

Part 4.3 Public Submissions

Part 4.3.1 Vision & Core Strategy

Name	Issue Raised
Ashford Development Association (C1)	<ul style="list-style-type: none"> • Ashford should be designated a village. • Bray and Greystones have good transport and can absorb high growth. • Wicklow-Rathnew has moderate transport and can absorb moderately high growth. Arklow could grow but poor transport links to Dublin. • Need to find places with rail not road transport.
Wicklow PPN (C2)	<ul style="list-style-type: none"> • Change title of CDP to County Sustainable Development Plan • Enterprise, employment and recreational facilities and services should be provided at local level. • Stop scattering zoning like confetti and instead grow a critical mass in Wicklow town so that people turn around on the N11 and travel south for work.
BirdWatch Ireland (C3)	<ul style="list-style-type: none"> • In relation to town and village development, appropriate planning supported by excellent public transportation is critical. Bray is identified as key town in the EMRA RSES yet it is choking in traffic on most days which impacts on quality of life as well as air quality. • Wicklow County Council must address the issue of car-focused development in the county and to enable a move to much greater use of public transport and cycling.
Keep Ireland Open (C16)	<ul style="list-style-type: none"> • Take into account other county plans in the Eastern Region including Louth and Meath. • Request that the Plan fully complies with all relevant provisions of the RSES Eastern & Midlands.
Wicklow Planning Alliance (C17)	<ul style="list-style-type: none"> • Submission is guided by the NPF, NDP and RSES. • If Wicklow’s new County Development complies with and delivers the objectives set out in the National Strategy then it will enable Ireland to qualify for capital funding under the Green New Deal published by the President of the EU Commission. • County Council should inspire pride in the County. • We want our educated youngsters to come back home to live and work in County Wicklow instead of being stuck in long congestion on the N11 trying to get to work in Dublin. • Need a concentration of jobs in the two towns identified in the National Strategy as Wicklow’s Key Towns, Wicklow town and Bray. • The National Strategy requires a radical alteration to the settlement hierarchy contained in the current Development Plan. The designation, place and hierarchy given to Bray, Wicklow, Arklow, Greystones, Newtownmountkennedy and Blessington in the current Development Plan require amendment. • The revised population growth target of 164,000 for county Wicklow should be reduced further if it is decided that Bray should get its figures for population growth from the metropolitan area and not from the figure of 164,000. • Only those towns and villages that have capacity in their existing built-up footprint and available underutilised land, brownfield sites and available infill space should be promoted for population growth. • Greystones- Delgany is not a key town or a self sustaining growth town as it is not a large economically active town, does not have good transport links and has a weak employment base. • Greystones- Delgany does not have the capacity to sustain more housing growth because its employment base and public transport infrastructure is very weak. • The level of housing development in Delgany in particular has not been matched by

	<p>adequate infrastructure and services.</p> <ul style="list-style-type: none"> • Delgany - Public transport is very weak and we lack a public realm and a public green space. The traffic congestion in the village is not consistent with Healthy Placemaking or Climate Action. • Delgany - The recent housing development has not created any Economic Opportunities. • The service shortfalls in Delgany include public parks, public cycle paths, public footpaths, bus services and jobs. Delgany has lost its sense of place and destination. New school places follow too slowly behind new housing; this causes great stress. • To make our towns more self-sustaining we must create walkable communities and stop spilling large numbers of commuters onto the N11 seeking work in Dublin. Instead, we must send our workers to the Key towns in the County as defined by the National Strategy.
<p>Delgany Community Council (C19)</p>	<ul style="list-style-type: none"> • The NPF has designated Bray and Wicklow-Rathnew as growth towns. Any increase in population should be focussed in these towns. • The revised population growth target of 164,000 should be reduced further if it is decided that Bray should get its figure for population growth from the Dublin metropolitan area. • Bray is a large urban town with employment as well as reasonable transport links. Those transport links will be further enhanced if the Bus Connects plan is realised. Bray DART station has been identified as a bus hub. • Delgany has experienced rapid growth in the last 2 years without an accompanying provision of community facilities and transport links. • Delgany has been treated as part of the greater Greystones/Delgany area even though these places have distinct separate identities. Delgany and Greystones should be considered separately in the Plan as they are totally different in terms of infrastructure and heritage. • The Greystones/Delgany area exceeds its ability to cope and should be prioritised in terms of provision of better public transport, additional local employment as well as additional community services. The largest employer in the Greystones/Delgany area is probably the Department of Education through the 10 local schools. • The most appropriate designation for Delgany is as a self-sustaining town as defined in the RSES. • Any future large developments should have a special condition of a contribution towards the upkeep of the Village of Delgany. This payment should be collected by WCC and handed over to the local community. • In order to ensure towns are self-sustaining we require: Local employment, excellent transport links, community facilities (sporting, cultural, heritage, amenity) local allotments, open spaces. • Compact growth can be delivered in towns and villages by ensuring that any development takes place within the existing footprint in order to avoid semi urban sprawl which is both unsightly and difficult to service with public transport.
<p>Bray Head Residents Association (C23)</p>	<ul style="list-style-type: none"> • It is noted that the Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly identifies Bray as a Key Town. • It is further noted that the Regional Policy Objectives RPO 4.26 and 4.27 are premised on a significant proportion of future urban development being accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth. BHRA considers that this future development, including meeting the requirement that 30% of all new homes be delivered within the existing built-up footprint of settlements, should be undertaken in a manner that protects and enhances the residential amenities of

	mature residential areas.
Blessington & District Forum (C28)	<ul style="list-style-type: none"> • Blessington is designated a moderate growth town and population growth should take into account the town’s location on the periphery of Co. Kildare and the possibilities of development within Co. Kildare adding to Blessington population growth. • Currently housing development in the town has not been matched by adequate infrastructure and services. This must be addressed, to ensure Blessington isn’t over populated, under serviced and turned into another Dublin commuter belt settlement.
James Scott (D7)	<ul style="list-style-type: none"> • Should continue to be extra vigilant about development outside urban boundaries. The plan should incorporate green belts around settlements to protect the rural nature of our surroundings and avoid having settlements that adjoin each other.
Keith Scanlon (D12)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Eleanor O’Farrell (D13)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Dr. Igor Cusack (14)	<ul style="list-style-type: none"> • The plans as outlined in the Issues Booklet are well intentioned but it is considered that the national planning guidelines prevent the County Council from developing policies encouraging serious sustainable development. • The rapid development of Greystones, and other towns down as far as Arklow, has not been matched by adequate provision of infrastructure. Land should only be zoned for housing where adequate public transport is available.
Ann Scanlon (D17)	<ul style="list-style-type: none"> • Need much stronger strategic planning & discipline on resource usage for the future Wicklow wellbeing. • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Patricia Ryan (D18)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition.

	<ul style="list-style-type: none"> • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Tina Roche (D19)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Tessa Stewart (D26)	<ul style="list-style-type: none"> • There needs to be joined up thinking between the Council, education providers and transport providers in order to facilitate joined up planning for areas. • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Noreen Keville (D28)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Ann Teehan (D29)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Leddy Family (D31)	<ul style="list-style-type: none"> • Ireland’s development sprawl is the result of under zoning in towns. • Designating green breaks within the Level 5 Town boundaries can no longer be

	<p>considered sustainable.</p> <ul style="list-style-type: none"> • Changes will be needed in the new Plan to reflect the RSES and new policies. Land is available within Enniskerry to facilitate the new RSES objectives.
Isobel Connolly (D32)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Alison Ryan (D34)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Sinead Wallace (D35)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Adam Calihman (D38)	<ul style="list-style-type: none"> • Compact growth and reduced urban sprawl – better design for new estates to prevent Dublin sprawl and to discourage strict bedroom communities.
Billy Timmons (D49)	<ul style="list-style-type: none"> • Structure of the plan: A ‘one size fits all’ policy is not appropriate for Wicklow. Some counties create development policies based on the needs of an area. Some parts have development pressures as great as anywhere in the country and on the other hand some townlands are in the Clár programme. The county should be divided into three categories, broadly based on high, medium and low to zero population pressure. • Engagement with those making planning applications, via preplanning, should be enhanced. • The ‘Core Strategy’ may contain some policies that are not reflected in National Guidelines. This is particularly applicable to Transport and Road policy, where certain desirable policies for the County are not presently included e.g. N81 new road and Luas to Blessington. • Settlement strategy: <ul style="list-style-type: none"> ○ Level Two. Large Growth Town 1. Wicklow/ Rathnew. The green space between both towns needs to be protected from development pressures. ○ Baltinglass. It should be upgraded to a level four town. This should not impact on the current settlement strategy re planning qualifications which I believe

	<p>should be abolished for all non rural areas. This is necessary to assist in developing it as a hub for South West Wicklow, as outlined in the application by WCC for funding under the Rural Regeneration Programme.</p> <ul style="list-style-type: none"> ○ Levels 6, 7 and 8. Zonings should be sustainable and development possible. Derelict buildings with the potential to link streets or areas need to be identified. ○ Level 9. Engagement with the landowners needs to take place. While this policy had potential the uptake is poor, this may be due to a lack of awareness.
<p>Paul Stanton (D52)</p>	<ul style="list-style-type: none"> ● It is considered that there is a need for additional residential zoned lands to provide for a high quality housing stock to address housing needs in the country. This submission therefore seeks to highlight the overall shortfall in residential zoned lands and housing allocation within the county based on the settlement hierarchy. ● Given the growth of Newtownmountkennedy in recent years, it is considered that Newtownmountkennedy should be designated as a Self-Sustaining Growth Town in the new County Development Plan. ● Population projections set out in the NPF Roadmap are seen to be very conservative and will result in a significant underestimation of future housing needs in the Dublin region. ● Population figures published by the CSO show an annual rate of increase of approximately 1.3%. If this rate is applied up to 2040 it will result in an increased population nationally of 1.486 million which is significantly greater than that set out in the NPF population increase. ● The figures set out in the RSES are a further underestimate of actual population growth that is currently taking place and likely to continue for the foreseeable future. ● It is vital that the preparation of the County Development Plan obtains accurate up to date data and current population for the County and the region and that the population housing needs are based on a current population growth level which reflect recent population growth levels, rather than the lower levels which have been predicted in preparation of the NPF. ● The number of residential units being completed yearly has rebounded to c. 21,500 units in 2019 (ESRI, 2019), this remains significantly less than the estimated equilibrium demand for housing in the State. Moreover, the current level of housing need and demand is not at equilibrium, being significantly augmented by the extremely low level of housing completions in the decade since 2010. Over this period, a significant shortfall in housing has amassed year on year, which is reflected in the data collected in Census 2016 – which revealed overcrowding and increasing numbers of households living in cramped conditions. ● Census 2016 revealed an increase in the national housing stock of just 8,800 units during the five year intercensal period (taking into account obsolescence) representing an increase of just 0.4 percent. Furthermore, almost 40% of these additional units were one off houses, the majority of which would never have come to market. ● Census 2016 also revealed a surprising rise in the average household size (from 2.73 to 2.75) (CSO, 2017). This was attributed to household formation falling behind population growth, another probable symptom of lacking housing availability and increasing housing need. ● There is now a need for a two-fold approach, firstly to set out the housing need to meet the deficit of housing for the existing population and then to add to that, the additional housing needs for projected population growth. This will result in a very significant increase level of housing need over and above that based on the traditional population growth base only. ● It is therefore respectfully submitted that the County Plan carefully consider the

	<p>population projections of the county and in particular Newtownmountkennedy and designate the settlement hierarchy accordingly.</p>
Liam Kenna (D59)	<ul style="list-style-type: none"> • More areas need to be selected as both Level 8 (Small Villages) and 9 (Rural Clusters) in this County Development Plan. This would encourage rural development to be carried out in key designated areas which will lead to enhanced protection of the rural landscape in addition to making the planning process easier. • I think it is key in the rural strategy to try designate areas for development in locations which will help control the need for one off dwellings. It is noted however that not all one-off dwellings should be stopped in the open countryside and only allowed in designated areas. It is considered that if more areas were available, we would better see who qualifies under HD23 building in rural clusters. • Encourage more growth in Level 8 and 9 settlements by creating more of these clusters in Wicklow.
Annette Vaucanson Kelly (D61)	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
Edel Corcoran (D65)	<ul style="list-style-type: none"> • Please focus development in Wicklow’s two key towns – Wicklow-Rathnew and Bray. • Continuous dispersed development will result in increased daily commuting and Wicklow becoming a dormitory county.
Colum O’Broin (D67)	<ul style="list-style-type: none"> • Noted that the Settlement Strategy is constrained by the requirements of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy and the NPF Implementation document, and that accordingly the status of Newtownmountkennedy and Kilcoole must be recategorised. • Request that you consider using the lower rate of density as required by the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) when computing the gross amount of zoned land for these towns. • The 25% headroom in the NPF is a vast underestimate of what is required. • Many landowners are happy to sit on what is generally an appreciating asset, denying supply of land that is desperately needed to address not only the current housing deficit, but also the extremely high price of development land in Wicklow, that rivals the price of development land much closer to Dublin, and well in excess of the other counties that surround the Dublin metropolitan area. This in turn factors in to the price of houses in Wicklow that is verging on the unaffordable for middle income earners. • Only by having a greater choice of land for development will houses be delivered and at a lower price. Request that the Council preserve the greatest amount of flexibility for when the Local Area Plan process begins, in decisions that are cemented in the County Development Plan. <p>Newtownmountkennedy</p> <ul style="list-style-type: none"> • Ever since the first Strategic Planning Guidelines for the GDA in 1999, Newtownmountkennedy has had a superior status to other towns in the county and this was restated in the two subsequent Regional Planning Guidelines for the GDA and similarly in the Retail Planning Guidelines. There was logic initially in this designation, given Newtownmountkennedy’s excellent connectivity and public transport, and available land to consolidate what is a relatively spread out settlement.

