

No 1

Leonora Earls

From: David Clements [David.Clements@nationaltransport.ie]
Sent: 18 August 2011 17:34
To: Wicklow Town Plan Review
Cc: Sorcha Walsh; Bernadette Harvey
Subject: NTA Submission on Wicklow Town Development Plan

To whom it may concern,

Please find attached the NTA submission on the Issues Paper for the Wicklow Town and Environs Development Plan 2013-2019. Can you please confirm that this submission has been received within the statutory timeframe.

Thanks,
David

David Clements
Land Use & Transport Planner




NATIONAL TRANSPORT AUTHORITY

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Acknowledged




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Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town

17th August 2011

Re: Wicklow Town and Environs Development Plan 2013-19 – Issues Paper

To whom it may concern,

The National Transport Authority ("the Authority") welcomes the opportunity to comment on the Issues Paper for the Wicklow Town and Environs Development Plan 2013-19.

The Dublin Transport Authority Act 2008 provides that each planning authority within the GDA shall ensure that its Development Plans are consistent with the Greater Dublin Area Transport Strategy for the period 2011-2030. The Authority has published a draft Transport Strategy and the consultation process is complete. The final document has been amended and has been submitted to the Minister for Transport, Sport and Tourism for his consideration. An integrated implementation plan, which will guide investment decisions over a six year period, will follow the adoption of the Transport Strategy.

While the Transport Strategy is currently a draft document, the Authority requests that Wicklow County Council reflect the policies, objectives and measures contained therein in the preparation of the Wicklow Town and Environs Development Plan.

Measures LU1, LU2, LU3 and LU4 of the draft Transport Strategy outline the land use measures that should be considered when preparing a Development Plan. In particular, the plan would be strengthened by taking account of the following principles/measures:

- A sequential approach to development whereby lands which are most accessible by public transport are prioritised for growth;
- The re-development of brownfield sites close to existing or proposed public transport corridors;
- General increase in densities in all areas where existing or planned public transport accessibility is good;
- Mixed use development will be the primary pattern of growth in all areas:
 - In Designated Town centres and in areas around rail interchange points there will be a greater emphasis on commercial development;
- Local services such as convenience stores, doctors' surgeries and schools are located and provided in a manner which ensures that access for the local community by walking and cycling is direct, safe and convenient;

- Rail stations in District centres will be the focus of higher densities;
- The strategic transport function of national roads, including motorways, will be maintained by limiting the extent of development that would give rise to the generation of local car traffic on the national road network;
- The Authority will seek that all non-residential development proposals in the GDA should be subject to maximum parking standards. The table below shows a number of these land uses and sets out regional maximum standards which should apply to them;

Land Use	Maximum Parking Standards	Threshold for Application
Employment, including Offices	1 space per 50m ²	1,500m ²
Food Retail	1 space per 14m ²	1,000m ²
Non Food Retail	1 space per 20m ²	1,000m ²
Cinemas and Conference Facilities	1 space per 5 seats	1,000m ²
Higher and Further Education	1 space per 2 staff +1 space per 15 students	2,500m ²
Stadia	1 space per 15 seats	1,500 seats

- While the above table provides a regional maximum standard, significantly more restrictive provision should apply in Designated Towns centres and in areas of good public transport accessibility;

The draft Transport Strategy also outlines a number of specific transport measures which will impact directly on Wicklow Town and Environs, including:

- Local bus services in the Hinterland Designated Towns subject to anticipated population increases... As a guide, a minimum daytime service frequency of 20 minutes will be sought;
- Express or limited stop type bus service from the Hinterland Designated Towns to Dublin city centre at regular intervals;
- Additional track and other measures on the single rail track south of Bray to facilitate additional rail services to Greystones, Wicklow and Arklow;
- Heavy rail service between each of the Designated Towns in the Hinterland and Dublin city centre, operating, as a minimum, on an hourly basis in the peak hours and on a two hour basis in off-peak service periods;
- Park and Ride schemes in the Hinterland area, where they improve public transport accessibility without worsening road congestion, or increasing car travel distance.

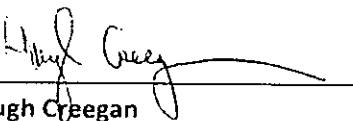
With the above measures in mind, the NTA would support an approach to the growth of Wicklow and Environs which aims to enhance accessibility to walking, cycling and public transport for trips to employment, education, retail and leisure.

The pattern of development most appropriate in achieving this aim would be one which emphasises the consolidation of development, insofar as is feasible, within the existing footprint of the built-up area. This would include retail development, which is a significant contributor to traffic on the local road network. As part of the Development Plan review, therefore, an evaluation of the extent of land zoned for development in the plan area should be undertaken, to ensure consistency with the above policies.

In terms of reducing the need for residents of Wicklow to travel long distances to work, the Authority would welcome a commitment to relate population growth to employment growth within the plan area. While a certain level of outward commuting to Dublin is inevitable, an evidence based approach to zoning for employment land would be supported which takes account of the Jobs / Labour Force ratio in the plan area.

I trust that the views of the Authority will be taken in to consideration and we look forward to assisting Wicklow County Council in the preparation of the Wicklow Town and Environs Development Plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hugh Creegan', written over a horizontal line.

Hugh Creegan
Director of Transport Planning and Investment

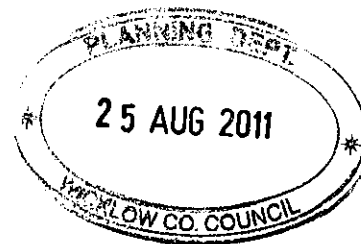
No. 2.


Leonora Earls

From: Patricia Potter [PPotter@dra.ie]
Sent: 25 August 2011 16:02
To: Wicklow Town Plan Review
Cc: Colm McCoy; tking@rpg.ie; Fergal Keogh; Bryan Doyle
Subject: Wicklow Town and Environs Plan - submission

Patricia Potter,
Director,
Dublin Regional Authority,
Mainscourt,
23 Main Street,
Swords,
Co. Dublin.

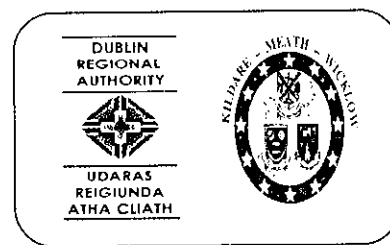
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acknowledged 

Regional Planning Guidelines for the Greater Dublin Area 2010-2022

Treoirlínte Réigiúnacha Pleanála do Mhórcheantar Bhaile Átha Cliath



Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town,
Co. Wicklow

25th August, 2011

Re: Submission by Implementation Group of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 on the Background Issues Paper for the Wicklow Town and Environs Development Plan 2013 -2019

Dear Sir/Madam,

On behalf of the by Implementation Group of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, I attached a submission on the Background Issues Paper for the Wicklow Town and Environs Development Plan 2013 -2019, for your attention.

Yours sincerely,

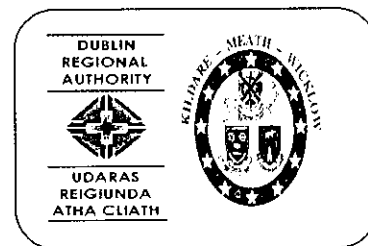
A handwritten signature in black ink, appearing to read 'Patricia Potter'.

Patricia Potter,
Director,
Dublin Regional Authority



Regional Planning Guidelines for the Greater Dublin Area 2010-2022

Treoirlínte Réigiúnacha Pleanála do Mhórchéantar Bhaile Átha Cliath



Submission of the Implementation Group for the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 on the Background Issues Paper for the Wicklow Town and Environs Development Plan 2013 -2019

Introduction

The Implementation Group for the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 welcome the publication of the background issues paper for the Wicklow Town and Environs Development Plan 2013-2019. The Regional Planning Guidelines (RPGs) 2010-2022 aim to direct the future growth of the Greater Dublin Area up to 2022 by implementing the strategic planning framework set out in the National Spatial Strategy (NSS) and by supporting the forthcoming National Transport Authority Strategy. The RPGs provide a framework for, and policy guidance to, local authorities in the areas of settlement patterns, population and housing targets, economic development, infrastructure, rural development, flood risk, heritage and the environment and social infrastructure.

This submission sets out a number of comments and observations to inform the review process, which are intended to assist the Local Authority in the context of supporting the overarching policies and aims of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.

Plan Vision

It is noted that it is intended to create a joint plan for Wicklow Town and its Environs, incorporating a series of LAP lands into the plan making process. The Regional Authorities would concur that such an approach is likely to provide a more coherent framework for plan making in the area. A key function of the Development Plan is to set out a clear growth scenario for the town over the life of the plan and to inform decisions regarding future development patterns. The growth strategy should be supported by a series of policies and recommendations which give effect to the delivery of sustainable and planned expansion in a manner consistent with higher tier plans such as the Regional Planning Guidelines and Wicklow County Development Plan.

It is recommended that the growth scenario and settlement strategy for Wicklow Town and its Environs supports the key elements of the Regional Planning Guidelines settlement strategy and is informed by the regional population and housing targets established within the RPGs (which have been transposed through the Wicklow County Council Development Plan 2010-2016). It is also



suggested that an integrated approach is taken to settlement, employment and transport policy, as advocated throughout the Regional Planning Guidelines¹.

Core Strategy

An evidence based core strategy, in accordance with the provisions of the Planning and Development Act (as amended) and complemented by the housing strategy for the County is a key component to inform necessary future planning requirements and to ensure consistency of policies and objectives with higher tier plans.

Strategic Recommendation SR1 of the RPGs indicates that each council should address through the core strategy and associated tables and text how the development plan meets the housing requirements described in the RPGs while Strategic Recommendation SR2 indicates that future expansion in towns should follow a clear sequential approach in accordance with the Development Plan Guidelines and the Guidelines for Sustainable Residential Development in Urban Areas. Strategic Recommendation SR 7 indicates that brownfield lands should be included to meet future housing needs when preparing the Core Strategy. It is further considered that consolidation of the town centre area and settlement core should be supported within the core strategy and other relevant sections of the plan.

The RPGs set out population and housing targets for the County, as per the table below, which have informed the Wicklow County Council Development Plan.

RPG Population and Housing Targets for County Wicklow

	2006	2016	2022
Population Target	126,194	164,280	176,800
Housing Allocation	49,088	68,351	82,012

Table 7 of the Regional Planning Guidelines also sets out metropolitan population and housing distribution targets for the County Wicklow up to 2016, with a population allocation of 56,213 (existing and proposed) and housing allocation of 8,090 (42%)

As part of the core strategy there is a requirement to prescribe details of population distribution together with housing allocations and adequacy of zoned housing lands within Wicklow Town and its Environs, which should be consistent with the provisions of the Wicklow County Council Development Plan 2010. Of particular note is a surplus of zoned housing lands² (as per table 3.3 of the County Plan) in the Town and its Environs. It is therefore recommended that current land use zoning provisions of housing lands within the Town and its Environs – including location, quantum and distribution- are assessed, and where necessary revised as part of the review process , to ensure consistency with the provisions of the RPGs and County Development Plan. The issues paper

¹ This approach is essential to deliver the vision of the RPGs as advocated at section 2.2 and is supported by a number of policies and recommendation in the Plan, such as ER3 and PIR1.

² Lands zoned for residential use or mixed use whereby housing is permitted.



raises the question as to whether de-zoning should be considered in such circumstances. In the first instance it is suggested that where relevant zoned lands would not have an expectation of being developed within the life of the plan or subsequent plan period due to rational planning and sustainable development reasons³ e.g. infrastructural limitations, de-zoning should be given consideration.

With regard to the anticipated housing yields and the quantum of lands required to meet future residential needs over the life of the plan, it may also be necessary to give further consideration to density levels in accordance with relevant guidance documents such as the Guidelines for Sustainable Residential Development in Urban Area.

Economic Development

The RPGs identify a number of strategic employment centres within the County, including Wicklow Town which is denoted as a primary economic growth town and level 2 retail centre. Such an area is considered as an important growth centre to deliver balanced regional development by serving the towns urban and rural hinterland areas and to assist in reducing the volume of unsustainable commuting patterns in the county. With regard to some of the questions raised in the background issues paper regarding economic development, Chapter 3 of the RPGs provides useful commentary on the direction of future economic activity for the Wicklow /Arklow Core Economic Area while the Strategic Policies and Recommendations contained at Section 3.8 (page 76 and 77) should inform economic development policies and objectives as part of the Development Plan review process.

The town, and in particular the town centre, should be considered as focal point for economic development and investment. The importance of the Port is also recognised within the RPGs. In relation to retail development, strategic recommendation ER14 of the RPGs indicates retail development should be consistent with the policies and recommendations of the Retail Planning Guidelines for Planning Authorities and the Retail Planning Strategy for the Greater Dublin Area 2008 (as may be updated). Consequently, the Regional Authorities would concur with the issues paper regarding the importance of protecting the role of the town centre as the primary retailing and business core of the settlement.

Infrastructure

In planning for better co-ordination and integration between land uses and transport facilities, the review process should take into account existing Governmental policies in the form of the Smarter Travel publications and the forthcoming NTA strategy for the Greater Dublin Area⁴. An emerging message from national travel policy and guidance, which is endorsed within the RPGs, is the need to implement land use policies that support and protect investments currently being made in all elements of transportation infrastructure (including public transport, walking and cycle routes) and consistency between transport planning, spatial planning and land use management to aid in

³ As per the provisions of relevant higher tier plans and best practice guidance documents.

⁴ The Greater Dublin Area Draft Transport Strategy 2011-2030.



reduced travel demand and distances between housing, jobs and community facilities– for example by the consolidation of population, employment and services in areas best served by public transport and a range of transport modes. In this regard, density levels and land use planning around public transport nodes together with prioritization of brownfield lands around existing and planned public corridors should be considered. Measures to support sustainable freight transport issues as part of the Development Plan review process should also be considered.

The Regional Planning Guidelines also establish a number of investment needs for water, waste water and energy which are considered important for the delivery of the RPGs, and which may assist in the prioritization of short term and long term infrastructure provisions within the review process.

Community

Section 8.9 of the RPGs sets out a number of policies and recommendations in relation to social infrastructure and sustainable communities and should inform community policies as part of any future Development Plan for the area. Population growth, the delivery of new housing and the needs of existing communities should be supported by the necessary social infrastructure and recreational facilities to serve these communities, for example in terms of education and adequate capacity, health care, housing accommodation, access to services and support networks and leisure. Local Authorities, through co –operation and co-ordination with other agencies and groups can assist in meeting these needs through the planning process. Policies and measures within the Development Plan, which advocate these issues, should therefore be considered.

Environment and Heritage

It is noted there are a number of existing special designations within the plan area including an SPA, NHA and SPC(c) which are subject to ongoing development pressure. Policies (and future development proposals) to deliver the vision for the town and its environs should be informed, and where necessary, shaped by environmental directives and take into consideration issues of flood risk, climate change, river basing management plans and impacts on water quality.

It is important that all relevant plans and infrastructure projects, which have the potential to impact on Natura 2000 sites either individually or in combination with other plans and projects are subject to relevant environmental assessment under the provisions of the Habitats Assessment Directive⁵.

Strategic Policy FP1 of the RPGs indicates that flood risk be managed proactively at all stages in the planning process avoiding development in flood risk areas where possible and by reducing the risks of flooding to and from existing and future development⁶. It is therefore considered that an examination of flooding issues, where necessary, as part of the review process, would be useful to inform the direction of future growth and land use planning for the town.

⁵ Refer to EU Habitats Directive 92/43/EEC for full details.

⁶ Section 9.3 page 187 of the RPGs.



Coastal zone management is a feature of the existing County Development Plan and is referenced in the current Town Plan. Continued reference to coastal zone management in the future town plan would be welcomed.

Inclusion of provisions for green infrastructure within the plan making process would be considered beneficial to enhancing the environment and has the potential to raise awareness of issues such as biodiversity and the way green spaces are used, developed and managed.

**John Tierney,
Chair,
RPG Implementation Group**

25th August 2011

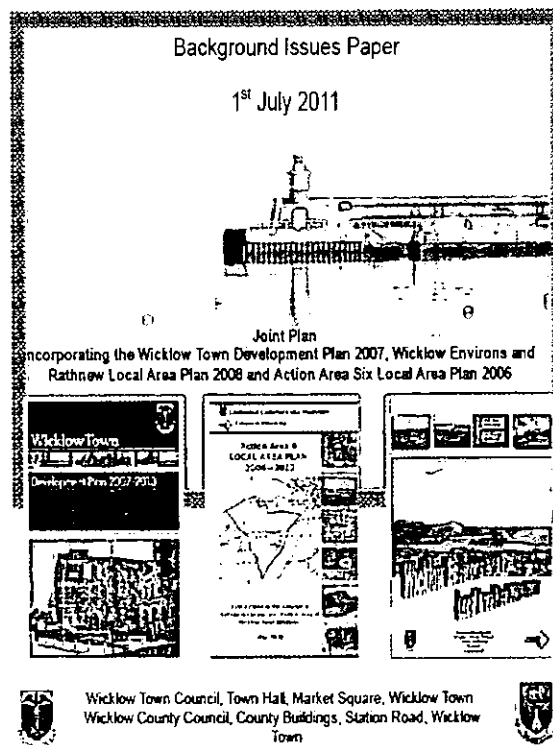


Appendix 1: Issues Paper for Wicklow Town and Environs Development Plan 2013-2019

(click on issues paper below to access full document)

WICKLOW TOWN COUNCIL & WICKLOW COUNTY COUNCIL

Preparation of
Wicklow Town and Environs Development Plan 2013-2019



No. 3

Leonora Earls

From: MichaelG Murphy [Michael.Murphy@ahg.gov.ie]
Sent: 26 August 2011 13:50
To: planningdev@wicklowcoco.ie; Leonora Earls
Subject: Issues Paper for review of Wicklow Town Development Plan

A Chara,

Please find attached the archaeological, architectural and nature conservation observations and recommendations of the Department of Arts, Heritage and the Gaeltacht. Kindly acknowledge receipt of this e-mail and attached document to the undersigned. Should you require a hardcopy of these recommendations please contact manager.dau@environ.ie I refer you to Circular DAU 1/10 in this regard

Is mise le meas,

Michael Murphy,
Development Applications Unit,
Built Heritage and Architectural Policy,
Newtown Road,
Wexford


t: (053) 911 7516

e: michael.murphy@ahg.gov.ie



*An Roinn
Ealaíon, Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht*



acknowledged 



An Roinn
Ealaíon, Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht

26/08/2011

Your Ref: 29 June 2011

Our Ref: DAU-WI-WU-G009/2011

Director of Services - Planning,
Wicklow County Council
Aras An Chontae
Cill Mhantáin

Re: Issues Paper for review of Wicklow Town Development Plan.

A Chara,

I refer to the above-issued paper circulated in relation to the review of the Wicklow Town Development Plan. Please find hereunder the architectural, archaeological and nature conservation recommendations of the Department of Arts, Heritage and the Gaeltacht. Please be advised that we have previously and quite recently offered observations in relation to the closely related consultation document for the *Wicklow Town and Environs Development Plan 2013-2019*

Architectural

As regards the present consultation we recommend that the Council should have regard to the surveys of the National Inventory of Architectural Heritage and to any recommendations concerning the record of protected structures made by the Minister for Arts, Heritage and the Gaeltacht. The Department supports the objective of protecting structures within the RPS and the Architectural Conservation Area and the inclusion of appropriate measures within the development plan towards promoting and achieving these ends.

Archaeological

In preparing the SEA assessment of impacts on the archaeological heritage should have regard to the following:

International Conventions

The European Convention on Protection of the Archaeological Heritage known as the Valletta Convention of 1992. This was ratified by Ireland in 1997 and requires that appropriate consideration be given to archaeological issues at all stages of the planning and development process.

National Policies, Plans and Programmes

National Heritage Plan (2002) - accessible at www.environ.ie. The core objective is to protect our heritage. In this regard the 'polluter pays' principle and the precautionary principle are operable. Specifically in regard to archaeological heritage the 'Framework and Principles for the protection of

the archaeological heritage' document (1999) sets out the archaeological policies and principles that should be applied by all bodies when undertaking or authorising development.

Relevant Policies and Plans at County Level

In relation to County Development and Local Area Plans, drafts of these documents should always be forwarded to this department for comment.

Archaeological Heritage

The area's archaeological monuments can be identified from the Record of Monuments and Places for County Wicklow and the National Monuments Service monuments data on www.archaeology.ie. Any monuments that are National Monuments in State ownership or guardianship and monuments subject to Preservation Orders should be identified and zones of visual amenity defined for them. National Monuments in ownership or guardianship of Local Authorities should also be identified. It should be noted that any direct impacts on national monuments in State or Local Authority care or subject to a preservation order will require the consent of the Minister for the Environment, Heritage and Local Government under Section 14 of the National Monuments Act 1930 as amended by Section 5 of the National Monuments (Amendment) Act 2004. Areas of high archaeological potential including subsurface archaeological structures should be identified. A pointer to the potential for the occurrence of subsurface archaeology is the annual Excavations Bulletin which contains brief accounts of excavations conducted in Ireland each year; these reports are also at www.excavations.ie. Information on occurrences of chance finds of archaeological objects is also a useful indicator of archaeological potential - information may be obtained from the National Museum and local museums. The archaeological potential of the coastal and inter-tidal zone, where relevant, should be carefully considered as should potential impacts on riverine archaeology. Any potential impacts on archaeological heritage should be subject to full archaeological assessment.

Development Issues

Increased development pressure increases the potential for impact on the archaeological resource. Impacts can be avoided or lessened by following criteria set out in 'Framework and Principles for the protection of the archaeological heritage'.

The Development Plan

There should be liaison with National Monuments Section on the drafting of the archaeological content of the plan. The plan should address in detail the potential archaeological impacts of any proposed development.

Nature Conservation

It is recommended that the Town Plan should include a natural heritage section. The Local Authority should ensure the Plan does not adversely impact on designated sites or protected species and should ensure that the Plan and any development proposals take into account the need to protect, retain and enhance biodiversity generally as per the National Biodiversity Plan.

All designated sites within the Plan area should be listed and mapped, including, if applicable, candidate Special Areas of Conservation (cSAC), special Protection Areas (SPA), Natural Heritage Areas (NHA), Proposed Natural Heritage Areas (pNHA), Nature Reserves and Refuges for fauna. Details of these sites are available on www.npws.ie. Where Statutory Instruments have recently been issued they may not yet be available on www.npws.ie but may be available on www.irishstatutebook.ie. For information on Geological and Geomorphological NHAs the Geological Survey of Ireland should be consulted. The Plan should take cognisance of boundary

changes to sites made during the lifetime of the Plan and all such sites should be zoned appropriately and policies and objectives should be devised to ensure their protection.

With regard to legislation the Plan and SEA should take account of the Biodiversity Convention, the Birds and Habitats Directives, the Wildlife Acts of 1976 and 2000, and the European Communities (Natural Habitats) Regulations, 1997 (SI No 94 of 1997) and its amendments (SI No 233 of 1998 and SI No 378 of 2005).

We recommend that the Biodiversity SEOs in the SEA cover habitats and species both within and outside of designated sites as below;

- Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designed under the EC Habitats Directive (Council Directive 92/42/EEC) and Special Protection Areas designated under the EC Birds Directive (Council Directive 79/409 EEC),
- Other designated sites, or sites proposed for designation, such as Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora, designated under the Wildlife Acts of 1976 and 2000,
- Habitats listed on annex I of the Habitats Directive,
- Species listed on Annexes II and IV of the Habitats Directive,
- Habitats important for birds,
- Birds listed on Annex I of the EC Birds Directive,
- Species protected under the Wildlife Acts including protected flora,
- Habitats that can be considered to be corridors or stepping stones for the purpose of article 10 of the Habitats Directive,
- Red data book species,
- and biodiversity in general.

In relation to biodiversity account should be taken of the 2020 biodiversity target agreed at the Nagoya CBD CoP in 2010 is to “take effective and urgent action to halt the loss of biodiversity in order to ensure that by 2020 ecosystems are resilient and continue to provide essential services, thereby securing the planet’s variety of life, and contributing to human well-being, and poverty eradication. To ensure this, pressures on biodiversity are reduced, ecosystems are restored, biological resources are sustainably used and benefits arising out of utilization of genetic resources are shared in a fair and equitable manner; adequate financial resources are provided, capacities are enhanced, biodiversity issues and values mainstreamed, appropriate policies are effectively implemented, and decision-making is based on sound science and the precautionary approach.”

With regard to the SEOs for Water in the SEA it is important that the needs of protected species such as salmon, lamprey species and freshwater pearl mussels, which are listed on annex II of the Habitats Directive, are considered in relation to water quality. It is important that the needs of the Freshwater Pearl Mussels, which are listed on annex II of the Habitats Directive, are considered in relation to water quality. Copies of the Draft Management Plans and Programmes of Measures for this species can be downloaded from:

http://www.wfdireland.ie/docs/5_FreshwaterPearlMusselPlans/ or through www.environ.ie.

It is also important that water SEOs are compatible with the relevant River Basin Management Plans. Regarding flood risk, flood plains should be left undeveloped to allow for the protection of these valuable habitats along the river corridors and provide areas for floodwater retention. Account should be taken of the guidelines for Planning Authorities entitled “*The Planning System and Flood Risk Management*” and published by the Department in November 2009.

As regards the scope of baseline data for flora we advise that the data of the National Parks and Wildlife Service (NPWS) is availed of by consulting www.npws.ie and that the data of the National Biodiversity Data Centre is availed of by consulting <http://www.biodiversityireland.ie/>.

Please note that the draft Plan should be screened for appropriate assessment. The Departmental guidance document on Appropriate Assessment, which was launched by the Minister on 10th December 2009, and since revised, is available on the NPWS web site www.npws.ie web site at <http://www.npws.ie/media/npws/publications/codesofpractice/AA%20Guidance%2010-12-09.pdf>.

We also refer you to the EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf.

It is particularly important that the appropriate assessment procedure, commencing with stage 1 screening, should take place in consultation with the teams working on the draft Plan and SEA as each process can help inform the other to ensure that the objectives and policies in the draft Plan will have no significant effects on any Natura 2000 site. The appropriate assessment should examine the effects of policies, objectives and any indicative maps or zonings, as well as cumulative impacts with other plans and projects both within and outside of the Plan area. In order to carry out the appropriate assessment you will need to collect information about the relevant Natura 2000 sites including their conservation objectives. These may be available on our web site www.npws.ie or can be obtained by requesting them by completing the data request form on our website at <http://www.npws.ie/en/media/Media.6687.en.doc>.

Kindly forward any further information received; or in the event of a decision being made a copy of same should be forwarded to the following address as soon as it issues:

The Manager,
Development Applications Unit,
Department of Arts, Heritage and the Gaeltacht,
Newtown Road,
Wexford.

Alternatively, documentation associated with the above can be referred electronically to the DAU at the following address:

manager.dau@environ.ie

In addition, please acknowledge receipt of these observations by return.

Is mise le meas,



Michael Murphy,
Development Applications Unit
Tel: (053) 911 7516
E-mail: michaeltg.murphy@environ.ie

Leonora Earls

From: Brennan, Lorraine [Lorraine_Brennan@education.gov.ie]
Sent: 19 August 2011 11:14
To: Wicklow Town Plan Review
Subject: FW: Preparation of Wicklow Town & Environs Development Plan 2013-2019



Submission to Dev
 Plan 2013-20...

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acknowledged

Administrative Officer
Planning Section
Wicklow County Council
Aras an Chontae
Station Road
Wicklow
Co. Wicklow

18th August, 2011

Re: Background Issues Paper – Wicklow Town & Environs Development Plan 2013-2019

Dear Sir/Madam,

The Department of Education and Science wishes to make the following submission in relation to the proposed Wicklow Town & Environs Development Plan 2013-2019.

Information used to calculate educational infrastructural requirements

At the outset, it might be useful to outline how the Department calculates the extent of primary and post primary provision needed in an area:

- 12% of the population at any given time is of primary school going age.
- 8.5% of the population at any given time is of post primary school going age.
- At primary level, school accommodation is calculated on the basis of a Pupil Teacher Ratio of 24:1 meaning each individual classroom in a school will have 24 pupils.
- New primary school buildings are generally provided in multiples of 8 classrooms. This is because there are eight individual class groupings between junior infants and 6th class. A 16 classroom school would mean that there are 2 junior infants' classes, 2 senior infant classes etc. with a 24 classroom school having 3 junior infant classes etc.
- A new school ranging in size from 4 - 8 classrooms requires 0.77 hectares (1.9 acres)
- A new school ranging in size from 8 - 16 classrooms requires 1.14 hectares (2.8 acres)
- A new school ranging in size from 16 - 24 classrooms requires 1.6 hectares (4 acres)

- A new school ranging in size from 24 - 32 classrooms requires 2.2 hectares (5.47 acres)
- At post primary level, the Department refers to the size of a building by the number of pupils it will cater for because the number of pupils, together with the curriculum to be delivered (which is school specific), will dictate the range and extent of specialist facilities to be provided.
- Generally, the Department will not build a post primary school with greater than 1,000 places.
- 4.86 hectares (12 acres) are required for a new post primary school.

It is noted as per the Background Issues Paper that population projections have not been provided for Wicklow Town & Environs, should this information become available, the Department can then comment on the need or otherwise to allow for additional educational provision.

Some other general points worth making at this stage are:

- The Department always requests site reservations to be made as close as possible to community facilities such as sports facilities, libraries etc. so that these can be shared between the school and the community.
- The Department is also open to the concept of multi-campus school arrangements e.g. 2/3 primaries side by side or a primary and a post primary school sharing a site.

Both of these approaches can have the affect of reducing the land take for school development.

Site Suitability

Please refer to our website www.education.ie and Technical Guidance Document - 025 – Identification and Suitability of Sites for Primary School.

Your attention is also drawn to the Department of Environment, Heritage and Local Government guidelines titled “**Sustainable Residential Development in Urban Areas**” published in February 2008 which provides that no significant development should take place without an assessment on impact of school provision (refer to Chapter 4: Page 22). Please refer to Department of Environment, Heritage and Local Government website www.environ.ie.

In addition the Department of Education & Science draws your attention to the Code of Practice for Planning Authorities and the provision of schools; in particular Item 2 and the need for consulting with this Department regarding the assessment of specific sites. Again this document is available on both the Department of Education & Science and Department of Environment, Heritage and Local Government websites.

If you have any queries in relation to the above or require any additional information please do not hesitate to contact me.

Yours sincerely,

Lorraine Brennan,
Executive Officer,
Forward Planning Section.

Tel. No: 057-9324392
Email: lorraine_brennan@education.gov.ie

Bernadette Harvey

No 5.

From: Tanya Murray [tanya.murray@daa.ie]
Sent: 15 August 2011 17:04
To: Wicklow Town Plan Review
Subject: DAA Submission to Proposed Review of Wicklow Town Development Plan Pre-Draft Consultation

To the Planning Section,

Please find attached the DAA Submission to the proposed review of the Wicklow Town Development Plan.

Kind regards,
Tanya Murray

☒ Dublin Airport Authority

Tanya Murray, Planning Team
Dublin Airport Authority, T: 00353-1-814 4157
email: tanya.murray@daa.ie

Proudly supporting the 3Ts (Turn the Tide of Suicide) - the DAA Charity of the Year 2011

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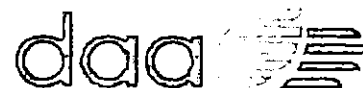
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T. 552-1-511 3111
F. 552-1-814 4120
www.dublinairport.ie



Planning Section
Wicklow County Council
Station Road
Wicklow Town

15th August 2011

Filename: GP10-1010-099

Re: Proposed Review of Wicklow Town Development Plan Pre-Draft Consultation

Dear Sir/Madam,

With regard to the proposed review of the Wicklow Town Development Plan, Dublin Airport Authority has no specific comments to make at this time.

Yours sincerely,

1-0-

Yvonne Dalton

Head of Planning

Bernadette Harvey

No 6.

From: Martin Hickey [Martin.Hickey1@esb.ie]
Sent: 15 August 2011 14:19
To: Wicklow Town Plan Review
Subject: ESB Networks submission to the review of the Wicklow Town and Environs Plan 2013 - 2019

Dear Sir/Madam,

Please find attached ESB Networks' submission to the review of the Wicklow Town and Environs Plan 2013 - 2019.

If you require any further information please feel free to call.

Yours Truly,

Martin Hickey

Network Investments North, Asset Management
 ESB Networks
 Rm A100, Osprey House, Lower Grand Canal St., Dublin 2
 Tel: +353 1 7027072
 Email: Martin.Hickey1@esb.ie

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* * * * *

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Is tuairimí nó dearcthaí an údair amháin aon tuairimí nó dearcthaí ann, agus ní gá gurb ionann iad agus tuairimí nó dearcthaí ESB.

Má bhfuair tú an ríomhphost seo trí earráid, ar mhiste leat é sin a chur in iúl don seoltóir.

Scanann ESB ríomhphoist agus ceangaltáin le haghaidh víreas, ach ní ráthaíonn sé go bhfuil ceachtar díobh saor ó víreas agus ní glacann dliteanas ar bith as aon damáiste de dhroim víreas.

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* * * * *

Osprey House,
Lower Grand Canal Street,
Dublin 2,
Ireland.

Phone: 353-1-676 5840

Fax: 353-1-661 5424

Website: www.esb.ie/esbnetworks

Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town
Co. Wicklow

ESB Networks submission to the review of the Wicklow Town and Environs Plan 2013 - 2019.

Dear Sir/Madam,

I refer to your application for input to the review of the Wicklow Town and Environs Plan 2013 - 2019. We appreciate you giving ESB Networks the opportunity to input into this plan. Electrical infrastructure is a key prerequisite for facilitating development; therefore it is important that we are aware of the plans of the Wicklow Town Authorities.

ESB Networks is a separate business unit within the ESB Group and is the owner of the Electricity Network. We are the licensed Distribution System Operator and are responsible for planning, operating and maintaining all the sub-transmission (mainly 38kV system and some lines at 110kV), medium voltage (10kV and 20kV) and low voltage electricity network infrastructure in the Rep. of Ireland. The electricity demand is distributed from the 110kV Station Bulk Supply Points (HV), through the 38kV (HV), Medium Voltage (MV), and Low Voltage (LV) network to customers.

ESB Networks' strategy for any area is to keep our networks within the specified standards while meeting the needs of our customers. The primary load growth of the country, in conjunction with specific local variables, is taken into consideration when planning our networks. Consequently, we have a number of important projects underway in the Wicklow area. These network improvements will serve the existing customers while catering for a level of anticipated future growth, therefore helping the Wicklow area meet its development potential.

38/MV stations Located in Wicklow	
Station	Capacity
Blessington	10MVA
Greystones	20MVA
Kilcoole	10MVA
Kilmartin	5MVA
Rathdrum	5MVA
Avoca	3.2MVA
Kilmagig	7MVA
Shillelagh	5MVA

110kV/MV stations Located in Wicklow	
Ballybeg	40MVA

Table 1: The capacity and names of the stations serving Wicklow area

Ballybeg 110/MV station serves Wicklow town and has ample capacity to accommodate any growth in the area. ESB Networks currently have a number of projects at approval or construction phase external to Wicklow Town Councils jurisdiction. The major projects are as follows:

- Installation of a second 5MVA 38kV/MV transformer at Shillelagh 38kV station.
- Continuity improvement through the construction of a new 38kV line between Bunclody and Shillelagh 38kV stations.

No major projects are planned or underway in the Wicklow Town area. In the case of major new developments which may not be foreseen in your plan it should be noted that there are significant lead times involved in the provision of 110kV substations and their associated 110kV cable connections which are generally of the order of 3 – 4 years. Consequently it is essential that ESB Networks would be consulted as soon as possible in the process to ensure that the required infrastructure is in place to meet development needs.

One aspect of 110kV infrastructural development that has proved problematic in urban locations is the availability of sites to facilitate the installation of the required High Voltage substations. It is desirable that provision be made for these sites, where necessary, in the early phases of planning for particular developments.

In relation to Wicklow Town's own Development Plan we would request that the highest priority be assigned to the provision of electricity infrastructure which is essential for the social and economic development of the area.

I hope that the above outlines adequately our plans for the Wicklow Town area. I also hope you will take on board our suggestion to guide the relevant authorities to facilitate ESB Networks in meeting the needs of the Wicklow Town area in relation to electricity infrastructure where required. Once again I would like to thank you for giving us the opportunity to input into the development plan.

Should you require any additional information or clarification on any of the above please do not hesitate to contact me.

Yours truly,

Martin Hickey
Network Investments North, Asset Management
ESB Networks
Rm A100, Osprey House,
Lower Grand Canal St.,
Dublin 2

Tel: +353 1 7027072
Email: Martin.Hickey1@esb.ie

No. 7.

Bernadette Harvey

From: Aisling Mac Namara
Sent: 05 August 2011 11:23
To: 'Coordination Unit'
Cc: Bernadette Harvey
Subject: RE: Re; Preparation of new Wicklow Town and Environs Development Plan 2013 2019 SEA Scoping

Mary,

We have included the submission from Inland Fisheries Ireland as a response to letters of 29th June 2011 and 1st July 2011.

Kind regards,

Aisling Mac Namara
Executive Planner

From: Coordination Unit [mailto:Coordination.Unit@dcenr.gov.ie]
Sent: 04 August 2011 15:16
To: Aisling Mac Namara
Subject: Re; Preparation of new Wicklow Town and Environs Development Plan 2013 2019 SEA Scoping

Our Ref: 6032

Dear Ms. MacNamara,

With reference to your correspondence dated, 1st July, 2011 re above, I have attached correspondence from Inland Fisheries Ireland, can you advise if this is a response to a letter dated 29th June, 2011 or letter dated 1st July, 2011 or does this response cover both your letters.

The Department of Communications, Energy & Natural Resources has no comments/observations to make at this time.

Kind Regards,

Mary Rabbitte,
DCENR,
Elm House,
Earlsvale Rd.,
Cavan.
01 6782903

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Deimhnítear leis seo freisin nár aimsíodh víreas sa phost seo tar éis a scanadh.

Ms. Carmel Conaty
Coordination Unit
Department of Communications, Energy and Natural Resources
Elm House,
Earlsvale Rd.,
Cavan.

Your Reference: NA
Our Reference: BB/DD/141

July 15th, 2011

Re: Review of the Wicklow Town Development Plan 2007-2013 and preparation of a new Town Development Plan.

Dear Ms. Conaty,

In response to Wicklow County Council's call for comments regarding issues that should be addressed in a review of Wicklow Town Development Plan; please note the following:

The Development Plan (DP) zone under consideration is traversed by the Rathnew and Vartry rivers in addition to smaller associated surface water channels. The River Vartry is an EU-designated salmonid system (S.I. No. 293/1988: EUROPEAN COMMUNITIES (QUALITY OF SALMONID WATERS) REGULATIONS, 1988). It is of vital importance that development in the area will not have a deleterious effect on aquatic life in this system. The Rathnew River supports a significant population of Brown trout and provides spawning habitat for a population of Atlantic salmon and Sea trout. The Vartry and several of its tributaries are exceptional in the area in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout (*Salmo trutta*) in addition to resident Brown trout (*Salmo trutta*) populations. Recent data also indicates the presence of a spawning population of Sea lamprey (*Lampetra marinus* - ANNEX II of the EU's Habitats Directive) in the River Vartry (Ashford area). This highlights the sensitivity of local watercourses and the Vartry catchment in general. Only clean, uncontaminated surface waters should leave the DP area and drain to the river network.

