known of any further consultation periods regarding the making of this variation and notification of the final adopted County Development Plan.

We very much welcome this opportunity and look forward to engaging constructively with you in the future. We would welcome the opportunity to discuss this submission in more detail at any stage.

Yours sincerely,

\*Sent by email.

Brian Dawson  
Head of Communications,  
Irish Wind Energy Association.

## Introduction

The Irish Wind Energy Association (IWEA) is Ireland's leading renewable energy representative body and, as such, it has an active interest in the potential for sustainable energy. IWEA is committed to promoting the use of wind energy in Ireland and beyond, as an economically viable and environmentally sound alternative to thermal or nuclear generation. IWEA also promotes awareness and understanding of wind power as the primary renewable energy resource.

Renewable energy development is a vital part of Ireland's strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change. Wind energy produces indigenous renewable electricity while reducing greenhouse gas emissions by displacing traditional fossil fuels.

IWEA clearly supports proper planning and sustainable development and recognises that wind energy projects must be properly and sustainably sited in accordance with the clear environmental and other requirements of the planning system.

Relevant policy documents, such as the new County Development Plan, must assist in enabling Ireland to develop its natural green energy resources and meet our EU 2020 targets. IWEA members are involved in developing more than 85% of the wind farm capacity that is planned to be built from now to 2020 and we, naturally, have a keen interest in policy formulation.

In summary, this submission is being made to:

1. Support the policies and objectives contained within the Draft Wicklow County Development Plan, 2016 which encourage and assist the continued provision and development of renewable energy and specifically wind energy development within the County, and
2. To request that certain elements of Objective CCE6 be re-worded to ensure compliance with National Guidelines and to ensure that the optimum sites for wind farm developments can be selected and supported through the planning process.

## EU Commitments

IWEA welcomes progress being made at local at national level towards meeting our EU commitments under EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources, which establishes a binding target of 20% of overall EU energy consumption coming from renewable sources by 2020. Ireland's target under the directive is for renewable resources to account for 16% of total energy consumption by 2020. In line with these commitments, our national target for electricity from renewable energy sources (RES-E) is 40% by 2020 and we are currently approximately half way towards reaching that binding objective.

The European Union is also now in the process of agreeing a further series of targets for renewable energy towards 2030, and Ireland in October 2014 agreed to new 2030 targets which seek a 40% reduction in Green House Gas Emissions and a binding EU target for renewable energy of "at least 27%".

Positive progress is being made towards our targets and especially in the renewable electricity (RES-E) area, where for 2014 18.3% of Ireland's electricity came directly from indigenous wind energy, and provisional EirGrid information for 2015, shows that 24% of our total Irish electricity demand has been met from Irish wind energy alone.

Ireland is today the fourth most energy dependent EU Member State importing 85% of our energy needs at a cost to our Irish economy of €15.6m every day. Irish wind energy is cutting the need for the use of imported, expensive and emissions heavy fossil fuels, however much work in developing our renewable energy potential is yet to be done.

## Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government White Paper entitled '*Ireland's Transition to a Low Carbon Energy Future 2015-2030*' has recently been published by the Department of Communications, Energy and Natural Resources (DCENR). This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007.

The White Paper states the advances in Ireland's energy efficiency and renewable energy and generation use between 2007 and 2015. Renewable energy sources (which include wind) accounted for nearly 23% of Ireland's electricity consumption in 2014, which is just over halfway to Ireland's 2020 target of 40%. The policy framework sets out a vision for a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The paper advises that a range of policy measures will be employed to achieve this vision and will involve amongst many things, generating electricity from renewable sources of which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

The White Paper states that onshore wind continues to be the main contributor of energy (18.2% of total generation and 81% RES-E in 2014) and that a significant amount of additional onshore renewable generation capacity is likely to be required to achieve the 2020 target of 40% RES-E. To achieve this target the White Paper states that the average rate of build of onshore wind generation will need to increase up to 260 MW per year from the current rate of build which is stated by the White Paper at about 170 MW per year.

## Renewable Energy Challenges

In the context of the 2020 deadlines and having regard to the available proven and most cost effective technology, the vast majority of new renewable energy generation in Ireland will be provided by on-shore wind, the 40% target is a significant challenge for the Irish wind industry as a whole. An approximate doubling of wind capacity will need to be installed on-shore in Ireland within the coming years if we are to meet our 2020 RES-E target.

The expansion of the Irish wind industry will be an extremely positive economic development for the entire Country and, indeed, for Wicklow County. It will result in greater job creation, as well as increased local authority income through commercial rates and development contributions. Furthermore, the availability of renewable energy as a power source is increasingly becoming a significant deciding factor in site selection for Foreign Direct Investment (FDI) projects as has been seen for recent renewables power data centre investments by Apple in Co. Galway and Facebook in

Co. Meath. At the same time, new wind energy development will also bring about a reduction of GHG emissions and help tackle global climate change.

## Draft Wicklow County Development Plan 2016-2022

IWEA welcomes the opportunity to comment on the Draft Wicklow County Development Plan 2016-2022, and acknowledges that the County Wicklow Wind Energy Strategy forms part of the Draft Plan. IWEA appreciates the recognition the Draft Development Plan affords to the significant increase in Ireland's energy requirements over the past two decades and the key role renewable energy will play in meeting increasing energy demand as well as addressing commitments to national and European energy policy targets. The Draft County Development Plan also recognises the substantive wind resource available to the Country, within the European context, with approximately 6% of EU wind resources (even though Ireland only accounts for 2% of the European landmass). IWEA welcomes in this regard Objective EMP 17 which states that it is an Objective of the Council *"to encourage and facilitate the development of "green" industries, including industries relating to renewable energy and energy-efficient technologies, waste recycling and conservation"*.

The Draft Plan goes on in Section 9.5 to acknowledge the renewable energy commitments that have been undertaken at a national and European level. In relation to Electricity generation the Draft Plan states *"It is therefore imperative that further progress is made in this area and that alternative renewable sources are further expanded and developed."*

The County Wicklow Wind Energy Strategy has identified areas that are *"Most Favoured"*, *"Less Favoured"* and *"Not Favoured"*, for wind energy development within the County, and is included as Appendix 6 of the current draft plan. The Draft plan states that *"it is the policy of the Council to maximise wind energy development within the County in all three of these areas, on a case by case basis, subject to meeting specific requirements and guidance contained within the strategy."*

IWEA wishes to state that we are fully supportive of the above objectives and provisions within the Draft County Development Plan.

## Serious Concerns within Objective CCE6

Notwithstanding the above, and despite the need for progressive and sustainable measures to combat climate change effects whilst providing for future energy requirements, the Wind Energy Objectives contained within the Draft Plan do not adequately address these needs.

Specifically, one element within Wind Energy Objective CCE6 is seen by IWEA as a significantly negative step, which appears at odds with other provisions within the Draft Plan itself as well as national policy and steps away from national and international sentiment in moving towards more sustainable energy generation.

In its current draft, Objective CCE6 seeks:

*"To encourage the development of wind energy in accordance with the County Wicklow Wind Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:*

- *Consideration of any designated nature conservation areas (SACs, HNAs, SPAs, SAAOs etc.) and any associated buffers;*
- *Impacts on Wicklow's landscape designations;*
- *Impacts on visual, residential and recreational amenity;*
- *Impacts on 'material assets' such as towns, infrastructure and heritage sites;*
- *Consideration of land cover and land uses on or adjacent to the site;*
- *Best practice in the design and siting of wind turbines, and all ancillary works including access roads and overhead cables; and*
- ***Wind farms shall be at least 1,000m from any residential dwellings".***

While IWEA acknowledges the importance of selecting the optimum locations for wind farm developments and ensuring that projects follow the requirements of proper planning and sustainable development, the last point stated within CCE6 (i.e. the imposition of the requirement for wind farms to be "at least 1,000m from any residential dwellings") runs directly contrary to the current Wind Energy Development Guidelines and places unnecessary restriction and constraint on the site selection process which would jeopardise renewable energy investment and development in the County.

IWEA would like to clearly state that the setting of such a separation distance under this variation, would cut across and undermine the Government policy to deliver more indigenous renewable energy and reduce our current 85% imported fossil fuel dependency. Ruling out what could be suitable sites on an arbitrary basis could hinder our ability to meet our ambitious, but necessary and legally binding EU renewable energy and EU climate change commitments.

The Draft Plan does not provide any justification for the imposition of this one kilometre separation distance, nor is one contained in the County Wicklow Wind Energy Strategy. The separation distance quoted is an arbitrary distance and no explanation has been provided for this deviation from current planning guidance.

In this regard, we refer to the Department of the Environment, Communities and Local Government Wind Energy Development Guidelines 2006, which contain the following statements in relation to set backs and buffer distance requirements for wind turbines (in the context of noise and shadow flicker):

- *"In general, noise is unlikely to be a significant problem where the distance from the nearest turbine to any noise sensitive property is more than 500 metres", (Section 5.6, page 30 of the Guidelines refer);*
- *"It is recommended that shadow flicker at neighbouring offices and dwellings within 500m should not exceed 30 hours per year or 30 minutes per day" (Section 5.12, Page 33 of the Guidelines refer);*
- *"Where the calculations indicate that occupied dwelling houses would be significantly affected, a condition requiring the non-operation of turbines at times when predicted shadow flicker might adversely impact on any inhabited dwelling within 500m of a turbine may be appropriate." (Section 7.14, Page 85 of the Guidelines refer);*

In proposing this "at least 1000m" separation Wicklow County Council is in fact blatantly disregarding the Department of Environment Guidelines, and directly contracting its own *Wicklow Wind Energy Strategy* which clearly refers to the authority of the current Guidelines on page 3:

*"The 2006 Wind Energy Guidelines (DoEHLG) for Ireland offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for*



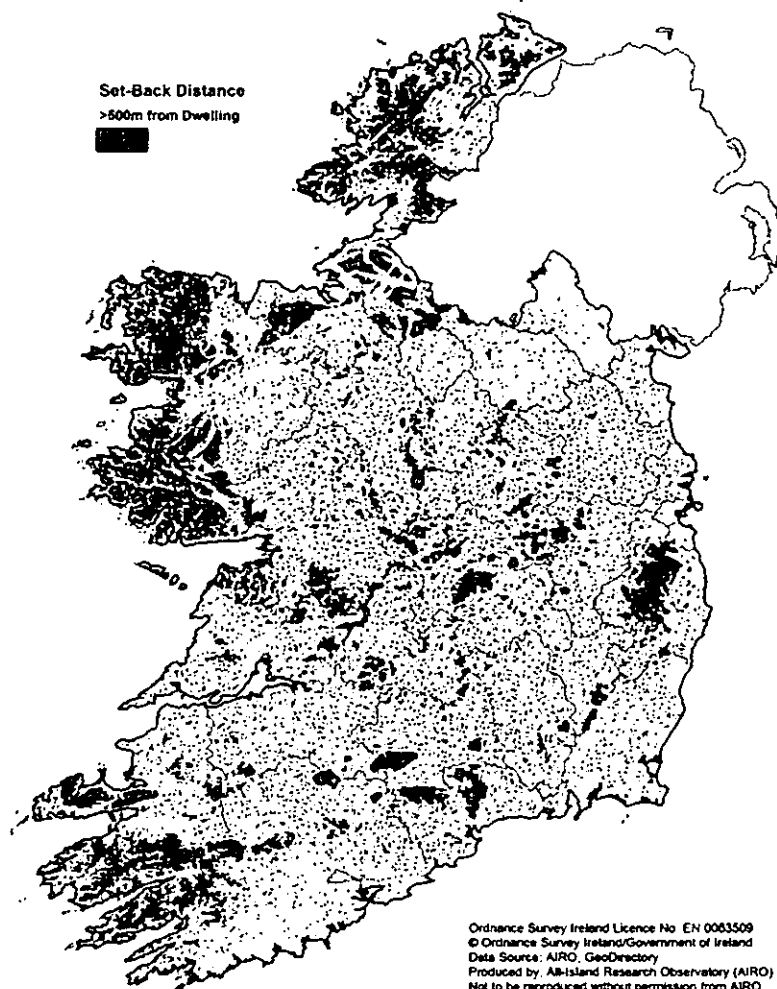
*planning permission. While an update to these guidelines is anticipated, the 2006 guidance currently forms the sole guide for planning for wind energy development in Ireland."*

Furthermore, The All-Island Research Observatory (AIRO) who are an independent spatial research body has mapped that for a 500m setback, just under a quarter (23.75%) of the total land area of the country would remain available for new wind farm development.

However, this significantly drops to:  
9.4% for a 1,000m setback,

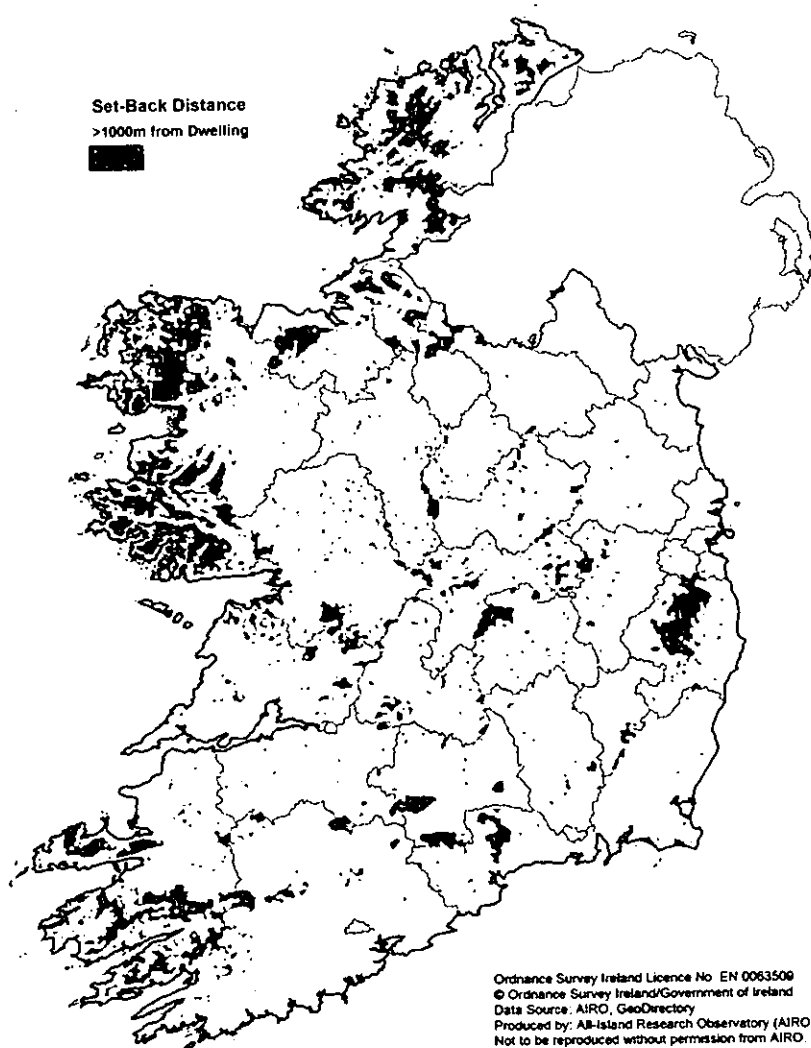
**(i) Impact of a 500M Housing Buffer Zone in ROI**

In the case of the 500m setback, 23.75% of the total land area of the country would remain available for new wind farm development.



**(ii) Impact of a 1KM Housing Buffer Zone in ROI**

In the case of the 1000m setback, only 9.4% of the total land area of the country would remain available for new wind farm development.



Source: Analysis carried out by AIRO at NUI Maynooth

It is also important to note that while the analysis above from AIRO at NUI Maynooth is robust, it does not take into account, other constraints such as:

- Availability of a viable Wind resource
- Avoidance of known archaeological features with an appropriate buffer if required
- An airport buffer
- A radar buffer
- A telecommunications buffer

- Landscape constraints for sensitive landscape
- County Development Plan zoning

**Therefore the total land area remaining available under the above scenario remains an optimistic number as the % land area would in fact be significantly smaller, if not towards zero for distances >500m, when all other constraints are taken into account.**

This analysis clearly indicates that a setback distance of 1km as proposed in Wicklow would mean that *there would be virtually no land available within the county for wind development and demonstrates that applying such a restriction is uninformed given no quantitative study has been prepared.*

**There is no doubt such a policy will rule out the development of Wind Energy Development within the County even in the areas considered otherwise suitable.**

IWEA are concerned that the inclusion of an "at least 1,000 metre" standard set back of wind farm developments from dwellings will:

- Greatly reduce the suitable site alternatives available for wind farm development within County Wicklow, as identified within the wind Energy Strategy that has been adopted;
- Reduce the ability of landowners to bring forward renewable energy projects on their own lands;
- Apply an inappropriate strategic level constraint that would not be necessary to ensure the protection of residential amenity at individual project level;
- Restrict the opportunities for Wicklow to benefit from development of its own Green Economy with benefits from jobs, investment, carbon emissions savings and for the reputation of the country. We note that within Chapter 5 on Economic Development, Green Energy is clearly identified as an opportunity for economic development within objective EMP17, including renewable energy.
- Reduce the ability of Wicklow as a County and the Country as a whole to support the delivery and achievement of renewable energy targets that have been set and are subject to national and international agreement;
- Restrict the ability of the planning Authority to favourably consider wind farm projects that fully satisfy all the other listed requirements following detailed individual project assessment and study; and
- Render the Wicklow Development Plan inconsistent with Ministerial Guidelines that have been issued under Section 28 of the Planning and Development Act, 2000 as amended.

IWEA reiterate our serious concern that the result of the proposed amendments would be the further overall reduction in wind farm capacity areas within County Wicklow.

The imposition of a rigid extreme separation distance of 1km within the strategic planning policy for the County will further restrict, to the point of extinction, any potential for future wind energy development in Co. Wicklow. **IWEA would like to ask the Council if this is the intended consequence of such proposals.**

## Conclusion

IWEA is hopeful that the new County Development Plan will contribute to achieving the continued development of the wind resource in the County. This is a valuable opportunity for Wicklow County Council, by taking a proactive approach, to realise, in an appropriate manner, the wind energy development potential of the County and to adopt policies and objectives that enhance sustainable development. The importance of adopting clear policies and a detailed strategy using a logical methodology and with the benefit of the statutory process is immeasurable. This approach brings a greater degree of clarity for the wind energy industry, as well as for the planning authority and the general public.