	<ul style="list-style-type: none"> • In the meantime Newtownmountkennedy has attracted a high level of commercial infrastructure (large supermarket, shopping development, Hotel/Conference centre) that can serve a much greater population than currently exists in Newtown. I would thus request that Newtownmountkennedy be given the higher of the available designations in the RSES of Self-Sustaining Growth Town. • Given the attributes that initially drove Newtown’s previous designation in the previous three Planning Guidelines, and the commercial infrastructure already developed based on that designation, I would request that the target population remain at least at its current level of 6000. <p>Kilcoole</p> <ul style="list-style-type: none"> • Kilcoole also has long planning pedigree, going back to its rapid growth in the early 1970s, but has been in the shadow of Greystones since. The previous CDPs for the past 25 years have always promoted growth in Kilcoole, and this has to some extent been realised. However the growth of commercial and employment infrastructure in this period has been considerable, again supplying what was envisaged for the ultimate population of the town, and more, as the density of employment numbers to the hectare has increased dramatically reflecting the move away from manufacturing to higher skilled services businesses. Kilcoole at this stage provides the employment infrastructure for many types of businesses that would otherwise have been located in Greystones. • Wicklow County Council appears to have realised this, together with the fact that higher level and bulk retail for Kilcoole and the railway station was located in Greystones, in deciding in the 2013 Local Area Plan to amalgamate Greystones and Kilcoole into a single planning unit, while protecting the unique features and community cultures of both by retaining a small greenbelt between the two towns. This made sense as the two communities exhibit great synergies. • Request that Greystones and Kilcoole are combined into one unit in the County Development Plan and designated as a Self-Sustaining Growth Town and included as part of the planned development of strategic development areas in Greystones (as envisaged in the Dublin Metropolitan Area Strategic Plan); • Given a combined population allocation that should, at least, be the same as the current populations allocated for each in the current County Development Plan.
<p>Sophia Meeres (D68)</p>	<ul style="list-style-type: none"> • The peripheral sprawl of Wicklow’s towns and villages to the detriment of their centres must be stopped. The aims of the RSES give hope that the CDP can achieve better control over future development but the CDP should stipulate that the town centres and brownfield sites are to be built before Greenfield sites may be developed. • Bray and Wicklow-Rathnew are identified as key towns in the RSES. It makes sense that the largest towns closest to Dublin are allowed to expand. The definitions of self-sustaining growth town and self-sustaining town are ambiguous and it is not clear how the plan intends to actually control growth. The County Development Plan should specify a desirable growth rate for each new type of town, such that the planned maximum 10 year increase in population can be stipulated and controlled. • Growth hierarchy was not implemented at local level and the last CDP did not work. The actual growth of settlements did not reflect the plan. Large growth towns remained static, moderate growth towns (Blessington and Newtownmountkennedy) and the rural town of Roundwood grew excessively. • Arklow was consistently designated a large growth town despite its distance from Dublin, local of employment opportunity and essential infrastructure. The plan for Arklow would appear to be a ‘sleeper town’ for Dublin but this is contrary to the RSES and NPF.

	<ul style="list-style-type: none"> • Arklow corresponds best with the description of a ‘self-sustaining town’ that must concentrate on improved quality of life and could benefit on catch-up investment. • Need to stop the sprawl of Arklow - all new housing in Arklow should be built within the existing footprint. • The CDP should stipulate figures for desirable growth of each settlement. The current designations seem to have no effect on the rate of growth. • The titles given to towns are ambiguous e.g. small growth town. • The CDP should recommend that 60% of new building take place within the existing built footprint. Wicklow should lead the way in the creation of compact settlements.
Lorna Kelly (D69)	<ul style="list-style-type: none"> • The CDP must be consistent with the NPF and RSES and the key driving principles – Healthy Placemaking, Climate Action and Economic Opportunity. • The Council should not make incorrect decisions for short term goals. • Underlying concepts in the NPF make sense. • The objective of delivering ‘compact growth’ that focuses on urban regeneration rather than greenfield sprawl is admirable and with that the creation of walkable communities. • Enniskerry should be a destination village and not be pulled into an urban suburb or commuter townland that is destroyed in the name of housing people quickly. • Enniskerry’s designation as a small growth town should be reconsidered. The village status should be respected, nurtured and enhanced. • Enniskerry does have capacity to sustain more housing growth but this should not compromise the village and its distinctive attributes.
John Kinsella (D70)	<ul style="list-style-type: none"> • Request that Glenealy is moved from Level 7 Large Village on the Settlement hierarchy to Level 5 Small Growth Town. • Access to an existing railway connection could potentially allow rail users to commute to Dublin and reduce traffic on the N11. • Also, the close proximity of the village to the N11 means that there are opportunities to provide a sustainable transport link/ system to surrounding towns as well as Dublin. • Glenealy has a unique opportunity for growth as much of the surrounding land on the main route through the village is available for development.
Kimpton Vale (D76)	<ul style="list-style-type: none"> • Request that an appropriate planning policy framework is in place in the County Development Plan to ensure the most efficient and effective use of serviced and accessible lands at Kilcoole to support the future requirements of the County and to provide for and ensure such lands are utilised to help facilitate the needs of local communities, including the existing housing need in the vicinity. • The Housing Need and Demand Assessment and subsequently the Core Strategy should take into account the existing housing need when approaching the allocation of housing growth and population in the county going forward. • Any need and demand assessment should be conducted based on the latest figures, bearing in mind that the projections contained in the NPF Implementation Roadmap have already proven to be conservative. • It would not be appropriate to gauge the necessary number of housing units based on NPF Implementation Roadmap population projections alone. • Recent population data as published by the CSO in the interim period since the publication of the NPF in early 2018, shows a higher level of inward migration and higher level of population growth than anticipated in the NPF roadmap. • The level of in-migration to Ireland experienced over the last two years which is in the order of 30,000+, is well in excess of the figure of 8,000 p.a. used in the NPF population projections. This alone suggests that the NPF population projections for the metropolitan and core areas of the Eastern and Midlands region are likely to be overly conservative.

	<ul style="list-style-type: none"> • It is respectfully submitted that the preparation of the County Development Plan should be based on accurate up to date data and current population for the County and the region and that the population housing needs should be based on a current population growth level which reflects recent population growth levels, rather than the lower levels which have been predicted in preparation of the NPF. • Figures relating to population growth, housing completions, household size, housing demand all point to a significant and increasing housing need in the state which is not being met at present. • The growth of Kilcoole should be dealt with in an integrated manner along with the adjacent areas of Delgany and Greystones. This is reflective of the functional connections between these urban areas and good quality public transport connections which these settlements. • Kilcoole represents an opportunity to provide for good quality, compact urban growth, which is served by a good range of facilities and services, at a location which allows for the delivery of further services and supports concurrently with housing delivery. • The town is well suited to the delivery of a mix of housing types at a sustainable density in accordance with the prevailing national and regional planning policy context, with which the forthcoming Development Plan must accord. • Whilst Kilcoole could be designated as a ‘town’ under the Settlement Strategy for the new Development Plan, it is submitted that it would be more appropriate to link the growth of the town with the nearby Self-Sustaining Growth Town of Greystones and with Delgany. This would acknowledge the existing relationship between these settlements, the high quality public transport facilities serving the settlements and the potential to plan for greater growth in Kilcoole than would be possible under a ‘Town’ designation. • Greystones waste water treatment plant has been designed with capacity to cater for Delgany and Kilcoole. It is understood that Irish Water are investigating whether some minor upgrades to local pumping infrastructure is required to facilitate any significant development projects. It is considered appropriate to provide for a sustainable level of population growth to vindicate this investment of public monies in the resourcing and servicing of the area.
<p>Helen Howes (D78)</p>	<ul style="list-style-type: none"> • Aim to make towns more self-sustaining by ensuring there is sufficient employment opportunities, recreational facilities, social services and retail outlets. • Ensure connectivity and easy access. • Keep people in their local area. • Develop a critical mass.
<p>Anita Tuesley (D89)</p>	<ul style="list-style-type: none"> • There is much in the NPF that is good for example: <ul style="list-style-type: none"> ○ Tilt the balance of future economic development away from Dublin ○ Deliver ‘Compact Growth’ that concentrates on urban regeneration rather than green field sprawl and the creation of walkable communities and reduced congestion on our roads ○ Strengthen Rural Economies and Communities ○ Deliver Sustainable Mobility, i.e. good public transport instead of car based long commutes to Dublin • If Wicklow’s new County Development complies with and delivers the objectives set out in the NPF then it will enable Ireland to qualify for capital funding under the Green New Deal published recently by the new President of the EU Commission. • Agree that the NPF requires a radical alteration to the settlement hierarchy contained in the current Development Plan. The designation, place and hierarchy given to Bray, Wicklow, Arklow, Greystones, Newtownmountkennedy and Blessington in the current Development Plan require amendment.

	<ul style="list-style-type: none"> • Using the criteria set out in the NPF the new County Development Plan must identify and list towns that are either Self-Sustaining Growth Towns or Self-Sustaining Towns. • The revised population growth target of 164,000 for county Wicklow should be reduced further if it is decided that Bray should get its figures for population growth from the metropolitan area. • Only those towns and villages that have capacity in their existing built-up footprint and available underutilised land, brownfield sites and available infill space should be promoted for population growth. • Greystones- Delgany is not a Self-Sustaining Growth Town. It does not have good transport links or capacity to become more self-sustaining. It doesn’t have the capacity to sustain more housing growth because its employment base and public transport infrastructure is very weak. • To make the towns more self-sustaining we must create walkable communities and stop spilling large numbers of commuters onto the N11 seeking work in Dublin. Instead, we must send our workers to the Key towns in the County as defined by the National Strategy. • The new County Development Plan should prioritise the location of new housing in the footprint of existing settlements and in particular, prioritise re-use of existing buildings, infill-development, regeneration.
<p>KRA Renewables (D95)</p>	<ul style="list-style-type: none"> • Change the title of the CDP to the CSDP County Sustainable Development Plan in order to increase stakeholder awareness and signal collaborate leadership ambition. • Strengthen Forward Planning / Scenario Planning for community and ecosystem resilience and well-being, e.g. 20 year plan and 100 year plan for Wicklow and the wider region. • Concentrate population growth in the 4 main towns and only very limited growth (10%) in villages with no car dependant isolated sprawling housing in the countryside except where essential for economic need. • Only zone land for housing where it has access to public transport and do not build commuter housing that is car dependant.
<p>Cosgrave Group (D96)</p>	<ul style="list-style-type: none"> • Alterations to the growth strategy in the new County Development Plan to achieve a reduction in the overall countywide population target should provide for reductions in the growth targets of the lower order growth centres and not the Key Towns of Bray or Wicklow/Rathnew as designated in the RSES. • The high growth rates identified in the 2016 County Development Plan for the lower order growth towns are not consistent with the provisions of the RSES. • The population targets for Bray as provided for in the 2016 County Development Plan remain generally in line with the provisions of the RSES. • Any excess population target growth due to redesignation of the lower order towns should be provided for in the Key Towns of Bray and Wicklow/Rathnew in line with the provisions of the RSES. • The provisions of the current Bray MD LAP comply with the requirements of the NPF with regard to compact growth and densification of existing built up areas rather than reliance on greenfield expansion only. It is noted that in the course of preparing the 2018 LAP, Wicklow County Council reviewed growth options for the town including opportunities for increasing development and densities within the existing built up area. The LAP identifies the need for greenfield expansion of the town beyond its existing built up area to accommodate growth targets in line with its strategic role as the Key growth centre for the county. • In this regard, it is submitted that the provisions of the current Bray MD LAP, in terms of its identified locations and quantum of zoned lands for future development, are already in line with the principles of development set out in the

	RSES and NPF.
Henry Fleming (D97)	<ul style="list-style-type: none"> • Due to the current stresses on large and small rural villages within the county, it would be beneficial to categorise rural clusters within the county as part of the overall settlement strategy in the upcoming development plan 2021 - 2027. The local need in these villages and environs needs to be re-examined as they do not fit the current projections of the current Rural Development Plan and the village renewal schemes. Often local populations are relocating to larger urban areas which contradict the purpose of such schemes. Redcross village is at development capacity due to site availability, services and infrastructure. The Waste Water Treatment Plant (WWTP) for the village has almost reached its capacity and also does not service the entire village. I propose that the area of Crone Upper, Redcross which is an unstructured settlement be re examined and re categorised as a rural cluster (level 9). • It is 1.2km outside the village centre and there are currently 13 occupied dwellings within the area as outlined on the attached map. The time is ripe to reassess these areas to meet demand and allow people from rural villages where there are no suitable sites or infrastructure to move.
Judy Osborne (D98)	<ul style="list-style-type: none"> • Submissions made on previous county development plans resubmitted. • Sprawl and unsustainable rural development continues, undermining the possibility of developing the strong urban centres that economic prosperity depends on. • More phasing of development is needed. • Excessive zoning in towns. • Vision statement is important. • Wicklow as the Garden of Ireland should be built upon and permeate the Plan. • CDP should reflect a commitment to sustainable development. • Zoning should be linked to availability of infrastructure and services.
Richmond Homes (D100)	<ul style="list-style-type: none"> • County Development Plan needs to reflect the up to date position in relation to population growth and housing needs in 2020. Failure to do so would result in an exacerbation of the existing housing crisis in the County and in the region. • Recent population data as published therefore by the CSO since publication of the NPF, show a significantly higher level of inward migration and higher level of population growth than anticipated in the NPF. • It is vital that the preparation of the County Development Plan obtains accurate up to date data on current population and actual population growth and that the projected future housing needs are based on these current population growth levels, rather than the lower levels which have been predicted in preparation of the NPF and the RSES. • It is well established that population growth levels in recent years have not been adequately met by housing supply in recent years, leading to a national housing crisis as set out in 'Rebuilding Ireland' and other key government documents which seek to address the housing crisis. • It is essential that in assessing housing need requirements, that the existing shortfall in housing provision for Co. Wicklow is recognised and addressed upfront. Failure to do so will simply build in a continuation of an existing housing crisis for the next planned period. • All statistical evidence available points to the housing crisis resulting in "crowding" within existing houses in urban areas and an undesirable trend of increased household size forced upon people, arising from the significant shortfall in the provision of new housing. • There is a need for a significant amount of "catch up" housing to meet the needs of existing population. This "catch up" housing must be provided for in the new County Development Plan, prior to providing for the requirement of future