In determining the likely significant effects of plans or programmes, regard should be had to the need for the sustainable development of the inland and marine fisheries resource (including the conservation of fish and other species of fauna and flora, aquatic habitats and the biodiversity of inland and marine water ecosystems). Consideration should be given to potential significant impacts on:

- Water quality
- Surface water hydrology
- Fish spawning and nursery areas
- Passage of migratory fish
- Areas of natural heritage importance including geological heritage sites
- Biological Diversity
- Ecosystem structure and functioning
- Sport and commercial fishing and angling
- Amenity and recreational areas

Inland Fisheries Ireland (IFI) would highlight the importance of the River Vartry catchment as one of the key salmonid systems on the east coast and would ask that the following is noted and incorporated by Wicklow County Council in the final consolidated plan:

- Sufficient treatment capacity must be available both within the receiving sewerage system locally and downstream at the relevant waste water treatment plant over the full duration of the plan in order that the ecological integrity of the ultimate receiving water is protected. IFI would highlight the importance of building a comprehensive and robust assessment of both local infrastructural needs and Local Authority capacity to meet those needs into the plan. Should the WWTP fail to provide expected capacities during the life of the plan, IFI would highlight the risk of associated significant environmental impacts resulting from local development.
- The impact of development on watercourses should be handled with the utmost sensitivity to the relevant aquatic and riparian habitats. It is essential that IFI be contacted in relation to all works that may have an impact on surface waters (as per PLANNING AND DEVELOPMENT REGULATIONS, 2001, Section 28). The disturbance of riparian habitats should be minimised. An undisturbed buffer zone between development area and river bank should be maximised (10m minimum). Riparian vegetation should be retained in as natural a state as possible at all times.
- Preparation of the consolidated plan should facilitate the utmost priority for protection and conservation of salmonid systems in the area (including the River Vartry, Rathnew River, Killiskey River, Burkeen Stream etc.). IFI Blackrock's policy is to maintain watercourses in their open natural state in order to prevent habitat loss, preserve and enhance biological diversity and aid in pollution detection. IFI would welcome the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation allowing protection / enhancement of biological diversity while providing open space and recreational amenity for river users. Natural heritage objectives should include maintenance of buffer zones of at least 10m from the water's edge along both banks of the surface waters in the plan

area. This measure should help to protect both fisheries and general ecological interests.

- The protection of habitats outside designated areas and a Council commitment to reject proposals that would interfere with natural floodplains (Policy HL14 in the current County Development Plan) would greatly benefit both aquatic and riparian features in Wicklow environs and the surrounding areas. IFI Blackrock is strongly opposed to any development on floodplain lands.
- The implementation of a SUDS design for surface water disposal in any areas of increased urbanisation is a positive indicator of the Council's intention for the sustainable development of the area and should, in conjunction with good management of the site, aid in flooding and pollution management. Policies and recommendations made under the Greater Dublin Strategic Drainage Study (GDSDS) should be applied in development of a drainage strategy for the plan under consideration.

Commitment to these broad principles within consolidated plan is recommended. The principles of sustainable development as set out in the National Sustainable Development Strategy adopted by Government should form the basis for development approaches. It is essential that infrastructural development should precede actual development at all times.

A note on drinking water sources/river abstractions:

It has been proposed to augment additional water supply from wells in the Ashford area and the Avonmore River in Rathdrum in the forthcoming number of years. The sourcing of groundwater in Ashford cannot result in a negative impact on the ecology (through hydrological mechanisms, groundwater recharge etc.) of the River Vartry (a designated salmonid system). Any such scheme should not compromise objectives as set out in national Fisheries and Water Framework Directive legislation. In this regard, An Bord Pleanála case reference PL27 .JD0012 and associated Order and Direction are directly relevant in this instance.

IFI has serious concerns regarding proposals for an abstraction from the Avonmore River which is an important salmonid tributary of the Avoca River – a system polluted by discharges from the abandoned Avoca mine site a short distance upstream of Avoca Village. An extensive fish population survey was carried out by the Central & Eastern Regional Fisheries Board in 2001 & 2002 and showed that no resident salmonids were found within the stretch of the Avoca between the mines and Arklow, however juvenile salmon were widely distributed at 74% of all sites throughout the remainder of the catchment, while brown trout dominate the catchment and are widely distributed in the upper main channel and its tributaries. These results demonstrate that the river is capable of producing salmonids and that salmon & sea trout migrate through the polluted

stretch of river, though this is likely to occur only when the river is at higher flows as fish kills of migratory fish occur regularly during periods of low / medium flow. According to the Central Fisheries Boards report "The Quantification of the Freshwater Salmon Habitat Asset in Ireland" a total of 261 discrete migratory salmonid "fishery systems" were identified nationally of which 173 are recorded as "salmon & sea trout" and 88 as sea trout only. Of these rivers, the Avoca system ranked 17th overall with regard to the fluvial habitat accessible to salmon. Fish-kills are a regular occurrence on the Acid Mine Drainage (AMD) affected stretch of the Avoca River under low / medium flow conditions. Of serious concern to IFI is the fact that the smolt run of juvenile salmon & sea trout has suffered very significant fish kills in 2003, 2006 & 2007.

Migratory salmon, sea trout and lamprey (juvenile fish on their seaward run and adult fish returning from the sea to spawn) pass through the 8 mile AMD affected stretch of the Avoca River. This is only possible when there are adequate flows to sufficiently dilute the toxic effects of the Acid Mine Drainage discharges to the Avoca. It is our belief that the abstraction as outlined in your letter will result in reduced flows in the lower Avoca and subsequently increased frequency & duration of periods when migration of salmonids and lampreys will not be possible. This is especially relevant to migratory salmonid smolts and lamprey which unlike adult salmonids do not wait for a flush of fresh water before making their run either upstream or downstream. In summary we believe that this will result in increased numbers of fish kills through the AMD polluted stretch, fewer juvenile fish will be able to successfully migrate to sea, fewer adult fish will be able to return to spawn and overall this will lead to a deterioration in the fishery value of the upper Avoca catchment (Avonmore & Avonbeg Rivers).

I trust you will take our concerns on board.

Yours sincerely,

William Walsh
Director – IFI Blackrock

Bernadette Harvey

From: Brian Beckett [Brian.Beckett@fisheriesireland.ie]
Sent: 15 July 2011 17:31
To: Coordination Unit
Cc: Gretta Hannigan
Subject: Review of the Wicklow Town Development Plan 2007-2013 and preparation of a new Town Development Plan.
Follow Up Follow up
Flag:
Flag Status: Flagged

Dear Carmel.

Please find attached our comments relating to Review of the Wicklow Town Development Plan 2007-2013 and preparation of a new Town Development Plan.

Best regards,

Brian.

Brian Beckett
Fisheries Environmental Officer

Iascach Intíre Éireann
Inland Fisheries Ireland

Tel +353 (0)1 2787 229
Fax +353 (0)1 2787 025
Email brian.beckett@fisheriesireland.ie
Web www.fisheriesireland.ie
15a Main Street, Blackrock, County Dublin, IRELAND.

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Iascach Intire Éireann
Inland Fisheries Ireland

Aisling MacNamara
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town.



Your Reference: NA
Our Reference: BB/DD/141

July 18th, 2011

**Re: WICKLOW TOWN AND ENVIRONS DEVELOPMENT PLANS - REVIEW
AND DRAFTING OF NEW PLAN (including SEA environmental comments)
2013 to 2019.**

Dear Ms. MacNamara,

In response to Wicklow County Council's call for comments regarding issues that should be addressed in a Local Area/Town Plan consolidation exercise; please note the following:

The Development Plan (DP) zone under consideration is traversed by the Rathnew and Vartry rivers in addition to smaller associated surface water channels. The River Vartry is an EU-designated salmonid system (S.I. No. 293/1988: EUROPEAN COMMUNITIES (QUALITY OF SALMONID WATERS) REGULATIONS, 1988). It is of vital importance that development in the area will not have a deleterious effect on aquatic life in this system. The Rathnew River supports a significant population of Brown trout and provides spawning habitat for a population of Atlantic salmon and Sea trout. The Vartry and several of its tributaries are exceptional in the area in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout (*Salmo trutta*) in addition to resident Brown trout (*Salmo trutta*) populations. Recent data also indicates the presence of a spawning population of Sea lamprey (*Lampetra marinus* - ANNEX II of the EU's Habitats Directive) in the River Vartry (Ashford area). This highlights the sensitivity of local watercourses and the Vartry catchment in general. Only clean, uncontaminated surface waters should leave the DP area and drain to the river network.

In determining the likely significant effects of plans or programmes, regard should be had to the need for the sustainable development of the inland and marine fisheries resource (including the conservation of fish and other species of fauna and flora, aquatic habitats and the biodiversity of inland and marine water ecosystems). Consideration should be given to potential significant impacts on:

- Water quality
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- Fish spawning and nursery areas
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- Areas of natural heritage importance including geological heritage sites
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Inland Fisheries Ireland (IFI) would highlight the importance of the River Vartry catchment as one of the key salmonid systems on the east coast and would ask that the following is noted and incorporated by Wicklow County Council in the final consolidated plan:

- Sufficient treatment capacity must be available both within the receiving sewerage system locally and downstream at the relevant waste water treatment plant over the full duration of the plan in order that the ecological integrity of the ultimate receiving water is protected. IFI would highlight the importance of building a comprehensive and robust assessment of both local infrastructural needs and Local Authority capacity to meet those needs into the plan. Should the WWTP fail to provide expected capacities during the life of the plan, IFI would highlight the risk of associated significant environmental impacts resulting from local development.
- The impact of development on watercourses should be handled with the utmost sensitivity to the relevant aquatic and riparian habitats. It is essential that IFI be contacted in relation to all works that may have an impact on surface waters (as per PLANNING AND DEVELOPMENT REGULATIONS, 2001, Section 28). The disturbance of riparian habitats should be minimised. An undisturbed buffer zone between development area and river bank should be maximised (10m minimum). Riparian vegetation should be retained in as natural a state as possible at all times.
- Preparation of the consolidated plan should facilitate the utmost priority for protection and conservation of salmonid systems in the area (including the River Vartry, Rathnew River, Killiskey River, Burkeen Stream etc.). IFI Blackrock's policy is to maintain watercourses in their open natural state in order to prevent habitat loss, preserve and enhance biological diversity and aid in pollution detection. IFI would welcome the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation allowing protection / enhancement of biological diversity while providing open space and recreational amenity for river users. Natural heritage objectives should include maintenance of buffer zones of at least 10m from the water's edge along both banks of the surface waters in the plan

area. This measure should help to protect both fisheries and general ecological interests.

- The protection of habitats outside designated areas and a Council commitment to reject proposals that would interfere with natural floodplains (Policy HL14 in the current County Development Plan) would greatly benefit both aquatic and riparian features in Wicklow environs and the surrounding areas. IFI Blackrock is strongly opposed to any development on floodplain lands.
- The implementation of a SUDS design for surface water disposal in any areas of increased urbanisation is a positive indicator of the Council's intention for the sustainable development of the area and should, in conjunction with good management of the site, aid in flooding and pollution management. Policies and recommendations made under the Greater Dublin Strategic Drainage Study (GDSDS) should be applied in development of a drainage strategy for the plan under consideration.

Commitment to these broad principles within consolidated plan is recommended. The principles of sustainable development as set out in the National Sustainable Development Strategy adopted by Government should form the basis for development approaches. It is essential that infrastructural development should precede actual development at all times.

A note on drinking water sources/river abstractions:

It has been proposed to augment additional water supply from wells in the Ashford area and the Avonmore River in Rathdrum in the forthcoming number of years. The sourcing of groundwater in Ashford cannot result in a negative impact on the ecology (through hydrological mechanisms, groundwater recharge etc.) of the River Vartry (a designated salmonid system). Any such scheme should not compromise objectives as set out in national Fisheries and Water Framework Directive legislation. The An Bord Pleanála decision and order in case # PL27.JD0012 is directly relevant in this matter.

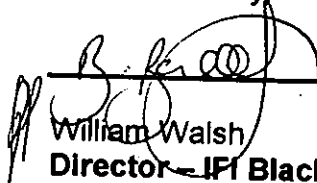
IFI has serious concerns regarding proposals for an abstraction from the Avonmore River which is an important salmonid tributary of the Avoca River – a system polluted by discharges from the abandoned Avoca mine site a short distance upstream of Avoca Village. An extensive fish population survey was carried out by the Central & Eastern Regional Fisheries Board in 2001 & 2002 and showed that no resident salmonids were found within the stretch of the Avoca between the mines and Arklow, however juvenile salmon were widely distributed at 74% of all sites throughout the remainder of the catchment, while brown trout dominate the catchment and are widely distributed in the upper main channel and its tributaries. These results demonstrate that the river is capable of producing salmonids and that salmon & sea trout migrate through the polluted

stretch of river, though this is likely to occur only when the river is at higher flows as fish kills of migratory fish occur regularly during periods of low / medium flow. According to the Central Fisheries Boards report "The Quantification of the Freshwater Salmon Habitat Asset in Ireland" a total of 261 discrete migratory salmonid "fishery systems" were identified nationally of which 173 are recorded as "salmon & sea trout" and 88 as sea trout only. Of these rivers, the Avoca system ranked 17th overall with regard to the fluvial habitat accessible to salmon. Fish-kills are a regular occurrence on the Acid Mine Drainage (AMD) affected stretch of the Avoca River under low / medium flow conditions. Of serious concern to IFI is the fact that the smolt run of juvenile salmon & sea trout has suffered very significant fish kills in 2003, 2006 & 2007.

Migratory salmon, sea trout and lamprey (juvenile fish on their seaward run and adult fish returning from the sea to spawn) pass through the 8 mile AMD affected stretch of the Avoca River. This is only possible when there are adequate flows to sufficiently dilute the toxic effects of the Acid Mine Drainage discharges to the Avoca. It is our belief that the abstraction as outlined in your letter will result in reduced flows in the lower Avoca and subsequently increased frequency & duration of periods when migration of salmonids and lampreys will not be possible. This is especially relevant to migratory salmonid smolts and lamprey which unlike adult salmonids do not wait for a flush of fresh water before making their run either upstream or downstream. In summary we believe that this will result in increased numbers of fish kills through the AMD polluted stretch, fewer juvenile fish will be able to successfully migrate to sea, fewer adult fish will be able to return to spawn and overall this will lead to a deterioration in the fishery value of the upper Avoca catchment (Avonmore & Avonbeg Rivers).

I trust you will take our concerns on board.

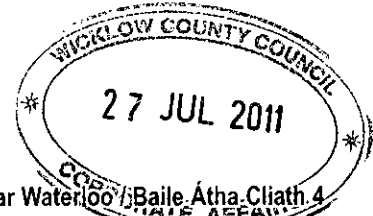
Yours sincerely



William Walsh
Director - IFI Blackrock



Administration Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town



Teach Ceann Mairtín / Bóthar Waterloo / Baile Átha Cliath 4
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Dáta | Date 25 July, 2011

Ár dTag. | Our Ref.

NRA11-82655

Bhur dTag. | Your Ref.

Re: Review of the Wicklow Town Development Plan, 2007 – 2013, and preparation of a new Town & Environs Development Plan (incorporating the Wicklow Environs and Rathnew LAP and AAP 6)

Dear Sir/Madam,

The Authority welcomes consultation on the preparation of the Wicklow Town and Environs Development Plan, 2013 – 2019. The Authority submits the following observations for the Councils consideration;

The Authority attaches particular importance to the network of national roads continuing to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's return to economic competitiveness by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

The Authority recommends that the Council, in preparing a new Town and Environs Development Plan for Wicklow Town and area, should have regard to the provisions of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities. In particular, Chapter 2 of the Guidelines addresses matters relating to development planning and national roads.

Section 2.3 recommends a general content for development plans and local area plans and the Council will be aware of the Land Use and Transportation Planning Checklist that is set out in section 2.12 of the Guidelines. The Council is recommended to prepare the Town and Environs Development Plan, particularly the proposed zoning objectives and development objectives adjoining and in proximity to the national road network, to ensure compliance with the provisions of the Draft Guidelines.

DEVELOPMENT STRATEGY

The Authority welcomes the intention of the Council to prepare a combined Town and Environs Development Plan combining the Wicklow Town and Wicklow and Rathnew Environs areas.

The Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development been framed within a coherent integrated land use and transportation strategy.

The Authority seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in Wicklow is protected.

The Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities highlights that the traffic carrying capacity of national roads, the level of service they deliver and the period

over which they continue to perform efficiently will be determined by a range of factors in addition to traffic growth including:

- frequency of access points to the network;
- extent of development accessing national roads, particularly at interchanges;
- traffic volumes generated by such development; and
- the availability of other transport modes such as public transport.

The Guidelines advise that where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including major junctions and interchanges, development plans should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future by:

- protecting undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements;
- ensuring that capacity enhancements and or traffic management measures will be put in place to facilitate new development; and
- improving operational efficiency of the regional and local road and transportation infrastructure – e.g. where appropriate, promoting new regional and local road networks and alternative modes.

The Guidelines also advise that development plans should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50 kph apply.

It is requested the foregoing official policy provisions are reflected in the Draft Town and Environs Development Plan.

The Council's attention is also drawn to requirements outlined in the Retail Planning Guidelines, in particular paragraphs 26, 65 and 84, and the Sustainable Rural Housing Guidelines, paragraph 3.3.4, which collectively indicates the importance of the protection of the national roads network.

Paragraph 26 of the Retail Planning Guidelines indicates an explicit presumption against large retail centres located adjacent or close to existing, new or planned national roads/motorways. The Sustainable Rural Housing Guidelines state that the objectives and policies of development plans should make it clear that direct access from future development should not be permitted to national roads outside the speed limit zones for towns and villages.

Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be done in consultation with and subject to the agreement of the NRA in accordance with the provisions of section 2.5 of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities.

The Council will be aware that the Guidance Note on Core Strategies (November, 2010) issued by the DoECLG advises that planning authorities should undertake an appropriate level of analysis to ensure that sufficient lands are identified for employment purposes at suitable locations, taking proper account of national planning policies and the availability of the required physical infrastructure, particularly access and water services to complement the Core Strategy. In addition, it is stated that information in relation to the location of other significant uses such as employment and commercial zones and amenity and community facilities and areas should be closely integrated with locations for future housing development. Therefore, the Authority recommends that the Core Strategy undertaken for the proposed plan addresses not only the quantum and location of residential land requirement but also the appropriate integration of employment and other commercial land uses in accordance with the Core Strategy Guidance Note.

NATIONAL ROAD PROJECTS

Although the National Roads Authority is not currently developing/progressing schemes within County Wicklow that have a direct implication for the plan area concerned, details of other schemes that the Council will be aware of include;

□ N11 Arklow/Rathnew.

Planning authority policies and objectives, including rezoning of lands, should not compromise the road planning and route option evaluation process in circumstances where road scheme planning is underway and potential routes have been identified and brought to the attention of the planning authority, including schemes that may currently be suspended. Similarly, development strategies or rezoning proposals should not have the effect of altering the function of these routes or importantly, increase the cost of land to be acquired or under active consideration as a route option for a national road scheme. Such proposals, while potentially bringing major financial gains to the property owners involved, would be at variance with the broader public interest and would, by significantly increasing the cost of the land to be acquired for road schemes, reduce the funding available to the Authority for road construction and improvement work generally.

The Council will be aware that the implementation of all national road schemes is subject to budgetary and funding constraints.

National Roads Traffic Management Study

The National Roads Traffic Management Study was undertaken in order to understand the implications of future traffic growth, to identify network deficiencies and to examine management requirements across the network such as would secure the ability of the network to cater for growth up to 2025. The Study is based on the National Traffic Model, produced by the Authority in 2008, and uses transport growth forecasts, which account for recent economic events and form the basis for current long in term forecasts in transport demand.

The Study identifies trends in traffic growth and demand and trends in travel patterns. The key concepts of trip density and transport need are developed and the conflicting demands on the strategic national road network to perform the primary function of facilitating the movement of freight and other strategic traffic with the impact of private car useage is demonstrated. Chapters two and three of the Study provides useful background and baseline evidence which may prove very useful information to the Council in the preparation of the Town & Environs Development Plan. Plotting transport need confirms the clear dominance of key inter-urbans; the corridor between Dublin and Arklow is also highlighted.

As the Council is aware, high levels of local trip generation, including commuting, on the national road network in the environs of towns has the potential to undermine the capacity of the national road network to facilitate the strategic movement of freight and other strategic traffic.

Given the level of reliance in Ireland on international trade and export markets, the Authority considers that specific reference should be made to support the objective of maintaining and protecting the safety, efficiency of national roads given their central role in catering for business travel and movement of goods to key markets, ports and airports.

Importantly, the National Roads Traffic Management Study also highlights a range of measures, which can be employed to address the demand side of land use and transport planning which should provide a useful resource to the planning authority in preparing the Town & Environs Development Plan.

GENERAL DEVELOPMENT POLICY

In association with the development strategy, it is important that policies should be adopted so as to avoid the undermining of the strategic transport function of national roads, by measures intended to cater for the needs of local traffic and local development related traffic, which should more appropriately be addressed within the framework of providing an adequate local transport infrastructure as advocated in guidelines given in the DoEHLG/DoT/DTO publication "Traffic

Management Guidelines" and also the National Spatial Strategy; such a general development policy is reiterated in the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities which indicate (page 19) that as a result of the majority of road journeys being over short distances, plans should ensure that the general pattern of development seeks to minimise local trip generation by encouraging integrated development and that subsequently such local trips are primarily catered for by routes and modes other than the national roads network.

The sustainable integration of land use and transportation needs to be a strategic principle in the Draft Development Plan, not only in the transportation section but also as a principle that feeds through the social, economic and especially more local area policies and objectives and a clear cross referencing of policies in this regard is requested through the relevant sections of the Plan.

The Authority recommends that all development objectives and especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by sustainable transport, foot, cycling, and private car so that areas can be easily accessible by all modes of transport and all sections of society.

JUNCTIONS

In addition to the general development strategy safeguarding the strategic inter-urban and inter-regional function of national roads, it will be important for the Council to exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

Draft Development Plan policies should reflect and safeguard the strategic role of the national road network and associated junctions in catering for the safe and efficient movement of inter-urban and inter-regional traffic. Planning authorities, in considering proposals for zonings adjacent or close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres. In particular, policies should be adopted so as to avoid the undermining of the strategic transport function of national roads, including junctions, by measures intended to cater for the needs of local traffic which should more appropriately be addressed within the framework of providing an adequate local road infrastructure.

It should be noted that whilst the Authority recommends that traffic and transport assessments be carried out for individual planning applications as part of the development management process, this is not a substitute for a prior overall transport assessment of areas where the planning authority is determining fundamental issues of land use and transportation. Leaving the overall transport assessment of areas to individual applicants' transport assessments is considered highly inappropriate and would lead to a piecemeal and unsustainable approach to development in the vicinity of the strategic national road network.

Thus, appropriate Strategic Transport Assessment (STA) should be undertaken in the preparation of the Draft Development Plan to determine the capacity of the local road network, the interface with the M11 in the Plan area and associated junctions and the impact of the extent of development envisaged on the operational efficiency and capacity of the national route. The Authority also advises that the cumulative impacts of any proposed developments in the area need to be considered.

It does not appear that either the existing Wicklow Town Development Plan or the Wicklow Environs & Rathnew Local Area Plan have been subjected to such transport assessments. The Authority strongly recommends that a Strategic Transport Assessment is undertaken for the plan area having regard to local road improvements previously identified (in particular the Rathnew

Inner Relief Road) and zoning objectives, including Action Area Plans in proximity to the M11 and associated junctions that have the significant potential, individually or cumulatively, to impact negatively on the national road network in the area.

In addition, it does not appear that any strategic transport assessment has been undertaken to assess the impact of the Rathnew Inner Relief Road, nor has any cumulative impact assessment being undertaken of the proposed 'Action Areas' identified in the existing Local Area Plan, for example, the traffic report submitted with proposed Action Area Plan 1(B) states that the assessment does not include any allowances for traffic flows which might be generated by development of other lands identified for future development in the Rathnew Local Area Plan.

The Authority previously highlighted the need to undertake a Strategic Transport Assessment of the area to be serviced by the proposed Rathnew Inner Relief Road and proposed link from the old N11 to the R-752 in a submission to the Council in February, 2008. It does not appear that such an assessment has been undertaken to date and, having regard to the significant investment in the national road network in the area, the opportunity to review the development strategy for the area in a combined Town & Environs Development Plan, the Authority again recommends the completion of a Strategic Transport Assessment to address the issues outlined in the foregoing, to give effect to the provisions of the DoECLG Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities.

The location and capacity of junctions on national roads are determined during the road planning process having regard to a range of factors and taking account, in particular, of anticipated inter-urban and inter-regional traffic volumes over a design horizon of at least 20 years. A key objective of the approach to road planning is to achieve a satisfactory level of service for road users and to protect and maintain that service over the design period applying to the mainline road and associated interchanges. In these circumstances, it will be necessary for planning authorities to exercise particular care in their assessment and management of development proposals that impact on the operation, safety and efficiency of the national road network and associated junctions.

SPECIFIC POLICIES AND OBJECTIVES

Traffic and Transport Assessment (TTA) and Road Safety Audits (RSA)

The Authority recommends that planning applications for significant development proposals should be accompanied with TTA and RSA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring developments on the road network. Guidance is given in this respect in the DoELG/DoT/DTO publication "Traffic Management Guidelines" and NRA DMRB (HD 19/09 Road Safety Audit).

To assist with the aforementioned, the Authority has prepared Traffic and Transport Assessment Guidelines, which are available at www.nra.ie. The Guidelines seek to promote best practice for the preparation of TTA and explain the relevance of TTA in the planning process. In particular, the document is intended to provide guidance for developers, their agents, as well as local authorities and the National Roads Authority, in the scoping, conducting and evaluating of TTA for proposed developments. The Guidelines will be updated over time in light of experience as practice evolves regarding the integration of transportation and land use planning. It is requested that the Draft Plan incorporates a requirement for the provision of TTA and RSA as appropriate.

Motorway Service Areas

The NRA's "Policy Statement for the Provision of Service Areas on Motorways and High Quality Dual Carriageways" October 2007, updated by NRA Circular No. 4/2010 of February 2010 and the Service Area Updates of January and May 2011, outlines the National Roads Authority's policy on the provision of service and rest areas to cater for users of national roads.

The Roads Act, 1993, as amended, requires that service area scheme proposals for locations on national roads must be brought forward either by the NRA or the relevant County Council or City Council for the area concerned and thus are a matter for An Bord Pleanála approval. It is

requested that the draft plan refers to the Authority's "Policy Statement on the Provision of Service Areas on Motorways and High Quality Dual Carriageways".

Proposals for off line service area type developments in the environs of national roads which incorporate significant commercial, retail, hotel and other accommodation elements could constitute destinations in their own right and which seek to cater for more than road user needs are likely to create an adverse impact on the national roads concerned. The use of national roads to accommodate short, local trips to such developments would conflict with the intended primary role of national roads in catering for strategic inter-urban and inter-regional traffic, such proposals may also be inconsistent with official policy.

In addition, the Authority wishes to highlight that NRA policy with respect to the provision of on-line service areas only addresses the major inter-urban network and other dual carriageways, in order to address the absence of facilities for drivers on these newly constructed routes.

It is the opinion of the Authority that a deficiency in relation to services does not exist on the, primarily, single carriageway network as these routes pass through or in close proximity to a significant number of urban towns and villages. The Authority would therefore not encourage a proliferation of such development proposals on and/or in proximity to stretches of national roads where the maximum speed limit applies.

Signage

The NRA has issued the Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011). The purpose of this document is to outline the National Roads Authority's policy on the provision of tourist and leisure information signs on national primary and national secondary roads in Ireland. With respect to the new Town & Environs Development Plan the Planning Authority is also referred to Paragraph 3.7 of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads.

Noise

The Council is also advised to refer to the requirements of S.I. No. 140 Of 2006 Environmental Noise Regulations in the Draft Plan. The Authority advises that it requires that development proposals identify and implement noise mitigation measures, where warranted. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.

Conclusion

It is requested that the foregoing comments and observations are taken into consideration in the preparation and adoption of the Draft Wicklow Town and Environs Development Plan.

Yours sincerely



Michael McCormack
Policy Adviser (Planning)

No. 9

Leonora Earls

From: Kevin Byrne [kevin.byrne@opw.ie]
Sent: 25 August 2011 13:19
To: Wicklow Town Plan Review
Subject: OPW Submission on Issues Paper for the Wicklow Town & Environs Development Plan 2013-2019



0656-2011 wicklow
devlpplan 20...

Dear Sir / Madam


Please find attached the observations of the OPW on the above.

Regards

Kevin Byrne
Engineering Services



Email Disclaimer: <http://www.opw.ie/en/disclaimer/>

acknowledged




Our ref: 0656-2011
25TH August, 2011

Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town

**Re: Issues Paper for the Wicklow Town and
Environs Development Plan 2013-2019**

Dear Sir / Madam

The Office of Public wishes to make the following comments on the above.

The OPW welcomes the inclusion of a section on Flooding in the Issues Paper. We would suggest that for your new Town Development Plan that the Council should focus on the key principles in the Flood Risk Management Guidelines of the sequential approach and justification test. These principles should then in a transparent way inform and underpin the development strategy in the Plan and any zoning proposals which form part of that strategy.

For your Development Plan you should carry out a Stage I Flood Risk Assessment to identify areas at risk of flooding (including rivers and the sea). Then, if any areas being considered for zoning might be prone to flooding, you will need to do a Stage II Flood Risk Assessment that should define indicative flood zones, which should in turn inform development zoning on the basis of the sequential test, appropriate development and justification test.

In addition, the issue of Climate Change could increase the risk of flooding in the town, both to currently developed and undeveloped areas, and should be borne in mind when drawing up your new Town Development Plan.

Yours sincerely,

Kevin Byrne
Engineering Services

No. 10.

Leonora Earls

From: Pat Kavanagh [1patkavanagh@gmail.com]
Sent: 25 August 2011 17:14
To: Wicklow Town Plan Review
Subject: Submission to Wicklow Town and Environs Development Plan 2013-2019

Administrative Officer,
Planning Section,
Wicklow County Council.

25th August 2011

Dear Planners,

I wish to make the following submission to the Wicklow Town and Environs Development Plan 2013-2019. As requested, this submission is more of a 'vision' for future developments in the town and environs and while some points may be outside the remit of the Plan, I would hope that the future plan might be coloured or tempered by the vision of its end users.

Can you please acknowledge receipt of submission by return?

Kind regards,

Cllr Pat Kavanagh
Wicklow Town Council.

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Please consider the environment before printing this email



acknowledged
J

Administrative Officer,
Planning Section,
Wicklow County Council.

25th August 2011

Dear Planners,

I wish to make the following submission to the Wicklow Town and Environs Development Plan 2013-2019. As requested, this submission is more of a 'vision' for future developments in the town and environs and while some points may be outside the remit of the Plan, I would hope that the future plan might be coloured or tempered by the vision of its end users.

Kind regards,

Cllr Pat Kavanagh
Wicklow Town Council.

14 Dunbur Glen
Wicklow Town

Tel: 086 2771871

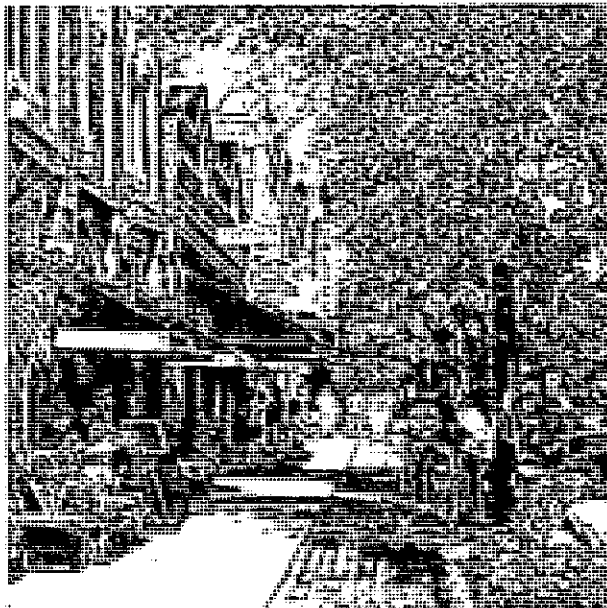
Submission to Wicklow Town and Environs Development Plan 2013 -2019

Housing: The most recent additions to the Council housing stock has been Bosun's Rest, which I believe is a good model of how future housing should be, i.e. a duplex complex, which accommodates both individuals and family units. I would ask the Council to bear in mind though that there are many single parents who need at least two-bed roomed accommodation so that they can have their children stay over during access visits. The most common requests I receive as a Councillor are from single people who cannot find suitable or affordable single accommodation in Wicklow Town, so this would need to be a consideration for the future.

I would suggest also that all future building works are made accessible to all, not just for residents but to accommodate visitors with restricted mobility too. Where possible, restricted mobility housing units should be close to the flat level of the town centre, but ideally all new developments should provide restricted mobility housing units.

Heritage

I welcome the Architectural Conservation Area status of the Main Street, and the commitment by most of the traders to show our traditional streetscape in a favourable light. While I appreciate that conditions cannot be applied retrospectively, it might be worth encouraging the removal of inappropriate neon signage. I would also like to minimise the 'prohibitive' signs around the town to instead encourage both residents and visitors to take pride in our town by making it homely and welcoming, and by providing bespoke seating areas in sunny positions where locals could stop and chat. Because we have to endure so much rain during the winter months, I believe that the addition of canopies to shop fronts could enhance the streetscape as well as providing shelter to shoppers – this would also encourage shoppers to look into the shop windows while they waited.



replaced with cobbled paving.

I would like to see the ACA extended to incorporate the older streets and buildings in the town which offer such immense character and history. The public should also be invited to identify as yet unknown architectural features on their own premises or in their area, which could be recorded and protected

Visitors to the town in recent years have also greatly admired our floral hanging baskets. 'Greening' of the town, especially along the main thoroughfare, using planters and vertical climbers would add colour and biodiversity throughout the whole year.

Concrete paving on Main Street should be

Economic Development:

Wicklow needs to capitalise on its **tourist potential**, particularly with a nautical theme because of our close proximity to the sea. We should look to other seaside resorts for inspiration on how best to achieve this, e.g. attractive street paving and street lighting and features which draw visitors towards the seafront and vice versa. In particular, Bridge Street, Bachelors Walk, Leitrim Place and both bridges lend themselves particularly well to a 'cultural quarter' and the acquisition of the Assembly Hall could facilitate arts and theatrical performances in the future.



Santorini, Greece.



Mondello, Sicily.

Waterfront development

Residents of Wicklow have always used the safe harbour of Wicklow seafront, in particular rowers, swimmers, divers, sailors, fishermen and children. Our harbour has not enjoyed the type of development it should have, and over time has been allowed to diminish. Where once we had a purpose-built clubhouse facility for our very active Swimming Club, which was raised by the local people, there are now no such facilities. The area would benefit immensely from improving the surfaces of the piers, footpaths from one side of the beach to the other, lighting, seating, planting and most of all, from a provision of clubhouse facilities. We could then encourage out-of-season water sports enthusiasts and tourists to enjoy the facility.

Eco Tourism: Extending from our Waterfront to the north, we are connected by a promenade to the Murrough and Broadlough, and to the south to Wicklow Head via the Black Castle and along the cliff walk. These are the jewels in Wicklow's crown. These unspoilt areas of outstanding natural beauty are the only parklands available not only to residents of Wicklow, but with direct train and bus routes, also offer an amazing outdoor experience to day-trippers (walkers and cyclists) from Dublin, as well as to visitors beyond that. In particular, we should be specifically targeting the eco-tourist market abroad to encourage bird watchers, botanists, angling clubs, hill-walkers, photographers, cycling clubs, photographers, artists etc. This of course would have a major spin-off effect for local hospitality and retail outlets.

I would be opposed to the development of a new commercial harbour along the seafront which I believe (based on the visual impact of the current commercial harbour) would create a 'dirty' image, i.e. with roll-on, roll-off trucks and storage of containers or recycled materials which would not only spoil the view and the tourist potential of the area, but which could also impinge on access routes along the promenade. Furthermore, I would have grave concerns about the environmental effects that such a development might have on the Murrough wetlands, i.e., causing tidal diversions which might flood the upper region. If we were to lose this valuable asset it would be lost and gone forever.

There should be a concerted effort by all to ensure that all of our beaches and the tidal river would be awarded and retain a Blue Flag.

Local produce and crafts: Wicklow would benefit as a tourist hub by promoting local, indigenous industries, food industries and crafts, especially where the visitor could see the producer in action. Future plans should identify a suitable site within the town for such a craft centre, perhaps along the quays.

Ceardlann Craft Centre, Spiddal



Local food production: In these times of economic turmoil, it is imperative that Wicklow Co Council would include in any Emergency Plan a retention of land banks within walking distance of the town for local food production purposes, eg allotments, as well as a seedbank reserve for the use of local people. Such designated land banks should also be considered for the plantation of fruit and nut trees, and for the promotion of **biodiversity** to enhance the survival of species necessary for our own survival.

With good planning now, we could also make sound provision for sustainable food production in the future, such as aquaponic, hydroponic and vertical farming.

Energy production: Wicklow could be a major contributor to future energy production at national level. In particular, we could utilise our prime location for accessing Wind and Wave energy from the sea, and anaerobic digestion from our waste products. Local Public and Community buildings could

be retrofitted with renewable energy systems such as wind turbines and solar panels to reduce energy bills.

Education: We have been promised for years that Clermont Campus would be developed into a full time 3rd level educational facility. To date this has not happened and I believe that with current unemployment levels, we need to push that agenda to the fore. I would be particularly keen to see Clermont as the top college in the country for Research and Development of Green technologies.

Furthermore, Wicklow is severely lacking in Track and Field and Indoor Sports facilities. I believe that Clermont Campus could also accommodate a top-class Sports Faculty to include Sports Training, Sports Injuries and associated 3rd level courses, as well as provide an after-hours facility for local community sports clubs.

Currently, we have two Wicklow Town Primary Schools without their own buildings from which to operate, and two more in Rathnew awaiting new premises. On the other hand we have two Secondary schools about to vacate their premises. While I believe the owners of these premises have other uses planned, it might be worth discussing a land-swap with them, in favour of the needy schools.

The Dominican Convent Ecology Centre is an educational establishment which is far-seeing and an invaluable asset in these changing times. These farm lands are a vital component for the courses they deliver in organic and biodynamic farming. The Ecology Centre attracts and accommodates International students and its role in this town will become increasingly important. The Council should resist any attempts to rezone these lands for other types of development.

Safe Routes to School: The Council should identify and develop suitable parking facilities within a safe walking distance of all schools, which would incorporate cycle lanes and bicycle parking facilities. These routes should be open and well lit, with traffic and parking restrictions in place, to encourage and facilitate children and parents to walk or cycle safely to school.

Community Facilities

Our children need safe places to play. It is no longer safe for them to play or cycle on the streets which are often heavily congested with traffic. All new developments should be required to provide a fully equipped playground.

Local children have been looking for a **Skateboard/BMX Park** for Wicklow, and I believe this request is justified. This is a healthy, outdoor pursuit which should be encouraged. Such a Skate Park should be in an open, visible place where onlookers can keep an eye on the children's safety and welfare. The Park should be in a neutral position so that it will be non-territorial, and should primarily service Wicklow, Rathnew, Ashford and Glenealy. I believe that the most suitable locations for a Skate Park could be at the Port Road Site Office site, or at Broomhall lands, which are both accessible by cycle lanes. I believe that grants could be available for this project through Wicklow Co Partnership.



With such a high unemployment rate, there are many displaced and retired workers with skills and time on their hands. Wicklow Co Council should work together with the Wicklow Enterprise Centre, the Co Enterprise Board, the VEC, Fás and Wicklow Mental Health Association to acquire facilities where unemployed, retired and young people can learn and develop new skills and new local industries and Co-Ops. There is already a 'Men's Shed' in Arklow, where the participants have begun boat-building, which has always been a traditional skill in Arklow. Leading on from this, they have also developed a 'Care and Repair Scheme' to assist the elderly with repairs to their homes.

I have used the example of Men's Sheds, but obviously there are many other local indigenous industries which could be born of such an initiative, e.g Ceart/Shuttleknit. I would propose that the acquisition of the old Veba premises might be a possibility.

Infrastructure

Water: A concerted effort should be made to retrofit existing buildings to harvest rainwater from rooftops into rainwater resevoirs or water butts, for re-use in toilets, street cleaning, window cleaning, watering plants etc. Grants and/or incentives should be advertised and uptake encouraged. Co-operation with Fás could enable a CE scheme to retrofit all public and community buildings.

The Council should investigate further the necessity for the addition of fluoride to our drinking water, and the cost benefits of removing fluoride. There should also be an open and transparent public consultation so that the public can determine what additives are acceptable or otherwise in the water that they will be obliged to pay for!

Overhead electrical cables have always been an eyesore, and should funding ever become available, I would like to see it as an objective to bury these cables underground, begining with the Main Street.