Given the development plan's remit in relation to wind energy development (i.e. that it provides a broad strategic land use framework), it is suggested that development plan objectives should not stipulate site specific design constraints. Appropriate design constraints such as set-back distances are informed by national policy guidance and further informed by the detailed project design process undertaken in tandem with the preparation of an Environmental Impact Statement for a project.

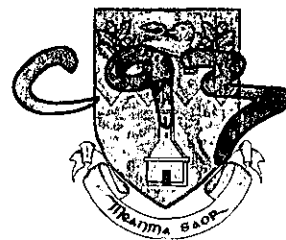
The inclusion of a mandatory 1,000 metre set back distance within a policy objective will unnecessarily and inappropriately restrict the implementation of national and local policy to generate additional electricity from renewable sources and artificially restrict the number and range of sites that could be brought forward that would otherwise satisfy all the other requirements of the County Development Plan, National Guidelines and the requirements of proper planning and sustainable development.

Climate change is a global issue and is a matter for all levels of government to address from an international to a local level. The inclusion of a mandatory 1,000 metre set back will unnecessarily prevent the full potential of County Wicklow's renewable energy and wind energy resources being harnessed, and would be misaligned with the other policies and provisions within the Draft Plan that support the development of renewables.

To conclude, therefore, while IWEA fully supports the provisions contained within the plan which seek to increase and foster further renewable energy development within the County, it requests that the requirement for an "at least 1,000 metre" set back from residential development be omitted from the final plan. Omitting this provision will ensure compliance with National Guidance while also allowing wind farm developments to be assessed on a more detailed case by case basis. Reviewing wind farm applications on a specific project by project basis will allow all relevant potential impacts to be assessed during the planning application process and will ensure that an appropriate balance can be struck between reaching national and international renewable targets and the protection of residential amenities.

# Wicklow County Council

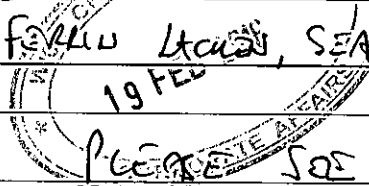
DRAFT COUNTY DEVELOPMENT PLAN  
2016-2022



## SUBMISSION FORM

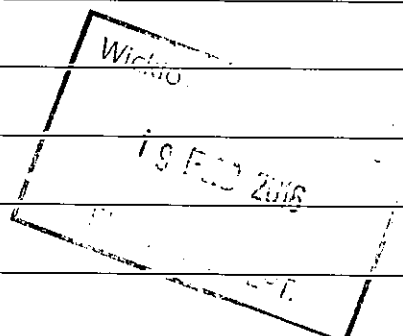
Name/ Organisation: KETEK JOHNSTON Date: 17 Feb 2016

Address: FORLAW LUGAN, SEA ROAD, NEWCASTLE, CO. WICKLOW A68 A250



PLEASE SEE ATTACHED LETTER AND MAPS  
(SENT ALSO BY EMAIL).

*[Signature]*



Express YOUR VIEWS on the future development of YOUR COUNTY

Write To:  
County Development Plan Review,  
Planning Department,  
Wicklow County Council, Station Road,  
Wicklow Town.



Email

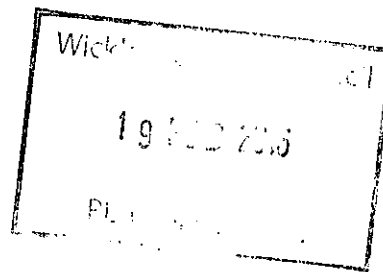
[planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

Submissions By

February  
19th

Ferrin Lacken  
Sea Road  
Newcastle  
Co Wicklow  
A63 A250  
17<sup>th</sup> February 2016

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow Town



Submission on DRAFT COUNTY DEVELOPMENT PLAN 2016-2022 regarding Sea Road, Newcastle

Dear Sirs,

Having attended the very useful public information on the Draft Development Plan at Newcastle Community Centre some weeks ago, and following a discussion with one of your planners there, I wish to make a submission concerning the western end of Sea Road. This submission concerns two of the "Newcastle Specific Local Objectives" on Page 161 of the Draft Development Plan, as follows:

*Newcastle Specific Local Objectives*

1. *Improve and provide roads, footpaths and cycleways where required and at the following locations:*
  - *The realignment of the junction of Sea Road/R761*
2. *To facilitate the provision of pedestrian and cycling linkages within and between existing and new housing/mixed use development throughout the settlement.*

This follows a previously declared Objective in the current Newcastle Town Plan (section 4, page 59 of that Plan):

### *Objectives*

- *Improve the road and provide a footpath, along the L5550 (Se Road) from Hunter's Leap to the R761*
- *Realign the junction of Sea Road/R761, in conjunction with development of the adjacent site*

(I am presuming that the "adjacent site" in the existing Town Plan is the site at the southern side of Sea Road, where it meets the R761).

Before making this submission, and in order to demonstrate that it has a valid basis, I should outline some relevant history in respect of this part of Sea Road.

I have lived at this address since 1987. I have marked our house "X" on the attached enlargement extract from the town map contained in the Draft Plan. The house is in fact now somewhat larger than is shown by the simple rectangle on the Ordnance Survey derived map – we extended the house, with planning permission, about 11 years ago.

During our early years here, our southern, roadside boundary, comprised a large hedge of mature Leylandii trees, which extended fully to the road edge. In anticipation of seeking permission to extend our house, I took down this hedge many years ago, and planted a new hedge and built a new fence set back from the road, to provide much improved sight lines from our gateway. I subsequently removed the fence, but this now mature hedge remains.

One side effect of the removal of the original Leylandii tress was that the road edge at our property, a grass verge/bank, then became vulnerable to traffic damage, and has in fact gradually been eroded back over the years. Sea Road is narrow at this point, such that traffic tends to drive up onto our grass, effectively widening the road. (To this extent, the existing declared plan for a realignment of the Sea Road/R761 junction makes sense).

When a developer sought permission for building what is now Castle Manor housing estate at the south side of Sea Road, and concerned that the top of Sea Road, now to serve an additional 54 houses and already too narrow, might prompt a Compulsory Purchase Order that would adversely affect us, and with our house already quite close to the road, I approached the then Area Engineer to express my concern in respect of the planned development. Reassured by the Area Engineer that this private development would not involve any CPO from Wicklow County Council, and that the planners' requirements for road



widening and footpath would have to be privately negotiated (by the developer) with the other landowner (the property opposite ours, at the south side of Sea Road), I noted that the permission, when issued, included conditions regarding widening of Sea Road between the main road and the entrance road to this new housing estate.

With this addressing my concerns, I did not object to the original planning, and did not appeal it. Local knowledge suggested that the necessary strip of land was in fact purchased from the landowner in question (Mr Ned Jameson, now deceased) – this was to allow fulfillment of the planning condition for the widening of this short stretch of Sea Road, to properly accommodate two-way traffic, along with the provision of a footpath, all at the southern side of the road.

When Castle Manor was built, and although a footpath was brought out as far as the mouth of its entrance road, this footpath terminated there. No road widening was undertaken, and the boundary of Mr Jameson's property was untouched.

The provision of the footpath (clearly shown on the map, jutting out into Sea Road) has been such as to effectively *narrow* Sea Road at this point. This path does not join up with the path at the top of the road (also shown on the plan).

Notwithstanding a planning permission condition regarding the widening of Sea Road at the southern side, along with the provision of a footpath to facilitate pedestrians moving between Castle Manor and the village, the resultant partial works left the road effectively even narrower than it was. This, along with the very substantial increase in traffic generated by an additional 54 houses, caused traffic to encroach onto the grass bank at our side of the road, damaging this and causing, in effect, widening of the road.

Eventually realizing that Wicklow County Council were not enforcing this planning condition, I approached the Area Engineer in place at that time (not the same person I had consulted previously), and he visited the site. He told me that, although Wicklow County Council did later look at providing these works themselves, this was deemed too expensive, because of the need to culvert a small watercourse that runs just inside this boundary wall and bank. He effectively conceded that Wicklow County Council had failed to enforce the original planning permission condition.

This highly unsatisfactory situation persists, our grass bank being constantly eroded and serving as a "safety valve" when vehicles meet, the road still being too narrow.

It is important to note this unsatisfactory history of a non-enforcement of a fundamental planning permission condition attaching to a large housing development, and Wicklow County Council's failure to either ensure that the developer complied with this condition, or to undertake these works themselves.

With this history of development in mind, my submission is that, in any implementation of the two objectives cited earlier, this top portion of Sea Road should be widened for traffic and pedestrian safety purposes (as was envisaged in the Castle Manor planning permission all those years ago), and that a footpath should be provided to link the two existing paths, and that all of these works (including removal of the projecting footpath and realignment of it) should be at the southern side of the road only, where the Castle Manor developer had planned it to be, and as required by the Council, and that these works should be accompanied by reinstatement of the original line of the northern edge (our side) of the road, formalized with a kerb to prevent further damage to our property.

Whatever logic might apply for any further footpaths on other parts of Sea Road, the location of Castle Manor on the southern side of the upper part of the road dictates that the footpath should be at that side (as was always envisaged anyway) – the most common pedestrian movement along this part of Sea Road is between Castle Manor and the service station shop, to the south of Sea Road; thus, all of this journey is on the same side of the road.

Whether or not the late Mr Jameson was paid for a never-used strip of land (and some arrangement must have been reached at the time, for the planning condition in question to be viable), the map makes obvious the fact that there is ample space between the roadside boundary in question and the Jameson house ("Y" on the plan).

Coincidentally, and noting my previous conversation with one of the Area Engineers, the watercourse at the Castle Manor corner (near the letter "S" of "Sea Road" on the plan") has in recent months been overflowing onto the road, though some excavation works have been done in that garden in recent days.

I would be happy to meet a planner or engineer on site to point out the relevant features. I presume that the original planning conditions for Castle Manor can be accessed to confirm the above history of events and the failure on the part of the developer to comply with a traffic safety measure condition in the original planning permission, and the Council's own consideration of this problem later.

To summarise:

SUBMISSION:

That the –

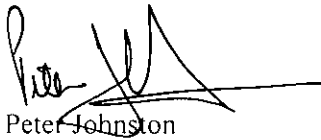
*Newcastle Specific Local Objective to*

*1. Improve and provide roads, footpaths, and cycleways where required and at the following locations:*

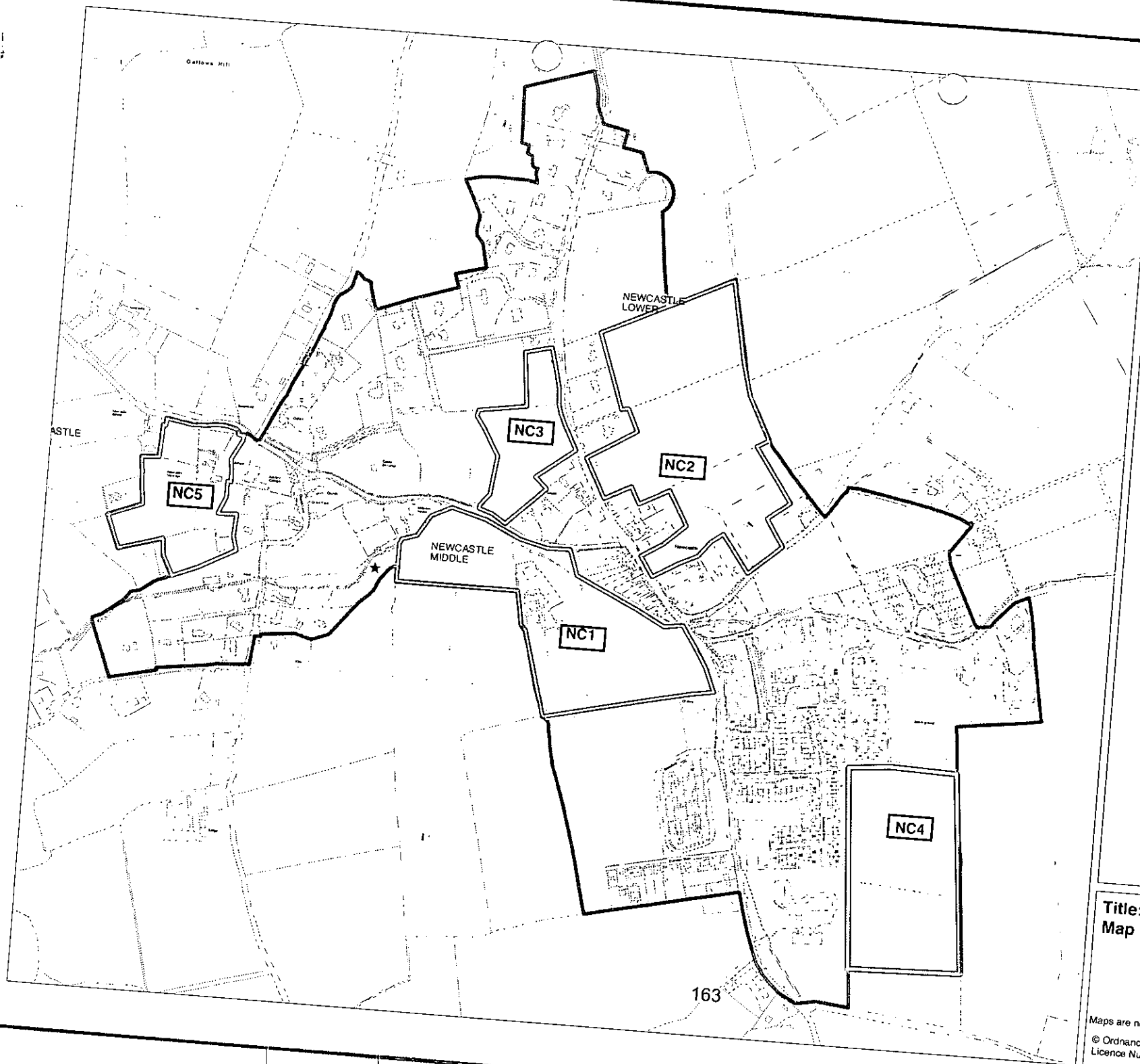
- The realignment of the junction of Sea Road/R761*

○ – should be implemented only at the southern side of Sea Road, and that all footpaths or cycleways should be at the southern side, in the context of a previous non-implementation of road widening and footpath construction as a planning condition of the Castle Manor development.

Yours faithfully,







  
Peter Johnston

○ Encl. Copy enlarged extracts from map attaching to Draft Development Plan



# Newcastle Settlement Plan

DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2016-2022

-  Settlement Boundary
-  Primary Development Area
-  Secondary Development Area
-  Tertiary Development Area
-  NC1 Plan Objective
-  Plan Objective Boundary

Title: Land Use Zoning Objectives  
Map No.: 1



Wicklow County Council  
Planning Department

Maps are not to scale

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Leonora Earls

From: 19 February 2016 14:49  
 Sent: Planning - Development Plan Review  
 To: 'Niall O'Byrne'  
 Cc: County Development Plan Review  
 Subject: Wicklow Draft Dev Plan Submission 19 2 2016.pdf  
 Attachments:

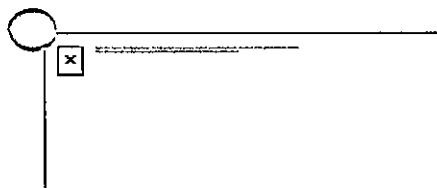
Good Afternoon,

Please see the attached submission in relation to the Draft Wicklow County Development Plan 2016 – 2022.

I would be grateful if an acknowledgment of this submission could be sent by return.

Best Wishes,

Ciara Slattery  
 BScSci MPLAN MIPI



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Kavcre La Touche Limited,  
c/o New Generation Homes,  
4 Inver Mews,  
Old Chapel Ground,  
Arklow,  
Co. Wicklow

County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town

19<sup>th</sup> February 2016

**Re: Submission from Kavcre La Touche Limited in relation to the Draft Wicklow County Development 2016-2022.**

Dear Sir/Madam,

We, Kavcre La Touche Limited wish to make this submission to Wicklow County Council in relation to the Draft Wicklow County Development Plan 2016-2022. Kavcre La Touche Ltd. have the ownership of a site at the former La Touche Hotel in Greystones, Co. Wicklow. The site is subject to a planning application to refurbish the derelict hotel into 5no. townhouses and to develop 21no. new dwellings on the surrounding site (Reg. Ref. 15/114). Planning permission has been granted by Wicklow County Council and is now subject to 3<sup>rd</sup> Party Appeals with An Bord Pleanala (PL27.245501 refers).

We are generally supportive of the Draft County Development Plan, and feel the vision and objectives contained therein will contribute to the positive development of the County up to 2022 and beyond. Notwithstanding this, it is submitted that the County Development Plan should put greater consideration on the proposed Land-Use Zonings within the Town and Settlement Plans to be adopted as part of the Development Plan Process.

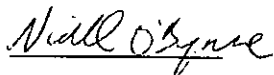
In the case of Greystones whose zoning is controlled by the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019, the majority of its coastal area is zoned as Town Centre 'TC'. The zoning objective seeks *'To protect, provide for, and improve the development of a mix of town centre uses including retail, commercial, office and civic use, and to provide for 'Living Over the Shop' residential accommodation, or other ancillary residential accommodation. To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and promote urban design concepts and linkages between town centre activity areas'*. While this may be appropriate in part, we are concerned at the concentration of mixed use zoning within Greystones.

The Town Centre is in need of rejuvenation and redevelopment in some cases, e.g. at derelict and brownfield sites, however it is submitted to Wicklow County Council, that the provision of mixed-uses is not appropriate in every instance and may lead to dead spaces and vacant units. As such, we would like to caution against the over provision of mixed use zoning generally within the County. We would welcome an acknowledgement in the Development Plan that single-use zoning may be appropriate in certain circumstances.



We further note that there is an opportunity to embrace the benefits of single use development within the proposed Town and Settlement Plans, in the forthcoming new 'Bray Municipal Local Area Plan, and in the existing Local Area Plans to be reviewed during the County Development Plan lifetime.