	<p>population growth in the County.</p> <ul style="list-style-type: none"> • The approach taken to date in preparation of the Development Plan is to link housing need over the plan period solely to forecast population growth. This is clearly no longer a valid approach. • There is now a need for a two-fold approach, firstly to set out the housing need to meet the deficit of housing for the existing population and then to add to that, the additional housing needs for projected population growth. • The County Council will be aware that in identifying land requirements for housing, the well established approach to this as set out in the guidelines, is to allow an element of headroom of the order of 50% of land requirement, to reflect lands which are zoned and which may not come forward for development during the plan, having regard to constraints such as infrastructure, services and the unwillingness of some landowners to bring forward their land for development. This has proved to be an essential part of ensuring adequate land supply and it is respectfully submitted that this approach should be continued in preparation of the new County Development Plan. • Contrary to the NPF Implementation Roadmap, headroom should be factored in having regard to the increased population figures. • The NPF and RSES require a detailed assessment of the suitability of zoned land for development, including availability to infrastructure and services. It is recognised that it would take some time to comprehensively assess all lands in respect of these matters in preparation of the new County Development Plan timescale and it is difficult to accurately assess likely delivery levels. Therefore, there is a need to maintain headroom levels of 50% or greater in the zoning of housing lands.
<p>Cairn Homes (D101)</p>	<ul style="list-style-type: none"> • Cairn Homes have delivered circa 250 new homes over a 3 year period in Greystones, Co Wicklow, and have sought planning permission for an additional 780 new homes over two sites also in Greystones. In addition, Cairn Homes own additional land in Greystones, Blessington and Enniskerry with capacity to deliver c. 1,200 new homes over the lifetime of the new County Development Plan. • The following is proposed for the settlement hierarchy: <ul style="list-style-type: none"> ○ Greystones – Delgany to be a self-sustaining growth town; ○ Blessington to be a self-sustaining town; ○ Enniskerry to be within the category of ‘towns and villages’ with local service and employment functions. <p>Greystones</p> <ul style="list-style-type: none"> • Cairn Homes are conscious that a large proportion of the Greystones working population travel outside the town for employment. Given its location and good public transport links to Dublin, a significant number of people commute to the capital on a daily basis. Land owned by Cairn homes, 6.6 Ha, has the potential to deliver circa 1,500 jobs in Greystones. • Cairn have applied for planning permission for a 1,356 sqm Community Enterprise Centre and 1,376 sqm office building as part of a SHD application. • Such developments, together with investment and improvements to both the N11 and DART will further enhance Greystones and create an attractive place not only to live but to work also which would represent a much more sustainable community and efficient use of public infrastructure. Greystones therefore meets the definition of Self-Sustaining Growth Towns. • Greystones should be promoted for population growth. The NPF encourages the concentration of development along public transport corridors, particularly rail corridors, and the consolidation of development within the metropolitan area.

	<p>Blessington</p> <ul style="list-style-type: none"> • With planning permission in place for the upgrade of the wastewater treatment plant there is a significant opportunity to deliver new development in the form of new communities with improved infrastructure and access to employment. • Cairn land equates to c. 64Ha at Blessington Demesne and includes zonings for Residential, Employment, Amenity, Community & Education and Agriculture. Therefore, given the mix of uses that can be accommodated on Cairn land, there is potential to deliver a self-sustaining community on the Cairn land within the lifetime of the new Plan. • Blessington would appear to meet the definition of Self - Sustaining Town. • Blessington should be promoted for population growth. • Blessington should be actively encouraged to address current pent up housing demand that has accrued from the lack of residential development over the past c. 10 – 15 years. The impact of this is evident in the population growth in the town. Between 2011 and 2016 the population of Blessington only increased by c.740 based on census figures. The current population target in the existing development plan is 6,540 by 2022 and 7,500 by 2028. <p>Enniskerry</p> <ul style="list-style-type: none"> • Cairn Homes have the capacity to deliver additional new homes and associated infrastructure to the south of the village and improve the vitality of the village over the lifetime of the new Plan. • Enniskerry would appear to meet the definition for <i>Towns and Villages</i>, the lowest level of settlement before <i>Rural</i>. This is consistent with its position in the existing development plan.
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Response of Chief Executive

The response is addressed under a number of headings which are in accordance with the issues raised in the submissions.

(a) Title and Timeframe for the County Development Plan

A number of submissions requested that the title of the County Development Plan be changed to the County Sustainable Development Plan. The rationale for this is acknowledged. However, the County Development Plan is a statutory document prepared in accordance with the requirements of the Planning and Development Act 2000 (as amended). Section 10 (1) of the Act states '*A development plan shall set out an overall strategy for the proper planning and sustainable development of the area of the development plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question*'. While sustainable development is at the essence of the county development plan, it does not form part of the title.

In accordance with Section 9 of the Act, the Planning Authority is required to make a development plan every 6 years.

(b) Development Plan Strategy

The County Development Plan will provide:

1. the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the development plan, and
2. the core strategy.

The overall strategy and core strategy are inextricably linked. In accordance with Section 10 of the Act, the *overall strategy* addresses a wide variety of topics including provision and facilitation of infrastructure, conservation and protection of the environment, integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population, the promotion of sustainable settlement and transportation strategies in urban and rural areas including measures to address the necessity of adaptation to climate change.

Reforms of planning legislation in 2010 required that each county development plan also include a ‘*core strategy*’. This is a subset of the overall development strategy for the county. The core strategy introduced an evidence based approach to justifying land use zoning objectives in development plans so that enough land is provided for future development but not so much that development becomes difficult to coordinate or undermines regeneration of existing areas. The elements of the core strategy are addressed in more detail in section (d).

(c) Compliance with National and Regional Plans

In accordance with Section (6) of the Planning and Development Act 2000 (as amended), the development plan ‘*shall in so far as is practicable be consistent with such national plans, policies or strategies as the Minister determines relate to proper planning and sustainable development*’. Section 10 of the Act requires that the development plan include a core strategy which shows that the development objectives in the development plan are consistent with national and regional objectives set out in the National Planning Framework and the Regional and Spatial Economic Strategy.

National Planning Framework

The National Planning Framework, published in February 2018, is a 20 year high level strategic plan to guide development and investment. The purpose of the NPF is to enable all parts of Ireland to accommodate growth and change by facilitating a shift towards Ireland’s regions and cities other than Dublin, while also recognising Dublin’s ongoing key role. The NPF identifies ten National Strategic Outcomes and 75 National Policy Objectives (NPOs).

The NPF promotes a regional parity growth scenario whereby there will be a 50:50 distribution of growth between Eastern & Midland Region and the Southern and Northern & Western Regions with 75% of growth to be outside of Dublin and its suburbs. This represents a shift from current trends. The NPF points out that in setting overall targets for future growth, it is a pattern of development that is being targeted, rather than precise numbers.

The targeted pattern of growth for the Eastern and Midland Region is as follows:

- 490,000 – 540,000 additional people
- 320,000 additional people in employment

Securing compact and sustainable growth is fundamental to the NPF. There is a major new policy emphasis on renewing and developing existing settlements rather than continual expansion and sprawl of cities and towns and villages. This policy framework will set the tone for Wicklow’s core strategy and settlement hierarchy.

The NPF requires that local authorities apply a tailored approach to the growth of towns and villages. This is set out in NPOs 7 and 9:

NPO 7

Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:

- *Dublin;*
- *The four Cities of Cork, Limerick, Galway and Waterford;*
- *Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;*
- *Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;*
- *Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities;*
- *Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;*
- *In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.*

NPO 9

In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- *Agreement (regional assembly, metropolitan area and/or local authority as appropriate);*
- *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and*
- *A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services.*

Regional Spatial and Economic Strategy for the Eastern and Midland Region

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was adopted on the 28th June 2019 and is underpinned by three key principles – Healthy Placemaking, Climate Action and Economic Opportunity. The RSES recognises that one of the key challenges facing the Region is the need for better alignment between population growth, location of residential development and employment to create healthy and attractive places.

The RSES determined that the optimum spatial strategy combines the growth of Dublin and regional centres (Athlone, Drogheda and Dundalk) with a selected number of large self-sustaining settlements that have the assets and capacity to grow in a sustainable manner while minimising impacts on the receiving environment. It was found that this option offers the best opportunity to align services with population and economic growth, promote compact growth in urban settlements and make the best use of infrastructure including public transport thereby reducing transport emissions and improve regional accessibility.

Relevant Regional Policy Objectives:

RPO 4.1: *In preparing core strategies for development plans, local authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements*

in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.

RPO 4.2: *Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.*

The County Development Plan must be consistent with the policies and objectives of the National Planning Framework and the RSES.

(d) Core Strategy

The County Development Plan must include a core strategy. This is a medium to longer term evidence based strategy for the spatial development of the County. In accordance with Section 10(2A) the core strategy must demonstrate that the development plan is consistent with national and regional policy particularly in relation to the hierarchy of settlements and the setting of population targets.

In accordance with Section 10(2A) the core strategy must take account of any policies of the Minister in relation to national and regional population targets. Accordingly the population targets set out in the Development Plan must be consistent with the population projections identified in the NPF Implementation Roadmap.

With regard to concerns raised over the accuracy of the NPF population projections in terms of estimating housing need, the NPF Implementation Roadmap indicates that the NPF will be subject to regular cycles of review and if necessary, updating, particularly during post 2021 Census period. The County Development Plan is reviewed every six years and will have regard to any new population projections issued as part of the NPF.

The NPF Implementation Roadmap sets out County Population Projections to 2031. The population projection for County Wicklow for 2031 is 164,000. The population growth target for the county as set out in the current County Development Plan (2016 – 2022) is 176,000 in 2028. Accordingly this will require a change in our population growth strategy going forward. This will be set out in the new Core Strategy and is likely to result in alterations to the growth strategy for some settlements. The core strategy will provide a transparent evidence-based rationale for the amount of land zoned for residential and mixed-use zonings.

The NPF includes 75 National Policy Objectives (NPOs) which will directly influence the content of the core strategy and settlement hierarchy. These include:

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities,*

towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

NPO 15: *Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.*

NPO 16: *Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

NPO 18a: *To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.*

(e) Settlement Hierarchy

The Core Strategy must include a settlement hierarchy for the County. This must be consistent with the settlement hierarchy set out in the Regional Spatial and Economic Strategy (RSES).

The RSES identifies key towns on settlement hierarchy below Dublin and the regional centres. These are defined as large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. Bray and Wicklow Town-Rathnew are identified as Key Towns in the RSES settlement hierarchy. Significant growth (i.e. 30% or more than 2016 population) will be directed into the key towns.

Bray is located in the RSES Metropolitan Area, while Wicklow Town-Rathnew, along with Arklow, are located within the RSES Core Region and are recognised in the RSES as forming part of a strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations but a wider catchment area. These towns have capacity for continued commensurate growth to become more self-sustaining and to attract high quality knowledge based employment at strategic accessible locations.

The regional settlement hierarchy identifies two types of settlement that sit below key towns on the hierarchy. These are ‘Self-Sustaining Growth Towns’ or ‘Self Sustaining Towns’. Self-Sustaining Growth Towns are settlements with a moderate level of jobs and services include sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining. Self-Sustaining Towns include towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.

In determining a settlement hierarchy for the County, the RSES advocates the use of an evidence-led asset based approach. The asset base compiles information across 25 different indicators which considers not just historic population growth, but a wider number of relevant factors to build an overall profile of settlements, in terms of their scale and functions, human capital and placemaking assets, enterprise eco-system, connectivity and environmental and infrastructure capacity. The asset base assessment is used to identify which settlements in Wicklow have the greatest capacity and potential for growth, while ensuring that future growth is sustainably managed.

This report includes a draft Core Strategy. Settlements that have a population of 1,500 or over (Census 2016) have been assessed in accordance with the RSES asset based approach¹. The assessment has been carried out for Greystones-Delgany, Arklow, Blessington, Newtownmountkennedy, Baltinglass, Enniskerry, Kilcoole and Rathdrum. All of these settlements are considered to come under the definition of ‘self-sustaining towns’.

In accordance with Section 4.7 of the RSES, ‘self sustaining towns’ are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.

- Until such time as the wastewater infrastructure is upgraded in Arklow it considered that it would be premature to designate it as a self-sustaining growth town.
- Employment growth has not been commensurate with population growth in Greystones-Delgany and Blessington and therefore these towns fit with the typology for self-sustaining towns. Greystones-Delgany is recognised by the CSO as one settlement and it has been identified as one planning unit for many years. It is not proposed to change this.
- Newtownmountkennedy has experienced significant population growth and is in need of catch-up services and community facilities.
- Baltinglass is the second largest town in West Wicklow and plays an important role in servicing a wide rural hinterland. It is considered important that Baltinglass continues to function as a hub for economic, administrative and social functions and new development should focus on consolidating the town strengthening its character and vibrancy.
- Similarly, Rathdrum functions as an important service town and has a relatively high jobs ratio. Growth should be tailored in these attractive rural towns to ensure that their character is not eroded and that they fulfil their potential as self-sustaining towns.
- Enniskerry is an attractive settlement with a defined village centre and reasonable level of services. A consolidated pattern of growth is important in order to protect Enniskerry’s character and unique sense of place.
- Kilcoole is an important service centre for its residents and for the surrounding area and future growth needs to be matched with adequate services and employment opportunities to ensure it becomes a self-sustaining town.

Towns and villages that do not come under the above settlement typologies are categorised as rural towns and villages with local service and employment functions.

In support of the overall pattern of rural and small town development, the NPF *‘seeks to protect areas that are under strong urban influence from unsustainable over-development on the one hand, and to encourage population to be sustained in more structurally weak areas, that have experienced low growth or decline in recent decades, on the other, while sustaining vibrant rural communities’*. The RSES acknowledges that rural areas are facing many challenges ranging from urban generated pressures in some areas to a declining and ageing population in other areas, changes to economic structure and lack of access to infrastructure and new technologies. The County Development Plan will provide a tailored response to the development of rural settlements reflecting their capacity to absorb growth in a sustainable manner.