Transport: A one-way system through Wicklow town should be considered, especially in light of the traffic-flow restrictions at the Market Square. I would like to see traffic going south through Main Street, and going north along High Street/Fitzwilliam Road or along the quay. Now that there is alternative access, Heavy Goods Vehicles should be banned from going through the Main Street. It may also be worth considering a toll on the new port road, for HGV's only, to help to pay for the bridge, which is currently being paid for by the taxpayer.

A feasibility study should be undertaken to determine whether or not a Local Link bus, serving Brittas Bay, Barndarrig, Rathdrum, Glenealy, Ashford and Rathnew would be beneficial to the community.

Cllr Pat Kavanagh
Wicklow Town Council

14 Dunbur Glen
Wicklow Town

Tel: 086 2771871

25th August 2011

No. 11

Leonora Earls

From: Leona Quigley [lquigley@johnspainassociates.com]
Sent: 25 August 2011 17:09
To: Wicklow Town Plan Review
Subject: Wicklow Town & Environs Development Plan 2013 - 2019

Dear Sir / madam,

On behalf of our client Aldi Stores (Ireland) Ltd., Newbridge Road, Naas, Co. Kildare please find attached a pre-draft submission on the Wicklow Town & Environs Development Plan 2013 – 2019 (Joint Plan incorporating the Wicklow Town Development Plan 2007, Wicklow Environs and Rathnew Local Area Plan 2008 and Action Area Six Local Area Plan 2006).

Can you please confirm receipt of the same by return?

Kind regards,

Leona Quigley
Senior Planner

John Spain Associates
10 Lower Mount Street
Dublin 2
Ireland

T: 01 662 5803
F: 01 676 6374

M: 087 6830443

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Acknowledged



Before printing, think about the Environment!

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Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town.

By email: wicklowtownplanreview@wicklowtc.ie

25th August 2011

Dear Sir / Madam,

RE: PRE-DRAFT SUBMISSION ON THE PREPARATION OF WICKLOW TOWN & ENVIRONS DEVELOPMENT PLAN 2013 – 2019 (JOINT PLAN INCORPORATING THE WICKLOW TOWN DEVELOPMENT PLAN 2007, WICKLOW ENVIRONS & RATHNEW LOCAL AREA PLAN 2008 AND ACTION AREA SIX LOCAL AREA PLAN 2006)

1.0 INTRODUCTION

- 1.1 On behalf of our client Aldi Stores (Ireland) Ltd., Newbridge Road, Naas, Co. Kildare we wish to make a pre-draft submission on the Wicklow Town & Environs Development Plan 2013 – 2019 (Joint Plan incorporating the Wicklow Town Development Plan 2007, Wicklow Environs and Rathnew Local Area Plan 2008 and Action Area Six Local Area Plan 2006).
- 1.2 The discount foodstore concept in Ireland has emerged rapidly in the past ten years or so and is now an increasingly accepted part of the retail mix in Irish towns. Aldi currently have 84 stores in Ireland with a number of other stores either under construction or at the planning stage. At present these stores are administered and serviced from the Regional Office and Distribution Centre at Jigginstown, Naas, Co Kildare.
- 1.3 As part of its major investment programme, Aldi has identified a requirement to develop stores in Wicklow Town and the environs. The preparation of the Wicklow Town & Environs Development Plan 2013 – 2019 provides an opportunity to proactively plan for the provision of discount foodstores in the area.
- 1.4 This submission requests that the Wicklow Town Development Plan 2013 – 2019 recognises the important contribution that discount foodstores can make to the retail sector and that the Development Plan includes appropriate policies and objectives to facilitate the development of discount foodstores in appropriate locations.

Managing Director: John P. Spain DESIGNATED MEMBER OF THE INSTITUTE OF PLANNERS
Executive Directors: Erika Casey DESIGNATED MEMBER OF THE INSTITUTE OF PLANNERS

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.
Registered in Ireland No. 396306. Registered Office: 10 Lower Mount Street, Dublin 2. VAT No. IE 64163060

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London

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- 1.5 In preparing this submission, we confirm that we have considered the 'Background Issues Paper' prepared by Wicklow Town Council and Wicklow County Council in relation to the preparation of the Wicklow Town & Environs Development Plan 2013 – 2019.
- 1.6 This submission initially sets out at Section 2 an overview of Aldi and its concept, before providing a review of the relevant national and regional planning policy context at Section 3, followed by an account in Section 4 of the proposed policies and objectives that should be included in the Wicklow Town & Environs Development Plan 2013 – 2019 in relation to discount foodstores. A summary and conclusions is provided at Section 5.

2.0 ALDI OVERVIEW

- 2.1 Aldi is a privately owned company and is one of the world's leading grocery retailers, operating in over 5,000 stores in Europe, the USA and Australia. Aldi was first established in the UK in 1990 and in Ireland in 1999. The discount foodstore concept in Ireland has emerged rapidly in the past ten years or so and is now an increasingly accepted part of the retail mix in Irish towns. Shoppers increasingly expect to be able to avail of the discount food offer as part of their weekly convenience shopping trips. Aldi currently have 84 stores in Ireland with a number of others either under construction or at the planning stage.
- 2.2 The basis of Aldi's success is a single minded philosophy of offering its customers a carefully selected range of high quality products at heavily discounted prices and guaranteeing these discounted prices week in week out.
- 2.3 The Aldi range comprises a limited selection of goods in the following key categories:
- General tinned, bottled and pre-packed groceries
 - Seasonal fruit and vegetable lines;
 - Frozen and chilled goods;
 - Beers, wines and spirits;
 - Pre-packed bread rolls and cakes;
 - Everyday non-food (limited range).
- 2.4 Because Aldi only sell approximately 800 lines, compared with for example up to 15,000 lines in a large supermarket, Aldi only meet a proportion of customers convenience needs. The discount foodstore concept therefore interacts closely with other shops and generally adds to and complements the existing retail mix in towns where they locate.
- 2.5 By limiting the range, Aldi's suppliers typically only need to produce one package size instead of multiple packages within the same category. With the higher volume of one item, Aldi achieve greater purchasing power. The limited range further allows Aldi to 'own label' most of its products.
- 2.6 An important part of Aldi's success is its approach to "specials". Every week throughout the year different goods, which are often low order comparison goods, are on offer on a once off basis at heavily discounted prices. This attracts considerable repeat custom across the socio economic groupings.

3.0 NATIONAL AND REGIONAL PLANNING POLICY CONTEXT

Retail Planning Guidelines

- 3.1 The Retail Planning Guidelines describe discount food stores as:

"Single level, self service stores normally between 1,000 to 1,500 square metres of gross floorspace selling a limited range of goods at competitive prices, often with adjacent car parking".

- 3.2 The Retail Planning Guidelines also recognise the role of discount foodstores in providing an alternative choice of retailing to certain sectors of the community. The Guidelines note that the customer catchments and retail offer of a discount foodstore is different to the mainstream superstores and supermarkets and their trade draw will be different.

Retail Planning Strategy for the Greater Dublin Area (2008)

- 3.3 The purpose of the Retail Strategy for the Greater Dublin Area is to guide the activities and policies for retail planning across the seven Councils which make up the Greater Dublin Area- Dublin City, Fingal County, Dun Laoghaire Rathdown, Fingal, Kildare, Meath and Wicklow.

- 3.4 Discount foodstores are specifically identified within the Retail Strategy as follows:

"This form of retailing forms an important part of the convenience market and should be located in highly accessible locations such as neighbourhood, district or town centre(s) (with a suitable provision of public facility fittings to be found therein). The key retail tests, such as justifying need, impact, sequential test and ensuring that the development is of an appropriate scale, should be demonstrated as part of any discount convenience store application (exceeding 1,700 sq.m. gross) where the site is not located in a designated neighbourhood, district or town centre".

- 3.5 Section 6.13 of the Strategy identifies the ability of discount foodstores to act as an anchor within district and local centres and outlines that:

"Consideration should be given and viable opportunities encouraged, with regard to the re-configuration of the existing provision to accommodate large modern retail units in centres from Levels 1 to 3. If new centres are to be re-configured then consideration should be given to them being anchored by a medium/large convenience supermarket/foodstore either as a town centre extension or on a smaller scale as part of a district or local centre improvement; this may provide appropriate opportunities for discount convenience retailers".

- 3.6 Section 6.25 of the Strategy further notes the ability of a discount foodstore to act as an anchor within Neighbourhood/Small Town/Village Centres. The Strategy highlights that:

"Neighbourhood/Small Town/Village Centres: These centres generally provide for one supermarket or discount foodstore ranging in size from 1,000-2,500 sq.m with a limited range of supporting shops (one or two low range clothes shops with grocery, chemist etc.) and retail services (hairdressers, dry cleaners, DVD rental)

cafes and possibly other services such as post offices or community facilities or health clinics grouped together to create a focus for the local population".

4.0 WICKLOW TOWN & ENVIRONS DEVELOPMENT PLAN 2013 – 2019

4.1 The Background Issues Paper prepared by the Planning Authority raises the issue of economic development and retailing in the town and the environs. The Issues Paper states that County Policy envisaged that Wicklow town should seek to have a full range of all types of retail services from newsagents to specialist shops and boutiques, department stores, foodstores of all types, shopping centres and high level of mixed uses to create a vibrant, living place. Rathnew should seek to have a limited range of supporting shops, retail services and facilities.

4.2 In respect of retailing, the following questions are raised in the Issues Paper which are of relevance to this submission:

- *How can Wicklow town centre and Rathnew Village centre be improved in terms of its physical attractiveness as a prime shopping location?*
- *What other retail services would you like to see within Wicklow and Environs? Where would you like to see these other shops and services located?*
- *In new residential areas what type of shops and services would you like to see provided?*

4.3 It is submitted that the development of discount foodstore formats, on suitably zoned lands would address the above noted issues in the Issues Booklet. Accordingly, it is submitted that Joint Plan for Wicklow Town, Rathnew and the environs should include the following:

Retailing Policies

4.4 The new Plan should set out and define the various types of retail development which will be considered within the town and environs and should include specific policies and objectives in relation to these retail formats. The Plan should define the role of each format and provide guidance as to how these formats might be developed.

4.5 In this regard the Plan should recognise the important role of discount foodstores and contain specific policies and objectives in relation to this type of retail development. These policies should inform the appropriateness of particular locations for this type of development in the county in the context of local area plans.

4.6 It is respectfully requested that the Plan provides for suitable opportunities in the town centres, district centres and neighbourhood centres to provide for the development of discount foodstores.

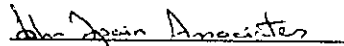
Neighbourhood Centres

4.7 As outlined earlier, it is acknowledged in the Retail Planning Guidelines, that discount foodstores can effectively anchor local neighbourhood centres. It is requested that the draft Wicklow Town & Environs Development Plan specifically recognises the role of discount foodstores in the context of the Retail Planning Guidelines and recognises that discount foodstores can fulfil such a role.

5.0 CONCLUSION

- 5.1 The Development Plan will guide planning policy in Wicklow Town and the environs between 2013 and 2019 and it is submitted that the Plan should provide guidance on the changing retailing environment in the County in the coming years.
- 5.2 It is therefore submitted that the Development Plan should recognise the importance of discount foodstores and contain specific policies and objectives in relation to this type of retail development and also provide the appropriate objectives to permit the provision of discount foodstores on suitable sites in the town to meet the identified need for this type of retail.
- 5.3 In this regard it is requested that the content of this submission be considered in the making of the Development Plan in order to facilitate the development of Aldi discount foodstores within Wicklow Town and the environs in the future.

Yours faithfully,


John Spain Associates

No. 12.

Leonora Earls

From: Phillip Assaf [phillip.assaf@durkan.ie]
Sent: 26 August 2011 16:03
To: Wicklow Town Plan Review
Cc: Neil Durkan
Subject: WICKLOW TOWN & ENVIRONS DEVELOPMENT PLAN

Dear Sir / Madam,

Please find attached our Submission on the Preparation of Wicklow Town & Environs Development Plan 2013 – 2019.

A hard copy is being sent in the post.

Kind Regards

Phillip Assaf
For and on behalf of Ballynerrin Co-Ownership

PHILLIP ASSAF
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acknowledged
[Signature]

Ballynerrin Co-Ownership

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Administrative Office,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town
Wicklow

Email: wicklowtownplanreview@wicklowtc.ie

Date: 26 August 2011

RE: Wicklow Town & Environs Development Plan 2013 – 2019 (WTEDP)

Dear Sir/Madam,

This submission is made in response to the Background Issues Paper on the preparation of the Wicklow Town and Environs Development Plan 2013 – 2019.

The submission is made on behalf of the Ballynerrin Co-Ownership who have lands to the west of Wicklow Town.

As we are all aware the economic environment is presenting all Local Authorities, Communities, Land Owners and other interested parties with very difficult decisions to be made in terms of achieving objectives that were set out as part of existing Development Plans. This in its own right is asking all interested parties to consider their "Vision" for development within their respective administrative areas, communities and ownership alike. There has been much positive work carried out by the Council in terms of infrastructure such as The Port Relief Road, Outer Relief Road, upgrade of the Waste Water Treatment Plant etc. which has seen a capital expenditure of c.€200m being spent to date.

It is acknowledged that there is a limitation in the current water supply for Wicklow Town & Environs and the Ashtown Reservoir which has been identified for many years should be prioritised as it will relieve many of the current issues which homeowners face in terms of

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quality/reliability of the existing water supply. While it is acknowledged there will be costs associated in providing the Ashtown Reservoir the funding can be provided for by way of Financial Contributions, and the direct benefit to Wicklow Town and Environs will far outweigh the challenges in delivering the scheme.

The Ashtown Reservoir is the last "piece of the jigsaw" that is required to put Wicklow Town on the map as a place to live into the future and will also assist in businesses forming decisions to locate their operations in the area. Wicklow Town will then have all the necessary components from an infrastructure perspective to encourage economic activity which in time will see Wicklow Town achieve its Social, Economic, Community and Housing Objectives by virtue of the fact that Wicklow Town will be one of the best served towns nationally.

We would have concern that there may be an approach taken when considering zonings that would result in an over correction in the quantum of land zoned for development. This may result in a shortage of zoned land into the future, which would be in conflict of the Wicklow Town and Environs status under the Regional Planning Guidelines but would also have a negative impact on the amount that would then be charged in the form of Financial Contributions for the remaining zoned land to meet the cost of the new infrastructure that Wicklow Town has seen developed in recent times.

The Wicklow Environs and Rathnew Local Area Plan, 2008 (Wicklow County Council) (WERLAP, 2008) identifies eleven areas within Wicklow Town Environs suitable for sustainable and comprehensive development (Action Areas 1 - 11). Those areas are located along the development boundary of Wicklow Town and are subject to development pressures as the Town expands. While economic conditions remain challenging, there are key fundamental factors that remain which will support growth when economic conditions stabilise such as:

1. Wicklow Town is designated a High Tier Settlement in the National and Regional Settlement Hierarchies.
2. Wicklow Town is a Primary Development Centre under the National Spatial Strategy 2002 – 2020.
3. Wicklow Town is designated a 'Large Growth Town 1/ Primary Economic Growth Town' in the Regional Planning Guidelines, 2010.
4. The Wicklow County Development Plan 2010-2016 states that in accordance with Ministerial guidance the zoning is made with a longer term vision.
5. The population of Wicklow Town/Rathnew is projected to grow from 11,919 persons in 2016 to 24,000 persons by 2022. (CSO 2006.)
6. Wicklow's population is younger than the National Average.
7. Wicklow Town is serviced by a Rail Network, Bus Network & Port.

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8. Wicklow County Council has invested considerably in infrastructure (c.€200m) for the area, which will need to be supported by future development.

Statutory Designations

Wicklow Town is designated a High Tier Settlement in National and Regional Settlement hierarchies. The local population of 11,919 (CSO, 2006), is projected to increase to 24,000 in order to reach the critical mass sufficient to support the functions of a High Tier Settlement. To achieve this, the housing supply must increase significantly.

National Spatial Strategy 2002 -2020

The National Spatial Strategy for Ireland, 2002-2020 (NSS) sets out the basis on which all areas of the Country will have the opportunity to develop to their potential within a National Spatial Planning Framework for the period up to 2020.

The NSS is based on a strategy of regional development using a framework of nine 'Gateways', supported by nine 'Hubs', which are in turn supported by smaller settlements. It is important for each settlement to reach a critical mass in terms of the size and concentration of population that enables it to support a suitable range of services and facilities.

Wicklow Town is a **Primary Development Centre**¹. Dublin City has been designated a Gateway in the Greater Dublin Area Region (Counties Dublin, Wicklow, Kildare, and Meath). It is to be supported by Primary Development Centres at Wicklow Town, Naas, Newbridge, Kilcullen, Balbriggan, Navan and Drogheda.

Wicklow Town benefits from its location on the coastal National Transport Corridor connecting Belfast and Dublin to Wexford and Rosslare.

Development in the GDA outside of Dublin City is to be concentrated in the **Primary Development Centres**:

"these development centres have a unique role in Irish terms, given the scale of the Dublin City region and the need for internal balance between the city and its surrounding counties." (NSS, 2002: 78.)

The economic and population growth implications of Wicklow Town's designation as a Primary Development Centre are considerable.

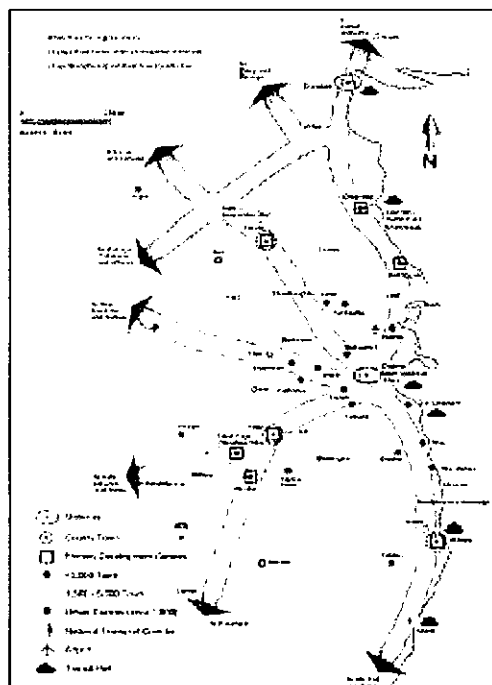
The NSS states:

"the Primary Development Centres need to aim at a population level that supports self sustaining growth, but does not undermine the promotion of critical mass in other

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regions. This suggests an ultimate population horizon of up to 40,000 people for "Primary Development Centres" (NSS, 2002:80.)

The Current population of Wicklow Town, Environs and Rathnew (11,919 persons, CSO, 2006) falls short of this figure.



Plan: Map of Dublin and the Mid East Region, showing Wicklow Town as a Primary Development Centre and Transit Port located on the coastal National Transport Corridor. (Source NSS: 79.)

Implementing the National Spatial Strategy: 2010 Update and Outlook.

The 2010 Update and Outlook provides 'Pointers for Future Action', including inter alia the following:

- Implementing existing good strategies for towns is the key to sustainable urban and regional development.
- Economic development strategies within regions need to address the requirement to provide new and diversified types of local employment in rural areas, which include small towns and villages, and recognise their increasingly important potential including the use of local assets, natural resources, agriculture as well as other sectors (e.g. knowledge-based enterprise) that are not location-dependant.

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- Renewed focus on the achievement of more compact settlement patterns within urban and rural areas, focussing especially on the development of locations within and around key towns that are served by the Rail Network and a significant modal shift towards more sustainable forms of transport such as public transport, walking and cycling within in turn will complement and optimise the use of serving infrastructure investment. (NSS update 2010: 22-23.)

Wicklow Town has a number of locational advantages as it is the County's administrative centre and has a rail connection to Rosslare, Dublin and Belfast, in addition to a sea port and strategic road connections.

Regional Planning Guidelines for the Greater Dublin Area, 2010-2022

Wicklow Town is designated a '**Large Growth Town 1/Primary Economic Growth Town**' in the Regional Planning Guidelines, 2010. It is located within the Hinterland² Area of the GDA.

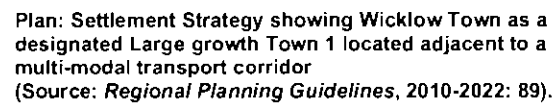
The Regional Planning Guidelines define Large Growth Towns as:

"These towns, located both within and outside of the Metropolitan Area are, in addition to the Gateway, critical to the success of the RPGs. They *will accommodate significant new investment in transport, in economic and commercial activity and in housing.* These towns act as important self sustaining regional economic drivers for the GDA, capitalising on their international connectivity and high quality connections to Dublin City Centre, whilst also supporting and servicing a wider local economy, and for some this extends beyond the GDA into surrounding Regions. They are important centres for delivery of Public Services, with Hospitals, Courts, Local Authority and Civil Service offices located within the town; alongside IDA promoted companies, High Order Retail Businesses, Supported Enterprise Centres and Active Chambers of Commerce providing a Strong Commercial Hub within the town and environs. [...] *It is envisaged that Large Growth Towns 1 would plan for growth up to 50,000 persons in scale* [...] It is essential to the achievement of the delivery of the RPG settlement strategy that new and appropriate mechanisms are developed to deliver enabling infrastructure to allow the planned development and consolidation of these towns to take place, particularly for key non-national roads, bus services and investment in water service." (RPGGDA, 2010: 94.) [Our emphasis.]

The GDA Regional Planning Guidelines further state in relation to County Wicklow:

"... The recommended *examination of possible improvements to the Wicklow rail route by the RPGs* will assist in supporting economic and housing activity in the key towns of Greystones, Wicklow and Arklow; as well as the smaller rail served towns of Rathdrum and Kilcoole, and

support the continued delivery of a strong defined settlement pattern for the County.” (RPGGDA, 2010: 99.) [Our emphasis.]



"Wicklow Town is the primary centre in this core economic area, however, the sphere of influence extends to a large hinterland and affects areas such as Rathnew, Ashford and Rathdrum. [...] Locational strengths include the location of this core economic area on a strategic European designated transport corridor (EO1) with this road linking port provisions along the east coast such as Dublin, Wicklow Port and Rosslare, important entry points to the region and the rail service along the east coast of the county, leading to Rosslare. Wicklow town has seen a shift in employment growth from traditional manufacturing and transport/logistics to professional services, public administration and commerce, financial and business services. Despite the fact that warehouse and distribution activities have experienced a relative decline, they continue to be a significant source of employment in Wicklow Town, supported by the Port. While Fishing, Agriculture and Forestry make up a small sector of the overall economic profile of the town and its environs, it has shown growth over the last census period, in contrast to national trends. [...]"

The *Core Economic Area* should seek to develop *Smart business* which can collaborate and develop through relationships with other such centres in the GDA and adjoining regions. The ongoing collaboration between Wicklow Co. Co. and Carlow IT at Clermont College at Rathnew to develop the facility as a centre of excellence in technology development is

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supported in the RPG's. Other sectoral areas with potential for further development includes the Pharma and Transnational Corporation (TNC) Enterprises.

A shift of emphasis to high value added manufacturing, in tandem with strengthening transport and business links between the port and other ports in the GDA, such as Dublin Port and exploitation of tourism potential from the existing man made and natural assets of the area should also be considered. Promotion of the key transport corridors as economic drivers and improvements to support economic growth and competitiveness is also recommended." (RPGGDR, 2010: 73.) [Our emphasis.]

The RPG's note the importance of the Region's Large Growth Towns, such as Wicklow in addition the Gateway of Dublin City, in realising the aims of the RPGs.

The Regional Planning Guidelines emphasis Large Growth Towns such as Wicklow must become self-sustaining regional drivers. Wicklow Town has a number of locational advantages as it is situated on a strategic transportation corridor with rail, road and port connections.

Wicklow County Development Plan 2010-2016

The Development Plan contains a 'Vision and Core' Strategy for the County. The Core Strategy states that the Settlement Strategy complies with the National Spatial Strategy 2002-2020 and Regional Planning Guidelines for the Greater Dublin Area, 2010-2022.

The County Development Plan covers the 2010-2016 period. However, in accordance with Ministerial guidance the zoning is made with a longer term vision. The County Development Plan settlement strategy therefore provides for the development of settlements up to 2022.

The following key strategic goals, which are among those applicable to the development of the entire county, are particularly relevant to the lands west of Wicklow Town:-

"... facilitate and encourage the growth of employment, enterprise and economic activity in the County..."

"... integrate land use planning with transportation planning, with the dual aim of reducing the distance that people need to travel to work, shops, schools and places of recreation and social interaction, and facilitating the delivery of improved public transport."

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"... provide for high quality new housing, at appropriate locations and to ensure the development of a range of house types, sizes and tenures in order to meet the needs of all in society and to promote balanced societies."

"... maintain and enhance the viability and vibrancy of settlements, to ensure that towns and villages remain at the heart of the community and provide a wide range of retail, employment, social, recreational and infrastructural facilities."

"... promote and facilitate the development of sustainable communities through land use planning, by providing for land uses capable of accommodating community, leisure, recreational and cultural facilities, accessible to and meeting the needs of all individuals and local community groups, in tandem with the delivery of residential and physical infrastructure in order to create a quality built environment in which to live."

"... protect and enhance the diversity of the County's natural and built heritage."

"... address the climate change challenge, as a plan dynamic, throughout the County Plan, directly in the areas of flooding and renewable energy, and indirectly by integrating climate change and sustainable development into statements of plan policy, strategies and objectives." (WCDP 2010-2016, pgs. 20-25.) [Our emphasis.]

In addition to these key strategic goals development will support the long term infrastructure needed for Wicklow Town.

The County Development Plan, Table 3.4, sets out the County's housing demand and an assessment of the adequacy of zoned land.

The population of Wicklow Town/Rathnew is projected to grow from 11,919 persons in 2016 to 24,000 persons by 2022. This requires an additional 3,481 no. units to be provided between 2010 and 2022.

The projected populations for each settlement includes headroom of 23% to account for uncertainties and to ensure that there is sufficient capacity in other settlements if some growth towns are unable to develop the required infrastructure.

The County Development Plan notes that 'Market Factor' must be incorporated into any Plan. 'Market factor' allows more land to be zoned than is strictly required to reach a population target. The County Development Plan recommends that "[the market factor] be 50%, though

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in local plans in the north and east of the County, a figure of 30% is normally used based on the greater likelihood of zoned land being developed in this part of the County.

Population – Younger than National Average

The Wicklow Town Development Plan provides a breakdown of the Town and Environs' population by age-cohort based on 2006 Census figures.

Table 1					
Age Profile of State, County and Town and Environs, 2006					
	0-14	15-24	25-44	45-64	65+
	%	%	%	%	%
Wicklow Town & Environs	23.9	13.3	33.5	20.3	9.0
Wicklow County	21.5	14.0	32.0	22.5	10.0
State	20.4	14.9	31.7	21.9	11.1

(Source: WTC, 2006.)

Table 1 shows that a higher proportion of Wicklow Town and Environs' population is within the 0-15 age cohort than is the case in either Wicklow County or the State. The proportion of the population in the 25-44 age bracket (or house-formation cohort) is also higher than in the County and State.

These two figures suggest that a significant number of people have recently moved to Wicklow Town in order to form new households. This is most likely due to the lower cost of housing in Wicklow than Dublin. The population profile is positive because it shows that 67.1% of the population is within the potential local Labour Force.

Transportation

Wicklow town is served by rail and bus. The town is located on the Dublin and Belfast to Rosslare rail line. Approximately 15 trains stop at Wicklow station connecting to either Rosslare or Dublin with a number of stations between.

The Wicklow Town Plan, 2007 notes that Iarnród Éireann is expanding the train services for the town and [had] hoped to have a fleet of Inter-City trains delivered by mid-2007³. As a result, Wicklow will have a core 2-hourly frequency of service to Dublin/Wexford. Additional commuter services will also run during morning and evening peak hours (WTC, 2007:25).

Ballynerrin Co-Ownership

Wicklow is well served by bus with Bus Éireann route numbers 2 and 133 serving the town. There is on average more than 1 No. bus an hour throughout the day and night connecting Wicklow to Dublin (including the Airport) and to Arklow.

Transportation is a fundamental requirement of communities and is integral to all Plans. The lands to the west of Wicklow Town are well connected to the surrounding lands and this level of connectivity will improve when the Town relief road and the "Hawkstown Road" are completed.

Infrastructure

When reviewing zonings, consideration should be given to the considerable Economic Investment made by Wicklow County Council to date including the Port Relief Road, Outer Relief Road and the upgrade of The Waste Water Treatment Plant. Future development will be required to support this infrastructure already put in place.

Economic Considerations

The development of sustainable community in Wicklow Town and Environs will require the creation of jobs in order to reverse the current trend that sees large elements of the population commuting to Dublin. Given the significant slowdown in economic performance evident since early 2008⁴ and the accepted forecasts of a marginal recovery in the immediate term, the creation of employment opportunities is increasingly vital to the continued development of Wicklow Town and Environs economy.

The development of the lands surrounding Wicklow Town will provide employment generating uses as the zonings permit uses such as: employment; education services; home-based economic activities; crèche/nursery schools; public services; recreational buildings; and sports clubs in addition to construction-related employment.

The creation of jobs in Wicklow Town and Environs will be of paramount importance to employment provision for future residents.

Significant areas of land are zoned for employment intensive uses in the surrounding areas. These jobs will benefit the residents of Wicklow Town. Furthermore housing will be needed to support development of commercially-zoned lands and help with job creation.

The latest available data from the Central Statistics Office (County Incomes and Regional Gross Domestic Product 2008) indicates that a target population of approximately 5,507 inhabitants will generate personal disposable income of €110.9 million per year⁵. Further disaggregation of the data available⁶ indicates that in the region of €21.6 million will be spent on comparison goods annually (clothes, footwear, household and electrical goods, furniture,

Ballynerrin Co-Ownership

etc.) with approximately €16.4 million annually being spent on convenience goods (food, beverages, alcohol, etc.).

Expenditure on convenience goods will be predominantly located at outlets in and around Wicklow Town reflecting the increasingly localized nature of this type of retail expenditure. This is reflected in data provided in the Wicklow Retail Strategy, 2010, which highlight convenience expenditure retention of approximately 82%. With regard to comparison retail expenditure, the Wicklow Retail Strategy highlights the overriding attraction of Dublin City and surrounding suburban centres for comparison shopping.

Conclusion

In conclusion the writers of this submission respectfully request the Council to give careful consideration when reviewing the current zonings of Wicklow Town & Environs. While economic conditions remain challenging Wicklow Town & Environs have key fundamental factors that will support future growth when the economy returns to normal conditions, the facts that Wicklow Town:-

1. Is Higher Tier Settlement,
2. Is a Primary Development Centre,
3. Is designated a Large Growth Town/Primary Economic Growth Town,
4. Population is projected to grow,
5. Has excellent transportation infrastructure and links and

In addition Wicklow County Council has made considerable investment in infrastructure (c€200m) to date that will need to be supported by future development. We would also note that financial Contributions are currently at an unsustainable level and are currently too high.

While the writers of this submission acknowledge that some lands will be de-zoned, we would ask the Council to consider the points/factors raised in this submission. Furthermore we would respectfully request the Council to consider Phased Zoning rather than outright de-zoning of lands, so as to avoid an over correction in zoning that would have a negative impact in the future.

Yours Faithfully

PP



Neil Durkan

For and on behalf of Ballynerrin Co-Ownership

References:

1. *Primary Development Centres in the Hinterland area are key growth settlements that have good transport links to the Metropolitan Area; accommodate a balance of residential and employment functions and act as key service centres for their rural hinterlands.*
2. *The Greater Dublin Area is divided into two areas: the Metropolitan Area, which consists of the existing built up area of Dublin and its immediate environs; and the Hinterland Area, which comprises the remainder of the GDA Area and contains large towns and extensive areas of countryside.*
3. *The increased frequency in the train service has not occurred to date, which we understand is due to a delay in delivery of rolling stock, but is still expected in the near future.*
4. *Economic and Social Research Institute (ESRI), Quarterly Economic Commentary, Winter 2010.*
5. *Estimates of Disposable Income Per Person (excluding Rent).*
6. *Source: Tom Phillips + Associates Town Planning Consultants.*

Bernadette Harvey

No. 13

From: Sylvester Burke [sylvesterjburke@gmail.com]**Sent:** 13 July 2011 14:57**To:** Wicklow Town Plan Review**Subject:** Submission for the preparation of the Wicklow Town & Environs Development Plan 2013-2019**Subject:** Submission for the preparation of the Wicklow Town & Environs Development Plan 2013-2019

Dear Sir/Madam,

The following is my vision for Wicklow Town & Environs.

What is my Vision for the settlement?

Visual Image – a picture says a 1,000 words.

Wicklow Town & Environs is a fantastic place to work and reside but it needs to clean up its image. This would entail scoring each street, housing estate, industrial estate etc on the quality, appearance, condition of buildings, roads, footpaths, trees, shrubbery, local parks with seating trees shrubs etc.

Sweat the assets we have to maximise return on investment and ensure a viable future of prosperity and employment.

What kind of town I would like Wicklow to be in 2022?

Wicklow in 2022 should have a sustainable level of services for its residents and visitors. The figures from the 2011 census correctly interpreted by qualified statisticians should be the basis to best determine future sustainable level of services for Wicklow Town in 2022.

Currently there are too many shops for the local population and visitors. Future planning could restrict this oversupply thus avoiding closure on shops etc due to lack of custom.

Currently there are many vacant and uncompleted houses, offices etc and this excess needs to be avoided for the future. Vacant public buildings should be sold and the proceeds reinvested.

Wicklow Town has an abundance of amenities but some amenities are missing. However planning permission for new amenities should only be granted on foot of a viable business plan for the projected population.

Wicklow Town needs fenced local parks for residents & visitors complete with seats, trees, shrubs etc.

Visually some areas of Wicklow Town need a makeover to improve the feel good factor for residents and attract visitors.

What is my view of Rathnew & the wider settlement?

Rathnew and the wider settlement in 2022 should have a sustainable level of services for its residents and visitors. The figures from the 2011 census correctly interpreted by qualified statisticians should be the basis to best determine future sustainable level of services for Rathnew and the wider settlement in 2022.

Currently Rathnew has an oversupply of warehouses and industrial units with many unoccupied and unfinished units. Currently Rathnew and the wider settlement has many vacant houses.

All these vacant buildings project a tatty image particularly in Rathnew village. It is essential to improve the feel good factor for workers, residents, and visitors that the whole village of Rathnew be given a makeover.

In particular the visual appearance of the industrial areas need to be upgraded to international standards visitors to attract new industries to occupy the vacant warehouses and industrial units to create employment locally.

What kind of opportunities and facilities will the settlement need to fulfil this vision?

Wicklow as the Garden of Ireland blessed by its natural topography has the opportunity to upgrade and enhance its current facilities to "Gold standard" and be a showcase for Ireland.

Let 2022 be the target to fulfil this vision.

Thanks & best regards to all the officials involved in the preparation of this development plan,

Sylvester Burke
Bayview House
Bayview Road
Wicklow Town

Home: 0404 66295

Mobile: 086 8764110

Email: sylvesterjburke@gmail.com

no. 14

Bernadette Harvey

From: Ann Carr [carrannmt@gmail.com]
Sent: 26 August 2011 18:09
To: Wicklow Town Plan Review
Subject: Submission for Wicklow Town Environs Plan 2013-2019

Hi,

Enclosed please find submission for Wicklow Town Environs Plan.

Martin Carr
Ashtown Farm,
Wicklow.

Submission on behalf of Martin Carr, Ashtown Farm, Ashtown Lane, Wicklow Town.

Wicklow Town is a wonderful place to live and having a foothold in both the Town Centre and the Environs gives me a clear perspective on the opportunities this town has to offer. Wicklow Town is ideally located with the sea to the east and its wonderfully varied coastline from the Mouragh to the North and Dunbur to the South. With its small harbour and old world town centre moving out to modern residential estates and on to the employment lands close to the M11.

The opportunities this almost unique location provides must surely be the envy of all who visit this town. The quality of life that we enjoy as residents here is sometimes missed in our day to day pressures.

The Tourist potential with sea and mountains on our doorstep, wonderful golf and riding, fishing and walking / cycling to name but a few of the opportunities on our doorstep.

Being so close to Dublin has to be a benefit to bring business into the environs, the Wicklow Enterprise centre is recognised throughout Ireland. There are large areas of land zoned for employment and we should be doing much more to attract business into the town. The Wicklow County Campus in Clermont should be doing a lot more to attract education and business into the Wicklow Environs as this would be a much needed driver of economic activity in the area.

Developing the future while protecting the past should be the theme of this plan, the town has a nice main street which is its centre or core. While the basic structure of the town should be preserved it needs to develop so that it can attract new modern business into the town so that people can find more of what they need in the town rather than going to Dublin and the businesses can grow and prosper. To achieve this we need to make Wicklow Town a destination and a more attractive place for shoppers to come and do their shopping.

Along with the Main Street there is a need to develop larger units which can compete with the Large Shopping centres in Dublin and Arklow and elsewhere which we lack in our own county town. The Marlton lands in AA6 are ideal for this.

Zoned lands to the west of the town in my ownership will provide for the natural growth of the town's population, not just in Residential terms but in Employment, Education and Green Space. It is important to remember that within the environs are two settlements, Wicklow Town and Rathnew, both of which have different objectives and targets within the national strategies. Rathnew has seen significant growth and now Wicklow Town needs to achieve its potential. To achieve this all the lands to the west will be needed once the current recession is over. My Lands within AA4 and AA6 are very well located being as they are divided by the Rocky Road and Ashtown Lane, some also adjoin the TRR. With the investment in the TRR road to the west of the town my lands are now well located between the town, TRR and M11.

I would like to point out that I, along with the other members of the Wicklow Town Landowners Group provided land for the TRR at no benefit to me.

With all the investment in infrastructure in recent years the Ashtown Tank has yet to be constructed. This water tank is needed for the town as a whole to maintain water pressure and is needed to supply water to as far away as Brittas Bay. I can see no reason why such an important tank should

not be included in the next Development Levies Contribution scheme. This scheme was devised in order that infrastructure needed for the good of a community could be built and the costs spread across the development area that benefit from the work and so that the costs did not have to be carried by a small no of developers. This seems to be a good example such a scheme.

Druid Lodge no 15.
Greenhill hghts,



We wish all green areas in town to be preserved and maintained. No new estates to be given planning permission within a 3 mile of main street. Please note disastrous planning in town in particular the Kilview Est. re: Architects + builders please never let this occur again. Can a shopping area other than the main st in Wicklow be created and once schools ~~between~~ a gridlock situation occurs, I hope a cheap shuttle bus service is put in place when new Coláiste Chlé Mhantam opens to prevent traffic gridlock @ 9 am + 4pm.

Paul Carr



Comhairle Chontae Chill Mhantáin

WICKLOW COUNTY COUNCIL

Aras An Chontae
Cill Mhantáin
Telefón : (0404) 20148
Fax No : (0404) 69462
Intl VPN : 181 2100
E-Mail: plandev@wicklowcoco.ie
Web: www.wicklow.ie

Your Ref:

Our Ref:

**Paul Carr
Druid Lodge
Greenhill Heights
The Murrough
Wicklow Town**

26th August 2011

Re: Wicklow Town and Environs Development Plan

Dear Mr Carr,

I wish to acknowledge receipt of your submission in respect of the above, the contents of which is noted.

Kind Regards

**Leonora Earls
Administrative Officer
Planning and Development**

**Paul Carr
Druid Lodge
Greenhill Heights
The Murrough
Wicklow Town**

26th August 2011

Re: Wicklow Town and Environs Development Plan

Dear Mr Carr,

I wish to acknowledge receipt of your submission in respect of the above, the contents of which is noted.

Kind Regards



**Leonora Earls
Administrative Officer
Planning and Development**

No. 16.

Leonora Earls

From: Eoin Carroll [eoinjcarrollarchitects@gmail.com]
Sent: 26 August 2011 12:37
To: Wicklow Town Plan Review
Subject: Submission Re: Wicklow Town and Environs Development Plan 2013-2019

To whom it may concern,
Please find a submission attached in pdf format.
If you have any problems opening the file or have any questions please do not hesitate to contact this office,
Regards,
Eoin.