Yours faithfully,



Niall O' Byrne MRUP MIPI  
Kavre La Touche Limited / New Generation Homes

C95

**Leonora Earls**

**From:** Kevin Hughes  
**Sent:** 18 February 2016 13:28  
**To:** Planning - Development Plan Review  
**Cc:** Parking Space Locators; Lotus Architects; Jim Egan  
**Subject:** Draft WCC Development Plan - Submission in Respect of Lands at Togher More, Roundwood, Co. Wicklow  
**Attachments:** Declan Keena - WCC Development Plan Submission - Roundwood.pdf

Dear Sir/Madam,

Please find attached a submission on the draft Wicklow Development Plan 2016-2022 prepared on behalf of Declan Keena in respect of lands at Togher More, Roundwood, Co. Wicklow.

I would be obliged if you confirm receipt of this submission by reply.

Regards

Kevin Hughes MIPI MRTPI  
Director

Hughes Planning & Development Consultants  
The Mash House  
Distillery Road  
Dublin 3

T 00 353 (0)1 533 4211  
M 00 353 (0)87 738 0096  
E [kevin.hughes@hpdc.ie](mailto:kevin.hughes@hpdc.ie)  
W [www.hpdc.ie](http://www.hpdc.ie)

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# **Town Planning Submission**

**Lands at Togher More, Roundwood, Co. Wicklow**

**Draft Wicklow Development Plan 2016-2022**

**16<sup>th</sup> February 2016**

**l|o|t|u|s architects**

21 Lauderdale Terrace, New Row South, Dublin 8



**Hughes** Planning & Development Consultants

The Mash House, Distillery Road, Dublin 3  
[www.hpdc.ie](http://www.hpdc.ie)

## 1.0 Introduction

Hughes Planning and Development Consultants, The Mash House, Distillery Road, Dublin 3 and Lotus Architects, 21 Lauderdale Terrace, New Row South, Dublin 8 wish to make this submission on behalf of Declan Keena, 4 Windsor Terrace, Portobello, Dublin in respect of the Draft Wicklow Development Plan 2016-2022. This submission relates to lands at Togher More, Roundwood, Co. Wicklow, which has been the subject of a recent planning application (Reg. Ref. 15/1089) where outline planning permission was declined for

*'A petrol filling station, café, and 8 no. detached 2/3 storey houses; petrol station to consist of convenience store, tyre bay, toilets, canopy, signs, water tank & underground fuel storage. All works are inclusive of ancillary site works, drainage, water main, access road, new entrance/exits.'*

Lotus Architects are preparing revised proposals to address the issues identified in the above application and it is considered appropriate to make this submission to request that the Draft Wicklow Development Plan 2016-2022 and the vision for the subject site are consistent and complimentary.

We request that the recommendations of this submission be given full consideration in preparation of the forthcoming County Development Plan 2016-2022.

## 2.0 Site Location and Description

The site in question is located on the edge of Roundwood, to the south-west of the town main street on the R755. The site is triangular in shape with no existing structures, relatively flat, and is mostly populated by gorse. Its immediate neighbours include the Roundwood GAA club to the south and detached rural houses and outbuildings to the north and east. The site has an approximate area of 1.05 hectares (2.59 acres). The site is currently zoned RE – Existing Residential in the Wicklow County Development Plan 2010 – 2016 and has a history of granted planning applications relating to commercial activities (please refer to Section XX Planning History).

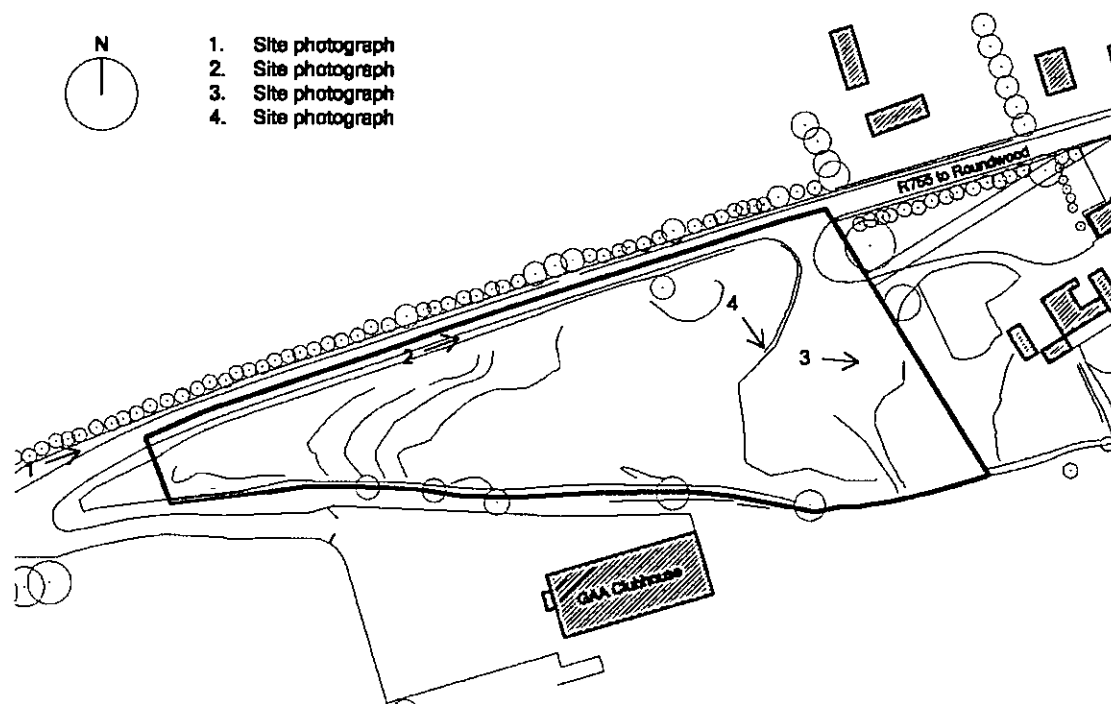


Figure 1.0 Existing Site Plan



Figure 2.0 - Site Photograph 1  
Road view from south-west corner



Figure 3.0 - Site Photograph 2  
Road view from northern boundary footpath



Figure 4.0 - Site Photograph 3



Figure 5.0 - Site Photograph 4

The site marks the south-west boundary of Roundwood, and acts as a gateway for traffic entering the village from Annamoe, Laragh, Glendalough, and Rathdrum. As the site is in a prominent location it is important that any proposal for this site adopts a scheme that is well proportioned, appropriately scaled, and provides an attractive and interesting entrance to the village. In our the site represents and opportunity site to an approach to the village and to accommodate a filling station use, which is more suited to an edge of centre location as opposed to the core area of the town .

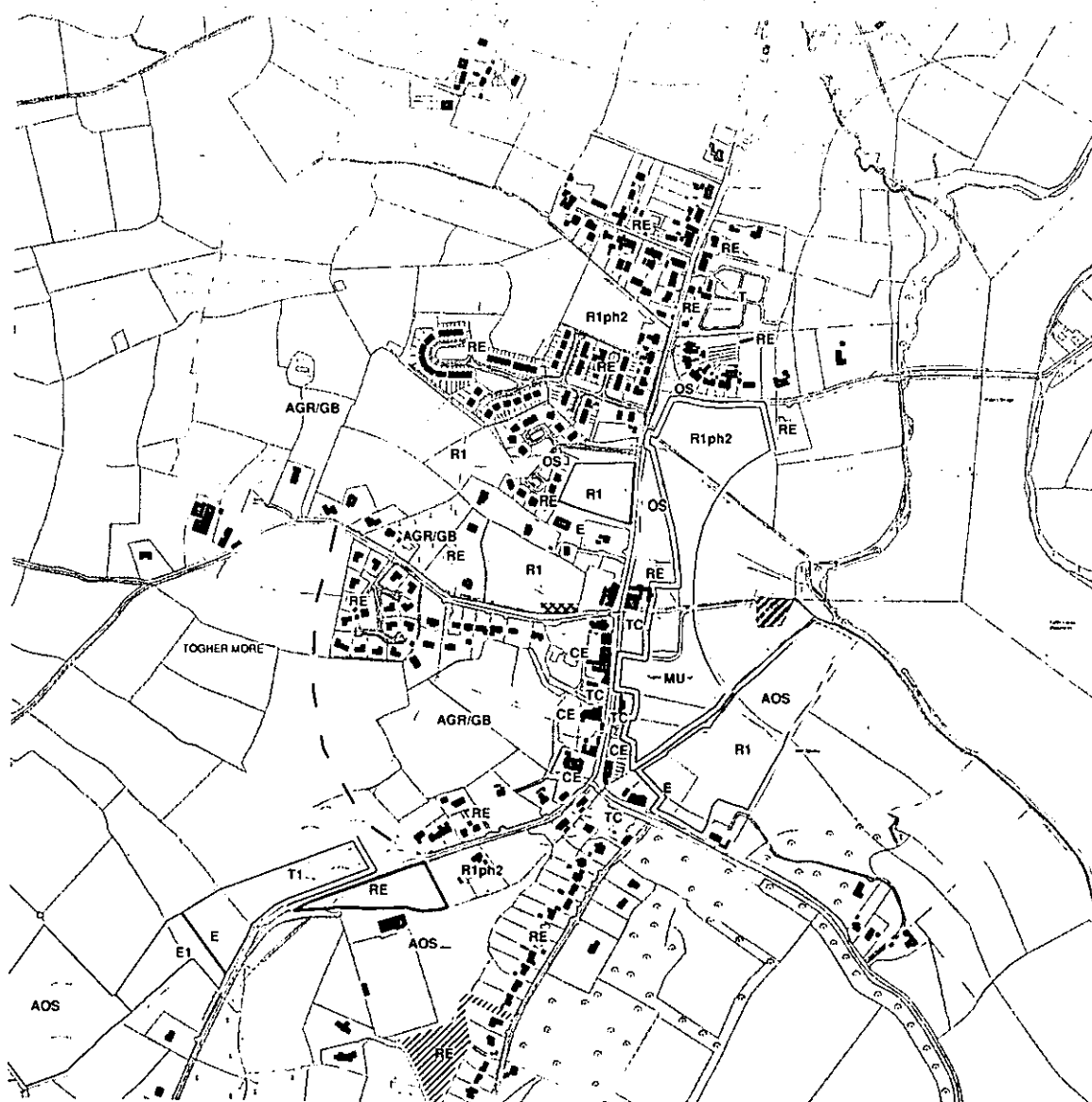


Figure 6.0 Current Roundwood Town Plan with subject site outlined in red

## 2.1 Planning History

The following is a review the site planning history, which indicates a series of permissions approved for commercial and residential use. The most recent application on site resulted in a refusal of outline permission and as previously stated the applicant is preparing revised proposals to address these reasons for refusal. This proposals are outlined later in this submission.

Reg. Ref.15/1089      Permission refused for a petrol filling station, café, and 8 no. detached 2/3 storey houses; petrol station to consist of convenience store, tyre bay, toilets, canopy, signs, water tank & underground fuel storage.

This recent permission of particular relevance to the subject site and review of the Report of the Planning Officer indicates the following:

- The subject site is currently zoned for residential use (RE) and the proposal to construct housing on the eastern part of the site is 'acceptable in principle';
- Notwithstanding the site planning history, the proposal to locate a filling station is deemed to contravene the development plan. However, the following commentary of the planning officer

are considered to be significant in determining the future use of the lands and their designation in the Wicklow Development Plan 2016-2022:

***'Notwithstanding the zoning objective for the lands, I acknowledge the fact that there is no petrol station in Roundwood at present and the closest filling stations to the settlement would be:***

- Laragh - 9km to the south
- Coynes Cross - 11km to the east
- Ashford - 12km to the east
- Kilmacanogue - 14km to the north

***'There therefore may be merit in the principle of a petrol station to serve the local population. However such petrol station and associated retail outlet would have to be of an appropriate scale'***

Reg. Ref. 09/167      Permission refused for 20 no. two storey dwellings with connection to services and site ancillary works on site of previously granted 11 dwellings (Reg. Ref. 05/3158).

Reg. Ref. 05/3158      Permission granted for a residential development of 11 no. two storey houses, comprising (i) 9 no. 4 bedroom detached (types A,B,C,D) (ii) 2 no. 4 bedroom semi-detached (type E) including all site development works of drainage, water main, access road, new entrance/exit.

This permission indicates the suitability of the subject site for residential development.

Reg. Ref. 02/7002      Permission granted for a 3 storey hotel development consisting of 36 no. bedrooms, foyer, lounge bar, restaurant, function room, ancillary and site works, carpark.

This permission approved a far more intensive form of development that proposed in this submission. The current proposals are intended to be of a limited scale only which will not conflict or compromise the retail function of the core of the town.

Reg. Ref. 02/6266      Further Information requested in respect of a petrol filling station, convenience store, tyre bay, toilets, canopy, signs, water tank, underground fuel storage, & ancillary works. This application was deemed withdrawn as no response to the request for further information was submitted within six months of the request.

Reg. Ref. 97/6323      Permission **granted** for a petrol filling station, convenience store, tyre bay, toilets, canopy, signs & ancillary works.

These permissions indicate that the planning authority was previously positively disposed to a petrol filling station on the subject site.

### **3.0 Planning Policy**

#### **3.1 Roundwood Town Plan (part of Wicklow County Development Plan 2010-2016)**

The subject is currently zoned 'RE' - Existing Residential with the following objective: *'to provide for residential development to provide new communities and to protect and improve residential amenity.'*

*The vision for this zone is as follows: 'to ensure that any new development conforms to County Development Plan standards and that development in existing areas (e.g. extensions, infill development, childcare facility etc) reflects the prevailing density and character of its immediate surroundings, and shall have a minimal impact on existing residential amenity.'*



The Town Plan states:

*'For such a Rural Town as Roundwood, the current level of convenience retail and service offer is relatively good and is, to a large extent, attributable to the town's extensive catchment. The Council will continue to promote the development of vital village shops providing an immediate convenience to local residents and the rural hinterland. Major retail development is not considered appropriate for a settlement the size of Roundwood.'*

*Roundwood is currently served by a reasonable choice of convenience retailing (incl. chemist, hardware store and foodstore). For this reason only a relatively small amount of extra retail infrastructure is envisaged for Roundwood. This will be facilitated under the Town Centre zoning or AA1 Zoning.'*

However as per the report of the Planning Officer on Reg. Ref.15/1089, there is an absence of filling stations in the town, with residents having to travel significant distances to other settlements. We submit that the subject site is an ideal location for a filling station of an appropriate scale.

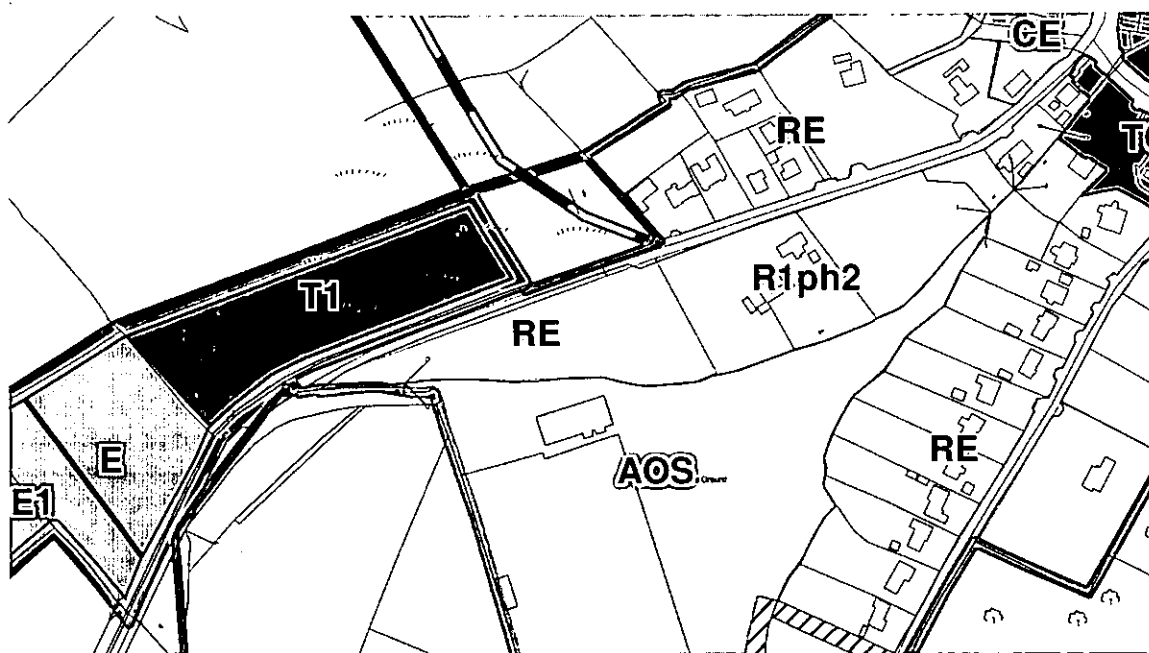


Figure 7.0 Extract from Roundwood Town Plan (Wicklow Development Plan 2010-2016) showing the subject site c.250m west of the commercial core of the town.

### 3.2 Draft Wicklow Development Plan 2016-2022

The draft plan contains three simple land use zoning objectives for Level 6 towns - Primary, Secondary and Tertiary. The subject lands are located within the Secondary Zone. The vision of the Secondary Zone is *'to provide for the sustainable development of a mix of uses including residential, employment, community and recreational uses that provide for the needs of the existing settlement and that allows for the future growth of the settlement.'*

We note that the development plan Core Strategy allocates 195 no. new dwellings for Roundwood in the period 2011 to 2022.