Glenealy is an attractive rural settlement with potential for limited consolidated growth in keeping with that of a rural settlement. It is not considered that Glenealy should be identified for significant growth having regard to the absence of wastewater infrastructure and the limited employment opportunities. Ashford has experienced significant growth in recent years and has permission for additional development. It is therefore important to control future growth to ensure that the town

¹ Bray and Wicklow-Rathnew are not included in this assessment as these are identified as key towns in the RSES.

does not expand at an unsustainable rate and that services and facilities are adequate to cater for its increased population.

It is intended that the new County Development Plan will review the overall policies and objectives for villages to accord with the provisions of the NPF and RSES. It is not considered that the designation of additional rural clusters would be consistent with the NPF and the RSES. Rural clusters are very small groups of housing with no services; they were originally identified in a variation to the 1999 County Development Plan in 2002 and promoted as places where people could build a rural house subject to certain criteria being fulfilled and would therefore reduce the impact of rural housing on the open countryside. The reality is that the identification of these clusters has not had any significant impact in reducing demand for houses in the open countryside. The NPF and RSES seek to renew and develop existing settlements that have a certain level of services and the development of which can promote sustainable living patterns, such as the ability to walk to school or avail of public transport services.

(f) Compact Growth

The National Planning Framework acknowledges that the physical format of urban development in Ireland is one of our greatest national development challenges. It requires a major new policy emphasis on renewing and developing existing settlements rather than continual expansion and sprawl. Compact growth is therefore identified as the first national strategic outcome. This entails delivering a greater proportion of residential development and other development within existing built-up areas, moving away from reliance on greenfield development to meet our development needs and encouraging more city, town and village centre renewal. There is a strong emphasis on the need to make better use of underutilised land and buildings including infill and brownfield and publically owned lands. This applies to all scale of settlements.

In accordance with NPO3c, the County Development Plan will include a policy requiring that 30% of all new homes are delivered within the built-up footprint of existing towns and villages. Compact growth will bring life back to towns and villages, create greater footfall, contribute to the viability of services, shops and public transport, increase housing supply and enable more people to walk or cycle to work, school or to recreational facilities.

To secure the delivery of compact growth two funding mechanisms have been set up:

- Urban Regeneration and Development Fund (URDF)
- Rural Regeneration and Development Fund (RRDF)

The County Development Plan shall include objectives for urban regeneration and rural rejuvenation that will support future applications for URDF and RRDF funding.

Delivering compact growth requires focus on quality of life in towns and villages, making continuous regeneration of urban areas as attractive as greenfield development, tackling legacies such as concentrations of disadvantage or addressing catch-up facilities and linking regeneration and redevelopment initiatives to climate action (Refer to Section 2.6 of the NPF).

The relevant NPOs include:

NPO 3c Deliver at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs, within their existing built up footprints.

NPO 4 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

Recommendations of Chief Executive

1. Determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level.
2. To identify the following settlements as self-sustaining towns: Greystones-Delgany, Arklow, Blessington, Newtownmountkenedy, Baltinglass, Enniskerry, Kilcoole and Rathdrum.
3. The core strategy shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework (NPO3c) and shall include an objective to give effect to this.
4. In accordance with NPO 6, include an objective to regenerate and rejuvenate towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.
5. Include an objective to give effect to NPO 4 to ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
6. In accordance with NPO15 include policies to support the appropriate and sustainable development of rural areas *by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.*
7. Apply a tailored approach to urban development that will (a) provide a focus for urban and rural generation and (b) where possible link to the Rural and Urban Regeneration and Development Funds in accordance with NPO 7.
8. In accordance with NPO 16 and NPO 18a and to support applications for RRDF funding include objectives to:
 - Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.
 - Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.

Part 4.3.2: Climate Change

Name	Issues Raised
<p>Ashford Development Association Ltd (C1)</p>	<p>The reality is that we are seeing the effects of climate change at a local level. In Ashford, the drought from 2017–2019 on the Vartry River caused an effect on the salmon as there was not sufficient water levels reached for the salmon to swim up the river.</p> <p>It is now an indisputable fact that carbon gases and our carbon footprint contribute to this Climate Change. Lowering our carbon footprint may not reverse this but may be possible to avoid some of the worst times to come. Wicklow should do its part and make new commitments and initiatives to help reduce this. Here are the areas that need support and strengthening:</p> <ul style="list-style-type: none"> • Farming is important part of Wicklow but all must be done carefully. Slurry Injection should always be used over Slurry Spreading. Grants must be publicised and encouraged for young farmers to do this responsibly. Individual farmers should be visited and helped to a more sustainable farming community. • “Work from Home” Initiatives • Drive electric encouragements and subsidies to be enforced as well as more charging stations visible. • Continual support for Solar Energy Farms and other sustainable energy initiatives. • Insulation grants and high rated homes. <p>Mitigation is about making sure that Climate Change has as little effect as possible. Low water levels in the Vartry River means a serious threat to the Salmon and Trout as well as the overall beauty of Ashford. High Water means flooding. We can reduce the impact of flooding by making a commitment to stronger corridors of flood zones. In Ashford, there should be a ban for building on either side of the Vartry from below Bramble Glade through to the source at the Broadlough to a distance of 100 meters on each side where possible. This would allow for the necessary absorption to avoid floods.</p> <p>Low water is more difficult as we have already had a long process with Irish Water about the amount of water in these conditions that they will release. This is an ongoing assessment and Wicklow County Council (WCC) need to commit itself to the support and preservation of the River Vartry and other Rivers in Wicklow. WCC need to see that the rivers are supplied with sufficient water in drought and that they will work with Irish Water to maintain these at safe levels.</p>
<p>County Wicklow Public Participation Network (PPN) (C2)</p>	<p>In response to the Issues Booklet’s question ‘How do you think the County Development Plan can address Climate Change?’ these are the following issues the PPN came up with -</p> <ul style="list-style-type: none"> • Protection of the Uplands • Uplands in better condition will reduce flooding risk • Re-wetting peat lands • Need sustainable land use • Increase broadleaf forestry, manage forests, no more clear-felling • Protection of flood plains • No building on flood plains • Ensuring sustainable drainage works • Encourage more tree and shrub planting in towns and on verges • Invest heavily in the conservation of insect life (Ireland is losing insect species at

	<p>the highest rate in the EU)</p> <ul style="list-style-type: none"> • Reduce or carefully manage the dredging of rivers • Mitigation measures to be included in developments (more strongly) • Densification – reduction in commuter distances (less CO2) and more pedestrianised town centres • High speed broadband and initiatives like rent a desk to allow working from home • Better attenuation for residential development • Protect coastal areas by establishing wildlife plants – natural reseeded • Protect the marine environment from pollution and over fishing • Public transport: Free and electric • Electric Car charging point network, more park and ride provision • Provide Digital Hubs • Community generated town heating/energy system for all • Ring fence receipts from carbon taxes collected in Co. Wicklow to be spent in Co. Wicklow • Publish and publicise all initiatives and all progress data, report regularly to citizens • Sell smart meters cheaply to homeowners & incentivise a 10% reduction in electricity usage • Fit low water usage taps to all public buildings and sell as cheaply as possible to homes • Citizen wind farms, solar panels on roofs of public and private buildings • Increase capacity of National Grid in Wicklow so can sell back to national grid • Incentivise Community Swap Shops, to hold Sales & Swap events, fashion shows, etc • R&D batteries to generate and store power and to extend their life. • R&D uses for kelp, seaweed, fish waste to plastic (MarinaTex) • Help farmers see they have a role in addressing climate change – more diverse less intensive farming, promote and incentivise methanisation and biogas to recycle animal waste • Pay farmers to stop farming cows and adjust CAP payments so they do not lose income • Monitor dosage of fertilisers and pesticides, appoint officials to manage this • Incentivise farmers to grow own cattle feed, green beans, non OGM soya, to go organic and to set aside sufficient land as a carbon sink to bring their C emissions eventually to neutral • ‘A’ rated housing through retrofitting with very low to zero cost loans • Research and promote best practice in managing climate issues • Rewilding land (provides habitat and habitat corridors) • Zone for Wind Farms and Community Renewable Energy • Planting trees on Council land (green spaces, land unsuitable for housing) • Zone rivers, wetlands and forest/uplands for climate and biodiversity (like Wexford) and protect against sheep • Identify & zone all Wicklow River Corridors & Wetlands for Protection (Waterford last 2 County Development Plans give a good example) • Create a "Land reserved for nature including Climate & Biodiversity Natural Solutions" zone type, and zone other uplands as well as the Rivers/Wetlands • Conserve native seed varieties and use wherever possible • Incentivise farm to fork and initiatives that sell local produce locally • Make Wicklow Campus a hub for research on all issues of sustainability and extend its links to the marine community
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	<ul style="list-style-type: none"> • Promote Wicklow’s marine heritage & build riverside beaches & facilities. • Publish all findings, progress, grants in local and national media, radio, newspapers • Incentivise supermarkets to lessen packaging, extend deli counters, allow customers bring own containers, stock only home compostable packaging, donate in-date food to community food banks, to employ local and to sell seasonal local produce • Advertise all ‘Green Jobs’ heavily in the local press. • Refund deposit on plastic bottles • Tax on plastic items • Proposed idea for coffee cups where you hand in a dirty reusable cup and get a new one from a participating coffee outlet. • Litter bins • Litter wardens • Biodegradable fishing line • Eat less meat • Availability of environmentally friendly insecticides • Issue of compost bins to households for garden waste to put goodness back into soil • Tree planting days in schools. • Have a Wicklow tree planting day • Planting wildflower meadows • Education on recycling, public not always sure what can be recycled • Emphasis on batteries needing to be recycled not put into household bin • More bins in sea areas to prevent rubbish landing in the sea • Emphasis on reusing things and reducing what we buy if we do not really need it • Pressure on supermarkets to reduce plastic wrapping.
<p>Birdwatch Ireland (C3)</p>	<p>The following overarching issues should be addressed within the next County Development Plan:</p> <ul style="list-style-type: none"> • Climate mitigation to achieve the level of emissions reduction action required at county level. • Climate adaptation actions to address projected increased sea level rise, storm surge, flooding and animal fodder impact which the County will face with global temperature average increase reaching 1.5 degrees. • Applying UN Sustainable Development Goals (SDGs) at county level. • Enhancing local food security enablers as well as low carbon and local food production networks to address the fact that 80% of Irish people buy food which is imported. <p>Birdwatch Ireland supports all efforts to ensure fast and deep cuts to greenhouse gas emissions so that Ireland can at least halve emissions by 2030. The reality is 2020 marks the beginning of a decade in which global emissions must reduce by 55% before 2030 if the 1.5°C limit in the Paris Agreement is to remain at all feasible. In 2019 the Joint Oireachtas Committee on Climate Action endorsed a target of net zero by 2050 and the enshrinement of this target into law in Quarter 1 of 2020.</p> <p>A rapid and deep, fair and transformative transition to a decarbonised global economy is now required over the next decade to prevent the spiralling of catastrophic climate impacts, and to reduce the levels of risks associated with the transition to a zero carbon future.</p>

	<p>Ireland will fail considerably on its 2020 climate and energy targets. Under the EU’s Effort Sharing Decision, Ireland continues to exceed its binding allocated emissions budget. Ireland had pledged to reduce emissions to 20% below 2005 levels by 2020. Ireland may reduce emissions by only 1% on 2005 levels by 2020.</p> <p>For 2018, Ireland exceeded its annual emissions allocation by over 5 million tonnes. This follows an exceedance of 3 million tonnes in 2017. A marginal decrease in domestic emissions (of 2%) in 2018 was attributed to the ESB’s coal-powered Moneypoint station being out of action for several months that year, rather than the outcome of any specific climate policy intervention. Any subsequent gains were offset by growth in emissions from households, transport, and agriculture.</p> <p>Ireland is far off track to meeting its current 2030 target and longer term commitments to decarbonise the economy. The most recent projections show that over the next decade, even with additional policy measures included in the National Development Plan, methane and nitrous oxide emissions from the agri-food sector are projected to increase by 3%. Continued growth in emissions from the transport sector is also projected in the short term, largely due to fuel consumption from diesel cars and diesel freight. Because of the delay in getting off fossil fuels, coal, peat and, increasingly, natural gas will continue to be key contributors to emissions from the power generation sector. Energy consumption is also expected to grow, going in the opposite direction of what is needed collectively by the EU.</p> <p>These trends are unacceptable. Climate action requires that CO₂ emissions from energy and cement need to go to net zero well before 2050; nitrous oxide and especially methane emissions need to reduce steadily and permanently, therefore increases in these emissions from agriculture cannot be permitted.</p> <p>Ireland faces annual financial penalties in the region of €500 million per annum after 2020 for failing to comply with our EU climate and renewable energy commitments. Noncompliance could cost Ireland between €3bn and €6bn by 2030.</p> <p>The 2019 Climate Action Plan sets a pathway for a 2% decline in emissions per annum from 2021 to 2030 to meet our EU targets. Such a shallow pathway was never in line with Ireland’s fair share of a Paris Agreement carbon budget. Ireland has a very limited remaining Paris-aligned carbon budget, and will need to reduce emissions by more than 7% per annum every year in order to achieve net zero emissions by mid-century at the latest.</p> <p>In addition, steady and permanent reductions in methane emissions (primarily from agriculture) of about 2% to 3% per year will be essential to achieving net zero and limiting warming-equivalent overshoot of a Paris-aligned cumulative emissions budget.</p> <p>At the UNFCCC COP 25 in Madrid in December 2019, Minister for Communications, Climate Action and the Environment, Richard Bruton stated that Ireland will join the Carbon Neutrality Coalition – a Coalition of countries committed to achieving net zero emissions by 2050. However, it needs to be emphasised that achieving net zero by 2050 is not the same as limiting warming to 1.5°C. Delivering on the 1.5°C limit demands steep, permanent near-term cuts in emissions, frontloading action over the next decade rather than hoping for technological miracles after 2030.</p> <p>Ireland’s continuing delay in increasing action and ambition will drastically escalate</p>
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	<p>the governmental and political effort that will be required in the future.</p> <p>The emissions reductions now required need to be achieved equitably and will be difficult, but every year of insufficient action only increases the required decarbonisation rate.</p> <p>With the EU now set to increase its 2030 target over the coming year to at least 55%, this is the time for Ireland to develop a 2030 pathway based on 5-year carbon budgets that is aligned with the science and Ireland’s fair share. As a rich nation with high per capita emissions, Ireland will have to do much more by 2030 and reach net zero emissions before the target date of 2050.</p> <p>It is within this context that we underline with the greatest of concern and urgency that WCC take ambitious steps within the next County Development Plan to make deep and fast cuts to emissions in order to protect communities in the mid to longer term from even deeper and more drastic and expensive cuts.</p> <p>Climate change also impacts biodiversity and bird species. Changes in temperature and precipitation at different times of the year may result in changes to food availability and habitat distribution and energy expenditure for both resident and migratory bird populations that will likely have population-level impacts at varying temporal and spatial scales.</p> <p>Habitat protection and ecosystem conservation can also help both mitigate and adapt to climate change.</p>
<p>Irish Wind Energy Association (C4)</p>	<p>The national Climate Action Plan (CAP) 2019 has set out an ambitious 70% target for renewable energy production out to 2030. To meet this target, the amount of electricity generated from renewable will have doubled on current figures. Based on the CAP assumptions, on-shore wind will provide the majority of the required electricity yield out to 2030. Taking account of this, WCC and all Local Authorities should be cautious when considering the zonation of areas for renewable energy development going forward, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.</p>
<p>West Wicklow Environmental Network (C7)</p>	<p>As the first county to declare a “biodiversity and climate change emergency” in April 2019, Wicklow County Council now has the opportunity to lead the way in showing how these vital considerations can be carried through in the new County Development Plan, and in the Council’s own actions across a range of activities.</p>
<p>Newtownmountkennedy Community Forum (NCF) (C11)</p>	<p>The NCF applaud Wicklow County Council in declaring a Climate Emergency. It is in all our interests to work to reducing energy consumption. We feel that the CDP should introduce incentives for businesses that can demonstrate reduced energy spends whilst maintaining sales in the form of discounted rates.</p> <p>We feel that large scale developments should be using surfaces which retain and slowly release surface water. Large industrial estates are full of hard surfaces that flood drainage systems with surface water in heavy rains. Water harvesting and softer surfaces should be implemented in all large-scale developments.</p> <p>We would like priority given to greenway/ cycleways and walking routes to reduce car journeys and promote a healthier lifestyle in Wicklow. Our feeder second level school is located in Kilcoole, a short distance away but no safe path or cycle route for children from Newtownmountkennedy to access the school. There is no public</p>