--

Eoin Carroll MRIAI RIBA

for

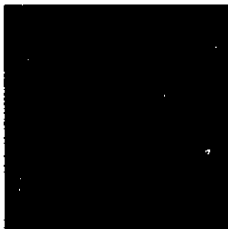
Eoin J. Carroll Architects

Ground Floor,
One Southern Cross,
IDA Business Park,
Bray, Co. Wickow

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m: 086 8743513
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acknowledged



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Web: www.ejcarchitects.com

Administrative Officer,
The Planning Section,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow,
Co. Wicklow.

26.08.11

By E-Mail: wicklowtownplanreview@wicklowtc.ie

RE: Wicklow Town and Environs Development Plan 2013-2019.

Dear Sir/ Madam,

On behalf of a private client we hereby make the following submission regarding the preparation of the Wicklow Town and Environs Development Plan 2013 – 2019.

The submission deals with some items of note that were raised in the 'Issues' Document prepared by the Planning Authority and made available to the public on the 1st of July 2011.

The items raised in the 'Issues' Document that we wish to respond to are as follows:

A) Core Strategy:

- Population Targets
- Land zoned for housing
- Land zoned for retail development

Population Targets:

The population targets for Wicklow Town and the environs are set out in the Wicklow County Development Plan (2010-2016). These targets are based upon the projections of the Regional Planning Guidelines for the Greater Dublin Area 2010-2016.

We broadly agree with the population targets and agree with the designation of Wicklow/ Rathnew as a Large Growth Town 1 in the County Plan, however it is considered that the target of having 76% of the population living in towns within the County by 2022 is too modest and should be increased.

As Wicklow/ Rathnew is designated as a Large Growth Town a large element of this population increase would naturally be accommodated in Wicklow Town and the Environs.

In general terms concentrating more of the county's population in towns and growth settlements would provide for more sustainable development with regard to traffic and transport, waste water treatment, water supply and visual amenity. It would reduce the instances of one off housing in a rural setting within the County.

Land Zoned for Housing:

The question is raised in the 'Issues' Document that if the current amount of zoned land is in excess of what is needed to meet population and housing targets should land be de-zoned.

In response it is considered that land currently zoned for residential development should not be de-zoned in the Wicklow Town and Environs Development Plan 2013-2019.

There has been extremely limited residential development of zoned lands within Wicklow Town and its Environs over the past 3 to 5 years due to the economic downturn.

The Construction Industry Federation has undertaken a nationwide survey of housing supply. The document, 'Future Housing Supply in Ireland', published in January 2011 by the CIF indicates that there is less than 6 months supply of new and complete housing units for sale in County Wicklow.

It is considered that in order to accommodate the growth of the town as a Large Growth Town it would be a very retrograde step to de-zone lands that are zoned for residential development in the current development plans.

In addition to this and as noted above the Planning Authority should be endeavoring to increase the proportion of the population in growth towns and settlements such as Wicklow Town/ Rathnew.

Considering the current inactivity in the housing market and given the dearth of new houses in Wicklow it is likely that there will be a considerable demand for new units in the town and its environs within the lifetime of the new proposed plan. In this regard it would be extremely premature to de-zone residentially zoned lands when the actual demand is not known.

Land Zoned for Retail Development:

The question was also raised in the 'Issues' Document that if the amount of land zoned and policies do not meet the higher level plans should land zoned for retail development be de-zoned.

In response it is considered that land currently zoned for retail development should not be de-zoned in the Wicklow Town and Environs Development Plan 2013-2019.

Wicklow is identified as a Level 2 Centre in the Greater Dublin Area Retail Strategy. In line with section 10.3.4 (B) of the County Development Plan it is estimated that there may be a population of up to 35,000 that would be drawn to Wicklow Town for shopping. We broadly agree with these projected figures. Considering the amount of land currently zoned for retail development in Wicklow/ Rathnew it is considered that it would not be appropriate to de-zone land designated for retail development.

B) Population and Housing:

- Where should the population growth be accommodated?

The population growth should be accommodated on the lands currently zoned for residential development within the current Town and Environs Plans.

We consider that the location of these lands are the most appropriate for new residential development. The lands currently zoned for residential development are located on the edge of the Town boundary and on sites within the environs that will allow for the sequential and logical growth of Wicklow from its historic and geographic centre. It is considered that there should be no alterations from the existing zoning designations of the lands currently zoned for residential development.

C) Economic Development:

- Where should new employment be located in the town? What type of employment would you like to see there?

New employment should be located on the periphery of the Town and Environs. It is best accommodated on the lands in the environs that are currently zoned for employment and employment & retail warehousing in the current Environs Plan along the boundary with the M11.

The location of these lands which have good access to transport corridors by road and rail make them the most suitable locations for employment zoned lands.

The lands are also separate from the lands currently zoned for residential development within the plan boundary but are widely accessible by road and located ideally to provide employment for the projected increased population of Wicklow/ Rathnew.

A mix of employment uses should be considered in these locations including retail warehousing, industrial and light industrial, office and service provisions including local commercial uses. This is broadly in line with the current zoning designation of employment/ employment and retail warehousing attached to the lands.

D) Infrastructure:

- Water Services- Not all areas in the town can be serviced unless new infrastructure is constructed to reach lands at the higher elevations. This will be an important consideration in the new plan.

It is imperative that the issue of the provision of water services to residentially zoned lands is addressed in the new plan. The growth of Wicklow is dependant on the provision of these water services, in particular the proposed new Ashtown reservoir which would improve the water supply capacity for Wicklow. The development of residentially zoned lands within Wicklow Town and its environs has to date been stalled by the inability to provide these much needed water services.

This issue must be integral to any future plan and must be dealt with in order to allow for the proper and sustainable growth of Wicklow Town and its environs.

We trust the above responses will be considered by the Planning Authority.

We note that submissions regarding the zoning designation of individual sites are not being considered at this time and we would welcome the opportunity to comment on the zoning designation of particular sites within the plan boundary when the time arises.

In the meantime if your department has any questions regarding any of the above please do not hesitate to contact the undersigned.

Yours Sincerely,

Eoin J. Carroll MRIAI RIBA

For Eoin J. Carroll Architects

No 17

Leonora Earls

From: R.F. CONWAY [rfconway@conwayport.ie]
Sent: 25 August 2011 11:05
To: Wicklow Town Plan Review
Subject: Submission on Wicklow town and environs development plan 2013 - 2019 (August 25th 2011)
Follow Up Review
Flag:
Flag Status: Flagged

Good Morning

Attached please find submission in respect of the preparation of the Wicklow town and environs development plan 2013 -2019

++

Best regards
R.F. Conway



acknowledged

25/08/2011



Wicklow town and environs development plan 2013-2019

Submission by R.F. Conway, North Quay, Wicklow.

General

The new Wicklow town and environs development plan 2013-2019 must acknowledge the unique character and geographic location of Wicklow and avoid any 'generic' approach to formulating the plan.

Wicklow has a wonderful maritime location. It is a coastal community in the garden county and is the county capital with primary growth status. Its proximity to Dublin should also be seen as advantageous in terms of its ability to access services and facilities in our capital city. Such access has been significantly improved in recent years with the provision of greatly improved infrastructure.

Wicklow and its environs has all of the required components to be a fantastic community in which to live, work and play. With correct planning, proper development and reasonable foresight, Wicklow can provide its inhabitants with an excellent quality of life where all social, cultural, economic and intellectual needs are catered for.

Vision

The draft refers to Vision and the development plan genuinely needs to be a 'visionary document'. In essence the plan should make provision for growth of our community well into the future and should seek to create an environment in which the aspirations of the community can be achieved, nurtured and developed on an ongoing basis. There needs to be a genuine effort made to ensure that the local authority, through the development plan, facilitates and encourages proper development for its own benefit and the benefit of the community in general.

Zoning

Fundamental to the proper planning of the area is the question of zoning which promotes and facilitates the objectives of the community. Zoning should provide a template within which beneficial and effective local development can take place.

The current plan is dependent on a "zoning matrix" which is rigid, restrictive and potentially creates a disincentive for development.

This is an extremely important issue.

For instance, any employment or industrial zoning should entertain a wide range of development which will create employment. The current system effectively prevents a potential applicant from making an application or forces the requirement for a material contravention.

Each application should be considered on its own merits and the provision of employment in whatever form it takes should be actively encouraged.

At present, the matrix has a very narrow interpretation and states specifically what is or is not permitted. This is a potential deterrent which should be addressed as it can impact negatively upon any prospective development which could contribute positively on the community.

Interaction with local authority

It must be possible for applicants to engage with the local authority and indeed the planning system in a positive way.

The approach to planning should encourage a spirit of cooperation which will produce cohesive economic and social development. The removal of any obstacles or deterrents needs to be treated as a priority so that significant investment in our community is encouraged.

Such an approach would lead to greater inefficiency within the planning system, less cost (time and money) to all concerned and the real promotion of an ideal that states "Wicklow is open for business". Economic development is crucial in terms of providing employment and creating 'wealth' within the community which in turn can be used to fund ongoing social and cultural development.

Development from within the community should be actively encouraged in addition to attracting external development.

The local authority has actively worked to encourage external development and attract new investors to Wicklow. It is respectfully suggested that existing local businesses which have already made the choice to locate in Wicklow should be encouraged in the same way.

Area 1 - The murrough

This area is of particular significance

- There is a large tract of employment zoned land suitable for many uses
- It is proximate to the town centre and has easy access
- There is a strategically important inter modal point where rail, road and sea converge. The importance of this should not be under estimated.

The murrough area is of great importance to Wicklow town. Recent development has meant the convergence of rail road and sea infrastructure which is rare on this island and a tremendous local asset.

The area is well positioned to accommodate new Commercial and leisure based port facilities in the longer term and any development plan should make provision for the consideration of such Development.

In addition, the prospect exists for the provision of new rail station services and additional linear parking to be provided in order to facilitate same.

Such development could result in the elimination of the current coastal erosion problem, create wonderful amenities such as promenades, leisure areas etc and encourage wicklow to look outwardly to the sea.

The reclamation of land which has been lost to the sea should be seriously considered. It would seem that this can be achieved and justified economically.

Earlier county development plans have identified the need for a Ro Ro shipping facility to be located in Wicklow. This is the correct location and with encouragement from the local authority such a facility is definitely achievable. It is suggested that the new plan should make provision for such a facility to the north of the existing port area where the facility can 'plug in' to existing infrastructure.

This is not something which would be competitive with the existing port but which should compliment same and indeed promote further economic development within the existing port area.

Area 3 - The Port and Harbour

It should be remembered that the town of Wicklow originally grew around the port area. Wicklow port is an important part of our local heritage and has always been important in terms of generating economic activity, providing employment and promoting maritime leisure.

The commercial port has always had an excellent reputation for efficiency and turnaround of vessels. It is important that activity in the port is encouraged and developed both in commercial, tourism and leisure terms.

The new port access road has removed the need to move heavy traffic through the main street and the existence of the new access route should be actively promoted and highlighted in order to encourage more activity within the port area.

More activity will result in more employment which will inevitably result in greater economic activity within the town and environs.

The port should be seen as a source of potential revenue (commercial, leisure & tourism) which will ultimately benefit the town and support local businesses. Wicklow needs to look outwardly to the sea for additional growth and its tremendous coastal location should also be seen as a valuable asset.

Area 4 -The Quays

Development on the quays has not been cohesive in recent years.

The south quay in particular could engage more with the town centre particularly given the fact that the south quay road and quayside repairs have now been completed.

There appears to be an anomaly in zoning on the south quay which potentially acts as a disincentive to development. For example, most of the area has been zoned town centre and one small area on south bank site is zoned for port use. This area is further away from the commercial quayside than the area zoned town centre. The new plan should address such anomalies.

Potential exists for the south quay to become an integral part of the town where a range of commercial, marine leisure and tourist facilities could be provided. Tourist accommodation - Marina pontoon facility - Leisure facilities - entertainment - gallery restaurants etc.

One of the main areas causing difficulty is provision of parking. The town centre desperately needs to be serviced by enhanced parking facilities if it is to develop economically.

It is suggested that proper 'traffic management' within the south quay area, in cooperation with the port company, could provide much needed additional parking just off the main street area.

no. 18

26 / 8 / 2011.

Dear Sir / Madam.

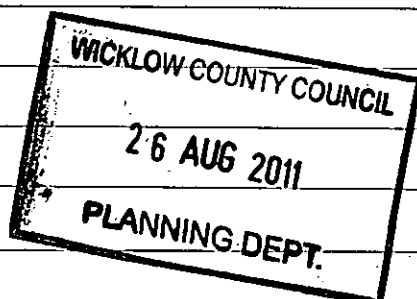
I, Gerard Corkish of # 57, Main Street, Wicklow Town wish to submit a proposal of a creative space for the benefit of local and out of town artists (visual artists, musicians, performing arts etc) to be included in the planning draft of future developments that will be undertaken by the Co. Council in the near future. I believe that the inclusion of such a space will be very beneficial to creative types and I trust that Wicklow Co. Council will look into this matter with enthusiasm.

My gmail account # is gerardc135@gmail.com and my mobile number is 087-1220424.

I look forward to hearing from you. ✓

Yours Thankfully

Ger Corkish



**Edmond Cussens
Robins Nest
5A Rocky Road Upper
Wicklow Town**

26th August 2011

Re: Wicklow Town and Environs Development Plan

Dear Mr Cussens

I wish to acknowledge receipt of your submission in respect of the above, the contents of which is noted.

Kind Regards

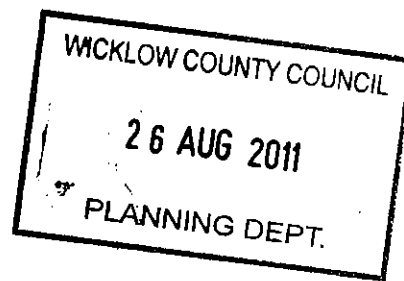
**Leonora Earls
Administrative Officer
Planning and Development**

Robins Rest.

5A Rocky Rd app.

Wicklow Town

23. Aug '11



Community facilities....

Q. what type of additional sports & "recreational facilities" would you like to see in Wicklow & environs?

A. Designated walking routes as outlined on the map provided. for their preservation & improvement & maps & display boards for tourists & locals alike.

This amenity also collaborates with government obesity policies.
& Tourism development.

Infrastructure

Q. what measures should the development plan include to ensure energy conservation, reduce carbon footprint & to promote sustainable energy in Wicklow?

A. pellet boiler with storage area for bulk storage of pellets in most public buildings where possible. A 40% cheaper running cost than oil.

Biodiversity.

Q What objectives do you think should be included in the plan to protect the flora & fauna & promote bio-diversity?

A. Do not zone any more land on the murrrough ballarney & Clonmonnon areas for development & upgrade existy protections.

(SEA) (AA)

Q What do you think are the big environmental issues within the Wicklow environs plan area?

A. • The murrrough under creeping damaging factors.

• Smells, sewage plant (during augmentation process.)

• Noise pollution, metal being stacked & getting shredded.

• Loss of habitat.

⇒ strict planning control: no further encroachment.

Q

How in your opinion should the design of new residential developments be improved.

A. New housing estates above 5 houses to include a play ground of some suitable size, & a development over ten houses to provide a ^{Flat} playing pitch for whatever sports & a play ground.

instead, what we have built is green vegetation on sloping banks which has been passed as suitable for recreational area, although spread out in 4 or more small parcels of ground.

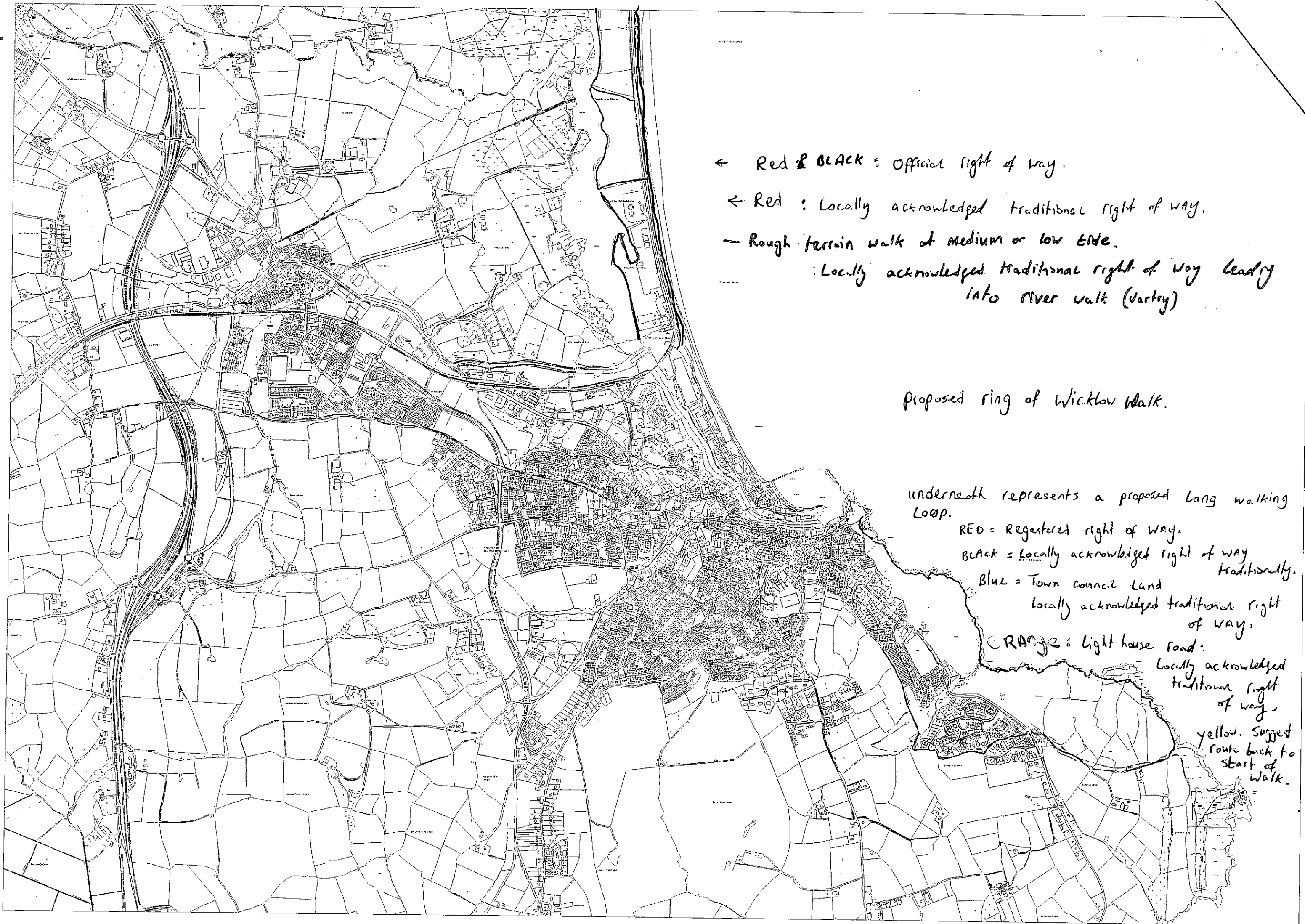
Regulation need to be more specific. & not open to abuse.

Q

Good design

A. Tree planting to be of a food producing source for birds. eg Ash tree berries etc, in public area to help with the ever increasing loss of numbers of birds.

your Sincerely
Edmond Cussen.



← Red & Black : Official right of way.

← Red : Locally acknowledged traditional right of way.

— Rough terrain walk at medium or low tide.

: Locally acknowledged traditional right of way leading into river walk (Dorsey)

proposed ring of Wicklow Walk.

underneath represents a proposed long walking loop.

RED = Registered right of way.

BLACK = Locally acknowledged right of way traditionally.

Blue = Town council Land

Locally acknowledged traditional right of way.

(RAGZ : Light house road:

Locally acknowledged traditional right of way.

yellow. Suggest route back to start of walk.

No. 20

~~AD 35~~

~~2011/08~~

Leonora Earls

From: Stephen Earls @ The Padraig Smith Partnership [stephen@psp.ie]
Sent: 26 August 2011 10:49
To: myles.buchanan@peoplenews.ie
Cc: Wicklow Town Plan Review
Subject: Wicklow Harbour Plan

Wicklow Harbour Plan

Myles,

Further to your article with regard to the above in this weeks Wicklow People, please find attached for your information our 2006 revisions to the mid 1980s plan prepared by the Padraig Smith Partnership Ltd (Architects) , which shows the harbour tying into the newly constructed port relief road, thereby retaining the old harbour for swimming and recreational use, whilst allowing the timely expansion if the north quay pier.

Should require any further details with regard to same please do not hesitate to contact us.

Stephen Earls

PSP Architects,
The Red House,
Market Square,
Wicklow Town.
Co. Wicklow.

Ph: 0404-69478
Fax: 0404-66584

e-mail: stephen@psp.ie



acknowledged

26/08/2011



THE PADRAIG SMITH
PARTNERSHIP LTD.

ARCHITECTS

PORT OF WICKLOW - PROPOSED 2006+



To Wicklow County Council

Planning Department

Wicklow

August 2011

Friends of the Murrough Pre draft submission regarding Wicklow Town and Environs Local Area Plan.

The Friends of the Murrough welcome the integration of these two Local Area Plans, particularly as this group's primary concern is the coastal strip from Kilcoole to Wicklow Head, one of Wicklow's key assets which has hitherto been much neglected.

VISION

Our vision for the future of the coastal strip would embrace the concept that this strip is a recreational amenity of national importance without compromising either the protected habitat and birds in the area or its tranquil beauty

The coastal strip has been used for recreation for centuries past as outlined in the history below. In recent years, (despite coastal erosion which has greatly reduced the public space available), numerous groups and individuals continue to take advantage of one of the few significant areas of open space along the east coast.

This is particularly relevant as much of the 30 miles of coast in county Wicklow is now privatised, developed or in other ways not accessible to the public. Indeed access to the cliff walk south of the town is barely accessible now due to a lack of maintenance of the path and the continuing encroachment of the local golf club though people still find their way through barbed wire fences.

Access to the Murrough has also diminished, particularly in the current period of development, but beyond the section closest to the town, there remains an unspoiled coastal strip framed by long views towards the Wicklow Mountains.

The scenery on the Murrough with lakes, wetlands, seashore and the backdrop of the Wicklow mountains – the cliffs and quiet little bays on the cliff walk make it a potential tourist destination of national importance. It is within reach by public transport from Dublin and is in walking distance of the primary growth centre and county town for Wicklow.

The Murrough is used by a range of local clubs and individuals as follows.

Bird watching

Due to the range of birds found in this area and the encouragement provided by Birdwatch Ireland from their HQ at Blackditch, bird watching has become a significant activity in this area. Birds include Fulmar, Shag, Herring Gull, Kittiwake, Guillemot, Razorbill, Puffin, Kingfisher, Little Egret, Greenland White-fronted Goose and Whooper Swan, ducks, waders, Short-eared Owl, Hen Harrier and Peregrine Falcon to name a few.

Photography and painting

The iconographic beauty of the area has inspired many artists whose work is sold at home and abroad, bringing fame and notoriety to the county.

Fishing

The 18 kilometer stretch of coastline between Greystones and Wicklow town is the most productive fishing area on Ireland's east coast. Most of the angling takes place on the sloping shingle beach running between the two towns. Access to intermediate points along this stretch is from the Kilcoole and Newcastle villages on the Greystones - Wicklow coast road. Small boat fishing is very popular with launching available in Wicklow harbour.

Sailing

Wicklow Sailing Club meets at the end of the quays and makes active use of the coast line. The visual attractiveness of the coast here, so close to the town, plays an important part in bringing major competitions to the area.

Rowing

There is a very active rowing club in Wicklow and regular events are held along the Murrough. The annual summer regatta is focused on this area and is a significant economic driver for the town

Swimming

Whilst swimming is not recommended along all the bay, the area nearest the town is popular for organised and casual swimming

Athletics

Inbhear Dee Athletics Club run frequent races along the Murrough and naturally the flat land makes a popular training ground for aspiring athletes. The area also proved useful during training for Special Olympics and for joggers. This facility is not available elsewhere.

Hang gliding

In recent years the lawns were used for power assisted hang gliding

Special Events

Regular public firework displays

Charity Events eg 7th Summer Family 5k Walk on behalf of the Cancer society and other Family Fun Runs

Walking and picnicking

Studies undertaken in 1966 for the Nature Park Feasibility Study indicated large numbers of people accessing the Murrough to walk. 15 years later, when the town has tripled in size, far more people are walking in an area reduced by erosion. The area is seriously degraded and the extension of industrial zoning north of the rail crossing has created a poorer visual outlook with considerably more litter blowing over from the developed areas. Despite this degradation the land continues to be a popular walk, close to the town, with views of the seascape and beyond the development to the Wicklow hills.

Circular walks are particularly popular and could be opened up along Broadlough and around Wicklow Head

THE VALUE OF SPACE FOR RECREATIONAL AMENITY

*** Tourist potential**

The opportunities here have been outlined in the previous section listing all the activities that take place along the strip. Studies have indicated the difficulty of bringing significant industrial employment to this area due to poor communications and weak urban structure. However if the environmental quality is protected then Wicklow town should have a bright future based on significant development of the tourist industry. The sensitive development of the Murrough will be vital if this potential is to be realised.

The benefits of providing good quality environments to the local economy and the tourism sector are exemplified in the report on the Economic Value of Nature, by Lorcan O'Toole from the Golden Eagle Trust (see attached). For example

Hiking and Cross Country Walking is the commonest activity noted amongst holidaymakers (830,000) and was over four times more important than the next commonest activity listed, Golfing (143,000). (Fáilte Ireland Tourism Facts).

The Friends of the Murrough recommend that these facts are given at least equal weight with other interest groups or land owners seeking industrial development opportunities which may be met in a variety of other sites around the town. It is not true that all development is good.

* Visual amenity

The sheer beauty of the Murrough with uncommonly long views across sea, lakes and mountains adds significantly to the quality of life in the area

It is now generally understood the environmental quality of life in a town has considerable impact on the potential economic development of an area. This is referred to in the National Spatial Strategy, Regional Planning Guidelines and at length in the draft Public Realm Plan for Wicklow. The economic spin off from the use of the Murrough for recreational purposes is also obvious though yet to be quantified.

In some countries quality of life indices are used in addition to Gross National Product as an indicator of the progress of the nation. The Happiness Index is acquiring increasing acceptance as a valuable indicator.

This new plan should allow for the collection of data so that the implementation of objectives can be monitored. Criteria relating to well-being should be included in this. Examples can be found in the development plans of other places in Ireland.

* Health Impact

There are also health impacts that affect both quality of life and economic factors. The Institute of Public Health in Ireland published a review of Health Impacts of the Built Environment in 2006. This draws on various research papers and notes for example that physical activity reduces the risk of obesity, cardiovascular disease, diabetes and stress, but according to the World Health Organisation, 60% of the world's population do not achieve the minimum amount of daily physical activity needed to bring about health benefits.

A review of the economic benefits of green space estimated that provision of greenspace to bring about a 1% change in the sedentary population could have an economic value ranging from £479 million to £1442 million per year depending on whether older people (75+) were included or excluded in the analysis. The report concluded that the impact of physical activity on cardiovascular disease, musculo-skeletal diseases, stroke and cancer was measurable,

Evidence from elsewhere suggests that the presence of green spaces can be beneficial to mental health.

* Urban environments that lack public gathering places can encourage sedentary living habits, while the provision of attractive parks and open spaces can facilitate opportunities for exercise. The likelihood of being physically active may be up to three times higher in residential environments that contain high levels of greenery, and the likelihood of being overweight or obese may be up to 40% less. Green spaces can have a positive impact on health through providing:

- A space for communities to meet and interact
- A place to exercise
- A place to relax
- A pleasant visual experience
- A barrier to reduce environmental noise
- A filter to improve air quality

The health effects of exposure to poor air quality have also been extensively studied. Long-term exposure to high levels of air pollution can reduce life expectancy by a year or more. There is also increasing evidence that air pollution impacts on the cardiovascular as well as the respiratory system. Some population groups are more vulnerable to air pollutants, including very young children, the elderly, those with cardio-respiratory disease, those who are exposed to other toxic materials that add to or interact with air pollutants, and the socio-economically deprived. Green spaces can positively influence health through their contribution to improved air quality. Vegetation removes pollutants, whether gases or dust-related and this effect is seen on all sizes of particulate pollution and with all traffic-related pollution.

Deteriorating physical features of urban environments such as dilapidated environments, vandalism, graffiti and litter can also harm health. Studies have highlighted how such environments can impact on both mental and physical health through reduction in physical activity, increased anxiety among residents and increased social disorder. People are more likely to exercise if the scenery is enjoyable.

The likelihood of using public open space for physical activity increases with increasing ease of access. Qualitative research has found that access to free facilities is an important factor influencing activity.

Slí na Sláinte has already designated a number of walks in the vicinity and it is proposed that further grants might be available from the Heart Foundation.

REVIEW OF CURRENT DEVELOPMENT PLANS – THE COASTAL STRIP HAS DETERIORATED IN RECENT YEARS..

This coastal strip meets many of the criteria highlighted for attention in several existing County Wicklow documents such as the Outdoor Recreation Strategy, the Heritage Plan, the Biodiversity Action Plan, the Wicklow Public Realm Plan.

Each of these documents highlight the importance of developing and protecting areas such as the coastal strip which are characterised by high quality environment.

The coastal strip is also singled out for attention in both earlier development plans yet on the whole, the ambiance of the strip has deteriorated since the last plan period. With the collapse of the economy the aspirations for developing the urban quarter have not been met and unfortunately the infrastructural improvements (roads and sewage) have resulted in unexpected damage to the amenity value of the strip.

The Wicklow Town Plan proposal for an Action Area Plan has not been progressed and the worthy objectives of the earlier plans have not been fulfilled. Currently in this area there have been some welcome upgrading of existing commercial structures and the establishment of a number of recycling businesses which appear to be difficult to regulate sufficiently to avoid public nuisance, primarily noise and visual intrusion. The objectives in the current Environs Plan have proved too vague to contribute anything useful.

Further north have been number of tentative proposals for development, mainly quite inappropriate for the area and none designed to take advantage of the splendid natural environment, nor to develop tourist potential of the area. Some land owners in the area do not see any reason why they shouldn't block off ancient rights of way with large industrial fencing.

The development plan should make the vision for this area very clear so that all stakeholders are completely clear about their rights and responsibilities. The plan is a contract between the local authority, developers and the public and should speak plain clear language so that there are no misunderstandings

Friends of the Murrough would state categorically that we would not support any proposal for more industrial development, including a new port, in this area as we believe that further industrialisation of this area would undermine the development of the town's tourist potential which we believe to be more viable in the long term.

To provide some context for this submission there follows an outline of the history of the coastal strip:

HISTORY OF THE MURROUGH

The first settlers in Wicklow Town date from the stone-age period. They were associated with a settlement on a high bank of the Vartry River. Later, the Vikings arrived around the 9th Century and tradition relates that they had a settlement at the Round Mount, also overlooking the river. There seems to have been a Viking settlement on the Murrough, as a richly decorated remnant of a Viking sword was found in that locality towards the end of the 19th Century.

Older residents of our town will remember the Murrough mostly as a recreational area where there was ample open ground to accommodate playing pitches for football and hurling, a small golf course, horse and dog racing. The Murrough was also a venue for school sports. It was much frequented by families who could spend the day swimming, cycling, fishing or boating either on the lakes or at the sea. For walkers, there was always unhindered access to the lakeside at Broadlough and the long stretch of coastline going north towards Kilcoole area. Most of the festivities associated with the annual regatta centred on the Murrough area and it was also a great location for travelling circuses and fun fairs during the summer season.

Following a dispute in 1970s concerning walkers' rights, the judge ruled that the public had the right to roam in that region but a large area of the lakeside at Broadlough has been inaccessible since 2005 with barbed wire down to the water's edge, while walking at the upper Murrough around Five Mile Point is also restricted due to wire fencing erected by Iarnrod Eireann.

The new road bridge presented some opportunities to open up a circular walk along the Murrough and back beside the lake however this has not progressed despite willing cooperation from the local landowner.

HISTORY OF THE CLIFF WALK

Records show that a traditional right of way exists, extending from Wellfield (Black Castle area) to Wicklow Head, and indeed the senior citizens of our town would testify that this walk has been in place for generations. Older residents of our town, some in their mid-nineties and closely associated with Wicklow lighthouse, recall that they often walked this area as children. Irish Lights maintained the roadway leading to the lighthouse.

Bride's Head, situated on this walk, is an area of particular historical interest. At the entrance to the canyon there is a fresh-water well (Bride's Well) from which local fishermen drank in the belief that it would keep them safe. It is possible to make out the outline of the foundations of a Penal Church which was erected in the late 17th Century to serve the spiritual needs of the local community during that sad period of our history. Close to the beach we can see the remains of an old lime kiln which gives

its name to the little bay, while in a cave nearby some workings have been found dating from the Stone Age period – over 5,000 years ago. Apparently a knapper carried on his business there, producing flints for arrow-heads and axes. There has obviously been human habitation in the area for a very long time.

Further on, at Wicklow Head, stands the old octagonal tower, which was constructed in the late 1770's and which served as a lighthouse – it was powered by candles! It now serves as a holiday home.

In 2002 the Councils erected wire barriers along with notices across this traditional walk in order to prevent access, as they considered certain parts of the pathway to be dangerous. No effort has since been made to repair this pathway, although the public still continues to walk there.

There was an objective in the current plan (4.6 Open Space OS4) to request funding to study the establishment of a tourist trail along the cliff walk however this does not appear to have happened to date though Friends of the Murrough have themselves prepared a costed proposal which will be presented to the Council very soon.

RECOMMENDATIONS

- The coastal strip be identified as a key resource for eco-tourism development and an integrated Action Plan be developed to regulate development proposals in line with its potential to provide active and passive outdoor recreation and associated amenities that do not compromise the biodiversity or tranquility of the area.
- We would like to encourage eco-tourism, specifically ornithologists, anglers, walkers, photographers, artists, etc. That is to say that we want to encourage tourists who have a respect for protected areas,
- That objectives and routes be mapped to develop walks and in particular circular walks both around the Murrough and Broadlough, and also around Wicklow Head. (see attached map)
- The educational value of the areas for ecology students could also be highlighted. A Management Plan would ensure information points for tourists when, for example birds would be nesting, or which areas should be out of bounds, or where binoculars or viewing points might be provided etc.
- A Management plan would also set out what is and what is not suitable for tourism development. Whilst a fun fair might be appropriate in the urban section of the strip it would not be suitable further north of course.



- The new plan should include a clear objective to complete a Local Biodiversity Action Plan for the entire coastal strip within 12 months
- Zoning for new built development should be reduced, and current sites along the Murrough de-zoned as there are plenty of other empty zoned sites in the town that are most unlikely to be developed now for several plan periods
- That previous objectives to identify the Murrough as a suitable site for a new port not be repeated. This is no longer a viable proposal and to retain it in the plan will blight the potential of tourist development.
- Any remaining sites zoned and/or developed for business and light industry should contain specific set of controls to regulate the height of buildings, noise and light emissions with constraints tighter than those generally applied.
- Clearly identify in text and on maps the rights of way
 - along the Murrough and the circular walk around the sea side of Broadlough,
 - along the cliffs from Black Castle to Wicklow Head
 - The circular walk from the Dunbur Coast Road (at the entrance opposite the red gates that lead to lighthouse) running along the back of Sea Point and Sea field to exit at Dunbur Park near the hockey pitch.
- Clearly identify views and prospects. This does not automatically reject any development but ensures that any development is sensitive to the location.

The sites should include:

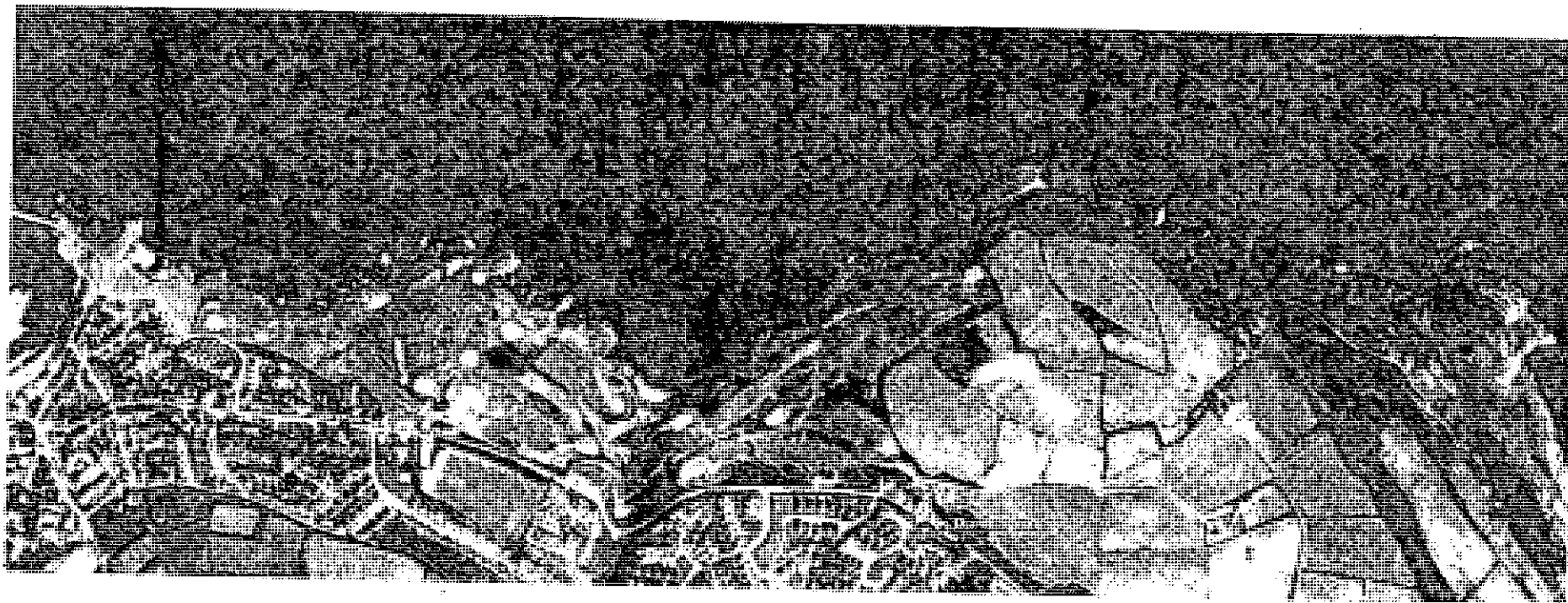
- the view south towards Wicklow town from the railway bridge footpath
- the views, north and south along the Vartry river from the new flyover.
- The view towards the Murrough from the new Town Relief Road between the Friars Hill Junction and the Rocky Road Junction

Note.

Friends of the Murrough was reactivated some years ago because the public were increasingly suffering the loss of certain amenity areas of the Murrough and Broadlough, together with other traditional walkways from the Black castle to Wicklow Head. The organisation has the support of 2,500 signatories together with an additional 1200 who give us support on line. A public meeting to discuss the issue was attended by two hundred people.

Contact

Malcolm Spencer. Chairman. Redwoods. Killoughter. Ashford



Cliff Walk from Black Castle to Wicklow Head, 3,679 yards – 2.09 miles

FRIENDS OF THE MURROUGH
PRE DRAFT SUBMISSION



The Avenue

FRIENDS OF THE MURROUGH
Proposed circular walks

return route
either side of
new road bridge

Lighthouse
road.

**Friends of the Murrough
C/o Malcolm Spencer
Redwoods
Killoughter
Ashford
Co Wicklow**

25th August 2011

Re: Wicklow Town and Environs Development Plan 2013-2019

Dear Mr Spencer,

I wish to acknowledge receipt of your submission in relation to the above, the contents of which is noted.