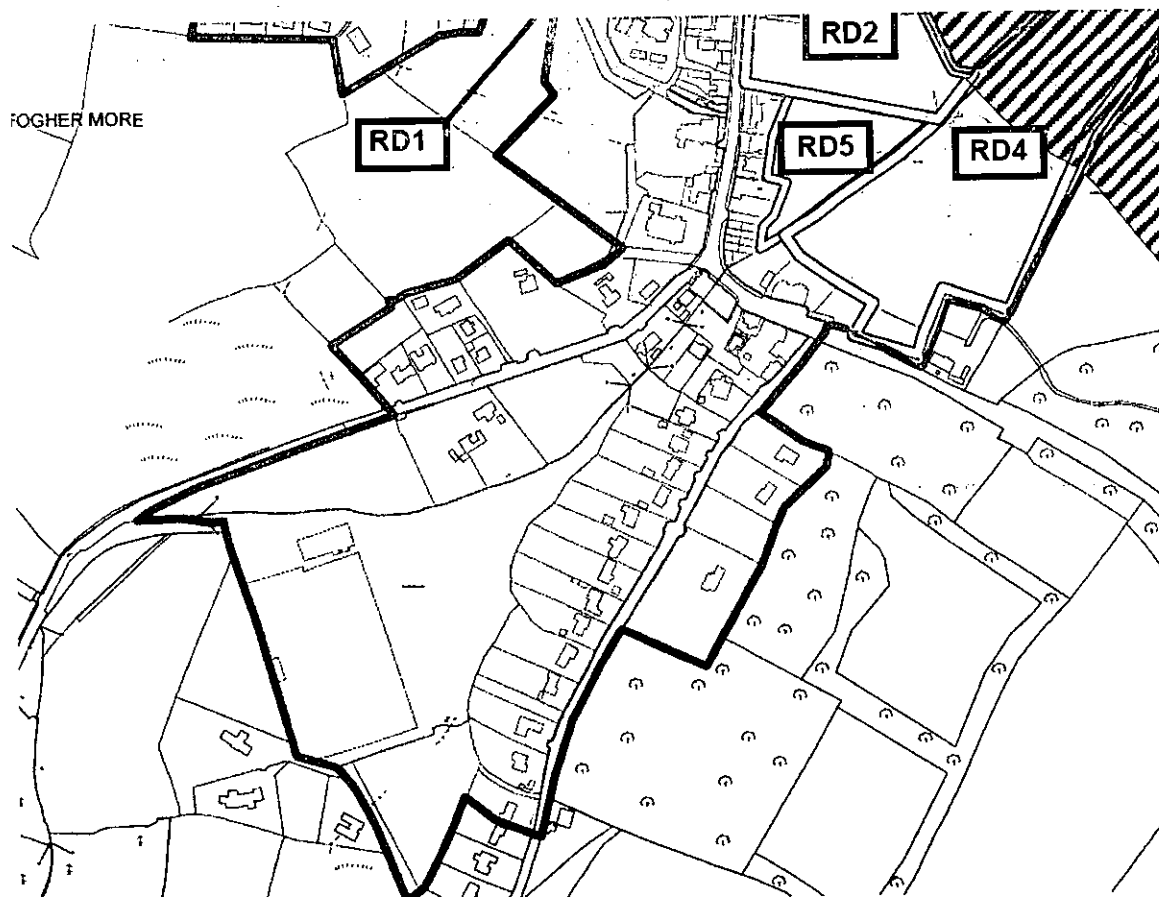


Figure 8.0 Extract from the Draft Wicklow Development Plan 2016-2022

The draft plan also contains the following provisions:

- Allow for the limited extension or 'spill-over' of the primary lands onto the secondary lands which immediately adjoin the boundary of the primary lands. New development of this type should be compatible with or reinforce the function of the primary lands and shall be visually and physically linked with the primary core. No development will be permitted that prejudices the viability and function of the primary lands.
- Retail developments will generally not be permitted on these lands; however consideration will be given to the improvement / expansion of existing retail facilities or small scale retail facilities ancillary to tourist facilities.
- In existing residential areas, it shall be an objective of the Council to protect existing residential amenity and to provide for infill residential development at a density and design that reflects the established character of the area in which it is located.
- Allow for new residential developments, including a mix of residential options within an attractive and accessible setting, at appropriate locations which have safe access to the public road network, which have pedestrian links to the primary lands, and which are served by appropriate water and sewerage infrastructure, and which, if possible are in proximity to community and public services.
- A full range of unit sizes, including smaller 2 and 3 bedroomed units shall be provided in all new housing developments (i.e. developments exceeding 4 units). Generally, no more than 50% of the units in any new development shall exceed 3 bedrooms or 120sqm in size.
- Promote densities in the order of 15 dwelling units per hectare. A higher or lower density may be considered appropriate, having regard to the context of the site and the prevailing density in the vicinity of the site.
- Protect and enhance existing employment areas to reach their full employment potential.

- Promote these lands for employment generating developments including 'product' intensive lower order industrial developments, small scale enterprise units, tourist developments, general business uses and home based economic activity.
- Protect and allow for the improvement of public and private open space and recreational facilities.
- Allow for the development of new and improved community services, for health, welfare, community, education, civic and institutional uses including schools, childcare, nursing homes, community buildings, churches etc. in close proximity to existing and planned residential communities as well as other ancillary services such as public services and recycling facilities.

#### Phasing

- Development should extend outwards from the primary area with undeveloped land closest to the core and public transport routes (where applicable) being given preference; this will normally correspond to the 'secondary area'. 'Leapfrogging' to peripheral areas, such as the outer edge of the secondary area or the tertiary zone should be avoided.
- A strong emphasis should be placed on encouraging infill opportunities and better use of underutilised lands.
- Areas to be developed should be contiguous to existing developed areas.

The development of part of the subject lands for housing is consistent with the provisions of the draft development plan. The provision of a petrol filling station is also not precluded within the Secondary Zone. However, having regard to the suitability of the site for such a use we request that a local objective be added to the plan 'to provide for a petrol filling station and ancillary retail facilities'.

#### 4.0 Proposed Development

The proposal for the site includes the development of four key elements. These are (as indicated in Figures 9.0 and 10.0) detached timber frame housing, a courtyard garden, a petrol filling station and landscaping/tree planting.

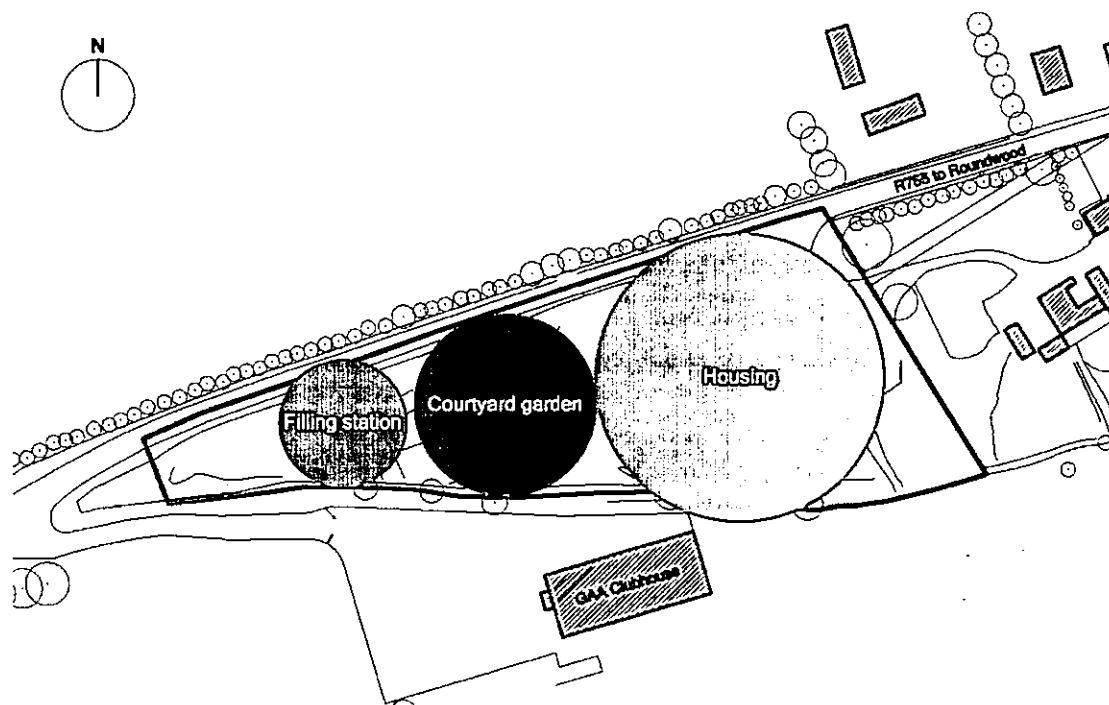


Figure 9.0 Proposed uses

Trees and hedgerows are a prominent feature of the Wicklow countryside and to enhance this it is proposed the three elements of housing, courtyard garden, and filling station, will be surrounded and penetrated by extensive planting of large specimen native trees and shrubs appropriate to this type of landscape; e.g. birch, scots pine, ash, and cherry. Native landscaping provides great privacy for residents and attractive habitats for wildlife. It is hoped the proposal appears more planted landscape than built environment.

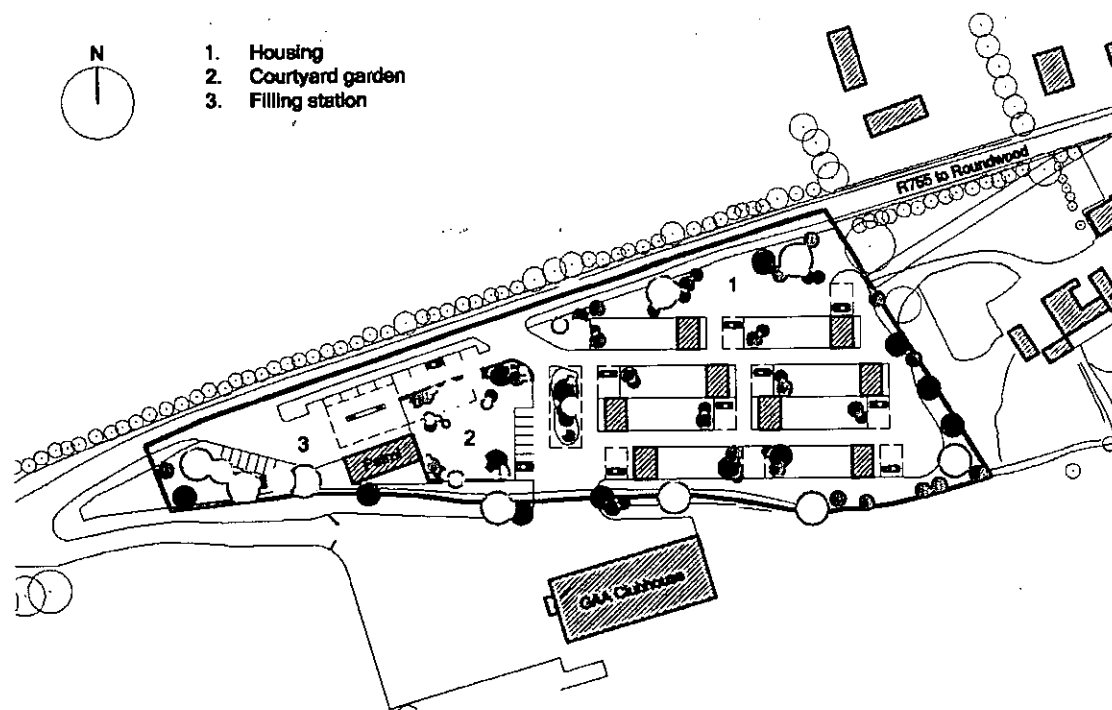


Figure 10.0 Site plan – proposed

#### 4.1 Housing

Eight detached timber frame houses, a mixture of pitched and flat roofs with two and three storey varieties, are proposed for the eastern boundary of the site with their gable ends addressing the road.

There is a history of three storey housing in the Irish landscape; it has never been exclusively two storey which is a suburban house type. Grand houses, industrial and agricultural buildings have been of a three storey type and dimension. Here it is appropriate as the site marks the end/beginning of Roundwood. The scheme acts as a book-end to the village.

Traditionally the Irish rural dwelling has not necessarily addressed the road off which it is accessed. The gable end addresses the noisy road, producing a quiet sheltered entrance to the house. The arrival from the road is consequently more ceremonial.

The houses have a staggered layout in plan and have generous private open space back gardens a minimum of 22 metres in length and approximately 132 m<sup>2</sup> in area. It is proposed the scheme will adopt generous planting and pedestrian space between each home, encouraging social interaction between residents.





Figure 11.0 - 8A Architecten  
datcha house, Nijmegen, The Netherlands



Figure 12.0 - 8A Architecten  
datcha house, Nijmegen, The Netherlands



Figure 13.0 - MVRDV  
Barcode house, Munich, Germany



Figure 14.0 - MVRDV  
Hagen Island housing, Ypenburg, The Hague,  
The Netherlands

#### 4.2 Courtyard Garden

The courtyard garden lies at the heart of the plan and mediates the space between the housing and filling station. It is proposed that this is a walled space with rich planting that can be accessed by filling station customers, housing residents, and members of the public.



Figure 15.0 - Piet Oudolf  
Serpentine Gallery, Kensington Gardens, Hyde  
Park, London



Figure 16.0 - Piet Oudolf  
Hauser & Wirth Garden, Durslade Farm, Bruton,  
Somerset



### 4.3 Petrol filling station

Roundwood currently has no petrol filling station. The nearest filling stations serving the local population are located in Laragh (9km to the south), Coynes Cross (11km to the east), Ashford (12km to the east), and Kilmacanogue (14km to the north).

It is hoped merit can be found to allow a filling station on this site to serve the residents of Roundwood and provide a much needed amenity. In addition, two previous planning applications were sought and granted for filling stations on this site providing precedent for granting. It is envisaged the filling station will be a discrete single storey structure with limited retail of 100m<sup>2</sup>, and designed to provide Roundwood with an attractive and appropriate entrance/end to the village.

We note that such a proposal is not precluded by the designation of the site within the Secondary Zone, however this submission requests that a local objective be added to the draft development plan 'to provide for a petrol filling station and ancillary retail facilities' on the subject site.

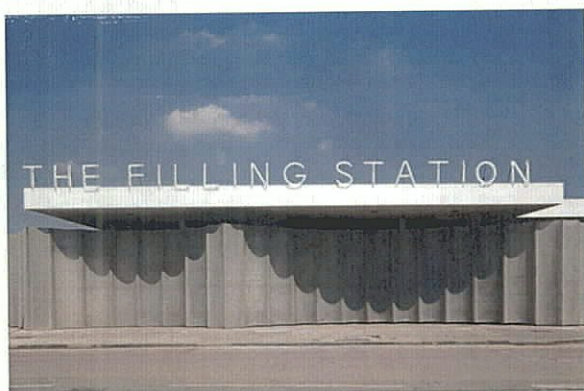


Figure 16.0 - Carmody Groarke Architects  
The Filling Station, King's Cross, London



Figure 17.0 - AH Asociados  
Legarda Service Station, Autovía del Camino de Santiago, Legarda, Spain



Figure 18.0 Foster and Partners  
Repsol Service Station, Madrid, Spain

## 5.0 Summary

The landowner, Mr. Declan Keena purchased the site in 2015 with the intention of developing the site to include a small number of family homes with a limited amount of commercial activity which would allow him to live and work on the site and raise his family in the Wicklow countryside. Mr. Keena intends to live in one of the proposed houses and to run and manage the petrol filling station if planning permission is ultimately granted.

It is hoped the four elements of the proposal provide an attractive strategy for the site and if implemented will improve the amenities for local residents, adding to the rich character of the village. It is also proposed that Roundwood GAA club can access their clubhouse through the new proposed entrance and make use of the garden and filling station conveniences.

In order to facilitate the development of the subject site to the quality proposed with a worthwhile use currently lacking in the town, we request Wicklow County Council amend the draft development plan to include a new specific objective for the lands: *'to provide for a petrol filling station and ancillary retail facilities'*.

## 6.0 Conclusion

We request that this submission be considered in the preparation of the Wicklow County Development Plan 2016-2022. We respectfully request that Wicklow County Council amend the Draft Wicklow Development Plan 2016 – 2022 as requested to facilitate and encourage a limited amount of commercial activity and high quality housing on the site as proposed in this submission.

Should you require any further information please do not hesitate to contact the undersigned.

Kevin Hughes MIPI MRTPI  
Director  
for HPDC



C97

**Leonora Earls**

**From:** Bradshaw, Simon |  
**Sent:** 19 February 2016 13:09  
**To:** Planning - Development Plan Review  
**Subject:** KFC UK & Ireland Ltd. Submission on the Draft Wicklow County Development Plan 2016-2022  
**Attachments:** 160219\_Wicklow Submission.pdf

To whom it may concern,

Please see attached a submission on behalf of KFC UK & Ireland Ltd. on the Draft Wicklow County Development Plan 2016-2022.

The main details of this submission are as follows;

- The contact Name & Address is Paul O'Neill, Bilfinger GVA, 2<sup>nd</sup> Floor Segrave House, 19-20 Earlsfort Terrace, Dublin 2.
- The submission is made on behalf of KFC UK & Ireland Ltd., part of Yum Restaurants International Ltd. of Orion Gate, Guildford Road, Woking, GU22 7NJ, United Kingdom.
- No map is provided with this submission as the document does not relate to site specific matters.

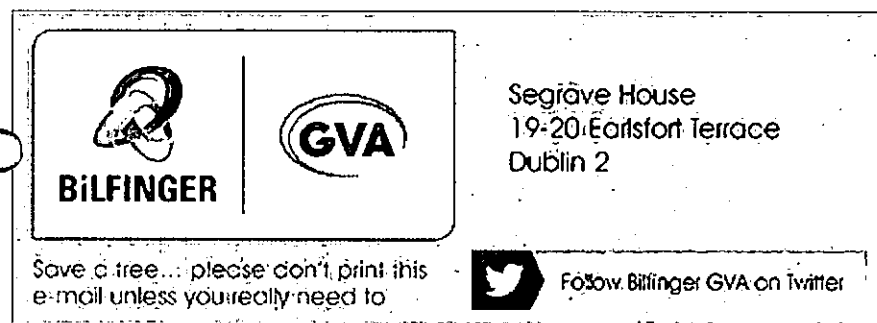
Should you have any queries with regard to the above, please do not hesitate to contact us. We would be grateful if you could confirm receipt of this submission by email.