	<p>transport to link Newtownmountkennedy to Kilcoole. All children from Newtownmountkennedy travel to and from school by school bus or car. As part of the new CDP we would like to see all Education zoned land have greenway access routes through neighbouring zoned lands. This should be outlined in the zoning.</p>
<p>Wicklow Planning Alliance (C17)</p>	<p>We take heart from the fact that for the first time your Issues Paper now acknowledges that the County Development Plan is much more than just “a land use framework” and that it does have a serious role to play in helping Ireland to achieve its national and international obligations and targets for emissions reductions. The County Development Plan in the past has been a significant contributor to carbon emissions because of the car-based development that it encouraged and promoted. We urge you to read the papers published on the Department of Transport’s website and how they make the link between bad spatial planning, carbon emissions and traffic congestion.</p> <p>The County Development Plan can address Climate Change by:</p> <ul style="list-style-type: none"> • Permitting only sustainable growth so that residents can live, work, study, play and socialise in the county; so that residents can walk or cycle from home to work, to school, to the shops, to the park; so that residents do not need a car because public transport options are varied and reliable, clean, comfortable and safe. • Permitting compact development not urban sprawl scattered across the entire county or along public roads in the county • Promoting cycling, walking and public recreation facilities • Promoting public transport to connect all settlements in the county with each other and to connect settlements with national public transport routes; • Prohibiting development in areas that are at risk of flooding; • Protecting the natural landscape and protecting biodiversity, • Explaining and encouraging re-wilding • Explaining how the Ecology Emergency is separate from the Climate Emergency • Implementing a programme to significantly increase the canopy cover of trees in urban spaces to provide locked-in carbon, calmer and cooler streets, and increased biodiversity. • Requiring all residential developments to have allotments so that we can reduce the carbon footprint by growing what we eat rather than importing 83% of what we buy in the supermarket. Currently, Irish farmers do not produce what Irish consumers are buying in the supermarket. • In adapting to climate change we need to prepare for better food security. It is necessary to zone and protect from development good quality soil suitable for horticulture close to towns and villages • Make all public buildings showcases to demonstrate what can be done to de-carbon our buildings and to demonstrate how zero carbon buildings are cheaper to maintain and more comfortable to live and work in. • Explain how and why Ireland is one of the most de-forested places in the world • Our ancestors were able to drink water straight from the river. We cannot do that today because of the artificial fertiliser, the animal and human waste, the industrial waste that we discharge into our rivers and sea. We need proactive planning enforcement. • Aim to make each settlement in the county energy sufficient with its own micro-grid.
<p>Delgany Community Council (C19)</p>	<p>We welcome the recent adoption of a Climate Adaptation Strategy for County Wicklow as well as the establishment of a relevant Strategic Policy Committee. The County Development Plan can address climate change by</p>

	<ul style="list-style-type: none"> • Encouraging compact development which can be more easily served by public transport • Provision of Park and Ride facilities and a bus corridor on the N11 • Refusing to engage with proposals that encourage further car dependency by widening roads and increasing capacity for car based transport. • Provision of local Link electric bus services to provide greater access to public transport hubs • Continuing and expanding retrofitting of housing that is not adequately insulated. • Considering carefully the environmental impact of any large scale developments that are planned for our county. • Development along coastlines should be tightly controlled and related to provision of amenities and for tourism. • Community energy projects should be promoted and supported in our county. There are initiatives in Co Leitrim which are worth exploring. • Increased number of recharging stations for electric cars. • Flood risk areas can be managed by ensuring that any development in close proximity addresses potential impact on the floodplain. In some cases flood plains can be developed to a limited extent as walking routes. • Providing allotments to encourage Wicklow residents to grow and consume locally produced food. • New developments should be subject to a climate change impact audit. • Developers should be encouraged to incorporate wild open space and measures conducive to wildlife as a matter of course.
<p>Wicklow Uplands Council (WUC) (C27)</p>	<p>Climate change is the greatest threat facing today’s society. All efforts must be made to address this crisis, to reduce our carbon emissions and halt the loss of biodiversity. Wicklow County Council was proactive in being the first local authority in the country to declare a climate and biodiversity emergency (May 2019) and should continue to lead. A Climate Adaptation Strategy was drafted in 2019 with full public consultation and WUC suggests that the strategy and the feedback received during the public consultation are enshrined in the new County Development Plan. While the strategy was welcomed there must also be a greater focus on mitigation measures in order to support a preventive approach. The successful implementation of mitigation measures is crucial in the transition to a more low carbon and environmentally sustainable economy as set out in the Governments Climate Action Plan 2019.</p> <p>The Wicklow Uplands region has a significant role to play in climate mitigation and adaption strategies. Healthy upland habitats store carbon, provide clean drinking water and slow floodwaters, preventing downstream flooding. Across Ireland, 53% of all soil carbon is stored in peatlands found in the uplands; this represents just 16% of the land area. It is the NPWS, Coillte and upland farmers who are managing large areas of the uplands. WUC suggests that, given the significant role the uplands can play in meeting national climate targets, Wicklow County Council continues to provide all necessary supports to their management and to the communities living in these areas.</p>
<p>Blessington and District Forum (C28)</p>	<p>It is great that WCC are working on a Climate Adaptation Strategy and signed up to the All Ireland Pollinator Plan, however we need to see some physical activities occur within our towns and villages. Some very simple suggestions might include:</p> <ul style="list-style-type: none"> • Rollout of public charging points of electric cars • Rollout of proper cycling lanes • Protection of our rivers, wetlands, hedgerows and the creation of wildlife corridors

	<ul style="list-style-type: none"> • Better public transport links • ECO friendly housing initiatives.
Jane Jackson (D5)	WCC recently declared a Climate and Biodiversity Emergency - the County Development Plan should reflect this, especially in transport. It is proposed that the top speed limit be cut to 80km/hr across the county. 80km/hr is regarded as the optimum speed for both fuel consumption and greenhouse gas emissions. A document called “Pilot study on the climate gains of motorway speed reduction” is attached to this submission.
Liz Tiernan (D8)	While climate change is obviously a huge issue to tackle and obviously requires policy changes at National and EU level plus individual action, Wicklow County Council can and should do everything it can to help. Having declared a “Biodiversity and Climate Change Emergency” earlier this year, Wicklow County Council has an immense opportunity to truly lead the way.
Keith Scanlon (D12)	<p>A ‘pro-forma’ submission on a range of County Development Plan issues has been received from a number of people. Each individual issue is addressed under the relevant topic and in relation to Climate Change the submission states:</p> <p>It is vital to continue to strengthen sustainable development planning for our future Wicklow wellbeing, especially in this time of (Wicklow) Climate and Biodiversity Emergency.</p> <p>The following principle should be prioritised in the plan:</p> <ul style="list-style-type: none"> • Set policy that all development must thoroughly assess Climate and Biodiversity impact before being given permission.
Eleanor O' Farrell (D13)	
Ann Scanlon (D17)	
Patricia Ryan (D18)	
Tina Roche (D19)	
Tessa Stewart (D26)	
Noreen Keville (D28)	
Ann Teehan (D29)	
Isobel Connolly (D32)	
Alison Ryan (D34)	
Sinead Wallace (D35)	
Annette Vaucanson Kelly (D61)	
Cressida Lynch (D33)	More people are waking up to the climate crisis and want to make changes in their day to day lives, but don’t know where to start. Every town and village could have a cafe that serves organic plant based food (e.g. An Lar, in Dunlavin).
Adam Calihman (D38)	<p>In a time of climate change we need to have a focus on sustainability, with the following suggestions made:</p> <ul style="list-style-type: none"> • Improved Sustainability, Diversity and Innovation • Waste reduction and management - reduce fly tipping and litter. Create incentives and conveniences for people and businesses to recycle and not litter e.g. bottle deposits, bins about town, excess food collection for homeless etc • Improved public transport and mobility within and between towns in Co. Wicklow and with Dublin. • Improved school bus infrastructure • Design for biodiversity and no spraying of weeds. Ban sprays unless absolutely necessary.

	<ul style="list-style-type: none"> • Make Co. Wicklow the most walking and cycling friendly county in the nation by increasing the number and connectivity of cycle-ways and safe pedestrian and wheelchair-friendly paths and crossings. These paths will serve to reduce traffic and provide amenities for local residents, businesses, and tourists. • Policies that address, mitigate and prepare for climate change and the associated symptoms of sea level rise, erosion, drought, flood, temperature fluctuation. • Improved Nature Reserves - increased protections, allocations, clean up and restoration of forests, biodiversity, wildlands, wetlands, waterways • CO2 reducing policies and Fossil Fuel free government operations • Programmes to convert solid fuel heat to less polluting heating systems • Clean, renewal energy investments including grid tie-in for businesses and residential • Affordable, energy smart housing in functional mixed communities • Improved availability of local health services, clinics and hospitals • Improved parks and recreation management, amenities and infrastructure (more public parks and spaces) • Growth of local businesses and enterprise to decrease need to travel to Dublin • Compact growth and reduced urban sprawl - better design to new estates to prevent Dublin sprawl and to discourage strict bedroom communities • University in Co. Wicklow (or annex of Dublin area Uni) • Increase funds to Tidy Towns, community groups and schools to do special environmental education and action events • Promote local produce and products
<p>Shane Stokes (D40)</p>	<p>This submission is requesting biodiversity and climate considerations in relation to the Wicklow County Development Plan to be prioritized. Concerned at talk of building major roadways, which has been proven in other countries and areas to lead to an increase in traffic rather than a reduction of cars. Ireland is already falling behind its commitments in relation to climate change and facilitating more cars at the expense of nature will only exacerbate this problem. Would urge an improvement in public transport to be a priority rather than building more roads.</p>
<p>Rosa Murray (D43)</p>	<p>Sustainable planning put to use and the climate emergency taken into account for all planning, large or small.</p>
<p>Art Ó'Laoghaire (D48)</p>	<p>In view of the current climate-carbon crisis, ALL development in the immediate future must aim to discourage dependence on private cars. There must be NO further development of dual carriage ways or motor-ways, as they only encourage people to use private cars. Instead there has to be a massive expansion of public transport: rail and long-distance bus services for longer-distance/ nation-wide travel, with integrated local bus services (including minibus) connecting to national networks.</p> <p>The County Development Plan can address Climate Change by:</p> <ul style="list-style-type: none"> • permitting only sustainable growth so that residents can live, work, study, play and socialise in the county; so that residents can walk or cycle from home to work, to school, to the shops, to the park; so that residents do not need a car because public transport options are varied and reliable, clean, comfortable and safe. • Permitting compact development not urban sprawl scattered across the entire county or along public roads in the county • promoting cycling, walking and public recreation facilities • promoting public transport to connect all settlements in the county with each other and to connect settlements with national public transport routes; • prohibiting development in areas that are at risk of flooding; • protecting the natural landscape • protecting biodiversity,