Yours Sincerely,



**Leonora Earls
Administrative Officer
Planning and Development**

The Economic Importance of Ireland's Natural Heritage. Some indicators regarding

1 The Annual Visitor Attraction List

http://failteireland.ie/FailteCorp/media/FailteIreland/documents/Research%20and%20Statistics/Tourism%20Facts/2009/All_revised_attractions_2005-2009.pdf

The visitor attraction figures compiled by Fáilte Ireland for 2009 list **Muckross House** (95,773), **Glendalough Visitor Centre** (80,336) and **Glenveagh Castle** (50,871) among the important visitor attractions nationally. Presumably, these figures are solely based on ticket sales at these locations within each National Park. But the Annual Visitor Attraction list also include non fee paying attractions and the much larger visitor numbers to these National Parks are not listed, even if they were to be based on minimum visitor number estimates. Hopefully the National Parks and Wildlife Service will be able to draw attention to the National Park Network, by name in the 2010 list and highlight that the overall National Park figures, even if just estimates, are at least 200,000 visitors more than presented in the 2009 list. Indeed it would be helpful if the visitor figures from the other National Parks were added to the 2010 list as well.

2 Fáilte Ireland Tourism Facts

http://failteireland.ie/FailteCorp/media/FailteIreland/documents/Research%20and%20Statistics/Tourism%20Facts/Tourism_Facts_2009_544KB.pdf

The third table on **Page 5**, highlights the importance of Hiking and Cross Country Walking. This is the commonest activity noted amongst holidaymakers (830,000) and was over four times more important than the next commonest activity listed, Golfing (143,000). Indeed amongst overseas holidaymakers it was almost five times more important than the second commonest activity. The main table on **Page 8** shows the importance of beautiful scenery, natural unspoilt environment and a good range of natural attractions as three of the 8 most important issues for visitors. Therefore, Page 5 and 8, underpin the importance of the role of the National Parks and Wildlife Service in both their National Park and general habitat management.

The third item (second table) on **Page 9** shows that 23% of domestic holiday makers visited National Parks – and that this was the third commonest activity amongst domestic holidaymakers.

The third table on **Page 10** has a list of both the top 10 fee-charging attractions and the top 10 free attractions in Ireland. If numbers could be counted accurately it is likely that Killarney National Park and Wicklow National Park visitor numbers might be among the top ten free attractions list in Ireland!

3 Executive summary of the MillwardBrown Landsdowne survey for Fáilte Ireland.

http://failteireland.ie/FailteCorp/media/FailteIreland/documents/Research%20and%20Statistics/Surveys%20and%20Reports/Visitor_Attitudes_Survey_Executive_Summary_2009.pdf

The findings in this document have a slightly different emphasis but it again emphasises the importance of beautiful Scenery, Natural unspoilt Environment and Good range of Natural Attractions – see **Pages 6, 8 and 9**.

The text on **Page 6** highlights the importance of Nature, Wildlife and Flora as having a particular resonance with German and French visitors. [German and French visitors are the 3rd and 4th commonest nationalities coming to Ireland (after British and USA citizens), totalling 798,000 visitors in 2009]

4 An Bord Bia's Performance and Prospects Report 2010-2011

<http://www.bordbia.ie/industryinfo/publications/MarketReviews/Documents/Export%20Performance%20and%20Prospects%202010-2011.pdf>

An Bord Bia published the overall Agri-Food sector sales figures for 2010 in January 2011. The increase in the level of Agri-Food exports in 2010 was a significant positive economic news story, in light of current circumstances, and deservedly garnered widespread positive media coverage.

On **Page 4** of this report it has the following: – (its only reference to its branding and marketing in the entire 40 page document.)

"Brand propositions and sets of values have been developed for consumer and trade testing in six international markets. These propositions occupy different and distinctive territories, linked with the essence of Ireland's reputation, and are credible to support a **"we are natural and we can prove it"** brand promise."

5 Summary

It would seem reasonable to state that the two key drivers of any potential economic rural recovery use Ireland's 'Natural Image' as a key selling point. Crucially, it was the Agri-Food and Tourism sectors themselves that have identified this Natural Image of Ireland, among potential markets, as vital. Rural communities deserve and expect to maintain and enhance both their incomes and local job opportunities. Senior managers in Rural Development have previously outlined the distrust between the Agriculture and Environment pillars, both in Ireland and across Europe.

But this new understanding of the importance of Ireland's Natural Image abroad, may present an opportunity to establish better communications and synergies between the Tourism, Agri-Food and Environmental sectors, in order to advance mutually beneficial practices. Linking these vital rural economic drivers with our landscape and nature may allow the wider rural communities to find agreed solutions and shared benefits.

Broadwater House
Greenhill Road
Co Wicklow

10 August 2011

Planning Section
Wicklow County Council
Station Road
Wicklow Town
Co Wicklow



For the attention of the administrative officer

Dear Sirs

WICKLOW TOWN & ENVIRONS DEVELOPMENT PLAN 2013-2019

I write in response to your recently published booklet re background issues consultation on the plan referenced above, and welcome the opportunity to provide feedback with a view to inclusion of specific key elements in the proposed joint development plan.

Vision

Wicklow Town should be the flagship town for the county, with a strong distinct identity and purpose. The aim must be for the wider public to immediately associate the town with a high quality and attractive centre for living, business, and discretionary visiting. Such a vision cannot be achieved by marketing alone. What is required is an overhaul of the town, incorporating international best practice in terms of effective planning and enforcement to deliver a markedly higher quality sustainable environment.

Public Realm

Following on from the overview document prepared on behalf of the council by Murray O'Laoire in 2008, there should be a strong emphasis on improvement of the public realm throughout Wicklow town. This is particularly important in the context of increasing tourism to the area as well as providing a high quality focal point for the residents of both the town and greater county area. A suitable strategy with meaningful implementation goals and enforcement would be of immeasurable benefit in regenerating interest, business, and civic pride in the town, which should be a desirable destination in its own right, and not the means to an end it currently is.

For successful examples of similar schemes on comparable towns, I would refer you to Lymington in the south of England. While serving a comparable population to Wicklow town, it has managed through successful planning, investment, and popular awareness to become both a thriving commercial centre as well as a tourist destination, making use of its seafront aspect and promotion of related activities (regenerated modest marina, seafood restaurants, specialist retailing, high quality boutique accommodation etc). Indeed there are several examples within Ireland that have successfully adopted such approaches, with West Cork being a particularly strong benchmark.

Infrastructure

The recent completion and opening of the R999 port access / town relief road has demonstrated the dilemma the town faces. While ostensibly provided to service the industrial/commercial area of the Murrough and port, the lack of commercial traffic along the road points to the lack of such activity in the Murrough lands and port area. A strategic decision needs to be made in relation to this area of outstanding amenity and untapped potential; specifically, the option to de-zone the Murrough from commercial usage and reinstate it as a purely civic amenity should be considered. Such businesses that are located there should be relocated from the scenic focal point they currently inhabit, as scrap metal and tyre garage facilities, coupled with disused and decrepit industrial units should not be the dominant feature of the area.

The infrastructure and facilities required to service the commercial operations of the port should be enhanced to make it more attractive and efficient as a working environment. To this end, consideration should be made to contain all light industrial and port commercial activity to the north quay, with the south quay from the Bridge Tavern reconfigured as a walking/recreational route extending from Bachelor's Walk to the Black Castle.

Given its location and existing infrastructure, a concerted effort should be made to promote the harbour as a fully functioning recreational marina, with existing disused and underused buildings reconfigured to service it. Specialist retailing and service facilities, for example, would reinvigorate the area and provide valuable income. The expertise and experience of the sailing club as well as consultation with other successful marina/harbour towns should be put to use in developing the specifications and requirements.

Retail

The retail offering in the town is demonstrably worsening. The factors influencing this are many and varied, but measures need to be taken as part of a new development plan to best serve this aspect. Unchecked, the current trend is for quality retail units to depart and be replaced with basic services. This makes the town a less attractive proposition for shoppers, who will invariably go elsewhere for the range and quality expected. Linked to a new public realm strategy, a clear decision needs to be taken for the main street. At present, the volume of traffic and the congestion caused by poor traffic management and parking measures has reduced the attractiveness of the area for shoppers. If the town is not readily accessible by car, then pleasant and readily walkable by shoppers, it will continue to lose out to Greystones, Arklow, Dundrum and others. There can be no justification for the continuous traffic jams now a seemingly permanent feature of the town, coupled with the increased parking costs and a zero tolerance approach to enforcement. Plans for a development and increased size for the Tesco shopping centre need to be carefully considered given the potentially detrimental effect on the main street and environs. Lessons should be taken from the Dundrum town experience and its effect on the main street there.

Housing

The proposed development plan affords the opportunity to reassess the housing requirement for Wicklow town and its immediate vicinity. A cursory glance from anywhere along the coast or outlying areas will demonstrate the extensive residential development that has taken place – largely to accommodate a perceived historic demand – and that has become the dominant feature of the town. This is exacerbated by the topography of the area, in that every new scheme, particularly those on the higher aspects of the hills, become immediately apparent. Coupled with their attendant facilities and services such as lighting and paving, there is a real danger of the environmental and aesthetic amenity of the hills being lost forever. In the previous plan, reference is made to the hills being offer a pleasant backdrop to the town and a ‘green lung’ in terms of ecology and environment. The housing strategy should propose limiting the availability of zoned lands on the hills, given their environmental and sustainability impacts.

Regarding those developments that remain wholly or partially incomplete, the development plan should consider the creation of a taskforce with sufficient powers and funding to assess the status of these ‘ghost estates’ with a view to either completing them to a sufficient level, or demolishing and reinstating/redeveloping the lands in question. The longer these edifices remain, the less attractive Wicklow will be to investment, and their presence could serve as an unwanted reminder and hindrance to future such schemes, regardless of their viability.

An enforced requirement needs to be made in every future housing development application that the service and facilities works (public lighting, road surfacing, utilities etc) be completed at the outset of the schemes’ construction given the history to date of these works not being done and the council left to address the shortfall. The acceptance by the council of a bond in lieu of the actual construction works should not be considered, given the inherent difficulties with such arrangements.

Area action plans

As per the previous town development plan 2007-2013, the area action plan for the Murrough area needs to be implemented, albeit with consideration given to the removal of the commercial units north of the access road, as mentioned previously.

The area action plan for the convent lands should be amended. The policies for the lands no longer apply in the current and foreseeable scenarios, and their intrinsic value in providing educational and sustainable organic farming services should not be undermined. The lands are noted as ‘providing a pleasant backdrop to the town, partly used for organic farming (an activity the proprietors wish to continue)’ and the existing principle is to ‘protect the function of the convent lands as a ‘green lung’ within the town, by formalising this role and incorporating into the future plan, an assessment of its potential in terms of ecology, recreation, agriculture and horticulture and visual amenity.’ This must be the overriding principle for the lands, and therefore their zoning must reflect their importance. Specifically, the zoning should revert to amenity/open space and not mixed use.

Transport

Key to the sustainability of the town as a working centre for the area as well as an attractive proposition for visitors and investors is its accessibility. At present the road network provides a strong link to and from Dublin and the southeast via the N11-M11. Priority should be sought and pursued with the National Roads Authority and National Transport Authority for commencement of the Rathnew-Arklow section of the motorway works.

The public transport service for Wicklow town needs to be improved for commuters, businesses, and tourism. At present, the frequent Bus Éireann 133 service is not as attractive as it might be to compete with the private car given the journey time to Dublin, the main trip attractor. There should be more express services at peak times as well as at weekends to increase the attractiveness of the service. For example, a door-to-door journey I regularly make by car will take 45 minutes, with the bus service taking 90. This is not conducive to removing the reliance and usage of cars around the town, thereby increasing congestion. Linking the service to other modes such as Dart and Luas should also be a priority to increase patronage, as a single efficient interchange can work successfully.

The train service is wholly inadequate. Journey times and poor timetabling mean the option of commuting to Dublin is nonexistent. While double-tracking of the line is unlikely any time soon, the timetable should be overhauled to serve the demand for arrivals in Dublin for ca 0820h, with departures from 1730h, both of which based on express services, given the availability of Dart from Greystones.

Energy

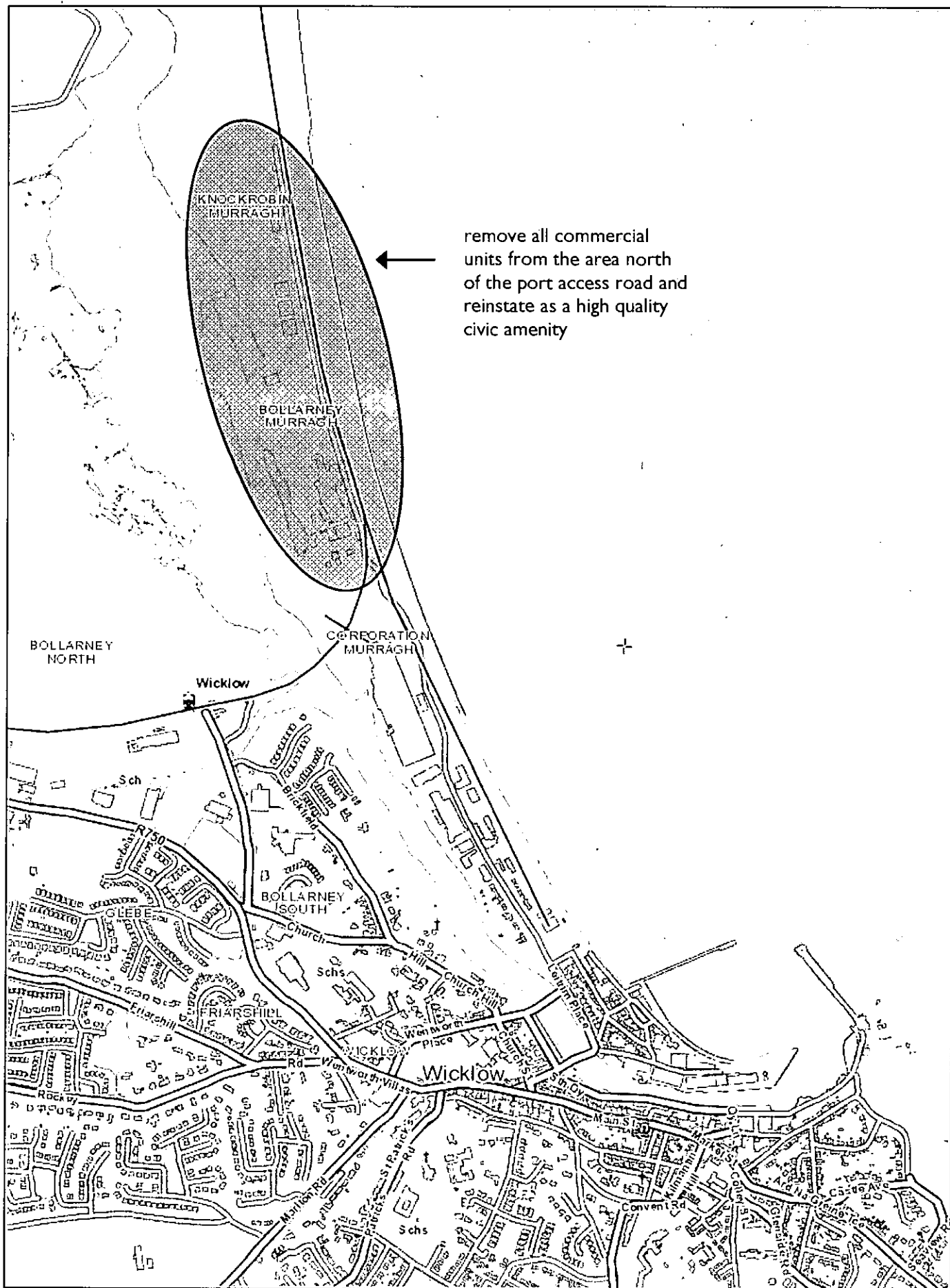
The development plan should set clear achievable goals for provision of sustainable energy. While tidal power technology is in its infancy, the efficiency of PV solar units has increased significantly. Efforts should be made to incorporate minimum requirements in the plan for new developments and refurbishment schemes to include sustainable energy provision. Wind farm provision should be carefully assessed however, as the attendant visual, noise, and geotechnical impacts of these schemes are significant and not conducive to a high quality environment. Given its location, Wicklow should focus on the offshore wind approach as per the existing facility at Brittas Bay/Arklow.

Thank you again for the opportunity to comment on the background issues booklet. I would be grateful if you could include my contact details on any database relating to the proposed development plan, as I wish to be kept informed of progress/consultations/meetings/developments associated with it.

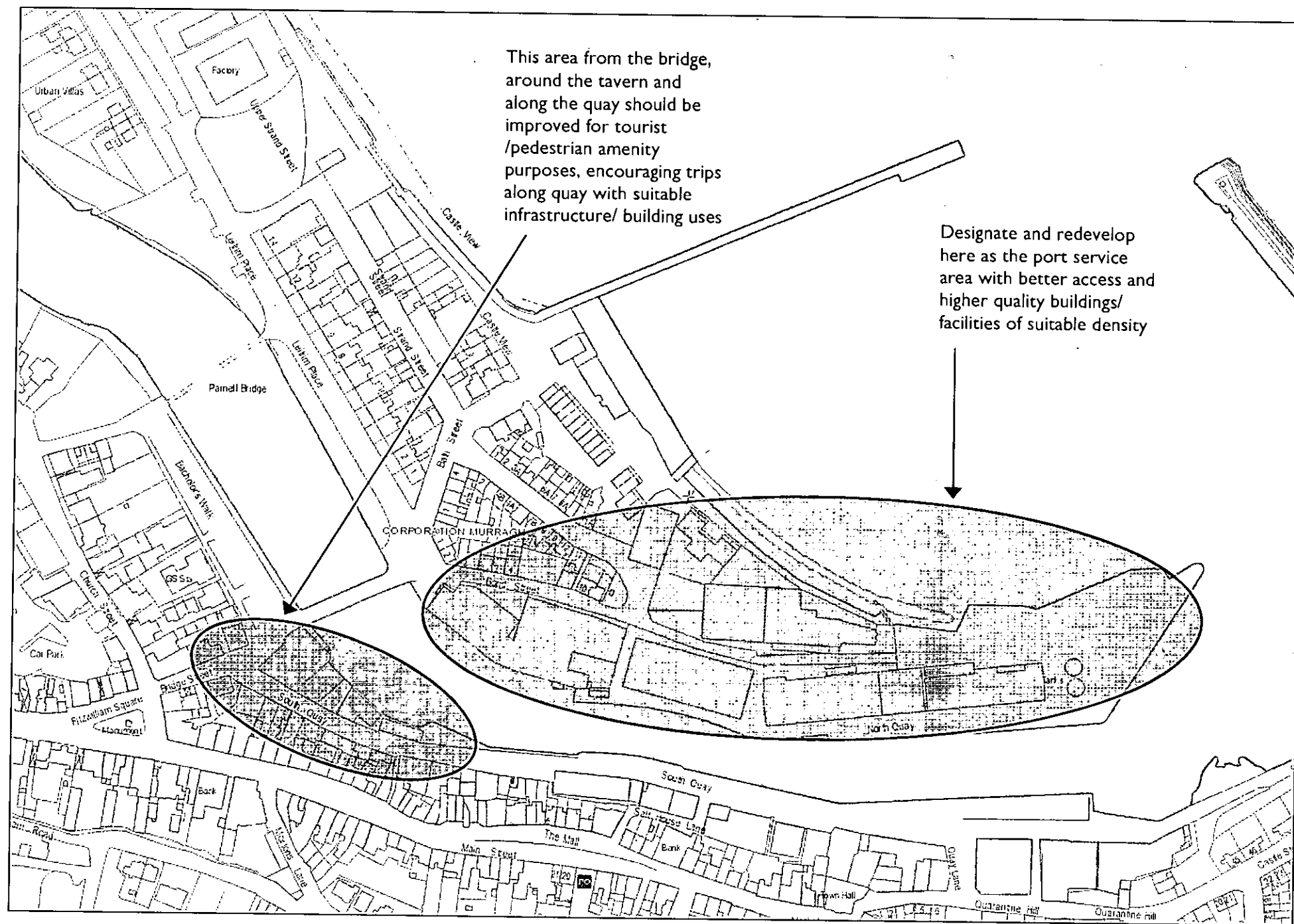
Yours faithfully



PAUL HIGGINS



remove all commercial
units from the area north
of the port access road and
reinstate as a high quality
civic amenity



This area from the bridge,
around the tavern and
along the quay should be
improved for tourist
/pedestrian amenity
purposes, encouraging trips
along quay with suitable
infrastructure/ building uses

Designate and redevelop
here as the port service
area with better access and
higher quality buildings/
facilities of suitable density

Bernadette Harvey

From: Paul Higgins [paulhiggins149@eircom.net]
Sent: 15 August 2011 14:25
To: Wicklow Town Plan Review
Subject: Wicklow Town & Environs Development Plan 2013-2019 - submission



WICKLOW TOWN &
ENVIRONS DEVELO..

Please find attached my observations on the background issues booklet for the Wicklow Town & Environs Development Plan 2013-2019.

Hard copy sent by post also.

Regards

Paul Higgins

No. 23

Bernadette Harvey

From: Michael Browne [michael.browne@bba.ie]
Sent: 26 August 2011 17:12
To: Wicklow Town Plan Review
Subject: Wicklow Town and Environs Development Plan 2013-2019

We write to make a submission regarding the above on behalf of Ifcana Developments Limited.

Wicklow town is classed in the Regional Planning Guidelines for the greater Dublin area as a Large Growth Town 1. In order to reach its potential in this regard and in order to provide sustainable growth and avoid commuting away from the area sufficient lands need to be provided to cater for employment creation in the area and in particular at transport hubs.

In the lifetime of the plan and given the current economic climate this is likely to be provided by small to medium enterprises. These will require sufficient employment zoned lands within the plan area.

Given that it is unlikely that all employment lands in a plan area will be developed for various reasons in the life of a plan and as the areas that will be developed cannot be predicted it would be prudent to maintain the extent of lands currently zoned Employment in the Wicklow Town and Environs Development Plan area. This will ensure that the potential of the town can be allowed to happen.

Best Regards

Michael Browne

bba architecture

- • • Suite 3 Eden Gate Centre, Delgany, Co. Wicklow.
Tel: +353(1) 2876949, 087 6229333 **Fax:** +353(1)2873521
Email: michael.browne@bba.ie or info@bba.ie
(bba architecture incorporating Bernard J Burke & Associates)

No. 24

Leonora Earls

From: Charlie Kavanagh S [sailsoutheast@eircom.net]
Sent: 19 August 2011 20:10
To: Wicklow Town Plan Review
Subject: Wicklow Town Plan

Hi,

Attached find an article I have submitted to the Wicklow People in relation to developing a new harbour in Wicklow. I would like the gist of my proposal to be considered seriously for inclusion in the 2013 -2019 Wicklow Town and Environs Development Plan.

It is my opinion, having operated out this harbour for nearly 30 years and from observing numerous harbours internationally in my travels, that Wicklow must think big now and develop a new harbour as soon as possible.

A similar town on the continent would have developed a proper harbour 50 years ago.

It is imperative the the powers that be look to the long term viability and prosperity of the area by equipping the town with both a commercial and tourist boost to serve it's population for generations to come. Shipping traffic, tourism revenue, wages and increased commercial activity would result from a well thought out and properly funded plan.

Don't pass up this opportunity - your children or grandchildren could live and work locally, if you get the formula right.

Regards,

Charlie Kavanagh
7 Glenvale Park, Wicklow
087 2394379



Acknowledged

Can Wicklow solve Dublin Port's problem?

Dublin Port has announced a plan to expand its capacity for handling more freight and passenger traffic. Eamonn O'Reilly, chief executive of Dublin Port Company, said: "the development plan - which includes expanding the 260 hectare port by reclaiming up to 40 hectares of land from the sea - would take place 'in bite size pieces' if it received planning approval." A proposed expansion of Dublin Port will cost at least €560million. (Post.ie 10/4/11) There is another option.

Wicklow Port can help to solve their problem. The port is ideally situated to help alleviate some of the traffic problems for Dublin Port, but in order to do so, a new modern breakwater and handling facilities would need to be put in place. By relocating the existing commercial traffic to a new purpose built harbour, an additional bonus for Wicklow would be the conversion of the existing harbour into a leisure tourism facility.

Recently retired Wicklow County Development Officer and former Wicklow Town Clerk, Tony O'Neill says "I have been saying for a long time that Wicklow should expand its harbour outside the present limits. I wrote an article in the Wicklow People in the mid 1980's to that effect. Wicklow Port can grow its commercial and tourist business substantially, if they get the formula right. He suggested that the town needs to face the harbour, rather than turning its back as at present, making the river and harbour an integral part of the town."

"In the mid 1990's, FORFAS, the policy making arm of the IDA and Enterprise Ireland, published a report advocating a new commercial port south of Dublin to serve the midlands and south east and to alleviate pressure on Dublin Port. It was supported by Wicklow County Council at the time, who saw the Roadstone Breakwater in Arklow as a possible solution, but nothing positive has happened since. Wicklow County Council also made a submission to the Dublin Outer Orbital Route (outside the M50), suggesting that a new harbour in either Wicklow or Arklow would help to service the outlying hinterland. With the recent advertisement of the Wicklow and environs Development Plan (closing for submissions 26th August 2011), perhaps the people of Wicklow might see value in promoting their own town as the ideal solution, potentially bringing jobs and long term prosperity to the area."

With the international trend towards larger ships and more concentration on container traffic, the existing harbour in Wicklow is too small and ill-equipped to attract this type of business. From a traffic peak of c.7 or 8 ships a week on average during the Celtic Tiger, Wicklow rarely has more than one or two ships a week now in 2011. Therefore, to make it feasible to accept the type of traffic that Dublin Port is seeking to offload, it would need to build quays with sufficient space and depth to take larger ships, accommodating container, ro-ro (roll on, roll off) and medium sized cruise liner traffic. Also, with sand banks stretching from the Kish off Dublin to Arklow, possible offshore wind farm developments would be most efficiently serviced from Wicklow.



Wicklow Harbour – existing layout



Wicklow Harbour – possible future layout

Wicklow County Council built a new port access road which opened in 2010, linking up with the M11 at Rathnew. Also, with a railway line adjacent to the port area, transport of containers could be easily facilitated. These transport links allied to the need for Dublin to expand its handling capacity should make for a compelling argument to build a new port outside Wicklow Harbour. Another bonus would be the cost – the capital cost of building a new breakwater with docking and freight handling facilities would be miniscule in comparison with the proposed reclamation on its own doorstep.

A rough estimate would put the costs somewhere between €50 and €80 million but as there is no recent such project to compare to, these figures can only be seen as guidelines. When asked about possible funding for such a project on a recent visit to Wicklow, US Ambassador Daniel Rooney, commented: "While it would not be a suitable project for the American Ireland Fund, the fund managers could put a developer in touch with interested potential investors. Through their many branches in the United States, they are in regular contact with individuals and organisations who might see value in assisting such a project." Other options could be Dublin Port, European Regional Funding, Wicklow County Council, Wicklow Port Company, Wicklow Town Council and Public Private Partnerships, amongst others.

The business community in Wicklow should be fully behind a new harbour as the potential for creating new jobs and commercial activity would be wealth generating for several generations to come. In the late 19th Century, an enlightened few developed the East pier, which transformed the prosperity of the town for many decades. Forward thinkers such as Charles Stewart Parnell MP and Captain Robert Halpin, amongst others, left a legacy for the town which benefits the town to this day.

A new breakwater, if built to protect the existing (old) harbour from troublesome northeasterly winds, would enable the transfer of all commercial traffic and storage buildings to the new port area, leaving the existing inner harbour available for development of leisure business facilities. The river/quay areas could be transformed from ugly warehousing to shops, restaurants, hotel, cinema, pubs etc and alongside, a marina could be developed to attract visiting yachts.

With a major development, environmental issues have to be considered and with the Murrough and Broadlough amenity areas backing onto the area, Fis Nua Town Councillor Pat Kavanagh expressed reservations: "we have a rare and beautiful eco jewel in our Murrough Wetlands which could bring in eco-tourism and might be negatively impacted by the building of a north side port."

Wicklow Sailing Club run the internationally renowned Round Ireland Yacht Race every two years from Wicklow Harbour, which attracts some of the top yachts and sailors in the world. A spokesman for Wicklow Sailing Club commented "A new deep water port would be a huge asset to our race. This is Ireland's premier offshore sailing event and it has been a huge asset for bringing international attention to Wicklow Town. I believe the race and festival were worth c.€500,000 to Wicklow in 2010. If we could accommodate another 50 yachts, that figure could easily be doubled."

While no positive moves have been made to progress this idea, it surely makes sense on several fronts:-

- A new harbour will help divert surplus shipping traffic from Dublin Port as it grows.
- Several hundred jobs could result from the new and old harbour developments.
- Tourism spend would increase considerably with a revitalised inner harbour and cruise liner visits.
- Wicklow could become the Kinsale of the east coast, mixing business and leisure.

Wicklow needs to think big if it wants to make itself a thriving town and port, with both working together for the greater good of its population. Future generations deserve to have a secure job and wealth creation facility on their doorstep, so that our youth do not all have to look overseas for a livelihood. As President Obama said on his recent visit: "Is feidir linn" – We can do it.

If you feel strongly, as I do, that this idea might have future benefits for Wicklow, put pen to paper today, enclose this article (or your own ideas) with a covering letter to:- The Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow or by e-mail to wicklowtownplanreview@wicklowtc.ie before end of business, Friday 26th August 2011.

Charlie Kavanagh
7 Glenvale Park, Wicklow
19th August 2011

No. 25.

Leonora Earls

From: Lusra Teoranta [lusra@eircom.net]
Sent: 26 August 2011 15:42
To: Wicklow Town Plan Review
Subject: Submission

Bernadette

Submission as discussed.

Regards

Tom



acknowledged \$

Submission for
Wicklow Town and Environs Development Plan 2013 - 2019

On behalf of

Lusra Teo

Marlton House

Wicklow Town

The amalgamation of the Wicklow Town Plan, the Wicklow Town, Rathnew and Environs plan and AA6 is long overdue and is considered a move that will help stimulate Wicklow Town as a whole. The three plans have long been considered by many to be an obstacle to development locally.

"What kind of town should Wicklow Town be in 2022" is the key question. In ten years' time the Town needs to be able to provide for the generation that is in school today.

Wicklow Town has lagged behind every major town within the County, even though it is designated a higher order town where the development should have been focused. Leaving aside some housing estates, the town has not really progressed during the "Tiger Years", in fact it has contracted in some ways having lost the Circuit Court from the town. At one time there were two Cinemas, now there are none.

This plan needs to provide the basis for developing the structures in education, particularly third level, in providing sustainable employment within the environs and addressing the significant short comings in the quality of the offer available in retail and leisure facilities that exist today. The recession will not last forever and this plan needs to position Wicklow Town to take full advantage of the turnaround when it comes.

Huge investment has taken place in recent years in infrastructure in and around the town removing many of the bottlenecks to growth. As a result and in spite of the recession, Wicklow Town sits on the crest of a wave of opportunity ready to deliver its potential. It should be all our ambitions to make Wicklow Town, in 2022 a sustainable, vibrant powerhouse for the East of the county providing employment, education, leisure and retail to the point where we have an inward commuting situation.

The importance of this plan cannot be underestimated, it is critical that this plan is far seeing in its approach and sets in place the framework and structures necessary to encourage the growth needed to help the town take advantage of all its potential.

One very important statistic is that for every € 100 spent in a town some € 67 stays in that town. This only serves to highlight the importance of improving the offer available in the town so as to reduce the extreme expenditure leakage out of the town.

A portion of the Marlton lands within AA6 which are zoned as Development Centre and these present a unique opportunity for future development of the town without the need to go "out of town". They are well located close to the town centre and in the centre of the residential zoned

lands that surround the Town to the west and adjacent to the main road heading south. They are also adjacent to the Town Relief Road which makes them ideally located. Any reduction of this strategically important area would seem short-sighted and inappropriate in light of the long term strategic planning for the development of the town. In spite of leading statements within the Background Paper these lands offer the most central and best option for the town going forward.

The integration of the AA6 lands will require a review of the objectives to bring them into line with those of the Environs area. In light of the Marlton Quarter experience and its implications for the scale of any development a review of the community and leisure facilities expected to be delivered will be necessary. In light of the current national economic outlook expectations need to be realistic and therefore deliverable.

The availability of water may affect the development of some of the lands within AA6 and AA4. To rectify this will require the construction of the Ashtown Tank or similar on Ballyguile. This is a vital piece of infrastructure that is required to not just supply the new developments on the higher levels of the environs but also to provide the Town with satisfactory water pressure on an on-going basis. It is also required to supply water to the resident of Brittas Bay were well water quality is a cause for serious health worries to the residents.

The lack of water pressure should not be used as a reason to dezone lands, rather it provides a natural phasing of the lands available for development. In time the tank or tanks will be built and this will benefit the whole town. There has been considerable investment by the council around the town and the current zonings are needed to recover these monies.

A revision of development levies should be considered in the imminent future with the intention of bringing them into line with the revised costs of construction and land values. While this may not be directly a consideration of the LAP it has implications for the delivery of the plan area. The current levels of levies within the town environs are so high that they are acting as a deterrent to development. With margins so low house and commercial building is at a standstill in the environs, no building means no levies, surly it is better to have some levies at a reduced rate than none. In turn there are very few planning applications. As part of any review the construction of the Ashtown water tank or a similar high level tank up on should be given priority.

Bernadette Harvey

No 26.

From: Helen Purcell
Sent: 15 August 2011 09:19
To: Wicklow Town Plan Review
Subject: FW: Wicklow Town and Environs Development Plan

for your information, I have acknowledged receipt,
Helen

-----Original Message-----

From: Roman Nesklada [mailto:roman@xenos.ie]
Sent: 12 August 2011 14:09
To: Wicklow Town Plan Review
Subject: Wicklow Town and Environs Development Plan

Dear Sir/Madam,

I am sending my submission for the "Wicklow Town and Environs Development Plan".
Power point presentation is in attachment.
Please confirm receiving of this letter.

Sincerely,
Roman Nesklada

tel. 0868646940

1 Avonvale Court
Ballyguile
Wicklow Town

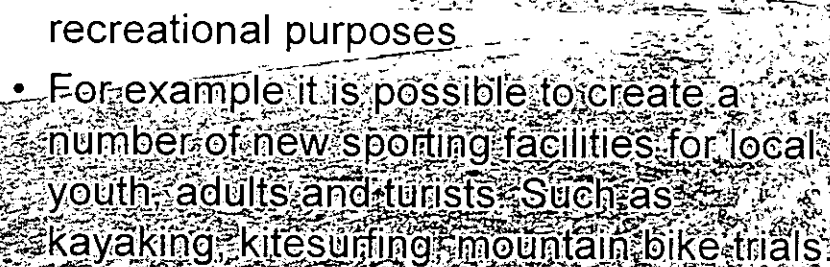
25/08/2011



Wicklow Town and Environs Development Plan

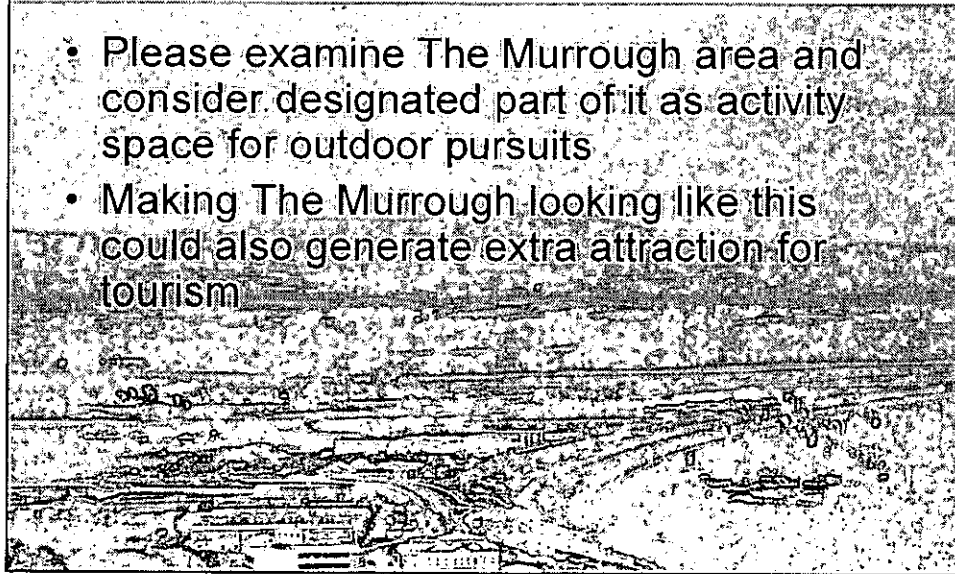
Submission from
Roman Nesklada

Community Facilities

- Suggestion to utilise Wicklow's coastal and river/lake amenities for sport and recreational purposes
 - For example it is possible to create a number of new sporting facilities for local youth, adults and tourists. Such as kayaking, kitesurfing, mountain bike trials.
- 

The Murrough area

- Please examine The Murrough area and consider designated part of it as activity space for outdoor pursuits
- Making The Murrough looking like this could also generate extra attraction for tourism



Thank you for your attention!

Sincerely
Roman Nesklada
kitesurfing trainer
tel. 086 86 46 940
Email: roman@xenos.ie

Roelof Smit
56 Grahams Court
Wicklow Town
Co. Wicklow

Mobile: +353 87 9596593

11th August 2011

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town.

Dear Sir / Madam

Re: Wicklow Environs Plan Review 2013 - 2019

Below are my comments and observations regarding the Wicklow Environs Plan Review 2013 – 2019 based on your Background Issue Paper dated 1st July 2011 and consultations with representatives from the Wicklow County Council.

For ease of reference I have used the above mentioned document as a guideline and taken the liberty of extracting you guideline questions from it and commenting on these. Page references are from this document too.

Background Issue Paper, pg 3
Vision for the area

1. What is your vision for the settlement?
2. What kind of town should Wicklow be in 2022?
 - **Wicklow Town is currently behind some other towns in the county in many aspects. It needs to live up to it's status as County Town.**
3. What in your view is the role of Rathnew in the wider settlement?
 - **Rathnew is a county village and should remain an entity in it's own right and not be enveloped by Wicklow Town as is threatening to happen. Historically there is a lot of traditional "rivalry" between these 2 neighbouring towns and this must be retained.**
 - **Rathnew is also a "gateway" to Wicklow Town from the North and must therefore be treated as such. They can benefit from each other. Rathnew reaping rewards from tourists passing through to Wicklow Town. Wicklow Town can benefit from Rathnew remaining a developed town, both residentially, commercially and socially.**
4. What kind of opportunities and facilities will the settlement need to fulfill this vision?