Kind regards,

**Simon Bradshaw, Planner, Bilfinger GVA**

Email: [simon.bradshaw@gva.ie](mailto:simon.bradshaw@gva.ie) Web: [www.gva.ie](http://www.gva.ie)

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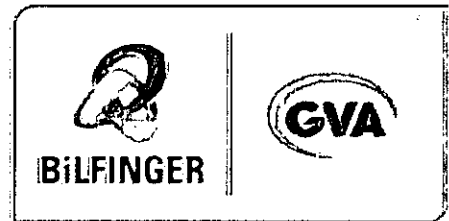
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# **Draft Wicklow County Development Plan 2016-2022**

**Submission to the Draft Wicklow  
County Development Plan 2016-2022**

On Behalf of KFC UK & Ireland Ltd.

February 2016

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Prepared By: Paul O'Neill  
 Draft Date: February 2016

**for and on behalf of GVA Planning and Regeneration Limited**

# 1. Introduction

This submission has been prepared by Bilfinger GVA on behalf of our Client, KFC UK & Ireland, part of Yum Restaurants International Ltd. of Orion Gate, Guildford Road, Woking, GU22 7NJ, United Kingdom. Yum Restaurants International Ltd. is a franchise company with a number of restaurant brands who have premises in the Wicklow County Council area, including the KFC brand. The purpose of this submission is to directly address the policy provisions set out in the Draft Wicklow County Development Plan 2016-2022 (hereafter referred to as Draft Plan) that relate to Fast Food Outlets/Takeaways as set out in Section 6.3 of the Draft Plan. Specifically, we wish to address those provisions that have changed from the current Development Plan, including Section 6.3, Objective RT16 & RT17, as outlined later in this submission.

KFC Ireland and its three franchisees play an important role in the economic development and vitality of Wicklow County Council by providing a source of employment and venues for social interaction that are extremely popular. Our client is committed to working in partnership with governments to increase the availability of healthy diet and exercise choices. It has delivered on this by:

- Signing up to the Department for Health Responsibility Deal in the UK.
- Displaying calorie information in all of its restaurants.
- Engaging in a programme of salt reduction across its menu.
- Not automatically salting fries and reducing salt sachet sizes.
- Removing all artificial trans fats from its menu six years ago.
- Working with the food standards agencies to improve its menu.
- Offering healthier choices such as salads and grilled chicken.
- Taking a responsible approach to marketing.

In general, development plans contain a series of land use policies that govern the location of restaurants, drive throughs and takeaways. It is important that the role of restaurants, such as those operated by our client, in the economy of the County is not under-estimated. They are a significant employer, employing more people per square meter of floorspace than the average industrial unit<sup>1</sup>. Disincentives for development that are enshrined in planning policy can be counter-productive and it is important that, where land use policies are included for specific uses, they are underpinned by accurate information and have a basis on which a defined outcome is desired. Our client and its franchisees intend to invest significantly in the County over the lifetime of the new Development Plan

<sup>1</sup> On average, our client's facilities provide employment for 1 no. person per 11 sq.m. compared to the average employment densities for industrial units of 1 per 38-47 sq.m. as per the Employment Densities Guide, 2nd Edition 2010; Homes & Communities Agency (UK)

when developing new sites or refurbishing existing stores as part of a five year reinvestment cycle. In this regard our client wishes to see a policy framework in place that accommodates this development rather than specifically restricting it, particularly where the basis for doing so is not entirely clear. Our client has raised some concerns relating to the policies as set out in the Draft Plan and how they could be interpreted in an unnecessarily negative fashion.

## **2. Economic Benefits of Drive Through's/Takeaways**

It is important in the context of devising policy that the positive impacts of our client's offer is recognised. Our client strives to contribute to every local economy in which it operates and create a positive impression both as a corporate entity and as a valued employer. Under the KFC model, for instance, each new drive through creates in the region of 50 no. jobs.

Each restaurant has a manager, one or two assistant managers, and three or four supervisors. An average drive through will recruit a team of 40-45 team members before opening. Managers are often recruited locally and will spend time training in other restaurants before their restaurant opens. On-going training is provided to team leaders and members, with the company offering the opportunity to complete University level courses.

Our client invests in the order of €730,000 in each new restaurant fit out, with new freehold construction projects resulting in a capital expenditure of up to €1.5million. Each of the existing stores is subject to a 5 year refurbishment cycle with the 10 year total spend on each of these being in the order of €500,000.

Clearly, this demonstrates the potential for a very real and substantive contribution to the local economy both in terms of construction jobs and in operational employment and further training opportunities. Whilst units that do not have a drive through element would result in different levels of job creation and investment, the above demonstrates the potential benefits of such uses to the Wicklow County Council area. In this regard, overly restrictive Development Plan policies can have a negative impact on this and our client is of the opinion that it is important that such policies are highlighted in this submission.

### 3. Takeaways and the Planning System

The matter of public health and diet is something that has come to the fore of the public consciousness over the last number of years. The surrounding debate is not unique to Ireland and a number of countries are considering how to approach the matter of increasing levels of obesity. Increasingly, there has been a call for the planning system to intervene in this debate and restrict the uses that can be permitted based on their offer and their perceived impact on the issue of growing obesity rates.

Diet and the impact of different foods on health is, however, a highly complex matter and should, in our opinion, remain outside the remit of planning, especially where a blunt policy tool such as locational restrictions are imposed without providing any real evidence to justify them. Whilst childhood obesity is clearly rising it has not been proven that locating a fast food/takeaway outlet near a school or park, directly increases the risk of this occurring and studies that appear to indicate same are fraught with difficulties with regard to correlation not equalling causation. Soft drinks and convenience meals sold in supermarkets have been equally implicated in the rising obesity problem yet the planning system is not seeking to restrict the development of supermarkets and the goods that are sold therein.

In this regard, we would note that academics do not agree that fast food/takeaway outlets are specifically to blame. In a 2014 article, UCD professor of food and health, Mike Gibney, outlined that he believes fast food is a convenient scapegoat for our obesity problems and that it is easy to blame corporate companies. The article notes that there are many overweight judges, politicians and academics who do not eat fast food. Gibney states that:

*"We get overweight in different ways: eating out, booze, sandwiches, travel. So if you want to solve the problem you have to look at all of the causes and not pick the one that's popular and easy."*<sup>2</sup>

It is submitted that it is not possible for the planning system to regulate the sale of goods in such a detailed manner as to have any discernible impact on obesity, especially without defining what it means by phrases such as "fast food". For instance our client sell a number of products that contain fewer than 500 calories, lower than many high street sandwiches, and offer salad options that have fewer than 300 calories. They offer ranges of Kids' Meals that are classified as not high in fat, salt or sugar as defined by the Food Standards Agency Nutrient Profiling Scheme in the UK. This clearly indicates that the wider question of the appropriateness of planning to deal with the issue of obesity, has yet to be adequately addressed and it should be incumbent on each Planning Authority to consider this matter in detail rather than adopt negative policies without due care.

<sup>2</sup> <http://www.irishtimes.com/life-and-style/people/ireland-s-growing-appetite-for-fast-food-1.1741807?page=3> (last accessed: 15/02/2016, 15:15)

We would highlight that the Chief Executive of Dún Laoghaire-Rathdown County Council agrees with this approach and stated in the report on the Draft Dún Laoghaire Development Plan 2016-2022, that;

*"...it is acknowledged that land use plans are not a panacea and it is unreasonable to expect that Planning Authorities can somehow take responsibility for the lifestyle choice of individuals.*

*In that regard it is considered appropriate to remove bullet point five as requested in this submission in relation to the location of fast food outlets in the vicinity of parks and schools.<sup>3</sup>"*

Based on the above it is our view that the planning system is not the appropriate vehicle in which to address the matter of child obesity and to do so would be outside of the remit of planning as well as being a matter that would require new skills which planner's and planning authorities do not currently have.

<sup>3</sup> Draft Dún Laoghaire County Development Plan 2016-2022, Chief Executive's Report, August 2015



## 4. Section 6.3, Policy RT 16 & Appendix 1

Section 6.3, Objective RT16 of the Draft Plan states:

*"To promote an appropriate mix and balance of different types of retail within centres and to control the number of bookmakers, off-licences (including off-licences in convenience stores), take-aways, and other uses that can adversely affect the character of a centre.*

*The mix and balance of different type of retail (including retail services) is important to attract people to centres, and to ensure centres remain the main meeting point for the community. Too many of certain types of outlet can destroy the balance of a centre."*

Our client wishes to raise a number of concerns with the proposed policy, as outlined above and the associated section of Appendix 1. In the first instance, we would note that this is a negative policy which seeks to restrict the number of fast food outlets/takeaways in an area, whilst the Draft Plan fails to provide an indication of areas that would be appropriate for such developments. Whilst we note that specific land use policies and zonings will be outlined in LAP's, the review of the Development Plan provided an opportunity to resolve this and give a clear indication of where such uses could be located. In the absence of specific land use policies for the location of fast food outlets/takeaways, the Planning Officer is required to make a subjective decision as to whether a proposed takeaway is appropriate or if it should be located elsewhere. The policies that do provide some indication (addressed below), are conflicting and it is likely that this will lead to inconsistencies in decisions from one application to the next and discourages investment in Wicklow, as such inconsistencies lead to an unacceptably high level of risk for applicants when they are considering future investments.

An example of such inconsistencies can be found in the case of two recent planning applications in South Dublin. In the case of Reg. Ref. No. SD14A/0255 (Application for Takeaway at a shopping centre at Lock Road, Lucan) permission was granted, however in the case of Reg. Ref. No. SD12A/0109 (Application for Takeaway at a shopping centre at Hillcrest Estate, Lucan) permission was refused, even though both sites are designated retail centres. Uncertainties such as these in the planning system are not helpful in practice and will lead to a wide range of interpretations that can have serious consequences on investment decisions, employment creation and, indeed, revenue creation for the Planning Authority.

Although the Draft Plan does not identify appropriate locations for fast food outlets/takeaways, it is usual that most new takeaways are only permitted in designated centres (village centres, district centres, etc.). By only permitting fast food outlets/takeaways in such locations, it is difficult for operators to avoid selecting sites that may be in close proximity to existing fast food outlets/takeaways, conflicting with the above objective. As Objective RT16 of the Draft Plan restricts

the over-concentration of uses in certain locations, this places new entrants to the market at a competitive disadvantage and, by not defining what it means by "excessive concentration" (in either number of units compared to other uses or a defined area in which the assessment will be made), it introduces a high level of uncertainty into the site selection and investment process. In this regard we would request that the policy is removed and more certainty is provided with regard to the provision of fast food outlets/takeaways in the functional area of Wicklow County Council.

## 5. Section 6.3, Policy RT 17

Section 6.3, Objective RT17 of the Draft Plan states:

*"Conscious of the fact that planning has an important role to play in promoting and facilitating active and healthy living patterns for local communities, the following criteria will be taken into account in the assessment of development proposals for fastfood/takeaway outlets, including those with a drive through facility:*

- Exclude any new fast-food outlets which offer foods that are high in fat, salt or sugar from being built or from operating within 400m of the gates or site boundary of schools, parks or playgrounds, excluding premises zoned town centre;*
- Fast food outlets/takeaways with proposed drive through facilities will generally only be acceptable within Major Town Centres or District Centres and will be assessed on a case-by-case basis;*
- Location of vents and other external services and their impact on adjoining amenities in terms of noise/smell/visual impact."*

The above policy will be addressed under two headings below. Our client is conscious of the surrounding uses when designing a fast food/takeaway outlet and for this reason we have no objection to the third point outlined above regarding the location of vents and other external services.

### 5.1 Exclusion of Fast Food/Takeaway Outlets in the vicinity of Schools

It is submitted that this policy provision will lead to significant difficulties in practice and should be omitted in its entirety from the final Development Plan document. It is submitted that the draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for fast food/takeaways as zero in circumstances of proximity to schools that it does not even define and it also does so without evidence of either a link between incidence of any adverse impacts and the proximity of fast food/takeaways or of a distance at which any type of link is demonstrated. Consequently, the development requirement has not been objectively assessed.

Furthermore, the policy outlines that only fast-food outlets are to be excluded from being developed in the vicinity of schools. The rationale for the policy being included however is to promote healthy living and other outlets, such as corner shops or supermarkets with hot-food counters will be able to locate in the vicinity of schools, despite their offer including the sale of "unhealthy foods".

Contrary to popular belief, our client provides a healthy product range that can be enjoyed on a regular basis and we would note that the proposed policy does not address what is and is not a takeaway and does not clarify how the products offered by a proposed operator would or would not influence the outcome of a planning decision. The intention of this policy is to reduce obesity; however, the policy could impinge on the offering of healthy takeaway food (i.e. hot food for the consumption off the premises) such as that offered by our client. In this regard the policy is inappropriate as it classes all takeaways as the same and provides a restrictive policy, even if a proposed development does not contribute to obesity. In this regard, it should be noted that our client's offer is different to that of a traditional takeaway which only serves burgers, chips etc. and that the broadness of this policy is inappropriate.

We would also note that different schools operate different administrative policies with regard to the operations of lunchtime. Some schools will not allow children to leave the school campus whilst others will. In this regard this broad brush policy does not reflect the reality of the operations of schools or peoples diets, whereas a set of general policies would for consideration of applications on a case-by-case basis depending on the pattern of development in the area, instead of matters of health and diet which a planning official is not equipped to adjudicate.

As outlined above, diet and the impact of different foods on health is a highly complex matter and should, in our opinion, remain outside the remit of planning. No study has conclusively proven that locating a fast food restaurant near a school directly increases the risk of obesity in those children. Indeed, such conclusions would ignore the impacts of other foods on obesity, such as those that are sold in corner shops, supermarkets and even school canteens (soft drinks, chocolate etc.) In our view, the above demonstrates that certain operators are being unfairly targeted, whilst other locations where foods high in sugar, salt and fat are sold (i.e. most other convenience retail outlets or even the majority of 'Traditional' restaurants) are being ignored. The draft policy is entirely subjective and open to a wide range of interpretations and it is submitted that this policy should be removed in its entirety.

With regard to the implementation of exclusion zones, an exemplar study, carried out by Arc GIS and published by @oneoffireland (via twitter), was developed in relation to a notional 1,500m exclusion zone around primary and secondary schools in Dún Laoghaire Rathdown and the results of this are indicated below;

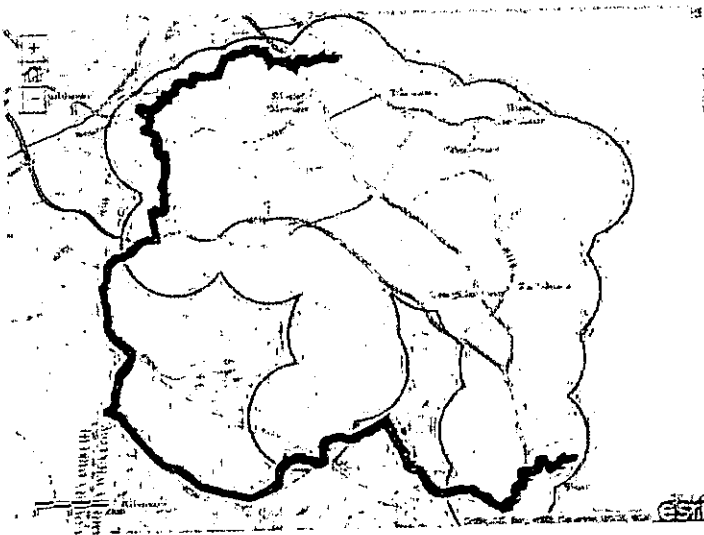


Figure 1: Notional 1,500m "No Fry Zone" as applied to Dún Laoghaire Rathdown

(Source: <https://www.arcgis.com/home/webmap/viewer.html?webmap=19e0481d960547ed880a58bd01da9e19&extent=-6.3434,53.1929,-6.0413,53.3229> Last Accessed: 13/05/2014 12:12)

It is clear that the application of a 1,500m exclusionary zone, would restrict the development of any new "Fast Food" outlet in the entire administrative area of Dún Laoghaire-Rathdown. Whilst the 400m exclusion zone proposed in the Draft Plan is clearly less than the 1,500m zone that is outlined above, we would note that the proposed policy is likely to have a similar effect. It is our view that the majority of the Wicklow County Council area would be designated in the exclusionary zone around schools. Clearly, this is not a satisfactory situation and highlights the necessity for due consideration to be had for the impacts of such prohibitory policy instruments. Below we have outlined an example of how the 400m exclusionary around 3 no. schools will impact on neighbourhood centre zoned lands in Greystones.

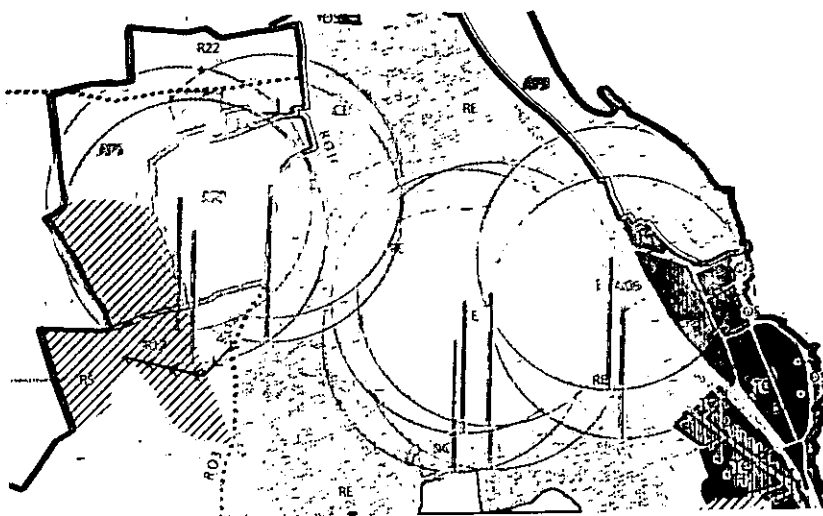


Figure 2: Approximate catchment of the 400m exclusion zone proposed as part of the Draft Plan.

Figure 2 above demonstrates that the neighbourhood centre lands will not be able to facilitate a fast food/takeaway outlet due to the proximity of the school. In the case of this location, it will force residents in the area to visit Greystones or Bray Town Centre and utilise the facilities there, thus increasing the number of vehicles already using the congested town centre streets.