	<ul style="list-style-type: none"> • Explaining and encouraging re-wilding • Explaining how the Ecology Emergency is separate from the Climate Emergency. • Implementing a programme for the planting of trees in urban spaces so as to create shade and refuge in the public realm when the temperature gets too hot. • Requiring all residential developments to have allotments so that we can reduce the carbon footprint by growing what we eat rather than importing 83% of what we buy in the supermarket. Currently, Irish farmers do not produce what Irish consumers are buying in the supermarket. • Make all public buildings showcases to demonstrate what can be done to de-carbon our buildings and to demonstrate how zero carbon buildings are cheaper to maintain and more comfortable to live and work in. • Explain how and why Ireland is one of the most de-forested places in the world. <p>Our ancestors were able to drink water straight from the river. We cannot do that today because of the artificial fertiliser, the animal and human waste, the industrial waste that we discharge into our rivers and sea. We need proactive planning enforcement.</p>
<p>Edel Corcoran (Scanlon) (D65)</p>	<p>Prioritise balanced, sustainable development planning in the next plan, explicitly aligned with Climate and Environmental Protection.</p> <p>Plan the steps towards a joined-up, sustainable service infrastructure for a Post-Fossil-Fuel 2030 period, e.g. parks and nature reserves, transport (not roads in isolation), water, energy, housing, residential zoning and services, etc. Please question any extrapolation and extension of current (legacy) policies. The Climate, Biodiversity and Environmental Emergency must trigger new improved thinking on all policies. Please do not invest in legacy fossil-fuel infrastructure but rather in renewable and sustainable infrastructure (and public education & engagement to support this).</p>
<p>Sophia Meeres (D68)</p>	<p>The Irish government declared a Biodiversity and Climate Emergency in May 2019, as did County Wicklow. Wicklow County Council must ensure that the new CDP strives to adapt to climate change and strengthen biodiversity. Climate Resilience and Strengthening of Biodiversity should be umbrella themes in this new plan. Although Climate change is named as a cross cutting theme in the CDP issues paper, the Biodiversity Crisis is ignored.</p> <p>Rather than viewing natural elements of the landscape as visual or green “heritage”, the landscape mosaic should be recognised as a network of natural infrastructures that help in the fight against climate change and its effects - by soaking up storm rainwater, preventing flooding, strengthening river banks and coastlines, cooling towns, storing carbon, purifying the air, removing pollution, strengthening soils etc. whilst providing food and shelter for wildlife.</p> <p>If the CDP is to address climate change, it must give priority to nature-led solutions and green infrastructure that respects and promotes nature. It must at the same time prevent further sprawl of settlements, and promote public transport.</p> <p>The policy concerning flooding should be the long-term withdrawal from areas at risk, from the coastline, as well as river floodplains. Short-term solutions should be complemented by natural or soft solutions (such as upstream woodland planting, habitat restoration and certain types of geoengineering) to reduce the quantity of storm water runoff arriving in rivers.</p> <ul style="list-style-type: none"> • No further development in flood risk areas (flood plains) should be permitted. • Upstream soft engineering techniques should be implemented to reduce river flow speed and volume. No further public money should be spent on the building of floodwalls or sea defences if they merely push the problem into the future.

	<p>Combine all short term actions with long term tree planting upstream and restoration of coastal transitional zones (sand dunes, estuaries, wetlands etc)</p> <ul style="list-style-type: none"> • Owners of properties that are liable to flood should be encouraged to move. • No new development should be allowed within 50 m the coastline, unless it is of a temporary nature and destined to fall into the sea at some point. • Creation of a “non-aedificandi zone” along all rivers and coastline would ensure space for natural dynamics such as flooding, erosion, accretion etc. • The planned construction of a Waste Water Treatment Plant, in a zone at risk from sea level rise, on the north shore of Arklow, seems extremely short-sighted. <p>The natural coastal flood zone of Arklow bay has been denaturalised, incomplete rock-armour sea defences have proven to be a short term solution that have worsened the long-term problem. Arklow’s sandy beaches have disappeared. Defences that work with the sea, not against it, are required all along the Wicklow coastline. In Arklow Bay, breakwaters located out to sea, plus sand nourishment, the removal of jetties and piers that affect long-shore drift and a barrier at the river mouth are all solutions described in the 1991 report by the Danish Hydrological Institute.</p>
<p>Helen Howes (D78)</p>	<ul style="list-style-type: none"> • Aim to make towns more self-sustaining by ensuring there are sufficient employment opportunities, recreational facilities, social services and retail outlets. Ensure connectivity and easy access. Keep people in their local area. Develop a critical mass – this will reduce the need for private transport and will benefit the environment. Key to this is public transport and excellent connectivity. • Ensure that protecting biodiversity and our natural landscape is central to all plans, policies and decision making. • Plan to encourage and increase local food production.
<p>Justin Tallon (D82)</p>	<p>In order to comply with our obligations for a decrease in our carbon emissions, it is essential that all development and zoning must be thoroughly assessed for Climate and Biodiversity impact. Only zone land for housing where it has access to reliable frequent public transport. The M11/N11 is now chronically congested as a result of poor planning where large housing developments were constructed with no access to public transport. Current proposals to upgrade the N11 by adding a 3rd lane or putting a road through environmentally sensitive landscapes are outdated, counterproductive and will lead to even more car dependency and corresponding pollution. The solution must be an increased investment in public transport. There has been little investment in our rail network on the east coast south of Bray. The NTA seems to have abandoned us. We must plan for sustainable Wicklow Public Transport and adopt ambitious targets for an increase in public transport usage and a reduction in private (especially single use commuting) transport use.</p>
<p>Anita Tuesley (D89)</p>	<p>This submission is in full support of the Wicklow Planning Alliance (C17) submission.</p>
<p>Innogy Renewables Ireland Ltd (D90)</p>	<p>Welcome and recognise the leadership of Wicklow County Council (WCC), the first Irish Local Authority to declare a biodiversity and climate change emergency in 2019. The County Development Plan should consider and address climate change through every aspect of its decision-making process as this is considered to be the greatest challenge facing our generation. As has been set out in the Issues Paper, climate change is a cross-cutting issue and all future policies and decisions must consider the current and future potential for climate change mitigation and adaptation.</p> <p>The revised County Development Plan can address climate change through a forensic approach to ensure the reduction of carbon emissions through every aspect of its decision-making process as well as providing a supportive and clear plan for the sustainable development of new renewable energy generation projects. As well as the</p>

	<p>development of a Renewables Energy Strategy, we would welcome the revised County Development Plan setting out how it will meet and report upon the commitments set out in the Climate Action Charter and demonstrate continued leadership through the early implementation of the Offshore Renewable Energy policies as set out in the consultation draft of the National Marine Planning Framework.</p> <p>Amongst other actions the County Development Plan can address climate change with the inclusion of the following three key actions which support the development of new renewable energy generation sources;</p> <p>Action #1: Policy Actions implementing the commitments as set out in the Climate Action Charter</p> <p>We welcome the most recent commitments, as set out in the Climate Action Charter (signed by all Local Authorities and the Minister for DCCAE and Housing (on 29th October 2019) that (in addition to many other commitments specified in the Charter), local authorities will:</p> <ul style="list-style-type: none"> • implement, in so far as is practicable, measures which reduce our carbon emissions in line with national objectives, and develop a method for planning and reporting on these actions; • deliver a 50% improvement in energy efficiency by 2030 (on the 2009 baseline); and • ensure that policies and practices at local government level lead us towards low carbon pathways and put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy. <p>We note that the Office of the Planning Regulator has written to Local Authorities within the Eastern and Midlands Regional Assembly advising them to maximise the output of renewable energy sources in line with national government policies on climate change and we agree with the sentiments expressed - we would welcome a regional Renewable Energy Strategy in the short term to ensure consistency across the region, as well as reducing duplication of effort. In the absence of such a regional plan, we support the development of a Renewable Energy Strategy for WCC, to support the strategic objectives of the transition to low carbon and clean energy, increase awareness of climate change and how to best mitigate its impacts, as well as enabling WCC to fully benefit from the economic opportunities that will be available through the transition to a lower carbon society.</p> <p>As part of the review by Wicklow of its County Development Plan, we would urge the Council to ensure the economic and carbon reduction potential of renewables, (including on and offshore wind) is reflected in all future policy decisions and procedures (especially the onshore elements of offshore windfarms such as cable landfall and the onshore grid connection and harbour infrastructure required to facilitate the project).</p>
<p>Coillte (D92)</p>	<p>Coillte and Irish forestry play a critical role in contributing to the reduction of greenhouse gas emissions, enhancing Ireland’s energy security and contributing to a post-carbon and climate resilient economy. We believe that Coillte Land Solutions and Renewable Energy businesses have the experience and expertise to support</p>