Background Issue Paper, pg 4
Core Strategy

1. Do you think that the settlement of Wicklow/Rathnew is fulfilling the role set out for it in national, regional and county strategies?
 - **No. It does not live up to its status of County Town.**
2. If the current amount of land zoned for housing is found to be in excess of what is needed to meet population & housing targets, what should be done?... Should land be de-zoned?... If so what land?
 - **Yes, land should be dezoned. There are still large numbers of unsold houses, apartments, flats, etc around the area. Discussions with local estate agents will give you an idea that these units will not be shifting soon.**
 - **Land that is further out from the town centres should be dezoned as there is no transport infrastructure linking these areas to the towns.**
 - **Some zones between existing housing can be rezoned as green spaces for those housing zones.**
3. If the amount of land zoned and policies with regard to retail development do not match the higher level plans, what should be done?... Should land designated for new shopping development be de-zoned?
 - **Perhaps some. A study needs to be done on how much shopping development zoning is required. The existing shops in Wicklow Town would be adequate were they all occupied.**

Background Issue Paper, pg 5
House Design and Standards

1. Where and how do you think this population growth should be best accommodated?
 - **No comment**
2. What additional services and facilities would you like to see to support Wicklow's growing population?
 - **More community facilities for young and old. E.g. Charlesland Sports Centre – not necessarily a running track, but all weather pitches, skate park, bmx track, etc.**
3. How in your opinion should the design of new residential developments be improved?
 - **Larger green spaces in residential developments. More green space around the towns.**
4. How can the Wicklow Town and Environs Development Plan facilitate and encourage good design and layouts in new residential developments?
 - **Engage with architects/designers to design more "liveable" residential developments.**

5. What are the problems, if any, with the newer residential developments in Wicklow and Rathnew?
- **Poor quality build control.**
 - **Too dense.**
 - **No amenities**
 - **Not connected to town centre or public amenities. No bike and footpaths. I accept that in some cases there may be plans to build the paths in the future, but these should be built before any construction may start on residential developments.**
 - **Not enough (usable) green space within residential developments.**
 - **Many residential developments remain incomplete.**
 - **Some residential developments are not connected to cable type digital TV networks.**
6. Is there a need for the plan to provide for higher density residential development in Wicklow and environs and if so, where should this be located?
- **No. Lower density is required.**

Background Issue Paper, pg 6 & 7
Economic Development

1. How can Wicklow best maximise its strengths and attractiveness for investment?
- **No comment**
2. Are the existing zoning provisions in the Plans flexible enough to allow for a sustainable mix of employment types?
- **No comment**
3. Where should new employment be located in the town? What type of employment would you like to see there?
- **No comment**
4. How can Wicklow town centre and Rathnew Village centre be improved in terms of its physical attractiveness as a prime shopping location?
- **Improve the run down shops.**
 - **Convert Old Hotel to shopping mall.**
 - **Quays can become more attractive as shopping areas.**
5. What other retail services would you like to see within Wicklow and Environs? Where would you like to see these other shops and services located?
- **No comment**
6. In new residential areas what type of shops and services would you like to see provided?
- **More convenience stores closer to residential developments. Currently a lot of time is spent in cars driving 2 miles to Tesco & Lidl from outer residential developments causing unnecessary congestion in the town centre.**

Background Issue Paper, pg 7 & 8
Community Facilities

1. What type of community facilities and local services are needed in new and existing residential communities and within the town?
 - **More green space, public parks and play grounds. Cabinteely Park and Marley Park are good examples. Wicklow doesn't need something as big but can be similar on a smaller scale.**
 - **Lack of cinema, even if it's a small one. What is happening with the old cinema?**
 - **What is happening to the school building of the 2 schools amalgamating and moving in to the new Community College. Can these sites be used for community facilities.**
 - **As a Wicklow VEC facility will the Wicklow Co Co have a say in the full utilisation of the new school building to it's full potential for after hours community use?**
2. Where should new facilities be located?
 - **An example will be adjacent to the new port relief road. This road is highly utilised by people exercising their dogs, walking, running, cycling, etc. If a park was developed just off this road then it could be used, in addition to the road, by people exercising. Alternately a park can be a "destination" accessed via the relief road and the improving cycle and foot paths around Wicklow and Rathnew. The relief road is easily accessible from both Wicklow Town and Rathnew so would be suitable.**
3. How can local residents and community groups be encouraged to engage in the planning and delivery of community facilities in their area?
 - **The publicity of invitation to engage is poor.**
 - **The council could approach residential developments' residents' committees directly.**
4. What educational deficiencies are there in the settlement? Are new facilities needed and if so, where in the wider town should they be located?
 - **No comment**
5. What type of additional sports and recreational facilities would you like to see in Wicklow and environs?
 - **More community facilities for young and old. E.g. Charlesland Sports Centre – not necessarily a running track, but all weather pitches, skate park, bmx track, etc.**
 - **Perhaps some of the disused industrial shed can be converted to indoor facilities for use during winter.**
 - **The completion of the proposed river/stream side walk from the Marlton Rd, under the relief rd up to the lake.**

Background Issue Paper, pg 8
Tourism

1. How can the plan facilitate the provision and development of tourism facilities and accommodation?
 - **As the Garden County Town, it's not very "Gardeny".**
2. What needs to be done to promote the arts in Wicklow town and Environs?
 - **No comment**

Background Issue Paper, pg 9 & 10
Infrastructure

1. Are there current deficiencies in the transport network in the town?
 - **Wicklow town is relatively small and is there easily accessible by foot and bicycle. The foot and bike path network should therefore be improved.**
 - **More bike locking facilities (racks) around the town.**
 - **Church Hill should become a 1-way road.**
 - **School buses should be brought in running along all major arteries into Wicklow Town. E.g. road from Rathnew, Rocky Rd, Friars Hill, Marlton Rd, St Patricks Ave, Convent Rd, etc., stopping at all residential development entrances at fixed times. This would relieve congestion in the town centre.**
2. Are improvements required to public transport networks, and if so, what are they?
 - **See items at 1 above.**
3. What might make you move away from private car use to public transport?
 - **Not sure if there is a need for public transport as such except for schools. Perhaps you should question what will get me to move away from private car and onto the bike – see items at 1 above.**
4. What needs to be done to improve the walking and cycling network in the town?
 - **Generally needs improving.**
 - **All paths should have dropped kerbs at junctions. Currently many are not accessible for wheelchairs, buggies, bicycles, etc.**
 - **All public amenities should be accessible by bike and footpath. E.g. sports clubs, play grounds, shopping areas, etc.**
5. Do you think are any improvements needed in the harbour/port area?
 - **Yes, although great strides have been made by the improved road along the South Quay there is a lot of room for improvement.**
 - **There is a potential for a mixed use waterfront type development/facility, utilising existing structures.**
 - **Empty buildings can be occupied and refurbished.**
 - **It can become a destination for day travelers from Dublin or national and foreign tourists spending time in the garden county.**

6. Do you think the harbour has the potential for future development... or should it be protected in its current condition?
 - **Yes it has, but this development can take place within the current confines and condition.**
7. If so how would you like to see this happen?
 - **See item 5 above.**
 - **Refurb existing structures.**
 - **Definitely no high rise structures.**
8. What measures should the Development Plan include to ensure energy conservation, reduced carbon footprint and to promote sustainable energy in Wicklow?
 - **See previous comments on improving bike and footpaths to get people out their cars.**
 - **Sports or other facilities requiring large amounts of non-potable water should be encouraged to install rainwater harvesting systems. Grants should be available to these facilities.**
 - **New non-residential planning applications should include all methods of sustainable energy where feasibly possible. Water harvesting, wind turbines, etc.**
9. How can we ensure that developments in Wicklow do not contribute to deterioration in waters –ground water, rivers, and coastal waterways?
 - **It must be insured that proper measures are incorporated at planning stage and carried through to construction stage and must then be policed after occupation.**
 - **Hard landscaped areas should have permeable paving to reduce flooding and washing of polluted surfaces into streams and rivers.**
10. What additional measures can the town do to promote and facilitate the reduction, reuse and recycling of waste?
 - **Besides increasing the number of recycle facilities the council could do work shops with the schools on recycling. I am sure the schools do a lot on this subject already. Educating the children is where it should start.**
11. Are you aware of any areas of flooding that need to be addressed?
 - **No**

Background Issue Paper, pg 10 & 11
Heritage and Natural Environment

1. How can the next Wicklow Town and Environs Plan contribute to the protection, conservation and appreciation of the built and natural environment?
2. How can a balance be achieved between protection of our heritage and at the same time, provide for the development and future needs of the town and its environs?
3. What objectives do you think should be included in the Plan to protect the flora and fauna and promote bio -diversity?

Background Issue Paper, pg 11

Strategic Environmental Assessment (SEA) & Appropriate Assessment Screening (AA)

1. What do you think are the big environmental issues within the Wicklow and Environs Plan area?
 - **Litter and fly dumping**
2. What measures should the Council take to ensure that the environmental impacts of development are minimised or mitigated?

Comments on Action Area Plans

Action Area 1

- No comments

Action Area 2

- Area zoned for residential development not already developed should be dezoned or rezoned as for open/ green space.

Action Area 3

- No comments

Action Area 4

- Is there a requirement for this much residential zoning? Is even further out of the town than some existing developments with lack of linking infrastructure. Should be dezoned. Should any of this residential development proceed then linking infrastructure must be constructed prior to commencement of development of sites.

Action Area 5

- A neighborhood centre at the Northern boundary of this zone can be developed for the use of residents across the road, e.g. Burkeen, etc.
- The remainder of the zone should be dezoned or rezoned as for open/ green space. This would be a good greenspace connection over the hill between Rocky Rd and Burkeen, where existing mature vegetation can be incorporated with new soft landscaping creating something like Cabinteely Park on a smaller scale.

Action Area 6

Comments on Map

<http://www.wicklow.ie/Apps/WicklowBeta/Publications/Planning/WicklowActionAreaSixLAP/AA6-LAP2006-2012.pdf>

- Areas West of the Relief rd should be dezoned or rezoned for open/ green space. No requirement for this much residential development.
- Residential zoning East of Relief Rd should be less dense than current residential developments around the town
- A pedestrian & bicycle link should be built between the Relief Rd bik/footpaths and the rugby club.

- Open space along river developed as such. Perhaps the strip could be made wider taking in some of the area currently zoned for residential.

Action Area 7

- The area zoned for residential should be dezoned or rezoned for less dense residential development. I notice there is a planning application for 156 dwellings for this site. Is there a need for another 156 dwellings in this area? No requirement for this much residential development. Road leading to Marlton Rd must be improved prior to any construction commencing on this Action Area.
- This area is largely zoned as open space. However, this is a large hill, which is not entirely conducive as an open green space. There are also no mature trees here and is very exposed to the elements and probably would not be highly utilized as its zoning.

Action Area 9

- Similar comments to Action Area 5

I hope that the above comments are in some way useful and that together with comments from other Wicklow Residents, a Development Plan can be produced that is satisfactory to most parties.

I look forward to seeing the end product.

Yours sincerely

Roelof Smit

No. 28.

Leonora Earls

From: McGonigle, Darragh [darragh.mcgonigle@gvaplanning.ie]
Sent: 26 August 2011 16:20
To: Wicklow Town Plan Review
Subject: Development Plan Submission
Importance: High

Dear Sir/Madam

Please find attached a PFD document which is a submission to the review of the Wicklow Town and Environs Plan on behalf of Tesco Ireland Ltd.

I would appreciate if you could confirm receipt of the document by return.

Kind Regards

Darragh McGonigle, Senior Planner, **GVA Planning**
Email: darragh.mcgonigle@gvaplanning.ie Web: www.gvaplanning.ie
National Number: +353 (0) 1 661 8500 - Fax: +353 (0) 1 661 8568

GVA

2nd Floor Seagrave House, 19 - 20 Earlsfort Terrace, Dublin 2

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acknowledged

26/08/2011



Submission

GVA Planning

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Wicklow Town and Environs Development Plan 2013-2019

Pre-draft submission

On behalf of Tesco Ireland Ltd.

August 2011

CONTENTS

1.	INTRODUCTION.....	1
2.	RETAIL PROVISION IN WICKLOW TOWN.....	1
3.	EXISTING TESCO SITE	4
4.	CONCLUSION.....	5

1. Introduction

This submission has been prepared by GVA Planning and Regeneration Ltd. on behalf of our Client, Tesco Ireland Ltd., of Gresham House, Marine Road, Dún Laoghaire, Co. Dublin. Tesco Ireland currently employs some 616 people in Co. Wicklow. This submission responds to the advertisement of the review of the Wicklow Town, Wicklow Environs, and Rathnew plans. Our Client requests that the following issues are considered by the Planning Authority in the formulation of the Draft Development Plan for the overall area:

- The need to confirm Wicklow's position in the Retail Hierarchy for the Greater Dublin Area through the provision of an appropriate level of retail floorspace.
- The provision of a retail policy that encourages redevelopment and modernisation of existing floorspace and does not disadvantage those seeking to provide new floorspace through restrictive floorspace caps on the proportion of a foodstore that can be used for the sale of comparison goods.
- The omission of regeneration briefs that are no longer suited to the economic climate that can be anticipated throughout the lifetime of the plan.

Addressing the above will ensure that foodstore operators within the area will be in a position to:

- **Further contribute to the economy at both a national, regional and local level.**
- **Sustain existing employment numbers and create new sustainable employment.**
- **Support Irish producers and suppliers.** Tesco is the biggest purchaser of Irish food worldwide.
- **Increase capital investment** in existing stores.
- Be a catalyst for investment for new and existing retailers.
- Encourage more **sustainable development** by reducing the carbon footprint of stores and encouraging consumers to 'go green'.

2. Retail Provision in Wicklow Town

Tesco currently operates a foodstore from a site within the retail core on the Dublin Road. The following section seeks provisions in the forthcoming Draft Development Plan that will support a viable retail environment in Wicklow Town.

Retail Hierarchy

The Retail Strategy for the Greater Dublin Area (RSGDA) defines Wicklow Town as a Level 2 centre in the Retail Hierarchy for the GDA, second only to Dublin City Centre and on par with centres such as Bray and Dún Laoghaire. Other centres in the County, such as Greystones and Arklow are defined in the strategy as Level 3 centres. However, it is notable that the quantum of retail floorspace in Wicklow Town is substantially lower than that of Bray, which is a directly comparable centre and is also below that of Arklow which is a lower order centre. The floorspace survey carried out for the RSGDA showed the following quantum of retail floorspace in the centres listed below.

Table 1: Existing Retail Floorspace in County Wicklow (sq.m)

Location	Place in Hierarchy	Convenience	Comparison	Convenience & Comparison
Bray	Level 2	10,010	21,015	31,025
Arklow	Level 3	7,818	13,045	20,863
Wicklow	Level 2	3,417	9,420	12,837
Greystones	Level 3	4,556	1,837	6,393

Source: Retail Strategy for the Greater Dublin Area 2008-2016

The above table shows that in 2008 Wicklow Town had circa one-third the quantum of convenience floorspace that Bray had and around half the comparison floorspace (no significant expansion has occurred in Wicklow since). It had less convenience floorspace than Greystones and approximately half the amount of convenience floorspace of Arklow. Arklow has more than 3,000sq.m more comparison floorspace than Wicklow.

As acknowledged in the County Retail Strategy, 2010, Wicklow Town has a wide catchment area encompassing Rathnew, Ashford, Roundwood, Rathdrum and the rural areas in between (page 12). Wicklow Town requires a quantum of retail floorspace that is appropriate to its catchment size and population and to its position in the Retail Hierarchy.

The County Retail Strategy sets out a number of strategies for Wicklow Town. The first strategy is:

"To promote and encourage enhancement and expansion of retail floorspace and town centre activities in Wicklow to enhance its role and importance as a County Town Centre in the GDA;"

It is submitted that, on the basis of the foregoing, the above strategy statement from the County Retail Strategy is an appropriate and sustainable approach to retail provision in the town. It is, therefore, requested that a similar statement be included in the Draft Development Plan to encourage consumers to reduce the distances which they are currently travelling to purchase goods.

Comparison Floorspace within Foodstores

It is noted that both the County Development Plan and the County Retail Strategy contain a provision which places a cap on the proportion of floorspace in a foodstore that can be used for the sale of comparison goods (i.e. 20%). We also note that despite the fact that the provision does not appear in the current Wicklow Town Development Plan and the fact that the County Retail Strategy has not been formally adopted by Wicklow Town Council, the provision has been applied to grants of planning permission by way of conditions on schemes in the Town Council area.

There is **no policy** within the Retail Planning Guidelines (RPGs) **that support the implementation of a floorspace cap** or restriction on the comparison element of foodstores. Indeed, the RPGs recognise that foodstores play a vital role in maintaining the quality and range of shopping and stating that they are:

"an accepted component of the retail hierarchy. They serve mainly the large weekly convenience goods shopping requirements of families..."

The Goodbody Report², which provided a comprehensive review of the Draft Retail Planning Guidelines, did not refer to any need to include restrictions on the balance between convenience and comparison goods to be provided within superstores. The Report does consider that foodstore operators that wish to:

*"...offer some non-food goods in a **superstore** format,...may well be required to reduce the floorspace given over to food in order to stay within the cap"*

(Emphasis Added)

This analysis infers that retailers providing a 'superstore' format are already restricted insofar as they must reduce the level of convenience floorspace in order to provide some comparison

¹ Retail Planning Guidelines, 2005, para 73, page 27

² Goodbody Economic Consultants, The Impact of the Draft Retail Planning Guidelines on the Retail Sector.

floorspace. Any additional caps introduced by Planning Authorities to control the quantum of comparison goods within foodstores are unnecessary and will not have the intended effect of protecting the town centre. The requirement represents an **additional level of market control** that has **not been substantiated** by any detailed economic or competition analysis.

The requirement to restrict the provision of comparison floorspace within foodstores makes little sense in land use planning terms. The County Retail Strategy states that the provision exists "to prevent any adverse impact on town centres" (page 17). However, there is nothing to prevent two stores, one selling convenience goods and one selling comparison goods being provided on the same (or directly adjacent) sites, so long as the goods are not being sold from under the same roof. However, as stated above, the retail attraction and any perceived impact of the two formats would be exactly the same.

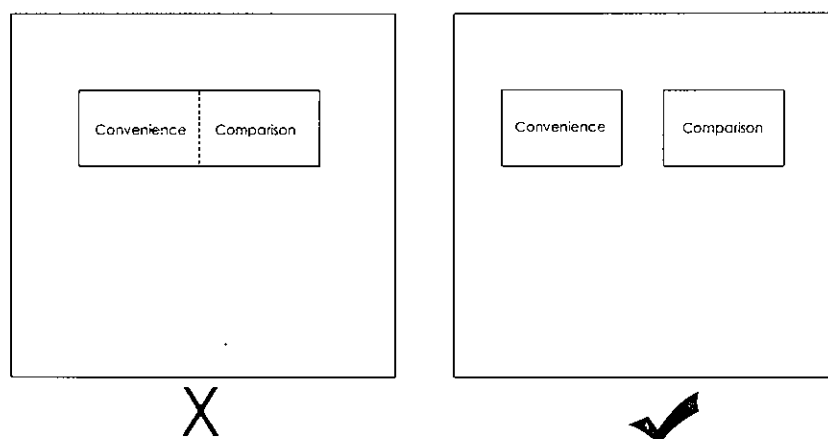


Figure 1: Indicative Site Plans - The format on the left is prohibited by the subject provision whereas the format on the right would not be. However, the retail attraction is the same.

The provision of a store selling convenience goods alongside a store selling comparison goods would have the same retail attraction as one store (with the same amount of floorspace) selling both from under the one roof. A good example of this already exists in the plan area, along the Dublin Road, where Heaton's and Lidl are located directly adjacent to each other. The retail attraction of this location is just as strong as if the same quantum of floorspace were located in the same unit, with the simple difference that shoppers have to walk across the car park. The provision therefore **unfairly discriminates against foodstore operators** who wish to provide comparison goods sales within their store.

It is noted that the Retail Planning Guidelines states that Planning Authorities should bear in mind:

"...the need to avoid taking any actions which would have an adverse impact on competition in the retail market³.

It is submitted that the provision is anti-competitive as it puts new development on a different footing to existing retailers. Where existing retailers (in Wicklow Town or in alternative shopping destinations) can continue to operate stores without the comparison area of their stores being affected by the provision, new developments will have to abide by the restriction. This will have the effect of discouraging new/ existing retailers from investing in the town, either in the town centre or elsewhere. The residents of Wicklow currently travel to foodstores outside of Wicklow's catchment area where modern format foodstores offering a full range of lower/

³ Retail Planning Guidelines, 2005, para 92, page 36

middle order comparison goods are trading. A restriction that limits comparison space in stores in Wicklow will do nothing to tackle this.

The provision will directly have the effect of discouraging the redevelopment and modernisation of existing stores (where more than 20% already exists) and where an established trading pattern of the sale of comparison goods exists. This can lead to a drop in the quantum of comparison floorspace and consequently in the range of comparison goods.

It is unclear from the provisions of the retail strategy how the requirement to limit foodstores to 20% comparison sales would have the effect of protecting town centres. This provision is even being applied to development proposals located on town centre lands, within the core retail area. If the provision is to be included at all, then it should be made absolutely clear in the Draft Development Plan that it applies **only** to developments located in **out-of-centre locations**. The provision does nothing to discourage the provision of large units selling exclusively comparison goods either in the town centre or outside of it and will therefore not have the intended effect.

It is therefore requested that a provision which limits the proportion of a foodstore that can be used for the sale of comparison goods **is not** included in the Draft Development Plan.

Parking

The current Development Plan sets out a reasonable quantum of parking provision for various forms of development. Under the current parking requirement, "supermarkets and large stores" are required to provide a level of parking that results in the range from 1 space per 25sq.m of floorspace (minimum) to 1 space to 14sq.m of floorspace (maximum). This is considered to be a reasonable level of parking for Wicklow Town and it is requested that these standards are maintained in the Draft Development Plan.

3. Existing Tesco Site

As stated above, Tesco currently operates a foodstore from a site on the Dublin Road and is committed to the continued operation from this site. There is a current planning application (granted by Wicklow County Council) on this site and the adjoining lands for full redevelopment, reflecting Tesco's continued commitment to its operation in the town. The application site covers the current Tesco site as well as the adjoining petrol filling and cash and carry sites. The total site area is 1.82ha.

Zoning

The Tesco site as well as the adjoining lands (the subject of the planning application Reg. Ref: 10/3409, Board Ref: PL86.238923) are currently zoned for Town Centre uses. Given the proximity of the lands to the historic centre of the town, the fine urban grain of the town and the resultant lack of development sites, the Tesco lands are suitably zoned as "Town Centre" and should remain as such. It is submitted that this zoning objective **should be maintained** in the Draft Development Plan.

Core Retail Area

The Tesco lands also form a part of the "core retail area". It is submitted that the area shown as being a part of the "core retail area" in the County Retail Strategy (Map 10.02, page 29) should be affirmed as same in the Draft Development Plan. This area is considered to be appropriate, given the current provision of retail floorspace at this location, its attraction to consumers, and its proximity to Abbey Street and Main Street.

Site Regeneration Briefs and Specific Objectives

The Wicklow Town Development Plan 2007-2013 contains a section entitled "Opportunity Areas" in which the approach to key regeneration sites and areas are outlined. The section contains a number of "Site Regeneration Briefs" including "Regeneration Brief No. 2" for the Abbey Lands (Section 15.19, Page 79). The brief for the Abbey Lands includes the existing Tesco site, the existing petrol filling station, the Abbey School, as well as private residential dwellings. The regeneration brief acknowledges that the lands have significant regeneration potential, given their central location and frontage. The regeneration brief also acknowledges that the lands are in separate land holdings, including private residential dwellings.

Currently there is an objective that a single Urban Design Framework for the entire regeneration area be prepared. However, given the fact that the lands are in separate ownerships, including private residential dwellings, it makes the full redevelopment of the site problematic.

It is submitted that where development objectives are presented in a plan, they should be framed in such a fashion that does **not create an interdependency for development** between land holders who:

- may wish to see their lands developed
- may not wish to develop their lands (such as dwellings)
- who may not view the development of their lands in the short to medium term as viable

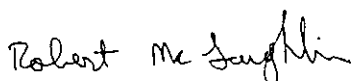
In terms of what is contained in the regeneration brief for the Abbey Lands, it is submitted that the scale and density envisaged in the brief is no longer achievable, given the current economic climate. Demand for new dwellings has decreased dramatically since the regeneration brief was formulated and the development typology proposed, which includes a density of development that is likely to result in apartment living, is no longer commercially viable in towns such as Wicklow.

For these reasons, it is requested that the Regeneration Brief is omitted in its entirety from the Draft Development Plan and that, instead, it is replaced by specific local objectives for the site. A Suitable specific objective for the Tesco/ Cash and Carry/ Petrol Filling Station area would be to **support the regeneration of the site to accommodate a retail/ commercial development, including a foodstore, along with a public plaza and improved pedestrian and vehicular linkages.**

4. Conclusion

Tesco Ireland Ltd. has a committed programme of investment, which seeks to locate in areas of proven under-provision and planned population growth, including areas within Wicklow. We are available for discussion on any of the matters referred to above. We would also appreciate if you could confirm receipt of this submission by return.

Yours sincerely,



Robert McLoughlin BAgrSc (Land Hort), MRUP, MIPI
Associate
For and on behalf of GVA Planning and Regeneration Ltd.

Leonora Earls

From: Kit Dunne [dunnekit@gmail.com]
Sent: 26 August 2011 12:35
To: Wicklow Town Plan Review
Subject: Support of Development of Wicklow Port

Dear Sir/Madam,

On behalf of Wicklow Bay Sea Angling Club I wish to express our support in principle to the idea of a developed Wicklow port area to incorporate marina and other aspects in relation to the encouragement of leisure and tourist business. We would like to be kept in the loop re developments as we already have some opinions and ideas we would like to be considered.

Regards,

Kit Dunne Jnr.
Secretary Wicklow Bay Sea Angling Club

10C Wicklow Heights
Wicklow Town
Co. Wicklow

087-6832179



acknowledged

Angela Higgsins
Chairperson, Board of Management
Wicklow Educate Together
National School
Marine House
The Murrough
Wicklow Town

26th August 2011

Re: Wicklow Town and Environs Development Plan

Dear Ms Higgins

I wish to acknowledge receipt of your submission in respect of the above, the contents of which is noted.

Kind Regards

Leonora Earls
Administrative Officer
Planning and Development



The Administrative Officer
Planning Section
Wicklow County Council
Station Rd
Wicklow Town

25th August 2011

RE: Submission on Wicklow Town and Environs Development Plan 2013 - 2019

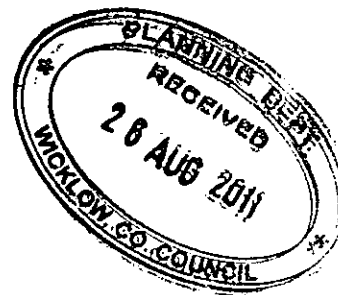
To Whom it May Concern,

Please find below the submission from Wicklow Educate Together National School to the Wicklow Town and Environs Development Plan 2013-2019.

Yours sincerely

A handwritten signature in black ink, appearing to read "Angela Higgins".

Angela Higgins
Chairperson Board of Management



Submission by Wicklow Educate Together National School to Wicklow Town and Environs Development Plan

There are two main premises for our submission:

The first premise for our submission is that there is a significant lack of provision for permanent accommodation for primary school places in Wicklow Town and Environs.

Currently, three schools - Gaelscoil Chill Mhantain, Wicklow Educate Together and half of the Glebe - are in temporary accommodation - either temporary rented buildings or prefabs.

The second premise is that the Development Plan has to be sufficiently flexible to allow permanent accommodation to be provided in different areas as it is unknown where the Department of Education can find a suitable site to provide this accommodation.

What might seem to be zoned a suitable site may not be serviced or may not be deemed suitable by the DES.

In this document, we set out two proposals for the Development Plan, and, thirdly, we are recommending that the planning team discusses the issue of school development and land zoning with the Department of Education and Skills *before* the Plan is completed. As the Department funds any potential expansion of education provision it is vital their views are considered.

Existing schools and Land zoned for educational use

While there may seem to be sufficient space in existing schools with approximately 68 classrooms in Wicklow and Environs a detailed analysis points otherwise. Of these 68 classrooms 28 are temporary rented or are prefabs. Plans for the two Rathnew schools will reduce this to 20. Thus perhaps 600 children in the area are in unsatisfactory facilities.

Not only that but birth-rates in the last few years, and by the Department of Education's predictions, suggest a need for 76 classrooms by 2016. That would mean possibly 28 new classrooms in Wicklow and Environs are required.

Land zoned for educational use that is not an existing school totals 5.2 hectares. Of these 3 sites one has permission for a 32 class school - at Merrymeeting. However, this site is occupied by the Gaelscoil and would not be suitable for three schools (the merged Rathnew schools, Gaescoil and WETNS) together [Sorcha Walsh letter 30/5/11 point 10].

Of the other two sites, the one in AA6 may be suitable for education as it is close to services. The one in AA4 is well removed from the town, has no services and poor road access. Thus, at present, the only possible extra zoned site for a school is in AA6. To have only one option when it comes to solving educational needs is surely bad practise. For example, what if the landowner is reluctant to sell?

Proposal: More land needs to be zoned for educational use near roads and services

Existing 'In Principle' development of schools on land not zoned educational.

Both the present Town Plan and the Wicklow and Environs LAP, including AA6, allow for the development of schools on land not directly zoned educational 'in principle'. For example the Wicklow Town Plan 2007-2013 states that lands zoned residential or mixed use 'are open for consideration' for educational proposals. Similarly, the Wicklow and Environs Plan would consider proposals for educational use on land zoned for other uses like town centre, residential and development centre.

The Wicklow and Environs plan also 'potentially' allows for educational facilities on land zoned E1 (Employment and Retail Warehousing)

Proposal: Continue and widen the provision for the development of schools on land not directly zoned educational in order to satisfy the need for Primary School buildings in Wicklow Town and Environs.

Joined up Government

While Wicklow Educate Together National school may have *opinions* on the proposed Development Plan we do not decide or purchase any site for schools- the Department of Education does. Nor do we have much influence with existing government funded educational establishments like the VEC.

WETNS, following a meeting with DES officials in June 2011, understands that Wicklow Town is high on the Department's priority list for providing further classrooms.

Proposal: That the Development Plan Team write to the Jerome Kelly at the DES and other educational providers in Wicklow and Environs and seek their views on primary education zoning before finalising the new plan.

**Wicklow Head Preservation Group
C/o Sam Conway
Cois Farraige
Seaview Road
Wicklow
Co Wicklow**

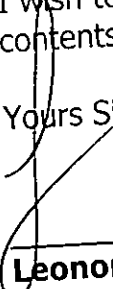
25th August 2011

Re: Wicklow Town and Environs Development Plan 2013-2019

Dear Mr Conway,

I wish to acknowledge receipt of your submission in relation to the above, the contents of which is noted.

Yours Sincerely,



**Leonora Earls
Administrative Officer
Planning and Development**



WICKLOW HEAD PRESERVATION GROUP

Submission

For the Preparation of Wicklow Town and Environs Development Plan

2013-2019

Submitted 25th August 2011 by Sam Conway. Tel. 0404-62785

CONTENTS



Vision Statement	3
Plan	3-4
Connectivity	4
Solutions to Connectivity Problems	4-5
Tourism	5
Action Area Six in Marlton	5
Closing Statement	6
About Wicklow Head Preservation Group	6
Appendix 1 Letter from Wicklow Town Manager	7
Appendix 2 Declaration 10959/10	8-9
Appendix 3 Colour Coded Map	10
Appendix 4 Prints of Wicklow Head Paintings	11-13

Vision Statement

The description 'an area of outstanding natural beauty' is in today's world very commonly used and often it is applied to areas that do not deserve such a lofty tribute. The same cannot be said of Wicklow Head. It is a very special place, not only is it an area of outstanding natural beauty but also due to its location and close proximity to the sea it is a place of real peace and tranquillity.

Although the site is not specifically designated for it's habitat it is, nevertheless rich in biodiversity e.g.; Peregrine Falcons and other birds of prey, over wintering Lapwing and Field Fare, Stoats, and numerous varieties of flora. This is worthy of protection.

Wicklow Head Preservation Group and it's hundreds of supporters, deem the area to be a priceless jewel which must be left in it's unspoilt natural state for the benefit of the local community and visitors to the area. Wicklow Town Councils purchase of over one hundred acres of land at Wicklow Head was in our opinion a wonderful acquisition, albeit initially for mainly the wrong reasons.

In this submission we have set out a plan and proposals for the area, which we deem to be constructive and attainable. If implemented, what we are suggesting would open up Wicklow Head for non sports orientated recreation and a whole host of environmentally friendly activities, such as painting, photography, bird watching, astronomy, the study of flora and fauna, meditation and the observation of wildlife in general on the land, at sea and in the air. The plan would not only provide a wonderful facility for the people of Wicklow Town and its environs, but would also attract tourists to the area, giving a much needed boost to the business community and in turn create employment. If there is a willingness to look at the big picture, combined with political courage and a can do attitude, what we are advocating can be made to happen.

Plan

Walking Trails and Sli Na Slainte

A) When Wicklow Town Council purchased the land it was their intention to develop a walking route and Sli Na Slainte walking trails across the land (see letter from Town Manager Appendix 1). The Council should now proceed and develop the Sli Na Slainte and a complex of walking trails, of varying distances, mainly around the periphery of all the land i.e. from Brides Head to the field adjoining the R750. The feasibility of erecting environmentally friendly low fencing to separate the trails from the fields should be explored. This would enable the Council to continue granting grazing leases. The benefit of doing this would be two fold. Firstly, the land would still generate revenue and secondly, the people walking the trails would have the added bonus of observing farm animals in their natural habitat.

B) Position wooden seats only, at regular intervals, around the trails to allow the walkers to rest and take in the beautiful views or just simply enjoy the peace and tranquillity of the headland. Plaques explaining the history of Wicklow Head, the flora and fauna and the wildlife should also be along the trails..

C) Provide a simple shelter as Wicklow Head is sometimes prone to quick changes in the weather.

Connectivity

When the planning application for the sports facility on the land was turned down one of the reasons given was the lack of connectivity to the area it was meant to serve. Declaration 10959/10, (see Appendix 2), which our Group obtained from Wicklow County Council concerning another proposed development on the land, deemed the lighthouse lane and entrance to be a traffic hazard and a danger to public safety. Logically and correctly the plan that we have outlined so far would fall victim to the same impediments.

Solutions to the Connectivity Problems

A) The letter already referred to from the Town Manager (see Appendix 1) also states that Wicklow Golf Club had expressed an interest in acquiring some of the Council land adjoining their Golf Course. We suggest that this matter should be revisited but with an offer of a land swap instead of a straight sale. The swap would entail exchanging a section of the Councils land for a strip of the Golf Clubs land along the coast from the Glen Strand to Brides Head. This would require Wicklow Golf Club to move that section of their Course a short distance inland. The Council could then connect the Dunbur Road Car Park and Glen Corridor to the Wicklow Head Walks and also to Brides Head itself.

At present the right of way along the cliffs to Brides Head is not for the faint hearted. The suggestion we have put forward would not only solve the connectivity problem, but it would also enable the Town Council to create an additional breathtaking and safe walk to add to the portfolio of trails at Wicklow Head. Residents of Wicklow Town, plus tourists, could either walk or drive to the Car Park at the Glen Strand, where they have the option to have a picnic in the picnic area, and then avail of the walking trails.

B) The footpath on the left hand side of the R750 going out of the town ends at the Glen Strand Car Park, but the kerbstones continue all the way to the Lighthouse Lane. It would seem that the original intention was to have a continuous footpath all the way on that side of the road. We suggest that this footpath be completed thus giving a second option of accessing the walking trails at Wicklow Head via the Lighthouse Lane. At present this can be done by using the footpath on the right hand side of the road but it necessitates walkers availing of the car park and picnic area having to cross the R750 twice in order to get to the Lighthouse Lane.

C) The problem of the danger to public safety on the Lighthouse Lane can be solved by only allowing residents, stakeholders and the emergency services motor vehicle access to the lane. Electronic gates may help to resolve this issue. Constructing the new footpath along the R750 from the car park and limiting the traffic using the lane would mean that the loop could be closed i.e. walkers could proceed along the coast, spend some time at Wicklow Head and return to the car park via the R750 in relative safety or if they wished go in the opposite direction.

Tourism

It is generally accepted that a very high percentage of the manufacturing and constructing jobs lost in this country will never return and to a great extent our recovery will depend on the success of building a bigger and better tourist industry. It goes without saying that tourists will only visit an area if there is something special to attract them. We strongly contend that Wicklow Head would be a wonderful attraction if the ideas that that we have put forward are brought to fruition. It is also very possible that the working lighthouse at Wicklow Head will be opened up to the public the same as has already happened at Loop Head and Mizen Head. This would create an additional attraction on the headland. Also the Landmark Trust Tower would get greater exposure with the possibility of more visitors spending a holiday there.

Action Area Six in Marlton

Wicklow Head Preservation Group has always stated, since it came into existence, that it fully supports the provision of new sports facilities in Wicklow Town. We therefore feel that the ideal location for the Sports Complex originally planned for Wicklow Head would be Action Area Six in Marlton.

Closing Statement

Contrary to what is stated in the Recreation and Amenity Chapter of the Wicklow Town Development Plan 2007-2013 Wicklow Town is not well served with informal open spaces. The only real open space available to the public for non-sports orientated leisure activities is the Murrough.

Sadly the whole Murrough area has been used and abused down through the years. A long stretch of the outer Murrough has running along it, a dilapidated factory building, a busy road, a railway line, two burnt out houses, the old Chemical Works buildings (which are an absolute disgrace), piles of waste left behind by a now defunct waste disposal company, a scrap yard with its twin peaks of scrap metal, a timber terminal and treatment plant, warehouses and finally a sewage treatment plant.

The wonderful acquisition of the land at Wicklow Head now gives Wicklow Town Council in conjunction with Wicklow County Council a glorious and once off opportunity to create a beautiful and very unique facility. A magical place where people can escape to, away from the hustle and bustle of urban living and the splurge of densely developed housing estates. If created, this facility will be a monument to creative and progressive thinking and of immense benefit to the inhabitants of Wicklow Town and the surrounding areas for generations to come.

Wicklow Head Preservation Group

Wicklow Head Preservation Group formed in 2009 as a result of the huge ground swell of opposition to Wicklow Town Council's planning application to build a sports complex at Wicklow Head. The Group has a one item agenda, with the sole aim of ensuring that Wicklow Head is preserved in its unspoilt natural state and is only used for non sports orientated recreation combined with a range of passive leisure activities.

Our Group has at its core a relatively small "kitchen cabinet" that holds regular meetings and interprets and acts on the wishes of the hundreds of people who support the cause. When the need arises, we call upon support outside of the core Group who have legal, planning and local government expertise to advise us.

The Group is not against the provision of new and necessary sports facilities and since its creation, it has at all times put forward alternative and constructive proposals for the relocation of the sports complex originally envisaged for Wicklow Head. It has never been the Group's policy to simply object to everything without putting forward a vision and plan as to what should happen at Wicklow Head. Any expenses incurred by the Group in furthering its objectives are borne by the core Group out of their own pockets and the general public have never been burdened with a request for funds.



Comhairle Chontae Chill Mhantáin

Wicklow County Council

Aras An Chontae
Cill Mhantáin
Telefón : (0404) 20100
Fax No : (0404) 67792
Intl VPN : 181 2100
E-Mail: housing@wicklowcoco.ie
Web: www.wicklow.ie

Your Ref:

24th May 2010.

Our Ref:

Wicklow Head Preservation Group
C/o Sam Conway
Cois Farraige
Seaview Road
Wicklow
Co Wicklow.

RE: Wicklow Town Council property at Dunbur

A Chara,

Thank you for your recent letter in connection with the above property and the Council's plans for same. I regret the delay in replying to your letter but as you can appreciate I was required to consult the Council's Law Agent prior to issuing a reply due to the comprehensive list of queries raised by you.

The Town Council took the innovative step to acquire this large portion of land (circa 100 acres) in an effort to provide much needed training and playing facilities for a number of sporting clubs in Wicklow Town. It is quite unusual for any local authority, especially a relatively small Town Council to acquire land to address the needs of Sporting Clubs but Wicklow Town Council, conscious of the benefits that accrue from involving young people in sporting activity, took this decision having been approached over many years by many different clubs, desperate for more training facilities to cater for their increasing membership. It is a proven fact that the more you involve young people in sports, the less chance there is of them becoming involved in other anti-social behaviour.

The lands in question are really only suitable for recreational purposes and the Council intended to develop a number of playing pitches, full-sized and training pitches together with changing facilities, viewing stands and carpark. The lands were comprehensively investigated and surveyed with a view to establishing their suitability for playing pitches. Pre-planning meetings were held with the Planning Authority (Wicklow County Council) and discussions took place with a number of sporting clubs in the town, the F.A.I., and the G.A.A. A planning application was lodged with the Planning Authority and unfortunately they were not in a position to grant planning permission for the application submitted. We have carefully studied their reasons for refusal and following further discussions with the Planning Authority, we hope to be able to address the shortcomings in a modified planning application. In effect, we will be scaling back the proposals and dealing with the other concerns of the Planning Authority.

In the meantime, we advertised the lands for letting and presently, all of the lands are let and generating some income for the Council. The Golf Club have also expressed an interest in acquiring some of the lands which adjoins their own land on which to develop two new holes and we are in discussions with them in this regard. It is also our intention, hopefully, to develop a walking route, perhaps even a "Slí na Slainte" walking trail across the lands and we are investigating this at present.

In summary, the Council's purchase of these lands has secured and protected them from any potential inappropriate development and we still hope to provide much needed facilities for sporting organisations in our town.

I trust this clarifies the situation for you.

Yours sincerely,

MICHAEL NICHOLSON
DIRECTOR OF SERVICES/TOWN MANAGER

APPENDIX 1.