The neighbourhood centres in Greystones were chosen as they highlight the potential impact of this policy on neighbourhood centre zoned lands. Whilst it is acknowledged that the proposed policy does not apply to town centre zoned lands it is common for takeaway uses to locate in other designated centres such as a neighbourhood centre. The reason new fast food/takeaway outlets are generally located in designated centres is that there is a restriction on the potential locations for such a use due to conflicts with other land uses and potential impacts on residential amenities. Bilfinger GVA is aware of this pattern of development due to our recent work in dealing with such uses in the Greater Dublin Area. It should be noted that due to the requirements of both schools and fast food/takeaway outlets, it is commonly found that both are located in designated centres including neighbourhood centres. Schools are located near such centres as this is usually the focal point for the schools' catchment area and siting near such centres is, therefore, logical. Restaurants are also usually located in such a centre, as it is essentially a retail/retail service operation (providing a good and a service) and it is, therefore, appropriate for such a use to be located in a designated centre.

It is also difficult to understand how the success of the 400m exclusion zone policy will be determined as the policy could cover most of the County, so it is difficult to see how the effectiveness of its extent could be monitored. What is the objective? Would poor or negative achievement against it result in redefining proximity criteria? What other corrective action might be taken short of its withdrawal?

For these reasons it is difficult for any takeaway/restaurant not to be located proximate to a school in built up urban areas. It is therefore, submitted that the proposed policy could sterilise all lands that would usually be appropriate for a fast food/takeaway outlet. In this regard, we would also highlight that the Planning Authority are aware of such a pattern of development and this is reflected in the fact that, in principle, the Draft Plan would allow a fast food/takeaway outlet to be located beside a school on town centre zoned lands but not on neighbourhood centre zoned lands. It is our view that distinguishing between these two zonings is irrelevant as it is common to find a takeaway unit located in both and this provision therefore, highlights the lack of evidence and objectivity surrounding the proposed policy. In this regard it is our view that the proposed policy is overly restrictive and should be removed as part of the final Development Plan.

## 5.2 Restriction on the location of Drive Through Facilities

With regard to the policy to restrict drive through facilities to Major Town Centres or District Centres, our client wishes to raise a number of issues with this policy provision. Based on our experience with such applications it appears that the proposed policy would be contrary to a number of recent decisions by An Bord Pleanála in relation to the locations of drive through restaurants. There is an acceptance that a drive through restaurant is a use that may be better suited to retail parks or edge of centre locations, due to the nature of the building form and layout and travel patterns. This is reflected in inspector's reports on such applications, of which extracts are outlined below;

*"I would consider restaurant uses in general to be viewed favourably in such areas as they would contribute to the attractions of a town centre and strengthen the diversity of economic uses. A drive-thru, however, is by its nature dependent on passing traffic rather than local residents or those using the shopping facilities, so it is less clear to me that such a use should in principle be viewed favourably within areas zoned town centres."* (Inspector's Report, PL04.239825)

*"Within their assessment, they state that it is considered that the proposed restaurant use would be more appropriately located within district centre zoned lands in order to facilitate the district centre to become a mixed use urban centre with a range of cafes and restaurants..... However, this current proposal is for a drive-thru facility and I question how it would be integrated successfully into the fabric of the district centre. I consider that this current proposal with the drive-thru element is very different to a conventional restaurant or fast food outlet that doesn't have such an element and I therefore consider that in this instance it is appropriate to locate it outside of the district centre zoning. I consider that the location of the drive-thru outside of the district centre zoning may ultimately lead to a more successful centre in terms of layout, density and design.....I also consider that having regard to all the above that the proposed development would be acceptable in principle on these lands."* (Inspector's Report, PL06D.240090)

*"Under the zoning provisions of the Plan there is a broad and varied mix of commercial uses permissible under the General Businesses zoning. Having regard to this zoning, and the permitted land uses in the area, I would consider a restaurant with a drive-thru facility to be acceptable at this location."* (Inspector's Report, PL31.205439)

The above clearly outlines that a land use such as a drive through restaurant, requires a level of car usage by definition and, that due to the required associated circulation areas, parking spaces etc., is better suited to lands that are not designated to accommodate high intensity, mixed use development that is aimed at creating pedestrian friendly environments. Furthermore, the proposed policy would also prevent a drive through facility being provided as part of a service station offer



such as the Burger King Drive Through at Coynes Cross (Junction 14, Mill). Such an offer has become common in such service stations and this clearly demonstrates that the policy is not appropriate in the context of County Wicklow.

The second point our client wishes to raise with regard to the above policy is that it may actually have conflicts within itself in that it seeks to locate drive throughs in specific areas but then states that the proliferation or overconcentration of them (Policy RT16) in areas can have negative impacts. By only permitting them in certain locations the Draft Plan makes it difficult for operators to avoid selecting sites that may be close to existing restaurants. It places new entrants to the market at a competitive disadvantage and, by not defining what it means by "proliferation or oversupply" (in either number of units compared to other uses or a defined area in which the assessment will be made) and it introduces a high level of uncertainty into the site selection and investment process.

We respectfully request that the Planning Authority carefully considers how it approaches this issue in practice and that arbitrary and subjective policy measures are not included in the final Development Plan. Such policies would also be, in our opinion, anti-competitive (as it would give the existing outlets an unassailable competitive advantage), which is contrary to the spirit of the Retail Planning Guidelines.

## 6. Conclusion


Our client takes its role as a responsible retailer extremely seriously and it offers a wide range of foods to its customers that are to be enjoyed as part of a balanced diet. Our client's product range has broadened over the years and will continue to do so as part of on-going brand development. Examples of this on-going development include the introduction of salads as well as new beverage layers and Starbucks coffee offer. KFC UK & Ireland is already inhibited in terms of its ability to invest in particular areas due to planning restrictions and it is anxious that further restrictions are not included in new policy instruments.

The effectiveness of using the planning system to tackle obesity is highly questionable and is not supported by any objective evidence and our client is of the view that it is wholly unfair to target a specific type of development when the causes of obesity are so wide ranging, with little or no restrictions placed on other uses, such as convenience retailing.

We would respectfully request that both of the above policy provisions (RT16 and RT17) are removed in their entirety from the Draft Plan and proposals for takeaway uses/drive through restaurants are assessed in relation to their land use impacts only.

We are available to discuss the above at any time, should you so require. In such an event, please do not hesitate to contact the undersigned.

Yours sincerely,



**Paul O'Neill**

Associate

For and on behalf of GVA Grimley Ltd.

**Leonora Earls**

**C98**

**From:** Ian McAulay [IanM@mcaulayrice.ie]  
**Sent:** 19 February 2016 16:06  
**To:** Planning - Development Plan Review  
**Attachments:** glenealy conceptual plan.pdf; GLENEALY MASTERPLAN.pdf; McAulay Rice Letter feb 19 2016.pdf; ordinance map.pdf

Hi Folks.

Please find attached information submission by John Kinsella, Station House, Glenealy, Co Wicklow for inclusion in the current development plan for the Glenealy area.

regards

**Ian McAulay | Director**

**McAulay Rice Architects**

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**Proposed Feasibility Report and  
Conceptual Plan for the Possible Development  
of a New Village Centre for Glenealy Village**

**Client: Mr John Kinsella**

**Date: November 2014**



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## **FOREWORD**

This report is to be read in conjunction with the accompanying proposed A1 Conceptual Plan Drawing. (An A3 version has been attached to the end of the report for reference)

The lands contained in the Conceptual Plan and referred to in this report are lands owned by our Client, Mr Kinsella. Additional lands outside of the proposed Village Centre study area are included to give an overall Masterplan on how the Village could develop in the long term/ distant future. These lands are also in Mr Kinsella's ownership and have been included to show further possible uses that are compatible with proposed uses for the Village Centre.

Proposed uses, activities, services, facilities, redevelopment and gateways are followed by a reference which corresponds to the same reference on the proposed Conceptual Plan and indicates the possible location of each.

Please note that all of the images included in this report are for illustrative purposes only. These images have been obtained from the internet and are neither the property of this office or actual proposals for the Conceptual Plan. They are merely a tool to convey a certain type of development, an atmosphere or idea.

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CONCLUSION

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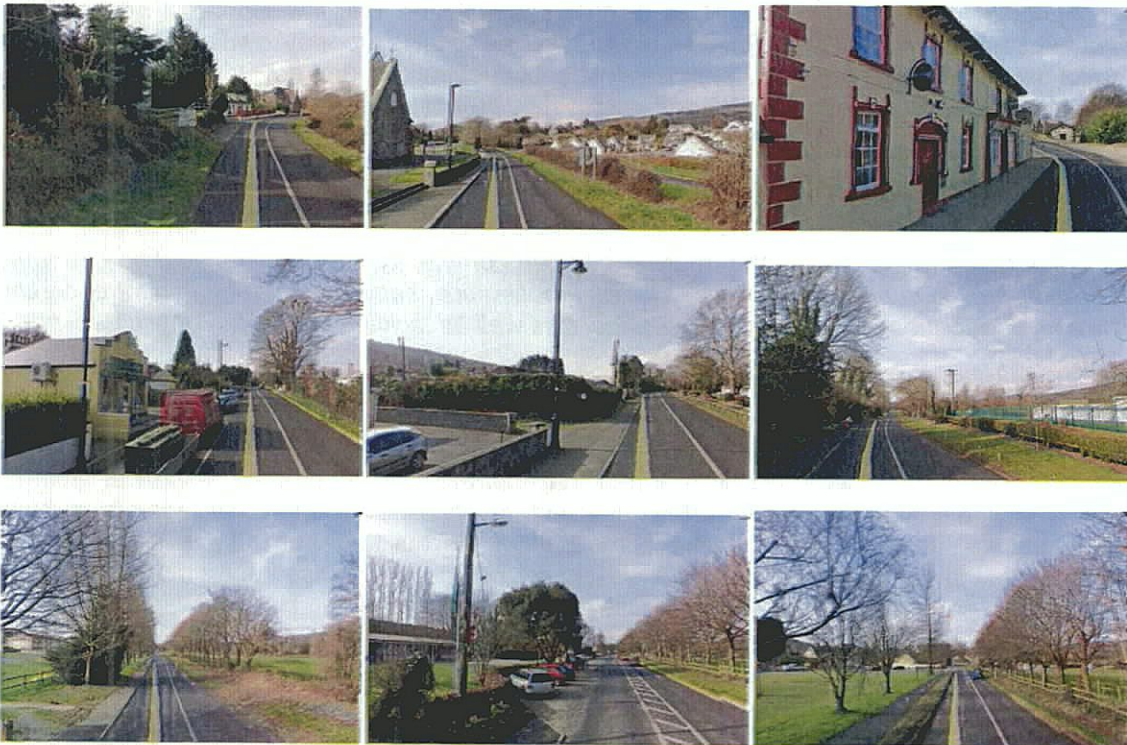
## INTRODUCTION

This report had been prepared on behalf of our client, Mr Kinsella, in support of possible future proposals for the development of Glenealy Village.

Over the years Glenealy has seen the decline in commercial based facilities and this has led to the loss of a village centre or heart to the village. The village has lost a hotel, bar, several shops and the train station and little has been done to entice such commercial ventures back into the village. At present the village is sprawled in a linear line along the main Rathdrum Road. This road dissects the village and reinforces the idea that there is no apparent village centre.

As noted in the Glenealy Village Design Statement (VDS), *"Glenealy has a distinctive and diverse character which is highly valued by its local residents. Any change brought about by future growth needs to be positively managed so that the unique qualities that contribute to the village's distinctive identity can be protected and enhanced."*

This report and subsequent Conceptual Plan strives to use this statement as the key driving force behind any proposals and various sections of the VDS will be referred to throughout.



## **PURPOSE OF VILLAGE CONCEPTUAL PLAN**

Our client has recently acquired a substantial section of additional lands within Glenealy. Having been an employer in the village for many years Mr Kinsella is no stranger to the problems facing Glenealy due to the sprawling nature of the village and lack of basic facilities. Even before the acquisition of additional lands our client has been actively seeking ways of improving the village as a whole and now hopes that this land could be the vehicle in which to do so. By proposing to create a Village Centre, it is hoped that Glenealy will be provided with a much needed heart and sense of place.

Prior reports have discussed the sporadic nature of the Glenealy and have looked into how improvements such as landscaping and street furniture/ signage etc could be used to develop a brand for the village. The recently acquisition of land in a prime location together with lands previously owned could offer a more substantial method of developing the village for its inhabitants to allow it to thrive and hopefully ensuring its future as a viable village and growth area.

While this report discusses a concept plan for the proposal of a Village Centre for Glenealy, it is important to note that it is only at a conceptual stage and is intended for discussions purposes only, to initiate dialogue. It is not the intention to incorporate or develop existing reports or recommendations at this stage. It does however take aspects of the VDS into consideration. The purpose of the report was to investigate the possibility of pulling all the disparate sections of the village together in the form of a masterplan and provide a heart and village centre. It is hoped that this conceptual masterplan will facilitate discussions with the Wicklow Council Forward Planning Department and Wicklow Rural Partnership as well as locals, property owners, business owners, potential developers and other stakeholders to identify aspirations and development that could allow Glenealy to become a growth area in the future. While proposals have taken on board many aspects of the village it does not take into account detailed design at this stage nor has it investigated proposed usages in depth. However many of the proposed facilities and services have been listed as services requested in the VDS.

Keys areas noted in the VDS is that there is a *"good community spirit which could be strengthened with greater provision of basic facilities such as a post office, supermarket, health centre, crèche etc and improved facilities for children and teenagers as well as tackling the lack of public transport."*

## **GOAL OF VILLAGE CONCEPTUAL PLAN**

The goal of the Conceptual Plan is to establish a core area of the community with key civic, residential, and commercial uses. It is hoped that this area will incorporate essential elements of traditional village character such as historic architectural styles, a common or village green, buildings close to the street, parking on the street and behind the buildings, an attractive streetscape, an intimate pedestrian atmosphere, and a mixed-use environment. It is also hoped that it will be a place where people can grab a bite to eat, make a variety of stops for business and pleasure, and converse and socialise with friends and acquaintances.

Glenealy has good potential for a variety of future development opportunities including residential (mixed-income rental and ownership), commercial, light industrial, medical and personal service, educational and civic uses. Opportunities for a farmers / artisan market and cottage industry could be created and we also believe that the village can expand and incorporate the concepts of the Ballinagran Project by integrating an ecovillage within the new village centre. This could create further business through tourism and tap into the sustainable product/ concept industry.

It is envisaged that public and private development will be required as an integral part of the Conceptual Plan to provide the needed framework to advance the following goals:

- **Develop the Village Centre as a mixed-use centre which links new and existing services and facilities, landmarks and buildings.**
- **Rehabilitate important structures and buildings and services (some of which are historic).**
- **Develop housing types for various income and age groups.**
- **Provide opportunities for new business development that support local entrepreneurship and create high-quality jobs.**
- **Provide specific commercial and retail operations desired by the community.**
- **Create tourism opportunities and establish public transport links.**



## LOCATION FOR PROPOSED VILLAGE CENTRE

To facilitate the establishment and development of a new Village Centre the Conceptual Plan is based mainly on the area centrally located along the main route through Glenealy adjacent to the main residential areas, school and the former Kerry Foods factory. The area is also located close to the former Glenealy Railway Station. As our client is also in process of the land containing the station there is a possible opportunity of reopening the former station. This could bring numerous benefits for the village making it a commuter area.



Based on the location and connection to existing facilities we believe this area has much potential to serve as the civic and mixed-use centre for Glenealy. The location of the land will facilitate development within the village boundary therefore discouraging further ribbon development. Discouraging further ribbon development is a key concern within the VDS.

Mr Kinsella owns further lands to the south i.e. the lands indicated as Ballinacoola. These lands are included in this report as they represent an area for possible development that may benefit the village as a whole and compliment other proposed uses.



## DESIGN STATEMENT FOR THE VILLAGE CENTRE

A reoccurring statement throughout the VDS is that the locals place utmost importance on the openness, green areas/ forest walks and rustic image of the village.

*"The ribbon nature of Glenealy and the bends in the road prelude views of the whole village at once from the main road giving instead a sequential view of the village. This combined with the dramatic wooded hillsides and open lower slopes is an impressive setting to the village and creates a predominantly rural feeling when travelling through the village."*

The VDS calls for the development of a Community Park in what is considered the centre of the village at present. This Conceptual Plan seeks to expand on a Community Park by not only incorporating the woodland opposite Kane's Pub but to actually place the New Village Centre within a proposed larger park.

For these reasons the concept for the future development of a Village Centre is based on a village common/ green idea with an extension of the woodlands/ forestry into and around any new proposals, therefore recreating the rural feeling that defines Glenealy.

**IN ESSENCE THE CONCEPT IS FOR A VILLAGE IN A PARK.**



Rural village centres are characterised by compact mixed-use settlement patterns, a community focus (such as a town common or green), traditional architectural design, and pedestrian (rather than emphasis on cars) orientation. They offer basic employment, services, and shopping for their residents as well as for those living in the surrounding lower-density rural areas. Rural village centres also provide civic facilities and activities for social interactions. At present Glenealy does not have a "main street" or Village Centre that is supported by the activities noted above.

Therefore the main design principals of the Conceptual Plan focus on the following:

- **Village in a Park**
- **Creating Vistas and Gateways**
- **Pedestrian Orientation**
- **Outdoor Activities**
- **Mixed Uses, New Land Development and Infill**
- **Building Redevelopment and Reuse**
- **Public Transport Links, Road Network, Pathways, Trails and Cycle Routes.**



## DESIGN PRINCIPALS

### **Village in the Park**

Central to the main concept is the relationship of the proposed Village Centre to the woodlands and pockets of open space and greenery within the village and surrounding areas. It is proposed that the Village Centre will be an extension of the woodlands and that the heart of the centre will be a village green/ park with a possible pond. Proposed mixed usages will integrate into the park providing a mixture of soft and hard landscaped areas, creating character and a uniqueness and brand for the village.

Buildings should respect the existing built fabric, architectural details and characteristic features of the village to create a unified identity for Glenealy.