	<p>Wicklow County Council and the Eastern and Midlands Regional Assembly to realise one the Region’s key principles around climate action, namely “Climate action, by enhancing the climate resilience and accelerating the transition of the Region to a low carbon society.”</p> <p>1 The Challenge of our Generation - Climate Action Plan 2019 and Renewable Energy Targets</p> <p>On 17th June 2019 the Government published the ‘Climate Action Plan 2019’ (CAP). This sets out the agreed course of action over the coming years to tackle climate breakdown. It is a visionary and transformational plan and at its heart recognises that “We [Ireland] are close to a tipping point” and “decarbonisation is now a must if the world is to contain the damage and build resilience in the face of such a profound challenge.” (Exec. Summary pg. 8)</p> <p>In particular the CAP places the decarbonisation of the electricity sector at the centre of its ambitions. In real terms it mandates this sector to move from its 2017, 12 million tonnes of CO2 equivalent emissions, to 4.5million tonnes by 2030. In other words a massive reduction of 7.5million tonnes (62.5%).</p> <p>Other sectors namely Transport, the Built Environment, Agriculture and Industry are also tasked with significant CO2 emission reductions but of a comparatively lower order namely 37.5%, 31.25%, 7.5% and 6.25% respectively. This makes transforming the electricity sector the single greatest lever in the CAP in terms of CO2 reduction (Ref. EirGrid Strategy Launch 2019, CEO presentation).</p> <p>The 2019 CAP provides a roadmap of what must be achieved and requires 70% of all our electricity to come from renewable energy sources by 2030. This almost doubles our current target of 40% by 2020.</p> <p>To achieve the 70% target, the CAP earmarks a target of 3.5GW off-shore wind and a doubling of existing on- shore wind from circa 4GW (today) to 8.2GW by 2030.</p> <p>To put this scale of the ambition into further context it should be noted that it has taken 20+ years to achieve the current level of renewable penetration onto the Grid. The challenge is now to achieve twice as much in half the time.</p> <p>2 The Role of Local Authorities and Local Authority Planners</p> <p>The scale of the CAP ambition is unparalleled and the pace of renewable energy delivery and penetration needs to increase exponentially.</p> <p>Coillte believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this ambition in the form of plan-led ‘Renewable Energy Strategies’ (RESs) as an utmost priority.</p> <p>Planners have the unique skills and experience to establish a clear and consistent plan-led approach to the delivery of this considerable quantum of renewables. Planners have a responsibility to ensure an appropriate, plan-led framework is in place to provide certainty and predictability to the market and to ensure the appropriate balance between all land use constraints and opportunities, and community and other interests.</p>
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	<p>All 34 local authorities signed a charter on 29th October 2019 committing to decarbonising their activities, to pursue sustainable development and to build climate resilience into every aspect of the work they do. On the occasion of the launch of the Charter Minister Bruton said “I am determined that government both at central and local authority level will lead the way in our response to climate change”. The development of Renewable Energy Strategy(ies) and their incorporation into the making of County Development Plans is a fundamental element of this commitment.</p> <p>3 Planning Policy Hierarchy and County Development Plans</p> <p>The mandate for action has been clearly set out in the CAP 2019 and also in policies and objectives in the National Planning Framework (2018).</p> <p>In addition, the Office of the Planning Regulator (OPR), which was established in 2019 with the aim of enhancing the proper oversight of the planning system in Ireland, wrote to Local Authorities within the Eastern & Midlands Region Assembly (EMRA) area advising them to maximise the output of renewable energy sources in line with national government policies on climate change.</p> <p>The EMRA Regional Spatial and Economic Strategy (RSES) also clearly recognises the urgent need to decarbonise the energy sector (Section 7.9 Climate Change). Policy RPO 7.35 and 7.35 of the EMRA RSES state: “RPO7.35: EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.” “RPO 7.36: Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to ‘Wind Energy Development’ and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions.”</p> <p>Coillte strongly believes the identification of ‘Strategic Energy Zones as areas suitable for larger energy generating projects’ should be set in the context of a plan-led approach, namely a holistic Renewable Energy Strategy for the entire EMRA Region.</p> <p>Coillte believes that this approach would ensure inter county consistency in relation to designating renewable energy zones, identifying landscape sensitivities and required set-back distances.</p> <p>However, notwithstanding our strong belief in a holistic Regional Renewable Energy Strategy, Coillte recognises that time is of the essence and that RPO7.35 is not time bound and may not materialise in the short term. With this in mind, Coillte recommends that each local authority in the Region incorporate a RES into the making of its individual County Development Plan.</p>
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	<p>In so doing each local authority must engage closely with neighbouring local authorities and with other local authorities in the EMRA. A regional steering group comprising planners from each local authority and potentially led by Wicklow planners and/or EMRA, would be optimum. A representative from the DHPLG should also be requested to join the steering group.</p> <p>Furthermore it is imperative that a set of guiding principles is agreed and used by all local authorities in developing local authority RESs. To this end the methodology and principles set out in “SEAI’s Local Authority Renewable Energy Strategy” [2013] remain valid and should be used. [https://www.seai.ie/publications/Methodology-for-Local-Authority-Renewable-Energy-Strategies.pdf]. The SEAI methodology is based on the 4 core steps as follows: The Preliminary Phase, which clarifies the local need for a LARES and identifies whether strategic environmental assessment or appropriate assessment are required; Step 1: The Policy Review, identifying all renewable energy and other relevant policies; Step 2: Identify the Renewable Energy Resources and their potential for exploitation; Step 3: Review the Constraints and Facilitators that might affect exploitation; Step 4: Develop the Local Renewable Energy Policy</p> <p>This methodology was used very successfully by Tipperary Co. Co. in devising their RES and was endorsed by the planning profession in 2018 at the Irish Planning Institute awards. This supersedes the step by step approach to identifying wind energy zones in the 2006 WEGs, which have been transposed into the 2019 Draft document2 .</p> <p>Based on Coillte’s extensive experience of developing and facilitating wind farms in Ireland we suggest that the following recommendations complement the principles in the SEAI document:</p> <ul style="list-style-type: none"> • Each local authority carry out a full assessment of all lands within their County and classify areas for renewables using terminology which is agreed in advance with the Steering group (referred to earlier). Such terminology could include: ‘No-Go’, ‘Open to Consideration’, and ‘Preferred’ areas. • Each local authority consider/reconsider its Landscape Character Assessment (LCA) and identify landscape sensitivities vis-a-vis renewable energy developments. As above an approach and terminology should be agreed in advance with the Steering group. Such terminology could include ‘Low’, ‘Medium’, and ‘High’ sensitivity. <p>It should be noted that turbine technologies have advanced significantly in the past decade and this trend is set to continue. For this reason we suggest the SEAI Wind Atlas, or any similar general wind resource data, is not used as a hard constraint when identifying suitable areas for on-shore wind.</p> <p>In addition, we recommend that existing grid constraints are not considered hard constraints when preparing RESs. This is because, amongst other things, the development of the Grid will react to (planning) consented developments where necessary. In essence this means that a planning consent, or indeed a critical mass of planning consented projects triggers grid development/reinforcement where necessary.</p> <p>This issue of existing grid availability was recognised in the SEAI [2013] document which suggested that “local authorities may consider policies and objectives which</p>
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	<p>could underpin and support infrastructure and network deployment to achieve national energy targets while realising local RE potential”. Coillte wholly supports the delivery and upgrading of grid infrastructure to facilitate Renewable Energy potential. The EMRA RSES has excellent policies in relation to grid development [RPO10.19-10.24] inclusive and Coillte requests that these are mirrored in the Wicklow CDP.</p> <p>3.1 Wind Energy Development Guidelines 2006 Focussed Review/Draft WEGS 2019 and Local Authority Wind Energy and Renewable Policies</p> <p>Coillte acknowledges and understands the requirements of Circular PL5/2017 “Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review” and the statements contained therein in relation to: “operating existing development plan policies and objectives [in relation to wind energy and renewables] until the completion of a focussed review of the Wind Energy Development Guidelines 2006”</p> <p>Also the obligation on local authorities in these Guidelines to “acknowledge and document national policy on renewable energy” in the development plan and “indicate how the plan will contribute to realising overall national targets on renewable energy...”</p> <p>The Draft WEGs 2019 have been published and will be adopted before the final Wicklow County Development Plan is made. There is therefore no impediment to incorporating a new renewable energy strategy into the making of this new CDP.</p> <p>4 Working in Partnership</p> <p>The scale of the overall CAP ambition is considerable and requires considerable collaboration between all parties involved or associated with renewable energy including the communities that will ultimately host the infrastructure.</p> <p>Coillte has an experienced team in the area of wind farm planning and development and is available to work in partnership with Wicklow County Council to support the realisation of the CAP targets.</p> <p>As a semi state company, Coillte profits belong to the state and are returned by dividend to the shareholder on an annual basis. We operate a ‘Fair Play Model’ of engagement that commits to transparent dialogue and the sharing of information on an on-going basis with those most impacted by proposed developments.</p> <p>Coillte is committed to ensuring that local communities benefit from having a wind farm in their locality in terms of Community Benefit Funds and we are also working hard in the area of Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.</p> <p>Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Wicklow County Council to deliver on local and wider needs in a manner which aligns with the overall vision for the County. We are rooted in communities all over Ireland and our record of providing land for and facilitating local sports clubs is a good demonstration of that local commitment. We will also continue to work with communities and Wicklow</p>
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	<p>County Council to facilitate the development of a wide range of community and sporting facilities, ranging from playing pitches and clubhouses to running tracks, all within easy reach of local communities.</p> <p>Coillte is also Ireland’s leading provider of outdoor recreational activities nationally, with over 3,000km of hiking trails, 12 forest parks, and 260 recreational sites, some of the finest of which are located in County Wicklow. Every year it is estimated there are over 18 million visits to our forests nationwide for outdoor recreation activities. Investment in outdoor recreation and forest based activities also drives economic activity, supporting job creation and sustaining local communities. Located in some of the most beautiful settings in County Wicklow, the Coillte estate is in a strong position to play a key role in developing “increase dwell time” tourism and recreation throughout the county. The nature of the Coillte estate encourages visitors to “play and stay”, whilst also capitalising on the potential of Ireland’s Ancient East without compromising the scenic landscape or rich heritage.</p> <p>In relation to the Wicklow Tourism Strategy and Marketing Plan 2018 – 2023 which identifies priorities and actions to ensure the County is successful in realising its tourism potential, Coillte therefore has a significant role to play in the priority actions identified, particularly in growing thematic experiences, promotion of the “active in nature” concept and developing new accommodation. Coillte considers it vitally important therefore, that the Development Plan includes clear objectives to deliver on these priority areas and welcomes future opportunities to work with Wicklow County Council and other stakeholders to deliver same.</p> <p>The zoning of appropriate lands for the purposes of commercial, industrial, residential, tourism and recreational uses is considered essential to ensure the availability of appropriate land-banks into the future. Coillte would like to continue to work in partnership with Wicklow County Council to identify and develop suitable lands that address local needs and to ensure the necessary infrastructure, services and supports are in place.</p> <p>Timber is without doubt one of the most environmentally-friendly and versatile building materials available, and being a natural carbon sink can be considered truly renewable. Coillte requests that Wicklow County Council promote the use of sustainable timber products wherever possible in building and construction projects.</p> <p>5 Conclusion</p> <p>Key asks of the Local Authority in the preparation of the Wicklow County Development Plan:</p> <ul style="list-style-type: none"> • Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process. • Develop a Renewable Energy Strategy for the county based on the principles of the SEAI LARES as part of the County Development Plan review. • Lead the EMRA region in developing a consistent approach to key RES issues including a consistent approach to identifying suitable lands and categorising landscape sensitivity. Ensure that wind speed and existing grid capacity issues are not considered constraints. • Work in partnership with other Government Agencies and third parties, including the public, to achieve these goals. • Continue to support sustainable rural based enterprises such as forestry and
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	<p>tourism in the County and make adequate provisions and objectives to facilitate their delivery.</p> <ul style="list-style-type: none"> • Promote the use of sustainable timber products where possible.
<p>KRA Visionary Project Partners (D95)</p>	<p>It is vital that we continue to strengthen our sustainable development planning for our future Wicklow wellbeing, especially in this time of (Wicklow) Climate and Biodiversity Emergency. Please prioritise the following principles in the upcoming plan:</p> <ul style="list-style-type: none"> • Set policy that all development must thoroughly assess Climate and Biodiversity impact before being given permission.
<p>Judy Osborne (D98)</p>	<p>This submission includes a copy of two earlier submissions from the public consultation stages of the County Development Plan review in 2008 and 2003.</p> <p>2003 Submission</p> <p><i>Transport</i></p> <p>A Mobility Strategy should be devised outlining the proposed Occupier Profile of any development and as to whether or not it is intended to meet local housing need or is for a wider commuter catchment area. Information should be provided as to what measures are being taken to promote Sustainable Development by means of access to non-car based commuting modes to workplace.</p> <p><i>Minimising Energy Consumption in Production of Building Materials and Construction</i></p> <p>A strategy should be provided for the maximum use of the most environmentally sustainable building materials and the minimisation of the least environmentally sustainable, both in production and lifetime performance, for example, uPVC. uPVC is environmentally highly problematic in its dioxin producing manufacturing process, its short environmental and economic life as a building material and the disposal and toxic waste difficulties on redundancy.</p> <p><i>Energy Conservation</i></p> <p>While amendment of Building Regulations is currently proposed to provide for increased insulation standards, this is not to prevent a Local Authority from seeking increased energy insulation standards in any development in the course of this, in order to meet greenhouse gas abatement targets at local level.</p> <p>2008 Submission</p> <p>CHAPTER 5 DESIGN</p> <p>Sustainable building methods</p> <p>Policy D2 Council will advise builders to use sustainable building methods beyond building standards. X this policy is not working.</p> <p>New housing is not suitable to the 21st century.</p> <p>We propose that polices be rewritten along the following lines:</p> <p>The Council will have regard to the following issues (some of which are expanded later):</p> <ul style="list-style-type: none"> • Desirability of conservation and re-use of buildings;

	<ul style="list-style-type: none"> • Value of building to higher densities, for example encouraging terraced housing as opposed to semi-detached or detached forms; • Integration of both passive and active solar technologies into buildings, such as solar and photovoltaic panels as well as of wind energy involving turbines for both domestic and non-domestic development • Orientation of buildings to enhance solar gain and reduce overshadowing, thus for instance, not requiring houses to be parallel to adjacent roads • Consider the energy performance of different buildings, e.g. discourage the building of structures • Encourage opportunities for plant growth on and around buildings, recognizing the potential for wildlife support • Encourage robust building forms which are both adaptable to different uses and are built to last • Encourage the re-cycling of materials from non-destructive / renewable sources and the use of both local and natural, environmentally sensitive materials. <p>Designing for efficient space and energy efficiency</p> <ul style="list-style-type: none"> • Dwellings shall incorporate adequate storage facilities, in accordance with the most stringent requirements in Ireland (e.g. for Dublin City) as well as facilities for drying clothes, recycling waste and composting (whether individual or communal). The Council will encourage the use of materials and technologies that contribute to environmental sustainability. Several neighbouring counties are adopting these standards and Wicklow’s policies should not be inferior to these. • Wicklow County Council shall support the achievement of standards higher than the current Building Regulations. These shall include the projected 2010 standards and, for example, A-Rated Passive House standard, with the aim of future-proofing in terms of energy efficiency. Developers and/or their agents shall further include an indication by the developer of how proposed development can be further upgraded to carbon neutral standard using a range of commercially available technologies, including photovoltaic solar panels as well as micro wind turbines. • The national best practice guidelines on Passive Home Design were launched in Dublin Castle in July 2008. It was co-authored by the Wicklow based architectural practice, MosArt. SEI regards the Passivhaus Standard of construction as providing an excellent basis for achieving a significant reduction in carbon emissions from the residential sector in Ireland. The first certified Passive House was built in Wicklow by MosArt. A Passive House requires 60% less energy for space heating compared to the recently upgraded energy efficiency standards (which introduced a 40% reduction in carbon emissions from the 2007 standards). Achieving such standards requires careful master planning to maximise passive solar orientation as well as achieving a compact building form. It also involves exacting standards of detailing and construction in terms of insulation of the building envelope (including triple glazed windows), airtight construction, reduction of thermal bridges and the use of a highly efficient heat recovery mechanical ventilation system. • Investing in Passive House design brings a multitude of benefits to the building manager and/or homeowner. Focusing on financial issues for a dwelling, for example, the space heating costs will be dramatically reduced compared to conventional construction standards. As an example, the total combined cost of space heating, domestic hot water and operating the mechanical ventilation system in the above referred to demonstration house has been measured by UCD
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	<p>as being €1.00 (one Euro) per square metre per year. Passive Houses are also proven (as measured by UCD) to provide excellent air quality through the ventilation system which extracts stale or humid air from bathrooms and kitchens and supplies fresh air to all living spaces and bedrooms. High levels of whole-house comfort are guaranteed through the use of superior detailing in terms of insulation and air tightness. Occupants of Passive Houses also benefit in terms of raised awareness of sustainability issues, helping them to become environmental ambassadors and spreading the uptake of such ground-breaking building practices.</p> <p>Alternative heat sources for large complex developments</p> <p>In regard to multi-use development, the Council shall seek evidence that the opportunity of involving energy innovative means of energy production, such as combined heat and power, (CHP) as well as symbiosis between different buildings and their uses has been thoroughly investigated. This could comprise, for example the utilisation of the heat excess of one building / use (e.g. offices) to the benefit of another (e.g. residences, hotel, swimming pool).</p>
<p>SSE (Scottish and Southern Energy plc) (D99)</p>	<p>SSE wishes to make this submission for consideration as part of the <i>Wicklow County Development Plan – Issue Paper</i> consultation. SSE welcomes the publication of this draft and supports the central role that County Development Plans will play in implementing the National Planning Framework (NPF) which aims to guide spatial planning while prioritising objectives including compact growth, sustainable mobility and the low carbon transition. Local authority planning will also be crucial to ensuring Ireland can deliver the objectives of the Government’s Action Plan to Tackle Climate Disruption. SSE would like to highlight the following areas for consideration.</p> <p>Reflecting climate action in local authority planning</p> <ul style="list-style-type: none"> • Alignment and consistency in relation to climate action is critically important. The Climate Action Plan commits to reaching 70% renewable electricity by 2030 through doubling Ireland’s onshore wind capacity and installing at least 3.5GW of offshore wind. Arklow Bank Wind Park will allow County Wicklow to make a significant contribution towards this offshore wind target, putting the county in a leading position nationally in regard to its response to climate change. Offshore wind development will also bring significant socio-economic benefits to the County. The Climate Action Plan also aims to drive the decarbonisation of heat and transport through electrification with ambitions for 1 million EVs and 500,000 deep retrofits by 2030. 3 • SSE welcomes the priority given to climate action in the East and Midlands Regional Assembly Regional Spatial and Economic Strategy (RSES) and the 16 Regional Strategic Outcomes described in the strategy which are aligned to those identified in Ireland’s NPF and the UN’s Sustainable Development Goals. We welcome the EMRA’s identification of climate action as a key principle underpinning the region’s RSES. • These priorities and objectives need to be reflected in Wicklow’s County Development Plans. Failure to prioritise implementation of the appropriate policy measures at a local level will only increase the costs of measures in the future and exacerbate the impacts of climate change.

Response of Chief Executive

The submissions cover a considerable variety of climate change issues; in responding to same the focus will be on those issues that are relevant to the County Development Plan. It is important to recognise that the best manner of addressing climate change in a County Development Plan is the subject of ongoing government policy development including the introduction of a climate assessment toolkit (Action 65 of the Government’s Climate Action Plan) and forthcoming updates to statutory guidelines to be published by the Minister on the preparation of development plans.