Comhairle Chontae Chill Mhantáin

WICKLOW COUNTY COUNCIL

Aras An Chontae
Cill Mhantáin
Telefón : (0404) 20148
Fax No : (0404) 69462
Intl VPN : 181 2100

Email: plandev@wicklowcoco.ie
Web: www.wicklow.ie

Your Ref:

Our Ref:

DECLARATION IN ACCORDANCE WITH ARTICLE 5 (2) (A) OF THE PLANNING & DEVELOPMENT ACT 2000.

Applicant: Wicklow Head Preservation Group
Location: Dunbur Head, Wicklow

DIRECTOR OF SERVICES ORDER NO. 10959/10

A question has arisen as to whether or not construction of a sporting facility to consist of:- erection of a "small structure" approx 100 sqm (for changing facilities) – hard stand car parking area; provision of underground electricity cables; laying out of lands as playing pitches is or is not exempt development, within the meaning of the Planning & Development Act 2000 – 2007.

Having regard to:

- i. the details submitted on 9th December and 9th November 2010.
- ii. Section 2 & 3 of the Planning & Development Act 2000 (as amended)
- iii. Articles 6(1) and 9 (1) Planning & Development regulations 2001 (as amended)
- iv. Schedule 2, Part 1, Class 26 and Class 33, and Part 4 of the Planning & Development Regulations 2001 (as amended).
- v. Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities 2009 published by the Department of Environment, Heritage and Local Government.

Main Reasons with respect to Section 5 Declaration:

A. The provision of a 'small structure' of 100m in size is development with respect to Section 3 of the Planning and Development Act 2000(as amended), this structure would not fall within any of the exempted development classes set out in Schedule 2 of the Planning and Development Regulations 2000-2010, and would therefore not be exempted development.

B. The provision of hard standing area for car-parking is development with respect to Section 3 of the Planning and

APPENDIX 2

42

Development Act 2000(as amended), this structure would not fall within any of the exempted development classes set out in Schedule 2 of the Planning and Development Regulations 2000-2010, and would therefore not be exempted development.

C. Schedule 2, Part 1, Class 26 of the Planning and Development Regulations 2001-2010 provide that under grounding of electrical cables is exempted development. Having regard to the provisions of Article 9(1)(a) of the Regulations it is not considered that such works would conflict with any of the provisions set out given that there are no designations on the site either of archaeological or ecological status.

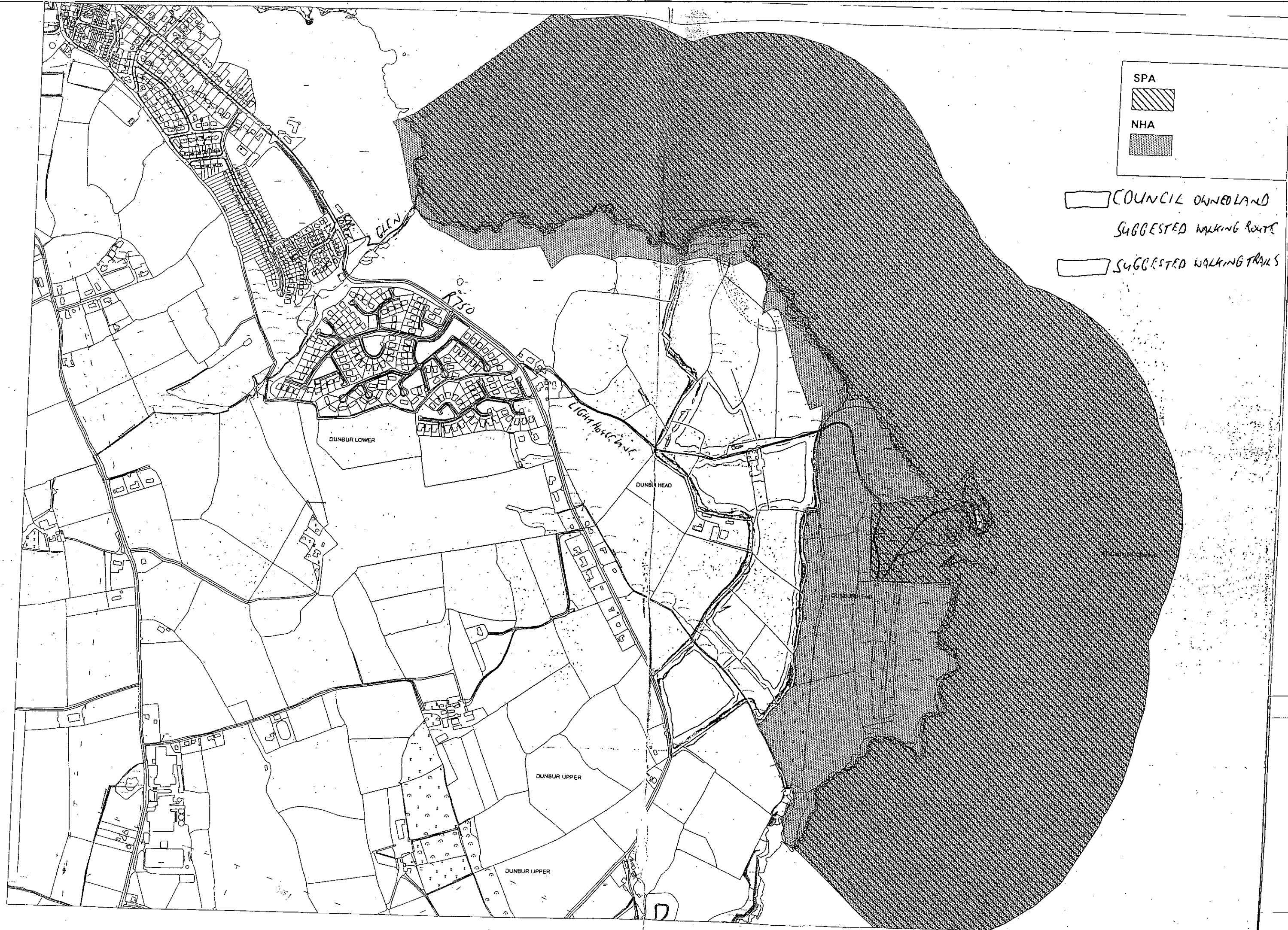
D. The laying out of lands for use as a playing pitch is development having regard to the provisions Section 3 of the Planning and Development Act 2000(as amended). The works required to make the lands usable would be in excess of those envisioned under Schedule 2, Part 1, Class 33 of the Planning and Development Regulations 2001(as amended). Furthermore the access lane and entrance are seriously deficient and this development would endanger public safety by reason of traffic hazard. Accordingly the development would not be exempted development.

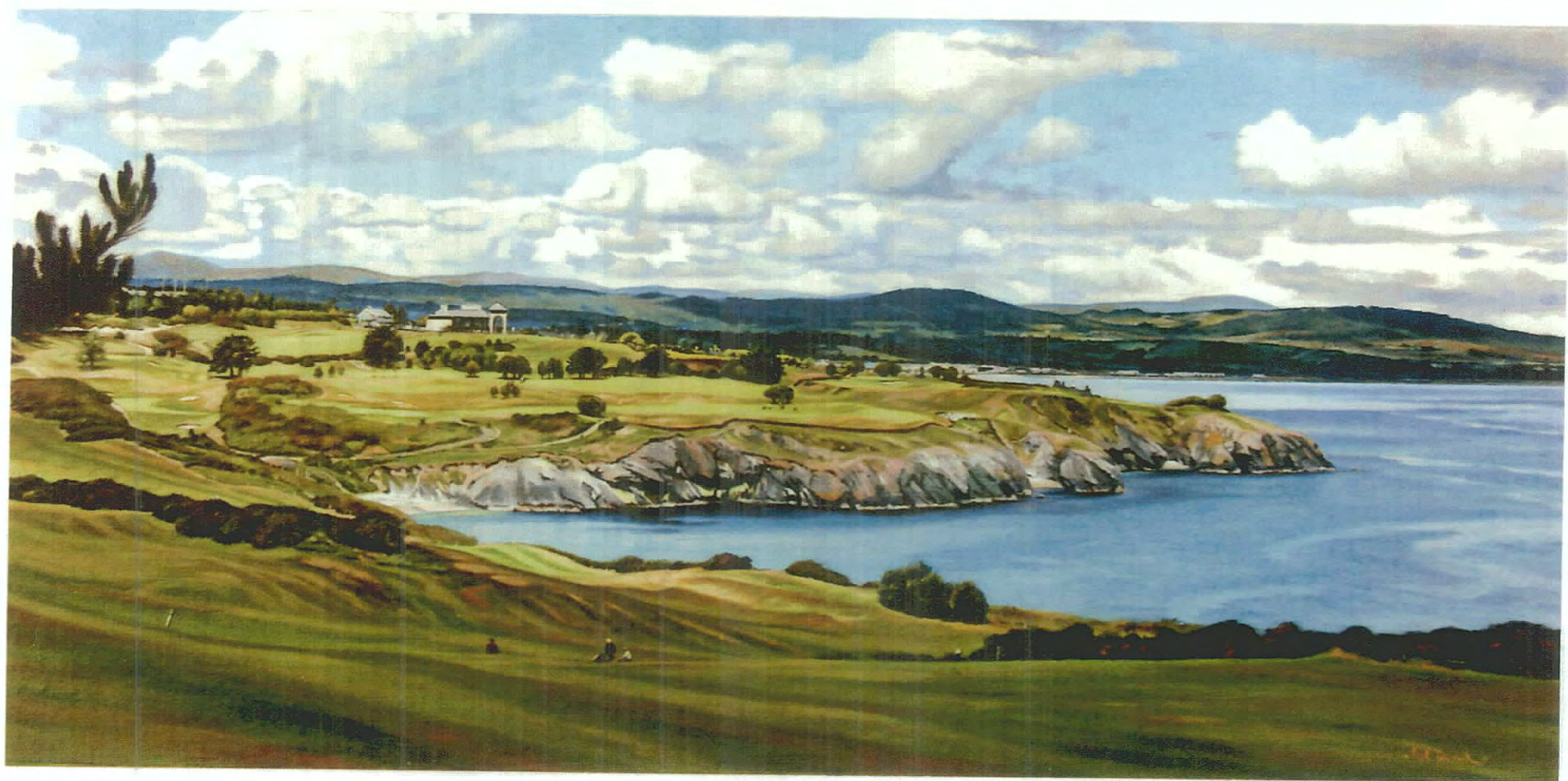
The Planning Authority consider that the erection of "a small structure" approximately 100 sqm (for changing facilities), provision of hard stand car parking area, layout out of lands as playing pitches is development and is not exempted development and the Planning Authority consider that the provision of underground electricity cables is development but is exempted development the Planning & Development Acts 2000 – 2007.

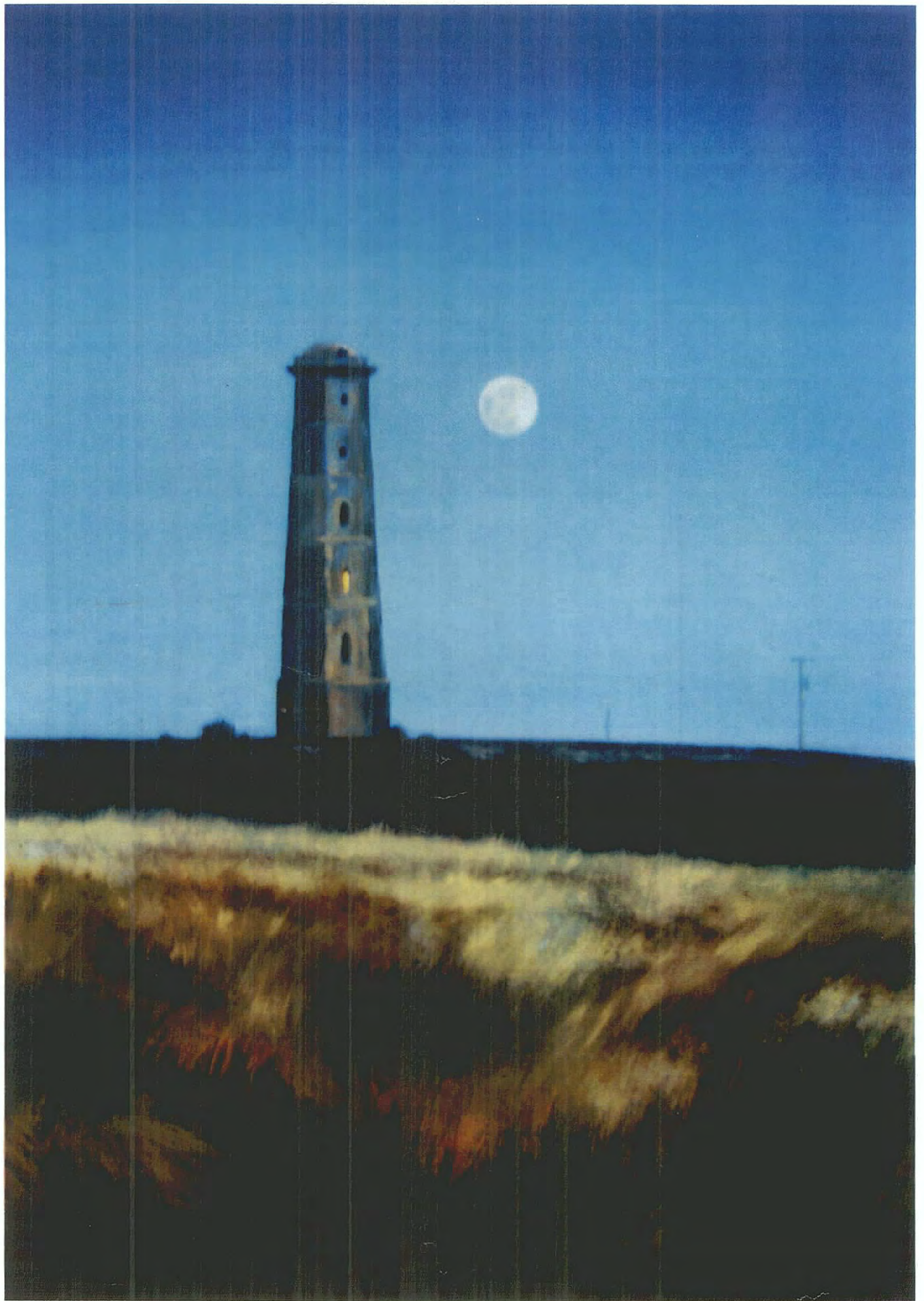
Signed:

H. Conolly
ADMINISTRATIVE OFFICER
PLANNING & DEVELOPMENT

APPENDIX 2







Moonlight ... Wicklow Head.

Pet Doves.



Wicklow Head.

Pat Dorey -

No. 32

Leonora Earls

From: Judy Osborne [judydaleosborne@gmail.com]

Sent: 25 August 2011 11:57

To: Wicklow Town Plan Review

Subject: Wicklow town and environs development plan pre-draft submission from the Wicklow Planning Alliance.

Please find attached the Wicklow town and environs development plan pre-draft submission from the Wicklow Planning Alliance.

Please acknowledge receipt.

regards Judy Osborne



acknowledged.
J

Wicklow Planning Alliance

The Wicklow Planning Alliance welcomes this timely opportunity to review the development plans for Wicklow town and environs.

Review of existing plan

Since the last plan there has been a seismic shift in circumstances, not only in the growing awareness of climate change and peak oil, but in the likely trend and speed of economic development. These issues must be considered in the new plan to assist the town in its transition to a low energy economy that protects its natural resources.

It is unfortunate that the issues paper produced by the local authority does not include a review of the success or failure of the existing plan, nor any update on the census figures for the area. A clear appreciation of the demography of the area is critical in the preparation of the new plan – not only in terms of the number of residents but also the age profile, skills profile, commuting profile, etc. Presumably these statistics will be collected in due course but at this time we are limited in our proposals by this lack.

Intuitively it can be observed that, though the area has grown to around 14,000 people the town is now most unlikely to grow to the target figure of 25,000 in the next plan period despite new roads, waste water treatment and new water supply infrastructure. Whilst Wicklow's fine location on the coast, not far from the main employment centres around Dublin, may mean that in the long term this area may attract new residents and grow, this is now not likely in the short term. Indeed we may expect some decline in population in the next period if the current spike in natural increase drops and emigration continues to increase.

A review of the employment zones would show that these zonings have not resulted in new industries locating here. The town remains a vibrant centre yet we know that the retail sector is very vulnerable. Employment opportunities are limited yet commuting becomes increasingly expensive. Tourism seems likely to take an increasingly important role yet the historic character of the town is increasingly damaged by empty shop windows and the intrusion of flashy neon lights that it appears cannot be refused on the basis of the current plan. There have been no improvements over the past plan period in the facilities for active or passive recreation and in fact many of the key locations, for example the river walk and the Murrough, have been seriously damaged during construction of new infrastructure. The existing plan has also proved inadequate in ensuring quality, sustainable housing. Over 500 houses have been built since 2006 and many of them still have low energy ratings, high water usage, and poor storage space. They will not serve their owners well as energy and water prices rise. The estates are not designed with a hierarchy of open space in mind. Nor have the existing plans ensured good visual design. The appearance of several new estates is discordant as is the design of a number of infill developments.

Vision Statement

Our vision is of a place where we can live, work and enjoy the best possible range of amenities whilst creating the least possible ecological footprint, not adding to global warming gases nor diminishing our bio-diversity. The town would retain its distinctive identity with a strong sense of history and links going back to earliest times. It would be a walkable place, built around the mouth of the river along a beautiful coastline of bays and cliffs, and surrounded by hills. The local independent shops would provide a range of goods and services to meet the needs of local residents, county visitors and tourists alike whilst larger supermarkets and retail outlets can be located on its existing sites accessed by the town relief road and by an efficient bus service which will have links to other towns in the County. We would have access to walks in open places and in urban spaces, and access to playing fields, sports facilities and other amenities. We would be able to go to the

cinema and a range of music venues. The town would accommodate drama societies and arts groups.

A lot of people will work out of town so a bus service would meet the needs of commuters and park and ride facilities would be provided alongside bus garages and the railway station.

A number of new schools will have accessible sites for all the new young people coming to the town along with parks and a hierarchy of urban spaces for young and older children to meet and play. There would be safe walking and cycling routes between the housing estates and other facilities. The new college in Rathnew would contribute to the town.

People working in the town might be attached to any number of businesses or services generally found in a County Town and the working port would provide some local employment. Many tourists would be attracted by the heritage within the town centre, the arts (in particular music and drama) coastal walks and eco-culture within a GMO Free/ Fair Trade Town. The value of our ecological heritage would be recognized in the protection and enhancement of eco corridors and networks and there would be lots of carefully chosen trees planted throughout the town.

Our houses would be low emission/energy efficient structures well connected to telecommunications, with proper facilities for waste management and built in well designed estates which conform to the highest standards of urban design. Public lighting would be chosen to create safe, light places whilst avoiding unnecessary waste of energy or light pollution.

Population and housing

Whilst not disputing the appropriateness of the proposal that population should be planned to grow to 25,000 the Wicklow Planning Alliance still maintain, as we have many times before, that using the various techniques of allowing additional zoning for 'market factors' etc. would create over zoning.

There are enough hectares zoned to accommodate 35,000 or more people. Fortunately, as it happens, most of the development that has already occurred is mainly closest to the town but there remains a great deal of undeveloped but zoned land – some of it on the outskirts of the environs. In current circumstances it would be quite possible for isolated developments to take place within current zoning pattern. Any isolated sites should be dezoned. Remaining zoned land that is close to either Wicklow or Rathnew town centres should be carefully phased to ensure that infill development and development close to town centres is developed first.

Walkability should be the first priority, in terms of location and design.

As the rail service is so poor and the rail line so vulnerable to rising sea levels, there is little point in treating this as a suitable node for high density housing. In fact high density housing is not appropriate except in small pockets. A range of properties styles is necessary to meet different needs of the community from single occupancy to family homes of different sizes and plot sizes. Alternative styles of living should also be accommodated including multiple occupancy or shared living space where singles may live in communal housing.¹ In order to provide for those who might otherwise seek rural housing serviced sites should also be permitted within new housing developments. Housing needs of older people should also be considered with an emphasis in providing sites particularly close to main streets and/or a number of units within each new housing development designated for older/disabled residents.

There are many examples of good design guidelines, which no doubt the local authority will be able to reference in the preparation of the next plan although all the guidelines in the world will not help if planning applications are permitted regardless of compliance to these standards. The Local Area Plan for Action Area 6 contained many good objectives but these were not evident in the final proposal for the Marlton Area.

¹ <http://shareable.net/tag/cohousing>

Many of the standard objectives relate to the development of a sense of place, which is important but standards relating to permeability and connection are particularly important to enable easy walking. Similarly the use of grey water systems and district heating systems for well-insulated homes will also be increasing important as energy and water prices rise. A guide for builders, such as that produced by Leitrim Development Company might be useful: Building a Sustainable Home. Realising the potential.

It is pleasing to hear that Wicklow is one of the counties now requiring strict adherence to the new Building Controls Part L , requiring 60% improvements on the 2005 regulations, which is something we have asked for Wicklow in several previous submissions. We trust this also applies to the town.

Economic Development

It is stated in the Background Issues Paper that Wicklow is well positioned when economic growth returns. Wicklow Planning Alliance contends that this is not a realistic proposition on which to draw up the next plan. Not only is a return to growth in the foreseeable future highly unlikely (and that is without questioning the desirability of returning to the growth of unsustainable business) but Wicklow town is deficient in the most important element that encourages economic development – people. A population of 14,000 is not of a scale that supports a wide range of large businesses. The employment zones require serious review. Over zoning is not helpful.

It is noted that the Background issues Paper seems to think that broadband communication in the town supports the town's competitiveness. This is not in fact so and despite numerous providers there are many estates where broadband access is very poor. It is likely that the roll out of fibre optic technologies will bypass Wicklow further limiting the likelihood of larger businesses locating here.

The most likely scenario is that Wicklow and Environs will remain predominantly a dormitory town with commuters largely dependent on road transport. An acknowledgement of this situation might encourage further improvements in the bus service, not only increasing the frequency of the airport bus but also providing bus access to Arklow via Glenealy and Rathdrum, Greystones, Glendalough and Sandyford. The bus depot originally proposed in Rathnew should remain an objective. Suitable sites for parking for car pools might be considered.

As the county town Wicklow houses the main council buildings, making an important contribution to a mix of employment opportunities however in an inevitably declining economy we must expect that providing services to each other will provide an increasing proportion of available jobs. If there are more people without work or working shorter hours it will be important to ensure that opportunities to strengthen community are facilitated by creating attractive, safe places to meet in public places and that sport and recreation facilities are available in easily accessible and attractive places.

Ironically, the area that has experienced the most development in the past plan period is the area least appropriate for industrial development – along the coast in the Murrough Action Area 1 which was optimistically zoned as a mixed use vibrant urban quarter in the current plan and along the more rural part of the Murrough north of the railway crossing. In a town that might ultimately depend on its ability to attract tourists to its coastal position there is a clear conflict of interest here. But we are where we are. In order to mitigate the damaging aspect of the recycling hub that has developed in this area WPA would propose that this whole area be designated as an action area so that clear objectives can be established to at least regulate development and encourage improvements. Work has begun in revamping the Enterprise Centre but more could be done in terms of landscaping the street environment. The height of future development should be restricted, particularly along the Murrough, and special attention paid to screening, noise and lighting issues.

The attractive, high quality location of the town is intricately entwined with the economic prosperity of the area, not least for tourism and it is imperative to retain this special historic character of the town. Whilst the late addition of an Architectural Conservation Area is most welcome the WPA propose that this should be extended much further, including ALL the Main Street and Abby Street and adjacent roads. The influx of neon signs is completely changing the character of this end of the street, especially at night. Is this what we want for Wicklow? Do we want to look like every other urban centre or do we want to retain our own unique character? If so the council must be able to control these aspects of urban design.²

There is also a new view that should be listed, that is on the Town relief road, between the Rocky Road and Friars Hill junction looking towards the sea. It's phenomenal. This would not of course inhibit development in the view but would ensure that the view is taken into consideration when development is proposed. It would also bring the view to public notice and add yet another attraction to the town.

Retail

Past planning decisions have left Wicklow with the strange arrangement of a strong main street (with opportunities to expand into backland areas including the quays) and three medium sized stores with large car parks on the edge of town. Previous zonings for edge of town retail would exacerbate this poor design and should be revised. Whitegates is not an appropriate place to expand shopping until such time as the town centre is bursting its seams, which is not likely to be soon.

In light of the now unlikely expansion of the town for some time to come and the declining levels of income to support expenditure it is likely that expansion of the retail offer is hardly necessary. Intuitively, what we have today serves our needs well. Many of the higher order shops in Main Street are now meeting demand for low order goods as well as high order goods in order to make ends

² se attached photos

meet. A careful study of up to date figures (post crash) would be required to establish this.

Certainly the new plan should resist the development of large 'big box' joint convenience/comparison superstore format³ A UK Report found that in their two edge-of-centre case studies, the principal effect of the new large stores was to divert trade from the town centre to the edge-of-centre locations and that there was a significant displacement of retailing activity. The UK Report further found that where food store proposals are disproportionately large compared with the size of the town centre, the new store can supplant the role of the centre. Smaller centres such as Wicklow therefore require additional 'protection'.

This destructive result is exacerbated if the location of proposed development is on the edge of town and able to avail of better road access and ample free surface covered car parking together with cheaper land, operating and construction costs. These facts distort market competition. Maintaining the viability and vitality of traditional town centres is a perfectly valid national, regional and local planning policy objective and the Planning Authority is completely entitled to place restrictions on use or to refuse planning permission as they consider appropriate.

Increasing the floor space for non-food goods will have a devastating impact on main street shops. Nor will increasing the size of the food hall necessarily improve the range of food products available as these decisions are based on demographic factors and existing expressed preferences of shoppers. There is ample space within the existing Tesco Store for a wider range of foodstuffs if less space were given to fizzy drinks, crisps and alcohol.

3

http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606124.hcsp

However, if the town should grow, the opportunity to facilitate some additional floor space still exists within the core area of the town. The WPA suggests that the land encircled by Abbey Street, Wentworth Place and Church Street should be designated as an Area Action Plan. If the buildings and space within this block were reorganised, and the car parking surface rationalised, this land could provide the necessary site for redevelopment of the town centre supermarket. Should current land owners have no interest in such development then of course, in the Irish planning system, it will not happen however well drafted planning objectives may incentivise such work and help provide the vibrant town environment that will support the wider range of small shops on the main street.

Some retail is also spilling over to the Quays where larger footprints are possible and generally, with a number of car parks expanding around the town, parking is no longer a serious impediment. More important is that pedestrian linkages are created and protected as proposed in the Public Realm Plan.

The ambiance of the main street is also important to maintain the vibrancy of the town. If the current development plan is not adequate to prevent the inappropriate neon signs that have multiplied in recent years then new, stronger and legally enforceable objectives should be inserted. The use of huge advertising boards, totems, as in garages and supermarkets should also be banned. They are unnecessary and intrusive. See attached file of neon signs in the main street, regardless of the fact that it is designated as an Architectural Conservation Area.

Similarly the recent work to decorate the windows of a couple of empty shops is admirable however the new plan should support such initiative and back it up with legal imperatives that windows facing onto the Main Street should maintain an attractive appearance. It is not acceptable that auctioneers take advantage of their position to advertise their service in such a gross and ugly way by placing large dirty signs in empty windows.

An objective is also required to deal with street clutter, unnecessary signage etc in order to improve the pedestrian experience in the town.

Community Facilities and Green Infrastructure

When we begin to measure progress by counting well-being⁴ as well as economic activity then we will make very different decisions in our development plans.

Health and community will be given much greater priority. There are now numerous studies that link health and longevity to access to outdoor green space.⁵ Such space also creates another meeting point for community to develop and where networks exist biodiversity also benefits. (NB imperatives within the Wicklow Biodiversity Plan require such networks)

In order to better plan for such outcomes it would be helpful to map on a large scale the green infrastructure of the town and environs. This would not only map natural features such as rivers, hedge rows, and patches of agricultural land but also developed green space such as the golf club, sports fields, parks, playgrounds, left over land plots on housing estates , allotments and community gardens etc. The investment of producing a 3D model showing these sites in relief would be most advantages and stop the making of unwise decisions such as placing sports pitches on cold north-east facing slopes.

Mapping like this will enable planners to identify strong networks that need protecting as well as gaps that can be rectified by wise zoning. Clear objectives for green networks should be included in the text.

⁴ An interesting site which lists indicators for well being and details of a useable survey can be found at <http://sustainableseattle.org/sahi/gnh-objective-indicators>

⁵ Professor Michael Depledge (Director, European Centre for Environment and Human Health) research shows that close interaction by people with their natural environment (whether it be a walk on the park, cycling in the countryside or a swim at the beach) has demonstrable beneficial health effects.

The WPA support the policy proposal adopted by Wicklow Town council, to establish greenways that connect the hills to one another as well as to the sea (page 96 Wicklow town Public Realm Plan).

Land purchased by the town Council on Wicklow Head would constitute a valuable start in the south of the Town.

This concept would contribute significantly to the tourist offer of the town as well as improving the health and well being of local residents. Walking is becoming increasingly popular yet many traditional walkways in the area have been damaged in recent years.

With the change in the law (Planning and Development Act 2010 Section 7 (2) (o)) requiring Rights of Way to be identified in Development plans creates an opportunity to develop several looped walks in the area. The walk along the Murrough and back beside Broad Lough requires very little work to improve the experience and the walk from Black Castle to Wicklow head can be made safe with only minimal interventions opening up the possibility of longer looped walk south from the town to Wicklow Head and then back to town through the old Dunbar Lane.

Based on the provisions of the many plans we have examined we suggest the following wording could be brought into the new Wicklow Town Plan:

*. Public Rights of Way in the countryside constitute an important amenity and an economic asset. See Clare Dev Plan- 3.1 – page 87.

*. List existing public rights of way, within one year of the adoption of the plan, but if the examination of traditional walking routes for possible designation is not completed within this time, that an Interim List will be prepared. The list will be accompanied by detailed maps showing the actual routes and the appropriate signage will be put in place. The list will be included in the Plan by way of Variation.

* Protect, preserve, promote, enhance, improve and maintain, for the common good, existing rights of way.

* Create new rights of way, as required, or extend existing rights of way either by agreement or by way of compulsory powers in the interest of ensuring access to amenities, including the coast, upland areas, lake shores, river banks, and heritage sites and National Monuments. In particular, rights of way should be provided to from built-up areas to the countryside. Based on Louth - 6.2.6 - P 6.3 - 1st p, Meath HER POL 38 – page 318, Sth Dublin 9.5.9.iii, Mayo – P/HC-ACC1 – page 75, Carlow – 5th pt on page 82 & Fingal GPD 6 – page 158.

* Prohibit development and keep free from obstruction existing rights of way and walking routes, and take legal action if necessary to prevent any attempt to close them off. Based on South Tipp – Pol ENV41 – page 36, Mayo O/TI- PC 1 – page 62, Fingal - GB04 – page 158 & Clare CDP 80 on page 85.

* Resist development which would prejudice public access to existing rights of way, unless specific arrangements are made for suitable alternative linkages. – Fingal GB09 – page 159. There is an identical policy in Carlow – 8th pt on page 82.

* Look favourably upon planning applications which include proposals to improve the condition and appearance of existing rights of way. – Fingal GB08.

* Developments will not be permitted where a public way will be affected unless the level of amenity is minimised by:

(i) The footpath/bridleway being diverted by the minimum practical distance and the route continuing to be segregated from vehicular traffic;

(ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.” – Leitrim – 3.04.12.

* Existing Rights of Way and established walking routes shall be identified prior to any new planting, new infrastructural development and any new

energy/telecommunications developments. Carlow – 6th pt in list of pts on page 82.

Other access points that need identifying are

- the lane from Brickfield Lane to the Railway Station
- The track from beside the Protestant church towards the Round Mound

South of the town access to the coast is largely limited to the stunning cliff walk. North of the port the sea is at ground level and is a hugely neglected asset of the town, particularly as so much of county Wicklow's 30 mile coast line is privatized.

In Wicklow Town access to the sea is within an easy walk and the WPA propose that the coastal strip is given special attention, probably within an action area or whatever planning device is chosen by the council.

The strip closest to the harbour up to the car park exhibits strong urban character and suitable objectives could be attached to incentivise this use. The concrete promenade needs considerable improvement. Examples of beach facilities from the UK and continental Europe could be considered for example simple beach ball or volley ball courts, 5 a side football pitches, skateboard park, outdoor gyms. Whilst there would need to be some capital expenditure, which would presumably be hard come by, there may be European grants available and costs need not be high if the product is well designed – particularly maintenance costs.

Whilst it is understood that a development plan cannot develop, if such proposals are included as objectives it may incentivise community action.

The Murrough north of the car park is less urban despite the presence of industrial land adjacent. This access point to the coastal path along the Murrough from Wicklow to Bray must be protected both for the intrinsic value of the eco system and the SAC/SPA designated there but also for the tranquil experience of the walk. This very special landscape character needs to be

identified in the plan and objectives attached to the designation to regulate development in the vicinity to severely limit any negative impacts. Regulations to control height, noise and light and requiring sensitive screening/landscaping are the most significant. The use of tranquility zones should be considered.

The hiatus in the rate of development may also give the opportunity to reconsider the location of sports pitches. Whilst good city planning requires the intensification of development in the centre around transport hubs, the pressure is less intense in small towns. The need for more town centre development to meet the demand from a growing population will not emerge strongly for some time to come. Meanwhile the location of tennis clubs and football and GAA pitches in or near the centre provide both easy access for the greatest possible numbers and green areas that please the eye and provide a restful ambience that is very valuable in health terms for local residents and visitors.

In expectation of high demand for development land in the town, the last plan sought to move these sports facilities out of town. The proposals in the current plan are for parks around Ballyguile, Wicklow Head, the Marlton Stream and Ashtown, all on the outer perimeter of the town. Similarly there is land zoned for playing fields around Claremont, near the new school in Rathnew, around the existing rugby pitches at Ashtown and on a windy site on Wicklow Head. The pressure is now off. This move was unpopular and should now be reversed.

Agriculture

Work should now begin in helping the town to transition to a low energy economy. This includes greater reliance on local food. Soil maps, indicating good quality soil suitable for agriculture should be included in this development plan along with mapping existing land used for crops, both animal feed, fruit and vegetables and bio mass. (recent research and life cycle analysis has indicated that grass based energy crops provide low carbon/methane emissions).

Such mapping should be taken into consideration in future zoning or development applications. Any new developments should include areas for community gardens and/or allotments.

Objectives could be included to facilitate planning permission for the temporary use of undeveloped land for community gardens etc

The waste section of the plan could include objectives relating to use of anaerobic digestion as part of the energy resources of the area.

Tourism and cycling

In almost all circumstances, what is good for local residents will be good for tourism and many comments in other sections of course relate to matters that would improve the potential of tourism.

One such matter is the potential of cycling tourism which now accounts for more tourists than golfing holidays and annually is worth in the region of €100m to the national economy. (€54 billion is spent annually on cycle tourism across the EU see Lumsdon et al, 2009⁶). However, the number of cycle tourists coming to Ireland is not exceeding 120,000 a year, held back in large part by a lack of suitable and attractive routes

There are a number of plans around the country, some funded by the Smarter Travel Schemes.⁷ In terms of proposed projects, planning work is most advanced on a blueprint for 83 km of off-road cycle route from Clifden and the Westport to Achill corridor, which covers a distance of 43.5km. Work is also progressing on the Dublin to Galway element of the National Cycle Network, which has been

⁶ Lumsdon, L., Weston, R., McGrath, P., Davies, N., Peeters, P., Eijgelaar, E., Piket, P. (2009). The European Cycle Route Network EuroVelo – Challenges and opportunities for sustainable tourism. European Parliament, Directorate General for Internal Policies, Policy Department B: Structural and Cohesion policies, Transport and Tourism.

⁷ See appendix of projects undertaken around the country as examples of what can be done to improve the cycling experience

split into three sections for route selection purposes. Route selection studies are underway and it hoped to have a preferred route by the end of 2011 for the Dublin to Mullingar section a distance of 80 km. The Mullingar to Galway route options study is about to commence.

Objectives could be inserted into the Wicklow development plan to support any local initiatives for similar work.

Similarly, requests to central government funding to improve cycling in the area is likely to be better received than requests for high budget road projects. Some work has been done on this under previous plans but much more is needed.

A map detailing existing cycle lanes/safe routes would make a significant addition to encouraging more cycling, not least by school children, as well as highlighting gaps.

Covered cycle racks are needed to enable visiting cyclists to secure their bikes whilst they visit the town on foot. Somewhere near the river might be an appropriate location.

Safe routes could include less used roads, which could be designated as green or quiet roads where pedestrian, and cyclists have priority and vehicles are restricted to 20kpm as in other jurisdictions. A cycle track beside the railway on state land may be worthy of consideration.

To reflect key issues of peak oil and climate change the tourism section should catalogue all sustainable attractions that are accessible by public transport.

Infrastructure. Transport

A recent document⁸ has reported that 51% of all journeys of less than 2km are walked and 18% of all journeys between 2 and 4kms, which is a reasonable distance to cycle so the importance of creating a walkable/cycle friendly community is clear to see.

There is considerable evidence to show that trade improves in pedestrian streets however if local traders continue to oppose introduction of pedestrianisation in Wicklow Main Street maybe 'shared space'⁹ would be an alternative.

Also worth considering is shopmobility.ie Shopmobility is a scheme which lends manual wheelchairs, powered wheelchairs and powered scooters to members of the public with limited mobility to shop and to visit leisure and commercial facilities within a town, city or shopping centre.

The concept of Shopmobility is for anyone, young or old, whether their disability is temporary or permanent. It is available for those with injuries, long or short-term disabilities - anyone who needs help with mobility. Shopmobility is about the freedom to get around. You do not need to be registered disabled to use it. Shopmobility schemes actively encourage inclusion and equality by providing wheelchairs, power chairs and power scooters for people to use. Where Shopmobility is available people with impaired mobility can continue to access a local centre either independently, or with family and friends.

Over five years ago the Disabled Drivers Association of Ireland established the Shopmobility Scheme in Ireland to improve access to shopping to people with limited mobility. Since that first venture five years ago, Shopmobility has expanded to make Mahon Point Centre, Cork, Dundrum Town Centre, Dublin and Whitewater Shopping Centre, Newbridge friendlier places for people with

⁸

<http://www.cso.ie/releasespublications/documents/transport/2009/nattravel09.pdf>

⁹ see video <http://www.youtube.com/watch?v=RLfasxqhBNU>

reduced mobility. As yet Shopmobility service is confined to shopping centres only in Ireland but might yet be considered in Wicklow..

There are also now a number of examples around the country showing how alternatives to car transport are being promoted. For example the Provision of local travel information, in Cloughjordan, Tipperary, Ireland

Key steps taken here were:

- * Identification of all local mobility services, covering local bus and train scheduled services, local private bus hire and taxis, local cycle shop and the local CarSharing offer. This involved contacting local and national providers, the local rural transport organisation, national taxi regulator and the national Department of Transport. Leaflets, licences and websites were reviewed as part of this process.
- * Production of local travel information leaflet and poster incorporating the above information. Distribution of the poster to key local shops and centres. leaflets and posters were designed by a professional company who input the information compiled from the various sources mentioned above; they also identified suitable locations for the posters and distributed the leaflets during the questionnaire survey of households as well as making them available at local events, such as the street market and community fair and for downloading from the local community website.
- * Production of a leaflet on calculating car costs. An existing British document was adapted to reflect the relevant content, costs and currency applicable in Ireland. This involved checking national government and motoring organisation websites and documents, redesigning the leaflet and inputting the new information as appropriate. This was also distributed during the questionnaire survey of households as well as being made available at local events, such as the street market and community fair and for downloading from the Mendes website and the local community website.
- * Development of an electronic cost and carbon calculator, which was not however tested during Pro.Motion. Based on the local travel information and car cost calculation leaflets compiled earlier in the project and a carbon calculator developed by staff from the local energy agency, the company devised a

spreadsheet containing information on costs of motoring, public transport fares and carbon emissions, which was then linked to the company website.

* Contribution to the preparation of an Operational Plan for the local rural transport organisation in North Tipperary. The company worked with a local third level educational institution and the local rural transport organisation to prepare this plan. It involved identifying the relevant services and potential operators, designing new services and a new organisational structure to enhance and develop further the services for rural communities in North Tipperary.¹⁰

A similarly successful project was developed for Personal Travel Planning.