### **Creating Vistas and Gateways**

Village centres should be visually distinct from surrounding landscapes. They should create a sense of arrival on approaching the centre. However traveling through Glenealy there is nothing to announce the core area or village centre. This visual issue needs to be addressed through a combination of attractive gateway treatments, infill buildings and existing building renovations with traditional village design and architecture, formal streetscape improvements such as interconnecting walkways, street trees, cycle paths, and lighting etc.

While this report has not gone into detail regarding gateways at the extensive ends of the village it does suggest locations for prominent gateways announcing the village core at particular strategic points.

- **Gateway 1 (G1)** The grounds of the Church and Old School could be developed to provide an important gateway through possible appropriate signage on new stone walls and planters. This could create a sense of arrival approaching from Glenealy.
- **Gateway 2 (G2)** The Gatelodge opposite Kane's Pub could be developed into a café/bistro and signage used to announce the entrance to the Park from this direction.
- **Gateway 3 (G3)** The area beside the existing Kerry Foods Factory area will form the main entrance to the Village Centre/ Park. This could have formal gates and possible railings.



- Gateway 4 (G4)** The intersection of the proposed relocated GAA grounds, proposed new Village Centre and existing Railway Station will form the gateway to the Village Centre on approach from the Rathdrum side. A sculpture, for example, could announce the entrance form this section. This could be anything from a sculpture depicting an historic event such as St Kevin and the establishment of the monastery at Kilmanagh through to a modern piece depicting a sense of community etc.



#### Pedestrian Orientation

A key characteristic of the concept is that the village centre is pedestrian-oriented and that a reasonable number of homes (representing the primary users) are within walking distance of the centre in order for it to be successful. This is one of the many advantages of the location of the proposed Village Centre in that it will be adjacent to the main residential areas and within walking distance of the majority of all residential developments. Any proposed pedestrian heart will spill out to the surrounding areas allowing links to the existing woodlands and walks further afield and permitting the pedestrian opportunities to filter through the many suggested uses for the Village Centre. Pedestrian circulation and safety are important features of the design.



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### Outdoor Activities

We believe outdoor uses are very important to attracting residents and visitors to any Village Centre. While this would include formal areas such as the village green and park, other suggested activities could be useful. Proposals for outdoor retail displays, outdoor dining, vendors, entertainment and farmers' markets are proposed along the main core of the village green. While external areas for seating for cafés/ restaurants could generate new business and encourage additional pedestrian traffic, give identity and vitality to the Village Centre, serve as a special attraction, and enhance the aesthetic value of community life.



### Mixed Uses, New Land Development and Infill

The long-term viability of the village is dependent on the expansion and flexibility of commercial, professional, light industrial, and residential uses. A combination of uses including retail, food and entertainment, professional services, light manufacturing and trades, recreational, cultural, and governmental will need to be catered for if the Village Centre is to become a "place of necessity" for residents and an attraction for visitors and prospective investors.

We have suggested a variety of mixed uses and development potential for the conceptual plan. Again we would like to point out that these uses are suggested here for discussion purposes and would require further investigation into the feasibility of such uses specifically for Glenealy. Requested specific services as requested in the VDS are noted when they appear as suggested services. Each service is numbered on the Conceptual Plan prefixed with MU for Mixed Use. Suggested uses include the following:



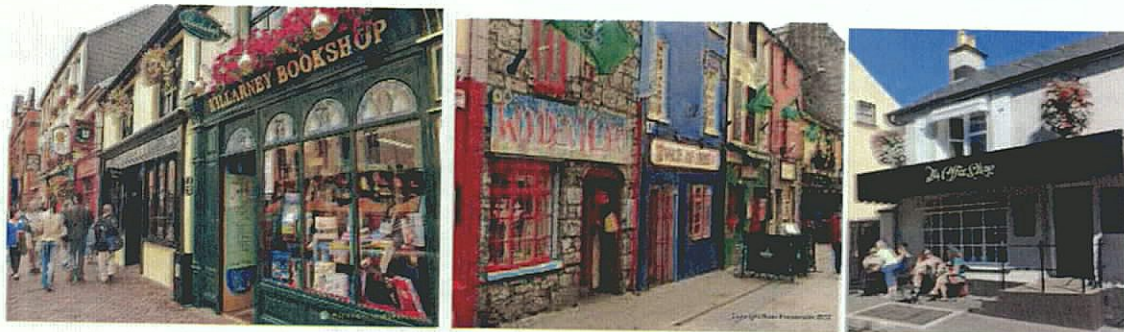
- **Medical Arts Health and Wellness Centre (Health Centre and Chemist listed in VDS) MU1**

It is noted in the VDS that the elderly residents would particularly benefit from the provision of local health facilities. With the opening of the new Health Centre in Wicklow Town we believe that any sizable health centre would now be unfeasible. However the health and wellness industry could be a potential primary employer and service provider in plans for growth and expansion. Suggested activities could include a gymnasium, spa, yoga/ dance studio, vein and laser therapy, dentistry, alternative medicine, nutrition counseling, laboratory services, pharmacy etc.



- **Light Retail and Commercial Centre (Listed in VDS) MU2**

Units to support key services such as clothes/shoe shops, hairdresser, bakery, bookshop, charity shops, eateries etc.



- **Historic Centre, Arts and Entertainment Centre (Listed in VDS) MU3**

The Village Centre could be recognised as a high-quality district for the arts, entertainment, and history that becomes the hub for local cultural activities. The Village Centre could become the site of mixed venues and support services for art exhibits, shows and entertainment. These activities could spill out onto outdoor spaces as previously discussed. A cultural centre has been included possibly containing a gallery, dance studio, hall, drama group spaces etc.



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- **Civic buildings – Library MU4**

The conceptual Plan allows for a new library set in the park. This links in with the proposed playground and proposed café culture. There are other opportunities for further civic/ government buildings within the scheme.



- **Protected Playground (Listed in the VDS) MU5**

A protected playground has been located at the main entrance to the Village Centre/ Park. This will connect with the proposed library and be close to proposed shops/ café/ eateries as well as linking to a walk through the park to the existing woodlands at the existing Gatelodge and various other routes.



- **Farmer's Market/ Artisan Market MU6**

A farmers market could bring in trade to the village centre. It would allow locals and visitors the chance to purchase fresh, local fruit, vegetables, meats, dairy, breads, pastries and cheeses direct from the growers and farmers.

Artisan Markets feature gifts and handmade pieces including ceramics, jewellery, hats, handbags, cosmetics, children's toys, soft furnishings, candles, paintings, photographs, baskets, clothing and costumes, accessories, haberdashery, mirrors, pottery and antiques etc. It is a chance to experience a versatile outdoor galley showing a wide range of functional art and design items. Artists personally display and sell only their own original creations. It is a chance to purchase a unique item but also provides an opportunity to speak with the artist themselves and experience demonstrations.



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- **Cottage Industry MU7**

Both of the above mentioned markets could tie in with the cottage industry theme whereby artists, niche producers, crafts persons etc could be in permanent residence in cottage style units, producing, displaying and teaching their work. This would be centrally located within the Village Centre/Park and link in with other mixed uses.



The concept plan illustrates a series of small to moderate-sized buildings that would be used for light industrial and trades. The Enterprise Centre would primarily serve as a business incubator to create employment opportunities for local residents. The proposed site is towards the rear of the subject site would be well screened from the main route through Glenealy by trees and landscaping.

- **Sheltered/ Independent Living Units for the Elderly MU8**

Another important factor in the development of the Conceptual Plan is the inclusion and integrating of the older generation of both existing and future residents. For this reason a nursing home has been located in the heart of the Village Centre/ Park with additional individual units for independent living serviced by the nursing home. Integrating these units within the actual village centre allows residents the opportunity to experience village life without having to travel. The majority of amenities will be on their doorstep.



- **Bowling Club and Green MU9**

A bowling green and club building has also been incorporated close to the nursing home. The individual units will have small self contained gardens while the nursing home itself will be in landscaped grounds. The home and independent units will connect directly to the village core and woodlands trails allowing residents to take advantage of all the amenities on offer while feeling part of the wider community.



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- **Crèche (Listed in the VDS) MU10**

A crèche has been located towards the proposed residential section of the plan and close to the existing wooded area of the proposed park. The children could avail of woodlands walks and be brought to the library on foot.



- **Traditional Neighbourhoods MU11**

The Conceptual Plan incorporates a series of infill housing and small neighbourhoods that are laid out to connect with existing and proposed new infrastructure, the proposed Village Centre and woodland park concept. Development includes a variety of housing types to meet the income and age demands of the community today and in the future. Traditional neighbourhoods are characterised by smaller house plots with the dwellings placed closer to the pathways, tree-lined streets and links and common open space. The concept plan integrates these neighbourhoods into the core area through roadway, walkways and trails and cycle way connections. These new and existing "village neighbourhoods" will serve as the primary market for the Village Centre. As part of the Conceptual Plan additional residential development has been included in lands outside the Village Centre study area to show how these could be linked into the core area of the Centre to allow Glenealy to become a growth area in the future.

At present there is no publicly owned land for affordable or social housing in the village, the provision of which is set out under Part V of the 2000 Planning & Development Act. Social and affordable housing will form an important part of the proposed residential areas and neighbourhoods.





- **Ecovillage MU12**

Based on the present interest around sustainability and the close proximity of Glenealy and possible connections to the Ballyinagran Project an Ecovillage has been incorporated into the design. The idea is that the Ecovillage will be self sufficient and act as a working/ learning/ teaching environment.



- **Garden Centre and Allotments MU 13**

As part of the self sufficient idea the Ecovillage could incorporate allotments. A possible garden centre could use products from the Ecovillage to create further retail opportunities.



- **Campsite MU14**

A campsite has been incorporated into the Ecovillage as part of the overall concept which could bring tourism into the centre. It offers another type of accommodation which will be integrated with the surrounding woodlands, lake, walks etc and a chance to try out life within an Ecovillage, if interested. Alternative camping ideas such as tree houses could set it apart and pull in tourism due to a unique/ niche market.





- **Educational Centre MU15**

An educational centre/ shop is located within the Ecovillage which could serve as an interpretative centre, educating others as to the workings of an Ecovillage.



- **Live/ Work Units MU16**

These units are based within the proposed Ecovillage and could serve as a business incubator for local tradesmen, artists, and entrepreneurs.



- **Employment/ Enterprise Centre (Listed in the VDS) MU17**

The Village Centre could serve as a primary employment centre with retail, service, medical, public, and light industrial jobs. There have been little or no developments creating employment in the village to balance the increase in residential development in the past. There are no zoned or designated lands for industrial/employment use in the village and there is a danger that the village will not develop into a self-sufficient settlement unless employment zones are created. Previous industrial developments such as the food factory and Christmas Tree Farm are no longer functional.





- **Petrol filling Station/ Car Showroom/ Small Supermarket (Petrol Station listed in the VDS) MU18**

A proposal has been included to provide a petrol station/ small supermarket / car showroom on the site of the school if it ever came up for relocation and it was viable to locate it into the core of the Village Centre. These services would be located on the main route through Glenealy and could pull in passing trade.



- **Solar Farm MU19**

In keeping with the Ecovillage and possible connections to the Ballinagran Project a Solar Farm has been included on the opposite side of the railway lines. Depending on planning laws and viability this farm could possibly power the proposed new Village Centre.

(An alternative or supplementary use could be a Willow Farm. Bioenergy has the potential to make a significant contribution to Ireland's 2020 targets for renewables.)





### **Building Redevelopment, and Reuse**

Also central to the concept is the redevelopment of a few of the village's historic buildings. Areas included in this section are marked on the Conceptual Plan as BR. Proposals include the following;

- **Reopening of Glenealy Railway Station (Better public transport facilities are noted in the VDS) BR1**

As mentioned previously, proposals could be put in place for the reopening of the Railway Station which could generate potential tourism, open up Glenealy to commuters as well as benefiting potential job creation and need for housing. Car parking will be included within this part of the scheme and a possible alternative exit route could be facilitated. Commuters proceeding on foot will be in the proposed Village Centre in minutes.

- **Glencarrig Hotel, Ballyfree BR2**

There is evidence that a hotel existed within the subject site in the 1900s. There are no places of accommodation listed for Glenealy on any tourism sites. Glenealy lacks any facility of this sort and the only existing public house has limited opening hours. Proposals include the rebuilding of a modest size hotel on the grounds of the former Glencarrig Hotel site. The hotel will connect to the Village Centre/ Park through landscaped walkways.



- **New Purpose Built School BR3**

There is also the possibility that the existing school could be relocated to the core of the Village Centre should the school come up for redevelopment. This could secure the future of the school in the long term with opportunities for growth or a possible campus incorporating a secondary school, complete with a secure environment, playing fields and parking, which the current school lacks at present.





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- **Gate Lodge BR4**

Turning the existing Gate Lodge building at the entrance to the existing woodland area into a coffee shop/ bistro will create a gateway to the new development and create a sense of arrival in this location. Mr Kinsella has already looked into how this could be achieved. Proposals include extending an external seated area in and among the trees and the images below show the concept.



- **Kerry Foods Factory**

It is hoped that the former Kerry Foods factory will be re-opened as a factory, retail or further enterprise venture. We have not developed the factory site as this stage.

- **Rehabilitation of Existing Buildings**

The rehabilitation and reuse of existing buildings is also key to the Village Centre Concept Plan. It is important to include existing uses and services within the plan. The wooded area and village in the park concept purposely extends to what is considered the existing village centre or hub ie the area containing Kane's Pub and the village shop. Some of the existing buildings in this area could be expanded or rehabilitated for existing or new uses. Reconfigured parking, access, cycle paths and landscaping will serve to pull this area into the overall concept plan.

### **Public Transport Links, Road Network, Parking, Pathways, Trails and Cycle Routes**

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To retain emphasis on the concept of the Village in the Park theme and pedestrian-orientated scheme a connector road has been proposed along the rear of the main core of the proposed Village Centre. This will keep vehicular traffic out of the main activity areas but allow for parking adjacent to these areas. Parking will be integrating into the scheme in a sympathetic manner.

This link road has been continued to show how future connections could work, allowing an alternative route into the village from any future development to the east of the proposed Village Centre.

In all cases walkways, pathways and cycle routes will link through and tie all the various areas together. Walkways and trails will also extend to the woodlands and forest walks further afield.

At present many people avail of the cycle routes in the surrounding forests. Users park opposite Kane's Pub. There could be opportunities for a cycle/ repair or hire shop if the village were to capitalise on this asset.

Glenealy could also be marketed as a stopping point along the Wicklow Way

## **PROGRESSIVE STAGES OF DEVELOPMENT**

The overall Conceptual Plan can be broken down into various progression stages of development based on the priorities of the Wicklow County Forward Planning Department and the Glenealy Community. Before any further discussions for a possible Conceptual Masterplan takes place, many planning tools will be required to be adopted to guide new development and Village Centre design standards. Additionally, many of these development stages include public infrastructure improvements and these will need to be identified early in the process.

It is important to reiterate that this report has not taken on board the above aspects in any depth as all areas of the proposed Conceptual Plan are up for debate at this stage.

## **CONCLUSION**

Our Client, Mr Kinsella, is a native of Glenealy and has provided employment in the area for many years. He is interested in developing his lands in a manner that would be most beneficial to the village and its inhabitants. He wishes to facilitate sustainable development that will improve the quality of life for the existing inhabitants and make provisions for the possible future development of the area as a more self-sufficient village.

He is in ownership of a substantial section of land in a prime location within the Village, providing the unique opportunity that could allow growth while maintaining the rural setting so characteristic of Glenealy.

Mr Kinsella has invested a great amount of time and energy in producing a Conceptual Plan for his lands and has put much thought into what he thinks might be lacking in the village in terms of housing, employment opportunities and community facilities. He is prepared to supply land for such community facilities, the positioning of which have been proposed within the overall Conceptual Plan for the site. The report has taken on board many aspects of the VDS.

It is important to reiterate that this is a Conceptual Plan produced to investigate the possibility of pulling all the disparate sections of the village together in the form of a masterplan and provide a heart and village centre. It is hoped that this Conceptual Plan will facilitate discussions with the Wicklow Council Forward Planning Department and Wicklow Rural Partnership as well as locals, property owners, business owners, potential developers and other stakeholders to identify aspirations and development that will allow Glenealy to become a growth area in the future.

Mr Kinsella is also prepared to facilitate the reopening of the Glenealy train station and redevelop the lands that would be left vacant should he relocate his existing business to any future Enterprise Centre or the Kerry Foods factory site.

Proposals would be required under certain phases and if the Council deems that certain facilities could, or should, be provided at certain stages then Mr Kinsella would be willing to accommodate such requests, within reason.







**Leonora Earls**

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**From:** Auveen Byrne [auveen@auveenbyrne.ie]  
**Sent:** 19 February 2016 15:03  
**To:** Planning - Development Plan Review  
**Subject:** Wicklow Co. Draft Development Plan 2016-2022  
**Attachments:** 2016.02.18 Submission on Draft Wicklow Co. Plan 2016-2022..pdf

Dear Sir or Madam,

Please find enclosed submission on behalf of Knockree Properties Ltd., owners of lands at Kilcoole.

The submission relates to the Core Strategy and Settlement Strategy of the Draft Co. Development Plan.

As the submission does not specifically reference any particular lands, no map is enclosed.

Please contact the undersigned at any of the contact points set out below, in relation to this submission.

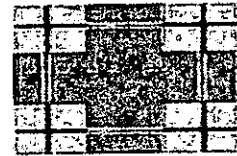
I have tried to get my electronic signature entered on my document. Unusually, it refuses to attach itself. Please let me know if this is a concern and I will re-send in Word format.

I would be grateful if you could acknowledge receipt of this submission by return e-mail.

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**Date: 19.02.2016**

**RE: Draft Wicklow Co. Development Plan 2016-2022**

**Item: Submission on behalf of Knockree Properties Ltd. in relation to the Core Strategy, Settlement Hierarchy, Population Targets and Housing Land Budgets, with particular reference to the town of Kilcoole.**

## **1.0 INTRODUCTION**

**1.1** This submission concerns the town of Kilcoole, its position in the settlement hierarchy of Wicklow and appropriate population targets and residential land budgets, to the Wicklow Co. Draft Plan horizon date of 2028.

**1.2** The submission is prepared and lodged on behalf of Knockree Properties Ltd. The Co. Council will be aware that the company owns land at Sea Rd., Kilcoole, and made submissions seeking re-zoning of the land during the process of preparation of the Greystones-Delgany-Kilcoole Development Plan 2013-2019. The lands were designated Strategic Land Bank in that Plan.

Table 2.7 of the Draft Wicklow Co. Development Plan 2016-2022 acknowledges that there is a need for additional residentially zoned land in Kilcoole (to accommodate 248 units). This shortage of residentially zoned land will be addressed in a review of the Local Area Plan, when the new Co. Plan is adopted. Clearly the Knockree Properties Ltd. land will be a candidate for re-zoning.

This submission contends that the shortage of residentially zoned land for Kilcoole is underestimated. It is suggested that the need for additional residentially zoned land should be accurately reflected in the new Co. Development Plan 2016-2022. The Local Area Plan will be required to be consistent with the Development Plan. It is clearly in the interest of proper planning

and sustainable development that Kilcoole is not limited by lack of zoned residential land and that the Co. Plan should competently “set the stage” for the review of the Local Area Plan.

1.3 In summary, our contentions are:

- There is a basis for review of the place of Kilcoole in the settlement hierarchy of Wicklow.
- There is a basis for allocation of a higher target population for Kilcoole for the plan horizon to 2028.
- The housing land budget which should appear in the new Co. Plan, Table 2.7, should indicate a need for additional residentially zoned land in Kilcoole. The Planning and Development Acts 2000 – 2014 require that core strategies of development plans should demonstrate that sufficient land is zoned to accommodate housing requirements for the Plan period.

1.4 Addressing the above issues, the format of this submission is:

Section 2.0 sets out the relevant provisions of the Regional Planning Guidelines 2010-2016 as they affect the core strategy of the new Wicklow Co. Plan. The impact of the delayed review of these Guidelines is examined.

Section 3.0 highlights relevant population trends observable from Census 2011 and CSO population projections based on same. It examines implications for the core strategy of the new Wicklow Co. Plan.

Section 4.0 examines how the Core Strategy of the current Development Plan 2010-2016 responds to regional planning and population trend issues.

Section 5.0 reviews implications for Kilcoole.

Section 6.0 reviews the Draft Co. Plan residential land budget for Kilcoole.

Section 7.0 concludes.

## **2.0 RELEVANT ISSUES IN THE REGIONAL PLANNING GUIDELINES FOR THE GREATER DUBLIN AREA 2010-2016.**

2.1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2016 set population targets for the constituent regions of the Greater Dublin Area – the Dublin Region and the Mid-East Region for the years 2016 and 2022. They also set targets for the constituent counties of the Mid-East Region – Wicklow, Kildare and Meath. These are as follows:

**Table 1.**

	2016	2022
Greater Dublin Area	1,955,500	
Dublin Region	1,361,200	1,464,200
<b>Mid-East Region</b>	<b>594,600</b>	<b>639,700</b>
<b>Wicklow</b>	<b>164,280</b>	<b>176,800</b>
Kildare	234,422	
Meath	195,898	

2.2 The Regional Planning Guidelines determine that min. 42% of the growth in Wicklow Co. population to 2016 should be allocated to the Metropolitan Area i.e. the towns of Bray and Greystones. The balance should be allocated to the Hinterland Area, concentrated in large growth towns and towns and multi-modal transport corridors.

2.3 The Regional Planning Guidelines set a generic settlement hierarchy, wherein

- Large Growth Towns I are to contain up to 50,000 population,
- Large Growth Towns II 15,000-30,000 population.
- The next level is Moderate Growth Towns, for which no population size is set.
- Small Growth Towns are envisaged as in the range of 1,500-5,000 population.

2.4 The future growth of towns is dependent on availability or provision of adequate infrastructure. Where infrastructure cannot be completed, the planning authority should encourage growth in other towns within the upper range of the hierarchy, to ensure that full provision is made for housing.

2.5 The Regional Planning Guidelines determine the settlement hierarchy for the larger towns in County Wicklow. The design of the settlement hierarchy at the smaller end of the scale is seen as the remit of the Co. Council. The allocation of population to the settlement hierarchy is considered the remit of the planning authority, within the broad structure set by the Regional Guidelines. These arrangements are reflected in the Wicklow Co. Plan 2010-2016 (see below).

2.6 With the passing into law of the Government Reform Act 2014, the 8 regional authorities (including the Regional Authority for the Greater Dublin Area) are dissolved. Co. Wicklow is subsumed in the new Eastern-Midland Regional Assembly. The new Regional Assembly is preparing a new economic and spatial strategy to replace the Regional Planning Guidelines for the Greater Dublin Area.

2.7 The current Guidelines remain in effect until the new regional strategy referred to above is produced. The core strategy of the new Wicklow Co. Development Plan 2016 – 2022 must be “consistent as far as practicable”<sup>1</sup>, with regional guidelines. The core strategy of the new Wicklow Co. Development Plan 2016-2022 may need to be reviewed even after adoption, to take account of any changes indicated by the new regional economic and spatial strategy.

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<sup>1</sup> S.10(1A) of the Planning and Development Act 2000-2014

### 3.0 RECENT POPULATION TRENDS AND PROJECTIONS

3.1 Table 2 below examines the progress toward the target population set in the Regional Planning Guidelines. The table sets out percentage growth for the 5 year period 2006-2011 in regions and counties in the Greater Dublin Area and in Kilcoole. The figure is based on actual census data for 2006 and 2011. It compares that growth with the target for the following 5 year period to 2016.

**Table 2: 2011 Population growth compared to 2016 RPG target growth, Greater Dublin Area.**

	2006	%change	2011	% change	2016 (target) <sup>2</sup>	% change 06-16
Dublin	1187176	7.0%	1270603	7.1%	1361200	14.7%
Mid-East	475360	11.6%	530437	12.1%	594600	25.0%
GDA	1662536	8.3%	1801040	8.6%	1955800	17.6%
Meath	162831	13.0%	184034	6.4%	195898	20.3%
Kildare	185335	12.7%	209955	11.7%	234422	25.8%
Wicklow	126194	8.3%	136648	20.2%	164280	30.0%
Kilcoole	3252	24.5%	4049	11.1%	4500	38.4%
State	4239848	8.0%	4581269			

3.2 Growth in the Mid-East Region (Cos. Kildare, Meath and Wicklow) is exactly in line with target (11.6% growth recorded with 12.1% to go to reach target in 2016). Co. Wicklow is underperforming (8.3% growth achieved, with 20.2% required to make its target). Kilcoole is "over-performing" relative to target, with 24.5% growth 2006 to 2011 to reach a population figure of 4049, and a mere 11.1% to go to make its target of 4500 by 2016. The 2016 target is inclusive of 12% headroom. Kilcoole is well on its way to achieving the 2016 target population, inclusive of 12% headroom.

<sup>2</sup> As set out in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, and in the case of Kilcoole, in the Wicklow Co. Development Plan 2010-2016.

3.3 The CSO has issued population projections for the country's former 8 regions to 2031. They were produced in 2013. They suggest growth in the Mid-East Region of between +78,000 -+144,000 persons, depending on migration and fertility scenarios. Taking the stronger growth scenario of +144,000, this is on a 2011 base of 530,436, and projected population growth is at an average rate of 1.3% per annum.

The Regional Planning Guidelines target for the Region is +109,000 over the period 2011-2022, or a projected population growth rate of 1.9% per annum. Do the CSO population projections indicate Regional Planning Guidelines targets were overly ambitious, such that they should be reviewed? Should Wicklow Co. Council review the regional targets in the new Co. Wicklow Plan 2016-2022?

We suggest that there are difficulties in using the CSO projections to assess the RPG targets and to inform new targets for Co. Wicklow without deeper analysis .

- The CSO projections are for a significantly longer period – does the projection assume even growth over the period?
- The range of scenarios and resulting population projections examined by the CSO is wide. It was not the function of the CSO to recommend which scenario should be used for spatial planning purposes.
- The CSO population projections are at regional level and not broken down for constituent counties. Given Wicklow's slower growth than the other constituent counties to date, how should regional growth be allocated to the counties?
- The CSO figures are population projections, not plan targets.

We suggest that, pending the production of the new regional economic and spatial strategy, departure from current targets is difficult to justify.

#### **4.0 WICKLOW DRAFT CO. DEVELOPMENT PLAN 2016-2022 – CORE STRATEGY**

4.1 Table 3.2 of the current Wicklow Co. Development Plan 2010-2016 adopts the population targets for the county set in the Regional Planning Guidelines for the Greater Dublin Area 2010-2016 (see Table 1 above).

4.2 Table 3.1 sets out the settlement hierarchy for the county and allocates population to it in accordance with the principles set out in the Regional Planning Guidelines.

4.3 The Draft Co. Plan 2016-2022 re-examines the County target population and allocation as between settlements. At par. 2.4, under the heading "*Core Strategy*" the Draft Wicklow Co. Development Plan acknowledges the difficulty that the Regional Planning Guidelines are out of date. It sets new population targets for the county and its towns, settlements and the rural area, taking account, it is stated, of

- patterns of growth since 2006,
- CSO regional population projections based on most recent census figures and
- the principles of the Regional Planning Guidelines.

**Table 3: Selected extracts from Table 3.1 of the Wicklow Co. Development Plan 2010-2016 and Table 2.7 of the Draft Wicklow Co. Development Plan 2016-2022, with additional data.**

				2006 <sup>3</sup> Pop.	2011 <sup>4</sup> pop.	2022 Pop. target <sup>5</sup> Co. Plan 2010- 2016	2028 Pop. Target Dr. Co. Plan 2016- 2022	Target Pop. Inc. 06-22 [28]
Co. Wicklow						176,800	176,000	
Bray	Metropolitan	Consolidation Town	1		31,872	45,000	40,000	
Wicklow/ Rathnew	Hinterland	Large Growth 1	2		13,320	24,000	24,000	
Arklow	Hinterland	Large Growth 11	3		13,009	23,000	23,000	
Greystones/ Delgany	Metropolitan	Large Growth 11	3		17,468	24,000	24,000	
Blessington	Hinterland	Moderate Growth	4		5,010	7,500	7,500	
Newtown mountkennedy	Hinterland	Moderate Growth	4		2,410	7,500	6,000	
Kilcoole		Small Growth	5	3,252	4049	5,000	5,000	54%/54%
Enniskerry				1,881		3,000	2,500	59%/33%
Baltinglass		Small Growth	5	1,735		3,500	3,000	102%
Rathdrum		Small Growth	5	1,528	1586	5,000	3,500	227%
Ashford		Small Growth	5	1,494		3,000	3,250	100%
Tinahealy		Small Growth	5	965		1,550	1,500	61%
Aughrim		Small Growth	5	960		2,000	2,000	108%
Newcastle		Small Growth	5	938		1,750	1,200	87%

4.4 Note from the above table that the population target for Co. Wicklow has been slightly reduced. More importantly, it has been pushed back by 6 years, from 2022 to 2028, to the horizon of the new Development Plan. No analysis of population growth patterns or projections is presented to justify this. See 3.3 above where we suggest that there are difficulties in using CSO projections to derive population targets.

<sup>3</sup> Census 2006

<sup>4</sup> Census 2011

<sup>5</sup> Table 3.3 Wicklow Co. Development Plan 2010-2016



We acknowledge the difficulty in which the planning authority finds itself in needing to revise its Development Plan in the absence of updated regional planning guidance. However, we consider that it is inappropriate to revise population targets as does the Draft Plan. Without clear exposition of the data and assumptions on which the revised projections are based, the public cannot comment on same. Our statutory right of participation in the plan review process is infringed.

Table 2 at par. 3.0 above illustrates that growth in Wicklow has not met with target, while the other constituent counties of the Greater Dublin Area have met target. It is difficult to set new target figures in the absence of a revised National Spatial Strategy and Regional Economic and Spatial Strategy, which will review CSO regional projections, select appropriate scenario(s) and will complete the task of translating these into county targets.

Given that Co. Wicklow has experienced retarded growth compared to regional constituent counties and has overcome infrastructural bars to development, it would appear reasonable for the new Plan to pursue the historic targets.

4.5 The population targets allocated to towns and villages in the settlement hierarchy of Wicklow are based on an unjustified county population target.

4.6 Par. 2.4.3 informs us that the target town populations include a headroom of 15% to take account of the fact that population growth in any one or more town may be hindered by lack of infrastructure. Thus the real population target of any settlement up to Level 5: Small Growth Towns, must be reduced by 15%.

## **5.0 IMPLICATIONS FOR KILCOOLE**

5.1 The target population for Kilcoole to 2022, of 5,000 population, was set by Wicklow Co. Council. This was on the basis that Kilcoole was designated by the Co. Council as a small growth town and the Regional Guidelines indicate that small growth towns should be within the limits 1,500 – 5,000 population. Thus, in the case of Kilcoole, the 2022 target population can, in fact, also be regarded as a limit, which does not reference the size of the town or its propensity to grow.

5.2 That limit has now been set for the much later horizon year of 2028.

5.3 We suggest that this is entirely inappropriate. The target population figure of 5000 includes 15% headroom, so the real population for Kilcoole is 4,347. Table 2 above shows that the town had reached over 4000 population by 2011. It had significantly surpassed its target growth rate in the years 2006 to 2011. The 5000 population target to 2028 will clearly limit the propensity of the town to grow.

5.4 Kilcoole has been subsumed into the Greystones-Delgany-Kilcoole linked settlement. P. 28 of the Issues Paper, under the heading "*Local Plans*," advises that, after the adoption of the Co. Plan, new LAP's will be prepared for

- Bray Town and Environs
- Arklow Town and Environs
- Wicklow/Rathnew and environs

- Greystones-Delgany-Kilcoole
- Blessington
- Newtown

It advises that *"These are all towns in Levels 1-4 of the settlement hierarchy"*. They are designated growth towns. We suggest that there is no longer any need to constrain Kilcoole's target population to the 5000 limit set for Level 5 Small Growth Towns.

5.5 Greystones-Delgany-Kilcoole, as noted in the Council's Issues Paper, is on the southern edge of the Metropolitan Area of the Greater Dublin Area. Therefore allocation of population growth to the settlement is in accordance with the principles of the Regional Planning Guidelines.

5.6 Table 3 above shows that Kilcoole (2011 Census) is larger than Newtownmountkennedy, which is a Level 4 Moderate Growth Town in the current hierarchy, with a target population of 7,500 in 2022/6,000 in 2028. Kilcoole's confinement to Level 5 in the Co. settlement hierarchy is not tenable.

5.7 Kilcoole is by far the largest of the Level 5 towns in the existing hierarchy. It is almost double the size of the next largest town, Enniskerry. Yet is allocated one of the lowest levels of population growth.

5.8 Table 3 above shows that, while Wicklow Co. has failed to reach target population growth to 2016, Kilcoole's population has grown strongly and has almost reached 2016 target population levels. The town has propensity to reach an upward revision of its 2022/2028 target growth.

## **6.0 RESIDENTIAL LAND BUDGET FOR KILCOOLE**

6.1 Table 4 below compares this office's calculation of need for additional residentially zoned land in Kilcoole, on the basis of the Draft Co. Plan target population to 2028. This submission presents, we would suggest, cogent reasons as to why such a target will inappropriately limit the growth of Kilcoole. Therefore our calculation of the need for additional residentially zoned land is inappropriately conservative.

- Greystones-Delgany-Kilcoole
- Blessington
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**Table 4: Review Of Need For Residentially Zoned Land In Kilcoole.**

	<b>ABA estimate</b>	<b>Draft Co. Plan 2016-2022 estimate</b>
Target population Kilcoole 2022	5000 + population	4835 population (to 2025)
Households at occupancy rate 2.16* per unit	2314 households	2239 households
Target no. dwellings incl. vacancy	2464 (@ 6.5 %vacancy)	2239
Existing dwellings (2011 Census)	1402 dwellings	1402 dwelling
New dwellings to be accommodated	1063	837
Zoned land capacity required,	1382 (assuming 30% over-zoning)	1030 (3 years' overzoning)
Current cap. zoned lands	737	782
Additional res. zoned lands required GDK LAP 2013-2019	645 units	248
<b>Additional zoned lands required at 22 / ha.</b>	<b>29 ha.</b>	<b>11 ha.</b>

**Notes:**

\*Wicklow Co. Council's figure is accepted.

We suggest that it is appropriate to accommodate the 2028 target population in the land budget, as the LAP review will run well beyond the adoption date of the Co. Plan.

The Regional Planning Guidelines recommend assumption of a standardised 6.5% vacancy rate, reflecting the need for the market to operate efficiently and to reflect normal turnover of housing stock.

Small miscalculations in the capacity of lands to accommodate housing development were made in the Greystones-Delgany-Kilcoole LAP 2013-2019. (2.4 ha. designated for development at 22 units per ha. were estimated to have a capacity of 74 units, whereas capacity is 53 units. 0.34 ha. zoned at 22 units per ha. are estimated to have a capacity of 31 units whereas the figure should be 7, no. Total overestimate of capacity of zoned lands was 47 units).

6.2 We conclude that Table 2.7 of the Co. Plan should reflect a need for an increased amount of residentially zoned land in Kilcoole, to inform the review of the Greystones Delgany Kilcoole Local Area Plan 2013 – 2019.

## 7.0 CONCLUSION

Based on the analysis presented above, we suggest that the adopted Wicklow Co. Development Plan 2016-2022 should

- Reflect the fact that Kilcoole, by virtue of its current population and relative size in the scale of Wicklow towns, should be a Level 4 Moderate Growth Town.
- Moderate Growth, Level 4 designation is further justified by its location on the edge of the Metropolitan Area of the Greater Dublin Area, served by rail and bus transport.
- Consequently the target population of the settlement should be increased.
- An adjusted estimate of required additional residentially zoned land, viz. 29 ha. plus the requirement to serve the increased population target, should be shown in Table 2.7, with the objective that such shortfall will be addressed in an early review of the Greystones-Delgany-Kilcoole Local Area Plan.

SIGNED

AUVEEN BYRNE, B.A., DIP.T.P., M.I.P.I.