Key steps taken with this were:

* the production of a local travel information pack, which included an updated version of the local travel information leaflet, the car cost calculation leaflet, information about longer distance bus services, a modern lift giving service using mobile phones, cycling and walking routes, national public transport tax incentives and cycle purchase scheme, questionnaire and travel planning log.

*Implementation of a personal travel planning process with 100 households, which also involved the distribution of the local travel information packs. In order to carry out this activity, Mendes partnered with a local third level educational institute, the local energy agency and the local development partnership organisation, which is responsible for managing the operation of the local rural transport service.

*In order to design, plan and deliver the PTP process, staff from Mende, a local third level educational institute, the local energy agency and the local development partnership organisation participated in a training workshop on

¹⁰ Fuller details on this attached and available from Graham Lightfoot

PTP. The workshop was designed to be a very practical event during which the team actually designed and planned the PTP process, which was implemented. This involved preparing the approach to be taken, the procedures to be followed, the materials to be used and deployment of the staff who would carry out the household interviews.

In the unlikely event of new employers entering the area then mobility plans should be mandatory however objectives could be included to encourage the Council and existing companies to prepare workplace travel plans. Any businesses with websites, such as hotels, restaurants etc. as well as organisers of events could be encouraged to include details of how to reach them by public transport as well as by car.

Energy Descent Plan

One of the fundamental changes in the new development plan is the need to raise awareness and develop an understanding of the impact of Peak Oil and Climate Change, especially on the local economy and the local community. This will include:

- * Exploring, with the community, sustainable transport options
- * Rigorously pursuing an energy efficiency and conservation programme throughout the county. Raise awareness across all sectors leading by example and best practice
- * Coordination of policy and action on reducing the county's carbon dependency in response to the need to mitigate and adapt to climate change and peak oil
- * Support of research and production within the county which helps develop local effective alternative energy supplies and energy saving products in order to encourage a move away from oil based fuels and in order to create local "green collar jobs"
- * Collaboration with communities to ensure resilience in weather related events and the consequences such as flooding, water shortages, snow and severe storm episodes

Laois county Development Plan is one of the first to include references to Peak Oil (2011 draft plan) but with oil prices likely to rise by 30% in the next three years, from 1.45 per litre to €2 per litre according to Fatih Birol, chief economist to the International Energy Agency, this opportunity to be preparing new plan for Wicklow now, should be welcomed. An audit of available renewable resources is a first step and could be inserted as an objective to map this.

END August 2011

Wicklow Planning Alliance is a network of groups and individuals around the county who have been drawn together by a shared interest in planning issues that have threatened their home towns. This submission has been drafted by several members of this group, however all correspondence can be directed to

Judy Osborne St. Patrick's Valley. Wicklow

Index

1. Review of existing plan

2. Vision Statement

3. Population and housing

Over zoning

4. De-zone isolated sites

Phase zonings

A range of property styles

Serviced sites

Housing needs of older people

5. Sense of place

Permeability and connections

Grey water, district heating and well insulated homes

Economic Development

Return to growth unlikely

Wicklow Town will remain predominantly a commuter town

6. Improvements in bus routes

Suitable sites for car pools

Industry v tourism in coastal location

Restrict height, noise and light of future development on the Murrough

7. Architectural conservation area

Retail

Whitegates is not an appropriate site for retail

Resist the development of big box superstores

8. Additional floor space exists within town centre

9. Neon signs and totems

Empty shop windows, street clutter and unnecessary signage

Community infrastructure and Green Infrastructure

Map green infrastructure

10. 3D models

Greenways

Rights of Way and looped walks

12. Coastal Strip

13. Location of sports pitches

Agriculture

Soil maps

Temporary use of undeveloped land for community gardens

14. Anaerobic digestion

15. Tourism and cycling

Cycling tourism accounts for more than golfing holidays

Map existing cycle lanes and safe routes

Catalogue attractions that are accessible by public transport

Pedestrianisation and shared space

Shopmobility

16. Local travel information and personal travel plans

18. Mobility plans and workplace travel plans for local council

Energy Descent plans

Climate change and peak Oil

19. Audit of renewable resources

Some of the inappropriate advertising
Signs in Wick low Town





No. 33

Leonora Earls

From: Susana Costello [susana@wicklowchamber.ie]
Sent: 26 August 2011 12:28
To: Wicklow Town Plan Review
Subject: Submission of Wicklow Town & Environs Development Plan 2013- 2019
Importance: High

To Whom It May Concern:

Please find attached herewith submission for the Wicklow Town & Environs Development Plan 2013- 2019 made by the Development Committee of the Wicklow Town & District Chamber.

I would be obliged if you could confirm receipt of email.

Yours sincerely,

Susana Costello
Chamber Executive
Wicklow Town & District Chamber

Wicklow Enterprise Park
The Murrough
Wicklow Town
Tel: 0404 66433
Fax: 0404 66464
susana@wicklowchamber.ie
www.wicklowchamber.ie



acknowledged

A combined LAP for Wicklow Town, its Environs and AA6 offers an opportunity to integrate the planning of the environs area in an integrated manner. The amalgamating of the three LAPS is strongly welcomed by the Chamber.

This plan is possibly the most important plan yet prepared for the town as it must facilitate the development of the Town to fulfil the role identified for it in County, Regional and National Strategies.

This plan needs to encourage development in order to facilitate and promote the expansion of the town to fulfil its designated role for the betterment of its population. With the considerable investment made by Wicklow County Council over the last few years in roads and services in and around the town the Council too needs to see a return on its investment.

Wicklow Town is the County Town of the Garden of Ireland; it is the seat of local government and centre of administration for the County. Wicklow Town is located at the intersection of high quality road, rail, and sea transportation and so is well connected nationally and internationally. Wicklow Town is defined as a Primary Development Centre in the National Spatial Strategy, as a Large Growth Town 1 in the Regional Planning Guidelines for the GDA and as a Level 2 Major Town Centres & County Towns in the Retail Strategy for the GDA. All of these plans seek to achieve a population horizon of 25-40,000 inhabitants. This LAP plan must facilitate the development of the Town to fulfil the role identified for it in the National Spatial Strategy and Regional Planning Guidelines for the GDA.

Vision

Vision Statement for Wicklow Town

Wicklow Town is where history, hospitality and natural beauty come together to form a community that is proud of its past and excited about its future.

In the Chamber we would like to see Wicklow Town and its Environs develop into a strong self-sufficient, sustainable and vibrant town. A Town capable of providing for the needs of its local population and the surrounding area by fostering a location that delivers sustainable employment, recreation, education and a quality of life that is second to none. We need to establish what we value in the Town for preservation and to encourage new development consistent with those values and to deliver the infrastructure required to realise the Vision and to service a potential population of 40,000 (National Spatial Strategy 2002 - 2020). As a large growth town it should grow to have the critical mass to be largely autonomous and provide a range of functions and services.

Within the GDA Large Growth Towns have a key role to play.

"They are important centres for the delivery of Public Services, with hospitals, Courts, Local Authority and Civil Services offices located within the town, alongside IDA promoted companies, high order retail businesses, supported enterprise centres, and active Chambers of Commerce providing a strong commercial hub within the town and environs" (Regional Planning Guidelines for the GDA 4.6 Defining the Key Elements of the Strategy, Large growth Towns Pg 73)

To make this strategy a reality the Town needs to firstly hold on to what it has, its Public, Local Authority and Civil Service offices, it needs to address the main street and support retail and business in the centre of the Town. At the same time there is the need to expand the offer with high order Retail, Shopping Centres and Retail Warehousing along with leisure facilities including a Multiplex Cinema, a Theatre, Community Halls and Sports Facilities. All of these are needed to support the current population and attract the new. At present the loss of spend to centres in Arklow and Dublin is crippling many of the retail businesses in the town centre.

We have four Industrial Parks in the Environs and planning granted for at least two more. Clermont Campus has huge potential for growth in education enterprise and innovation, and the Vision that was prepared for the Campus needs to be progressed ASAP.

Private Sports Clubs and Arts groups have long been the unsung heroes of the town providing much need outlets for our young and not so young residents. These organisations need to be supported and helped to grow so that they will be able to service the larger population. The Town needs a hall or civic centre and to cater for and display its Art and Theatre groups.

The Local authority, along with the community recognize that the future prosperity of the Town depends on protecting these assets through encouraging residents and welcoming visitors and business to the town and to become participants in the development of this vibrant hub for business, residential and recreation.

The prompt return of the Circuit Court to the Town needs to be the number one priority. This is a huge loss to the reputation and status of the town and also is an avoidable loss of revenue.

While development pressures are unlikely to be as intense as in the past the development plan offers an opportunity to go beyond traditional zoning maps and to design a town which promotes itself as a progressive, vibrant county town serving the social cultural and economic needs of the local population and the hinterland.

Towards the latter end of the "Tiger" years WCC set about redressing the lack of services in and around the Town and to their credit they have invested approximately 200 Million in much needed services in the form of roads, waste water treatment and water services. Wicklow Town & District Chamber of Commerce welcomes this investment and would look to support the Council in getting a meaningful return for this investment. This LAP provides an opportunity to set in motion the ground work for a vibrant Wicklow Town of 2020.

Implementing the Vision

The Local authority and community must recognize that the future prosperity of the Town depends on protecting and developing its assets through encouraging residents and welcoming visitors and business to the town and to become participants in the development of this vibrant hub for business, recreation and dwelling.

In order to implement the vision we contend that there is an opportunity with the combined plans of Wicklow Town and its environs to develop a design led plan to meet the social economic, cultural and recreational needs of its citizens and that the form this plan should take is that of a Master Plan developed through engagement with the citizens of Wicklow.

Zoning

Wicklow County Council has invested heavily in infrastructure in the Wicklow Town environs and will need substantial investment to justify this expenditure and to get a return in the form of levies and rates. The expansion of the rates base by attracting business into the environs needs to be a priority.

It is the Chamber's view that the current zonings are generally good and allow for the Town to develop in line with its stated strategic role as a "Large Growth Town 1" as part of the Greater Dublin Area. The current lack of water to certain areas will in effect result in a natural phasing of the lands.

The current plan is dependant of a zoning matrix which can be seen as a disincentive for development. In the review of the development plan the zoning matrix should be amended to facilitate greater integration of compatible uses. As commercial activity has become more technologically and service oriented, the need to separate functions has diminished. With this change in the nature of work, the opportunity to mix uses is presented to encourage live-work units, mixed use communities which are more sustainable in economic and environmental terms and create vibrant communities.

Retail

Within the Wicklow Town Environs can be broken down into three main areas. Firstly is the Main Street which should be considered as a "natural" shopping centre; however it lacks an anchor tenant, particularly at the south end of the town. Retail development should be permitted to expand from the commercial heart of the town which is the Main Street and the assembly of sites to facilitate the development of a larger footplate retail development at the southern end of the town should be promoted in order to increase the footfall on the main and side streets. The South Quay is the logical extension to the Main Street and could include new connections and car parking.

Rathnew Village has a number of local shops which provide for local needs. While there is some need for an increase in retailing there the emphasis has to be on local needs for the village so as not to dilute the importance of Wicklow Town.

The Lands at Marlton, the subject of a major planning application for the provision of high quality retail, office, community and leisure facilities which regrettably was refused planning are the lands

identified in the Wicklow Town LAP, the AA6 LAP, and the County Development Plan as the location for the expansion of large scale retail and other uses. These lands are located close to the town centre and are very central to the zoned lands around Wicklow Town. They are well serviced by roads and adjacent to the TRR. It would seem good long term planning to maintain these lands to provide for the future growth of the town.

Housing design and development

Housing development should be based around traditional neighbourhood developments; they should be permeable walkable neighbourhoods with community facilities available within reasonable walking distances. In order to promote sustainability commercial uses should be permitted within residential areas where they do not cause nuisance to residential uses.

To facilitate better design of residential areas, housing "standards" are not appropriate to an area as wide as the local area plan covers. "Standards" produce uniform standardised solutions but there is however an opportunity to propose housing or development guidelines or design codes based on character areas or an urban transect from the Town centre or village core in the case of Rathnew to the urban edges. These design guidelines should be prepared for existing character areas within the Town and the 1987 Wicklow Town Plan sets out good guidance on characters areas within the town and these principles could be applied to other existing and new development areas in the local area plan. Appendix A

The use of design codes or design guides is compatible with a Master Plan be prepared for the environs area, and much of this work can be extrapolated from plans already in existence in the environs area.

Transport

In order to facilitate sustainable development, residential density appropriate to the proximity of public transport is appropriate. The public transport network in the town and linkages with Rathnew, Ashford, Glenealy and the Brittas Bay area to the South and to the iconic tourist attractions to the West is poor and needs to be improved. Engagement with local and state transport providers to service the local population and its catchment area needs to be encouraged.

Tourism and Recreation

Wicklow Town enjoys an attractive built and natural heritage, both of which are under exploited. There are enormous opportunities to develop and rehabilitate the historic core of the Town centre by encouraging building owners to implement the Wicklow Town Shopfront Guidelines and the Public Realm plan both of which should be incorporated into this development plan. Accessibility to the public spaces of the Murrough, Broadlaugh, cliff walks, river walks can all be developed for recreation and education, and the Greenways proposed in Vision 2000 prepared by Wicklow Chamber of commerce gives good guidance here – See appendix B and was further re-stated in the Wicklow Town Public Realm Plan.

The Town should become a tourism and recreation hub for the hinterland of the town and for the county, consistent with the objectives of Fáilte Ireland. To that end the town requires additional accommodation for visitors and this should be provided in a variety of forms. Hotel, and bed and breakfast accommodation should be encouraged in proximity to the town centre and a campsite within walking distance of the town would serve one element of the tourism market and this should ideally be integrated with other recreational facilities such as municipal sports fields. More detailed proposals related to cycling and walking routes is included in Appendix A.

Commerce

Apart from retail, Wicklow Town should capitalise on its advantages of being close to national and international road, rail and sea transport links with a rural hinterland facilitating food production, processing and export. Wicklow also has a high quality fibre optic cable passing along the railway and this could be exploited by industries requiring high quality and capacity data usage.

Port

Wicklow Town has a wonderful maritime location, it is a coastal community in the garden county and is the county capital with primary growth status and the new plan must acknowledge the unique character and geographic location.

It should be remembered that the town of Wicklow originally grew around the port area. Wicklow Port is an important part of our local heritage and has always been important in terms of generating economic activity, providing employment and promoting maritime leisure.

The commercial port has always had an excellent reputation for efficiency and turnaround of vessels. It is important that activity in the port is encouraged and developed both in commercial, tourism and leisure terms.

The new port access road has removed the need to move heavy traffic through the main street and the use of the new access route should be promoted in order to encourage more activity within the port area. More activity will result in more employment which in turn will result in greater local economic activity within the town.

The port should be seen as a source of potential revenue (commercial, leisure & tourism) which will ultimately benefit the town and support local businesses. Wicklow needs to look outwardly to the sea for additional growth and its tremendous coastal location should also be seen as a valuable asset.

With the development of the port access road comes the opportunity to extend or relocate commercial port activity adjacent to the newly developed transport links to the N11 and this would serve to protect the Murrough from coastal erosion and protect the vulnerable railway line. In preparing the LAP consideration should be given to facilitate such development in the future.

Earlier county development plans have identified the need for a Ro Ro service to be located in Wicklow. This is the correct location and with encouragement from the local authority such a facility is definitely achievable.

Provision of Infrastructure

As previously stated, considerable expenditure has been invested into the Environs and the benefits of this investment are plain to see, roads being the most obvious. The WPA&TRR have created great opportunities for the port area and all the lands to the west of the town.

The Rathnew bypass is very important to remove much of the passing traffic from the village.

The Rocky Road badly needs to be upgraded as far as the Ballinabarney Interchange as this road is now the quickest way to get to the Town Relief Road and many areas to the west of the town without going through Rathnew and all the traffic lights.

The standard of footpaths throughout the town is very poor and needs to be addressed as a priority; every time a contractor digs up the footpath it is returned in an even poorer state.

The completion of the link road between the Marlton Estates and the TRR is a relatively small job that really should have been part of the Road project.

To gain full advantage from the development of the TRR a new road needs to be constructed to connect the Marlton Road with Blainroe thereby creating a ring road all the way around the town and reducing passing traffic in the main street.

Drinking water

The provision of the Ashtown Tank needs to be a prioritised as this is needed to provide the whole Town with sufficient water pressure. It can also allow for the extension of mains water to peripheral areas such as Brittas Bay where the residents are as far as we are aware experiencing difficulties with the quality of the water in their wells. When the levies are reviewed this needs to be included along with the connection to Brittas Bay.

Clermont

The Clermont Campus is one of only three sites in the country identified for support from the Oireachtas Enterprise Committee and the Vision that was prepared for the Campus (with input from the Chamber) is a road map for the development of a centre for Innovation, Enterprise and Education. The Campus and surrounding zoned employment lands offer great potential for the future development of the town and its environs.

As a local centre of Third Level Education and with its connections with IT Carlow the Campus has great potential and the new plan needs to support this potential.

Engagement with the planning process

From a review of the 2009 planning statistics it is apparent that the implementation of planning and development does not function as well as it might. Wicklow Town and district Chamber would like to engage with the local authority in the planning process to make this plan for the future development of the County Town a model for sustainable, vibrant development.

Appendix A

TOURISM AND RECREATION IN WICKLOW TOWN AND ITS SURROUNDING AREAS

Wicklow is seaside resort that is also the county town stands on the lower slopes of Ballyguile Hill. Wicklow town is surrounded by mountains, lakes, rivers, sweeping hills, woods and forests and of course the sea. It overlooks a wide bay fringed by a crescent curve of coast. Pebble beach runs for 12 miles (19km) north of the town offering the delight of undisturbed walking, cycling, bird watching, beach combing and swimming.

Wicklow Town and its surrounding area have all the ingredients to be transformed into a centre of Tourism and outdoor activity.

It is the aim of this document to highlight the potential to transform the area into a hub of outdoor activity, if utilised and developed the following areas have immense potential to make Wicklow Town a must to any tourist visiting Ireland.

Some of the following activities are already in place and some could be developed around Wicklow Town and the surrounding area. If they are developed it would increase not only the number of tourists visiting Wicklow but also add greatly to the quality of life for its residents:

- Walking and cycling trails
- Dedicated Leisure and commuting Cycling Trails
- Mountain Biking Trails
- Sea and River Kayaking
- Camping walking distance to Wicklow town
- Sea and River Fishing
- Boat hire
- Surfing
- Forrest Parks
- Adventure Parks
- Beaches
- Golfing
- A Town Park/open space within Wicklow Town

Walks/Cycle trails:

As per the GDA Draft Transport Strategy for 2011 to 2030, Recreational cycling facilities are a major benefit to people's health and wellbeing and are a good way of introducing people, especially children, to cycling, this also would support the growing cycling tourism market in the region.

It is the intention of Wicklow Town Chamber of Commerce to propose that a cycle track be included in part of the GDA plans for the future.

We are proposing that a leisure and commuter cycle trail that would also (the Wicklow Trail) be constructed linking surrounding towns, tourist attractions, schools, colleges, beaches, hotels, forest parks and recreational areas. The Wicklow Trail will run through the countryside, along rivers and coastline meandering past many places of interest. Wicklow Town is the heart of the Garden County and is surrounded on all sides within a circumference of 10-20Km with some of the country's most beautiful attractions.

We propose that possibly three trails could be introduced running North, South and West. Each trail would link all areas of interest as runs through the country side.

Currently there are a number of nature walks within the Town, such as the Murrough coast walk and Black Castle to Wicklow Head, however access is poor and these are mostly only known through local knowledge and used mainly by local people.

The trail along the Murrough has great potential and possibly could be easily transformed into a potential walking and leisure cycling trail possibly as far as Newcastle, Kilcoole and possibly Greystones. Currently the trail begins to get narrow and becomes impassable by bike once past Knockrobbin.

Wicklow has some of the most breathtaking scenery in Ireland, it is the intention of Wicklow Town Chamber of Commerce to showcase its surroundings to the full. We believe that by introducing the Wicklow Trail, it will be of great benefit to the town and surrounding area.

The trail will benefit the tourist industry, business in the area and also the people living and working in the area.

Mountain Biking Trails:

Currently there are purpose built Mountain biking Trails in Ballinastoe in Roundwood and Carrick Woods in Gleanealy. The existing trails have a large amount of users every day with racing events taking part throughout the year. With the ever increasing number of mountain biking cyclists we see a large amount of potential in this area.

Sea and River Kayaking:

With the Sea Cliffs running north and the Murrough running south within close proximity from Wicklow Harbour there this activity is already in use with Kayak hire available for a local business in Wicklow Enterprise Park.

Camping walking distance to Wicklow town

Currently there are a number of very successful and busy Campsites in the County of Wicklow; however there is no campsite within close proximity to Wicklow Town. Camping Holidays are on the increase for young and old and we foresee this as a great opportunity to bring a large amount of visitors to the town.

Sea and River Fishing

Currently the Seas and Rivers around Wicklow Town are popular for both commercial fishing and leisure angling clubs.

Surfing

Currently there is a beach just a few miles from Wicklow Town that is famous within the surfing community as one of the best beaches for surfing on the East Coast of Ireland. The Beach is used by a large number of surfers that travel from miles around. There is great potential to develop a surf school and centre for surfing for the East Coast.

Forrest Parks

Wicklow is famous for its Wicklow Way and forest parks and there are currently a large amount casual walkers currently utilising walks throughout Wicklow, and if Wicklow Town is developed as the centre of outdoor activities tourists visiting Wicklow for its walks could use Wicklow Town as their base.

Boat hire

With increased tourist visitors to there would be good potential for chartered fishing boats and small boats from Wicklow Harbour.

Adventure Parks

With increased visitors to Wicklow, there is a potential to develop an outdoor adventure park with Climbing Walls, Zip Wires, abseiling, etc.

Beaches

Within a short distance from Wicklow is one of the most popular beaches in Ireland. Brittas Bay is located just 5 miles from Wicklow Town, and if the Wicklow Trail South is provided could be a short spin on the bike for both tourists and locals.

Golfing

Wicklow is a top golfing destination featuring world class links courses and stunning parklands. There are currently more than 25 golf courses through the county of Wicklow to suit all levels and all budgets.

With the success of the Irish Golfers in recent years, all eyes on the world's golfing community is looking at Ireland and now is the time to promote Wicklow as a top golfing destinations.

Open Public Spaces:

Currently there are very few public open spaces where the people from Wicklow town can gather and spend leisure time. There are currently a number of locations that could be utilised and developed as

The sheer beauty of both the cliff area and the Murrough add significantly to the quality of life in the area. It is incumbent upon the present generation to realise the benefits and value of open space and ensure its safeguarding for future generations. It is now generally understood the environmental quality of life in a town has considerable impact on the potential economic development of an area. The Happiness Index is acquiring increasing acceptance as a valuable indicator. However, there are also health impacts that affect both quality of life and economic factors.

The following elements are to be considered when investigating the quantity of public open green spaces:

- A space for communities to meet and interact
- A place to exercise
- A place to relax
- A pleasant visual experience
- A barrier to reduce environmental noise
- A filter to improve air quality

The potential areas that to be considered when considering open spaces within the town of wicklow are as follows:

- The Murrough
- The Black Castle
- Marlton Park
- Abbey Grounds
- River Walk East Bank
- River Walk West Bank

No.324

Leonora Earls

From: Bernadette Harvey
Sent: 24 August 2011 12:13
To: Wicklow Town Plan Review
Subject: FW: Wicklow Town & Environs Issue Paper

-----Original Message-----

From: Patricia Reilly
Sent: 24 August 2011 11:54
To: Bernadette Harvey
Subject: Wicklow Town & Environs Issue Paper

Hi Bernie,

Please find attached a submission from C&E on the Wicklow Town & Environs Issues Paper. In the main the observations are from local community groups (these groups are listed at start of document).

Hope that's all ok.

Regards,
Patricia



acknowledged

[Signature]

24/8/2011

**SUBMISSION ON ISSUES PAPER
OF
WICKLOW TOWN & ENVIRONS DEVELOPMENT PLAN**

This submission incorporates the views of Wicklow Child & Family Project (Wicklow town), Co. Wicklow Partnership (Community development officer for Wicklow town), Rathnew Community Development Project, Co. Wicklow Older Person's Network, Community & Enterprise Section WCC.

A. Vision for the Area

(i) What kind of town should Wicklow be in 2022?

No Responses

(ii) What in your view is the role of Rathnew in the wider settlement?

Responses:

- The new Plan should recognise that there are huge differences between Rathnew and Wicklow town. Rathnew is an old village with a very distinctive heritage, identity and community spirit which should be preserved. It does not consider itself to be part of Wicklow town although it is joined by roads and new housing.
 - The Plan should also recognise that there are huge socio-economic disparities between Rathnew and Wicklow town. When one looks at the statistics for the area as a whole it appears relatively affluent. However, this masks the high level of deprivation which exists in the area, especially in Rathnew which is an unemployment black spot.
 - Rathnew provides the area with choice and employment through the business parks and services provided in Broomhall.
-

(iii) What kind of opportunities and facilities will the settlement need to fulfil this vision?

Responses:

- As Rathnew's deprivation indicators have not changed since the early 2000's it is vital that the village engages with its young people in a meaningful manner to break the cycle of early school leaving. We need support to develop a youth dedicated space (one that encompasses all young people and doesn't just pigeon hole those at risk). Ideally a youth cafe that welcomes all youth and stands out as being inclusive. This could be a house or a dedicated space (if possible in the New Community Hall). Although it is acknowledged that it may not be possible to have it in the new hall as this facility will be servicing every group in the village.

- There are public transport access problems with facilities in Rathnew. All new services and businesses should be easily accessible by public transport.
-

(iv) What are the strengths/weaknesses of the newer residential developments in Wicklow town and Rathnew?

Responses:

- The communities in the newer residential developments can be a challenge for Rathnew's Community Development Project to engage with under their social inclusion objectives. However, the Community Development Project consider this to be a priority as they want to encourage cohesion in the community and prevent fracturing as has happened in Clondalkin, Tallaght and Bray in the 80s and early 90s. This new community could be used to bridge the divide between Wicklow Town and Rathnew as they have not been exposed to the historical precedent of being deemed second best due to lower earnings and education levels.
 - Educational achievement/educational levels are a strength of the residents in the newer residential communities.
 - Lack of common ground between the old and new community is a weakness.
 - Southbound public transport routes (to Rathdrum, Arklow and beyond) are inadequate. Transport is the area of biggest weakness in the town. Public transport affects everything, particularly as the housing estates spread outwards and away from the town. A local shuttlebus service would address many accessibility issues.
-

B. Community Facilities

Q1. What type of community facilities and local services are needed in new and existing residential communities and within the town?

Responses:

- Work on the parochial hall and assembly hall is a welcome development. If the buildings are used to promote maximum participation by all members of the community they will address many issues for many groups.
- However, the limited size, layout and therefore capacity of these halls was also noted. It was therefore suggested that given the size and diversity of the area's population an additional, much larger, modern, fit-for-purpose community centre is also necessary for the town, particularly one that would cater for the needs of community development type groups.

Community facilities should be:

- Multipurpose
- Inclusive to all members of a community
- Cater to all age groups
- Ensure they have disabled access
- A main community centre should have space for various agencies in the town to provide outreach services e.g. on a youth evening youth organisations could have access to rooms to offer or provide identified support to young people.

Dedicated community hubs e.g. Council houses used as community spaces in local authority estates to encourage activities managed and directed by the community.

Wicklow town and environs has a lack of community childcare facilities (not-for-profit).

- As the population of both settlements continues to grow there is increasing pressure on the sporting and playing facilities in the area to be enhanced and preserved. In particular there is a demand for boxing club facilities in both Wicklow town and Rathnew.

Also demand for "softer" activities and facilities e.g. badminton and table tennis.

- An area should be zoned in the plan for a Wicklow hospital – a 50 bed facility to replace the one which closed this year. This could be on the lands proposed already by Wicklow Town Council members.

Retail:

Many residents are going out of Wicklow to shop (mainly to Arklow and Dundrum). A large multiple such as Penneys would be a huge addition to the town and would act as a draw for outsiders to visit.

Q.2 Where should new facilities be located?

Responses:

New facilities should be easily accessed by all the community. They should be centrally located- maybe on bus routes- not in isolated areas.

Some facilities should be located near social housing areas.

Council houses could be used as community spaces in local authority estates

Q.3 How can local residents and community groups be encouraged to engage in the planning and delivery of community facilities in their area?

Responses:

The importance of continuous and open consultation with local communities was stressed. Involve local residents and communities from the very start with open meetings, questionnaires etc. Make them feel that they are being consulted with properly and being heard, and that their opinions are being respected and acted upon. This prevents communities feeling they are just being paid lip service.

Another suggestion is that if there are specific areas or pieces of land that are to be developed then meet the community at these places (where possible). This makes it easier for people to envision the new development.

Keeping people informed of (proposed) developments and providing regular updates may encourage interest and consequently participation.

Set up supported local community forums that are non-political and are not affiliated to GAA, FAI etc. Support these structures with small grants for combating exclusion and for diversity training.

Q.4 What type of additional sports and recreational facilities would you like to see?

Responses:

Skateboard park - Cycle track - Open play areas - Picnic areas.

While people are aware that there is a playground in one area of Wicklow town this is not easily accessed by all members of the community so perhaps where possible there should be more than one facility of a particular type located in different areas.

In addition, even though the Wicklow area is well resourced with regard to sports facilities such as rugby, tennis etc. in some people's experience not all of the local community has access to these facilities due to very limited finances.

- The town needs a comprehensive community sports and recreational facility similar to the Charlesland Sports & Recreation Park in Greystones i.e. different types of outdoor courts (soccer, tennis, basketball, MUGA), playground, skate park, running track with sports field and a modern building containing changing rooms, offices/meeting rooms.

County council to make land available for more community gardens or allotments. Allotments/community gardens can be particularly beneficial in terms of building the capacity of local communities and for working with disenfranchised men etc. This applies to both Wicklow town and Rathnew.

Any new schools should be obliged to follow the "Fingal Model" of shared campus-style facilities i.e. that the school's sports facilities, libraries, halls etc. are shared with the local community.

Additional Issues;

Social Housing:

The process of allocating social housing should take into consideration not keeping all people in need of social housing in defined areas. Sometimes better integration within other residential areas may stop some of the cyclical problems that keep recurring within social housing estates.

Safe Pedestrian Routes:

Applications for new schools or works at existing schools should be conditioned with the development of a school travel plan.

http://www.nationaltransport.ie/downloads/archive/safer_routes_to_school_2005.pdf

- Children's mobility: It should be acknowledged that children and young people are one of the main users of pedestrian routes. Therefore the pedestrian routes system should be as comprehensive as possible and be designed to be as safe as possible.

National Guidelines:

The new Plan should acknowledge the DoE Guidelines "Quality Housing for Sustainable Communities," the "Guidelines for Sustainable Residential Development in Urban Areas" and the Dept. of Education's "Provision of Schools and the Planning System" guidelines.

[Ends].

No. 35

Bernadette Harvey

From: Ian McAulay [IanM@mcaulayrice.ie]

Sent: 26 August 2011 12:04

To: Wicklow Town Plan Review

Subject: Revised Density proposals for Site at Wentworth place.

Please find attached letter and map for the Wicklow town plan submissions

kind regards

Ian McAulay

MCAULAYRICE architects

For the Attention of :

The Administrative Officer
Planning Section
Wicklow County Council
Station Road,
Wicklow Town.

Date 26th August 2011.

Dear Sir/ madam,

Please find enclosed application for increased density/ relaxed densities for existing Town Center site at Wentworth Place. The application is been made By Mr. Patrick O Toole,

The reasons for our submissions are as follows.

The Site is currently zoned town center and already constructed. The previous development plan required a mixed usage on site -As such apartments, offices and two small commercial units were granted permission. The current status of the site requires the maintenance of the office block unit.

However with the current downturn and an abundance of office spaces available both within the town center and the surrounding areas the need for office space has now diminished greatly. The applicant is now asking the council to consider allowing a higher density residential provision on this site.

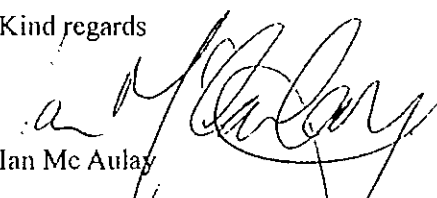
The site is predominantly apartment. The existing tenants have indicated there preference for these existing office units to be used as residential rather than offices .

The advantages in this case would be the reduction in the demand for parking on site.

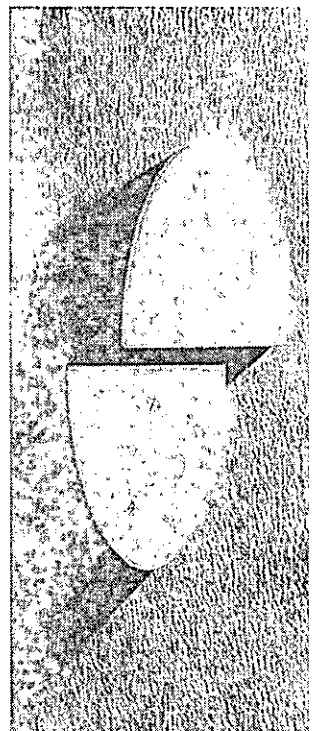
The issue of open space cannot be addressed but areas within the town center have and are been granted permission for full site coverage.

In addition to this a part of the site area was lost to allow for the necessary road improvements for sight lines to the junction with Church Hill. With Plot ratio,site coverage ,parking, usage all complied with the applicant is requesting that considering the above and the current down turn and requirement for office space that within the development plan some flexibility could be given within the new plan to convert existing granted units that are not in demand to different usage without the need to fulfill all requirements of the plan.

Kind regards


Ian Mc Aulay

on behalf of Mr. Patrick O' Toole.



First Floor,
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Co. Wicklow.

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email:
mcaulayricearch@eircom.net

Surveyed 1960
Revised 2008
Levelled 1979-1990

Urban PLACE Map



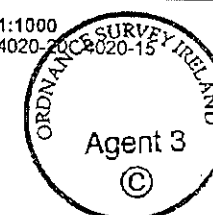
ITM CENTRE PT. COORDS.

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DESCRIPTION

MAP SHEETS

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Produced by University College Dublin,
Rathview, Dordkagh, Dublin 14
On behalf of Ordnance Survey Ireland,
Phoenix Park, Dublin 8.

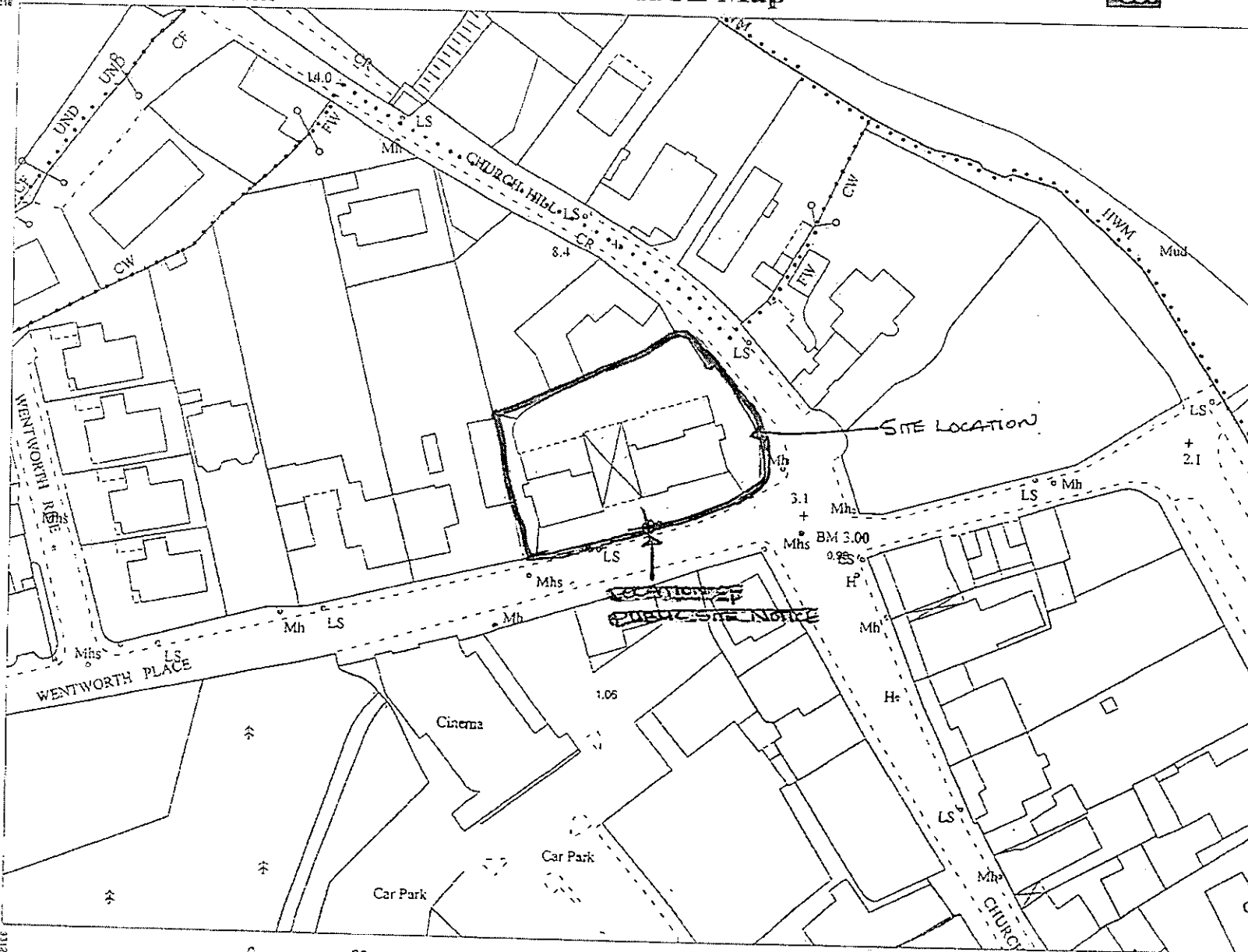
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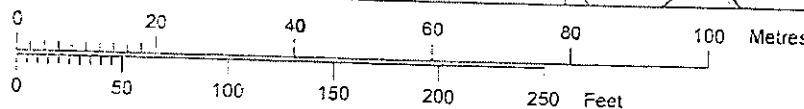
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KD/P-02



Scale:- 1:1,000
Scála:- 1:1,000



Plot Ref. No. 1360705_1_6
Plot Date 20-APR-2009

Bernadette Harvey

From: Hilary Hamilton [hilary.hamilton@esatclear.ie]
Sent: 27 August 2011 13:04
To: Wicklow Town Plan Review
Subject: Pre draft submission to the Local Area Plan for Wicklow and Environs



wicklow LAP draft
traders subm...

As an independent trader in Wicklow town I know that business is very vulnerable to the ongoing recession. In order to maintain market share and remain viable a number of factors, within the remit of a development plan, are vital:

1. It is important that Wicklow retains its unique character to draw in both local shoppers and visitors. The character is made up from the historic style of architecture, the layout of streets and laneways, the attractive nature of the natural environment etc.
2. These aspects can be protected in a development plan however the past plans have failed us. New development along Abby Street / Main Street has been out of character, and neon shop signs abound. The new plan should be drafted so that the objectives outlined in the plan and the Public Realm Plan can actually be achieved.
3. The town is also characterised by the maintenance of independent stores offering a very wide range of goods and services. These shops can not survive against the competition of multi nationals developing combined comparison and convenience superstore/hypermarkets on the edge of town with the considerable competitive advantages of preferential access to the local road network and free car parking. It was a shock to see such an application granted by the Planning Department against all the evidence that this would seriously damage the town. The new plan should make it clear that such applications will not be approved in the future.

I would be pleased to be informed of future developments in the preparation of this plan.

Hilary Hamilton
Bridge Street Books, Bridge Street, Wicklow.
ph: +353(0)404 62240
www.bridgestreetbooks.ie

Hilary Hamilton

By email to: wicklowtownplanreview@wicklowtc.ie

Pre draft submission to the Local Area Plan for Wicklow and Environs

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