Furthermore, it must be borne in mind that the County Development Plan is only one in a suite of strategies / plans that can contribute to climate change adaptation and mitigation. At a County level, a Climate Change Adaptation Strategy has already been adopted and County Climate Action Plan (which will address a wider range of issue that the adaptation plan puts forward) is in development. These strategies / plans will set out a much broader range of measures that need to be taken to address this challenge, and will clearly identify the best mechanism for achieving that action, whether that be through the County Development Plan or some other action of the Local Authority or other agency.

In addition, it is also important to note that the policies and objectives of the County Development Plan in themselves do not deliver ‘actions’ and do not provide an ‘operational plan’ for how the Local Authority will carry out its functions or expend its resources / funding; but rather they set the framework within which development can occur, either by private individuals / companies or public bodies, and what standards they must both adhere to or goals they should endeavour to realise. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan.

EXISTING CLIMATE CHANGE PLANS/STRATEGIES

County Development Plan 2016 - 2022

Climate change has been addressed directly in a number of Wicklow’s previous development plans; in particular the 2016 plan which includes a comprehensive overview of the climate change challenge, the role of the County Development Plan in addressing same, a detailed ‘audit’ of the plan (similar in process to Strategic Environmental Assessment) to ensure that the plan contributed positively and actively to both mitigation and adaptation and gave rise and support to the inclusion of numerous policies and objectives in the plan in the areas of land use, transport, energy, building design and flood risk.

Goal 10 of the CDP 2016 related specifically to Climate Change;

“to 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.”

Climate Change and the County Development Plan (CDP) 2021 - 2027

It is intended that the new plan will build on the previous plans and having regard to more recent State climate change policy and legislation (such as the National Mitigation Plan 2017, the National Adaptation Framework 2018 and the Climate Action Plan 2019) along with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), as well as the locally adopted Climate Action Strategy 2019 and the Climate Action Charter which WCC signed in December

2019, climate change will be very much to the fore of the new plan and will influence all aspects of the plan.

Climate change will be directly addressed with a specific climate change chapter and indirectly throughout the entire plan by integrating climate change mitigation and adaptation into the plan objectives.

The County Development Plan, as a land use framework, has only a certain remit with regard to mitigation and adaptation to climate change, as not all sources and impacts are associated land use or development. Further to this the County Development Plan has no role in allocating funding or resources to carry out climate change actions / initiatives. Wicklow County Council and other government organisations have a number of climate change related strategies / plans that address many of the issues raised in the submissions received.

However, it is recognised that the County Development Plan has a key role in developing and enhancing an integrated approach to climate action on spatial planning policy development.

In directly addressing mitigation and adaptation to climate change, it is proposed that the new County Development Plan will focus on the following issues in crafting the climate change action strategy of the new plan:

- Compact growth and crafting more sustainable settlement patterns
- Sustainable and low carbon transportation
- Enhancing public transport and access to same
- Flooding, surface / storm water management
- Natural resource management
- Renewable energy
- Low energy building design

National Adaptation Framework (2018)

The National Adaptation Framework (NAF) sets out a clear pathway for Ireland to become a resilient economy and society, capable of dealing with the complexities and challenges climate change is likely to present. The NAF sets out the National Adaptation Strategy which aims to reduce Ireland’s vulnerability to climate change impacts. The critical importance of planning and development measures in the overall strategic approach to adaptation to climate change is recognised here and the role of the spatial planning process, with full engagement of key stakeholders, in providing an established means through which to implement and integrate climate change objectives, including adaptation, at local level. The strategy was a key influence in the crafting of the Wicklow County Council Climate Change Adaptation Strategy.

National Mitigation Plan 2017

This is the first National Mitigation Plan (NMP) and it is an initial step to set Ireland on a pathway to achieve the level of decarbonisation required. This plan provides guidance on how to approach incorporating mitigation into the areas of ‘Decarbonising Electricity Generation’, ‘Energy Efficiency in the Built Environment’, ‘Decarbonising Transport’ and ‘An Approach to Carbon Neutrality for Agriculture, Forest and Land Use Sectors’.

Climate Action Plan (CAP) 2019

This is an action plan, with a sectoral roadmap and a coherent set of policy actions, to reduce Ireland’s greenhouse gas emissions in order to reach lower emission targets by 2030 and 2050, published by

the Department of Communications, Climate Action & Environment. The plan sets targets, measures to deliver the targets and actions in the following areas - ‘electricity’, ‘enterprise’, ‘built environment’, ‘transport’, ‘agriculture, forestry and land use’, ‘waste and the circular economy’ and ‘public sector leading by example’.

Wicklow’s Climate and Biodiversity Emergency

On the 29th of April 2019 Wicklow County Council declared a Climate and Biodiversity Emergency. This emergency requires action on Adaptation and Mitigation of Climate Change and on Biodiversity. In response to climate change, WCC has put in place the WCC Climate Change Adaptation Strategy (Sept 2019) which sets out the approach for adaptation to Climate Change and it addresses how Wicklow County Council as an organisation responds to the impacts of climate change. The WCC Climate change Adaptation Strategy has been drawn up in line with the Framework (NAF) sets out a clear pathway for Ireland to become a resilient economy and, National Mitigation Plan and the Climate Action Plan. WCC has also established a Climate and Biodiversity Special Policy Committee (SPC), and a Climate Action Officer, both of which will play a key role in guiding the implementation of the Climate Change Adaptation Strategy as part of Wicklow County Council’s response to Climate Change and Biodiversity loss.

Wicklow County Council Climate Change Adaptation Strategy (Sept 2019)

This strategy addresses how Wicklow County Council as an organisation responds to the impacts of Climate Change. It does not look directly at the work being done to prevent or mitigate Climate Change.

The Climate Adaptation Strategy aims to:

- Make Wicklow a stronger County by reducing impacts of future climate change related events.
- Fully consider and mainstream climate adaptation in the day to day delivery of services by WCC.
- Actively engage with and inform citizens and communities in Wicklow about the impacts of climate change. Public awareness is key to developing effective climate adaptation measures.

The Strategy features a range of actions across the following six themes:

- 1** Local Adaptation Governance and Business Operations (functions and activities of the local authority)
- 2** Infrastructure and Built Environment (climate resilient structural infrastructure)
- 3** Land use and development (sustainable policies and measures)
- 4** Drainage and Flood Management (drainage and flooding)
- 5** Natural Resources and Cultural Infrastructure (natural capacity to absorb the impacts of climate change)
- 6** Community Health and Wellbeing (empowering resilient communities)

Theme 3 on ‘Land use and development’ is relevant to the County Development Plan. The goal here is

‘Sustainable policies and measures are devised influencing positive behavioural changes, supporting climate adaptation actions and endorsing approaches for successful transition to low carbon and climate resilient society’.

The strategy states that *“Climate Change will be fully integrated as a concern in all relevant plans and policies that influence planning and development. It will ensure that the County Development Plan and associated plans focus on delivering sustainable communities with climate smart buildings and infrastructure. It will ensure the continuing focus on protecting habitats in the planning system and also*

recognises their role in protecting against Climate Change threats.” A number of actions have been identified to fulfil this goal by integrating climate change into the CDP. The current County Development Plan 2016 fulfils this goal and it will be further enhanced in the draft CDP.

Climate Action Charter (Dec 2019)

WCC signed up to the Climate Action Charter in December 2019. This charter includes substantial targets with regard to mitigation of climate change and increase energy efficiency. WCC are currently in the process of drawing up an implementation plan which takes in all the actions from the Climate Action Charter and the Climate Adaptation Strategy. The implementation plan will list all the actions, who is responsible for delivering it and an indication of the time to deliver it.

Wicklow County Council Draft Energy Plan / Energy Performance Strategy (2020)

WCC Housing and Corporate Estate Department are currently working on the WCC Energy Plan/ Energy Performance Strategy which seeks to deliver the targets of the Charter with regard to WCC infrastructure / assets. Upgrading of the public lighting to LED lights is an example of a project which is being rolled out over the next 2 years.

National Planning Framework (2018) – Project Ireland 2040

The National Planning Framework (NPF) has clearly-defined National Strategic Outcomes (NSOs) supporting the objectives of this framework, including Transition to a Low-Carbon and Climate Resilient Society, Compact Growth and Sustainable Mobility.

A top priority of the NPF is for compact and sustainable growth with the cities the main target for population growth in the country and a settlement hierarchical approach throughout each county. This will mean increasing the proportion of more compact forms of growth in the development of settlements of all sizes, with a focus on urban infill and the re-use of brownfield lands. ‘Brownfield’ targets are to deliver at least 40% of all new homes nationally within the built-up footprint of existing settlements, comprised of at least 50% of all new homes in the five cities and at least 30% of all new homes in settlements elsewhere. Such national objectives will have a significant influence in the crafting of the new draft CDP’s Core Strategy and settlement hierarchy.

Regional Spatial and Economic Strategy (RSES) for Eastern and Midlands Regional Assembly (EMRA)

Climate Action is a cross cutting key principle of the RSES with the following objective - *‘The need to enhance climate resilience and to accelerate a transition to a low carbon society recognising the role of natural capital and ecosystem services in achieving this’.* The RSES is in itself a **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The RSES clearly states that Local authorities, in developing their core strategies and settlement hierarchies, will consider the following growth enabler, in relation to Climate Action, for every part of the Region to meet its potential;

Climate Action – *to accelerate a transition to a greener, low carbon and climate resilient region with focus on energy transition, carbon sequestration and reduced travel demand through the promotion of sustainable settlement patterns. Support the Climate Action Regional Offices and local authorities in their implementation of climate strategies.*

The RSES, in line with the National Planning Frameworks NSOs, has the following Climate Action Regional Strategic Outcomes (RSOs):

RSO 6. Integrated Transport & Land Use

Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8,9)

RSO 7. Sustainable Management of Water, Waste and other Environmental Resources

Conserve and enhance our water resources to ensure clean water supply, adequate waste water treatment and greater resource efficiency to realise the benefits of the circular economy. (NSO 8, 9)

RSO 8. Build Climate Resilience

Ensure the long-term management of flood risk and build resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region.(NSO 8, 9)

RSO 9. Support the Transition to Low Carbon and Clean Energy

Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. (NSO 8, 9)

RSO 10. Enhanced Green Infrastructure

Identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as our coastlines, farmlands, peatlands, uplands woodlands and wetlands. (NSO 8, 9)

RSO 11. Biodiversity & Natural Heritage

Promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection. (NSO 7, 8)

The RSES further states the following:

Local authorities, in preparing their development plans, are required to include objectives for the promotion of sustainable settlement and transportation strategies in urban and rural areas. This is to include the promotion of measures to reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources, reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change.

Guidelines, prepared by The Department of Housing, Planning and Local Government (DHPLG), will provide clarification around the development of a suitable methodology for measuring carbon emissions, appropriate to strategic land use designation and related transport infrastructure in the context of the preparation of city/county development plans.

It is not the intention of the RSES to render approval of land use designation or transport infrastructure, conditional on consistency with GHG emissions reductions targets in the absence of an agreed methodology at national level. In the interim, the RSES will support the development of a methodology to assess the impact of city and county development plan strategies on carbon reduction targets.

Climate policy objectives are integrated throughout the RSES, including the following priorities:

- Built Environment** *Promote sustainable settlement patterns to achieve compact urban development and low energy buildings.*
- Sustainable Transport** *Achieve modal shift towards public transport, walking and cycling and roll out EV charging infrastructure.*
- Energy & waste** *Identify Strategic Energy Zones and district heating opportunities, support a just transition to clean energy and a circular economy.*
- Flood resilience & water** *Address flood risk and coastal erosion, to ensure resilience of critical infrastructure and water resources in the Region.*
- Green Infrastructure & Eco-system services** *Integrate Green Infrastructure and Ecosystem services into development and land use plans.*

The following regional climate change policy objectives (RPOs) are relevant to land use plans:

- RPO 7.35:** *Eastern Midlands Regional Assembly shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.*
- RPO 7.36:** *Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to ‘Wind Energy Development’ and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions.*
- RPO 7.38:** *Local authorities shall consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in local authority areas shall be carried out and statutory planning documents shall identify local waste heat sources.*
- RPO 7.40:** *Local authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings. All new buildings within the Region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).*
- RPO 7.41:** *Support and promote structural materials in the construction industry that have low to zero embodied energy & CO2 emissions.*
- RPO 7.42:** *Local authorities shall include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including measures for more recharging facilities and prioritisation of parking for EVs in central locations.*

PLANNING PERMISSION AND CLIMATE CHANGE

It is existing planning policy that planning applications, that meet certain criteria, are required to submit different assessments that ensure climate change mitigation/adaptation measures are incorporated into any proposed development or that there is no/minor climate change impacts. The

need to manage wastewaters and surface water, or to carry out flood risk assessment in certain flood zone areas or to show how sustainable mobility will be achieved are examples. Therefore including a general policy to seek that all developments assess the impact on the climate is not considered necessary, but will be considered in the drafting on the new plan.

COUNTY DEVELOPMENT PLAN CHAPTERS

Given that climate change is relevant to the majority of the chapters in the CDP, the climate change aspects to the issues raised are addressed here and all other aspects of that topic is addressed under the relevant section of this Chief Executive’s Report.

Core Strategy and Settlement Hierarchy

It is acknowledged that sustainable compact settlements with integrated land use planning and transport are key to reducing the impact of climate change where people work, live, attend school and can carry out their day to day activities locally. The new plan, through the core strategy and settlement hierarchy, will support the need for compact growth and better integration of transport and land-use planning, including walking and cycling infrastructure, public transport, park-and-ride facilities, etc.

Housing

The Housing chapter will set out the land use policies and objectives relevant to the development of housing in the County. Similar to the current CDP housing chapter, mitigation against and adaptation to climate change will be integrated throughout the housing chapter with policies, objectives and standards that promote and facilitate energy efficient building design, environmentally sustainable layout and locations. In addition to this the current ‘Development and Design Standards’ address a range of climate related issues, with specific reference to Section 1 ‘Mixed use and housing developments in urban areas’ and ‘Green issues’ and Section 10 ‘Energy and Telecommunications – Design Standards for improved energy efficiency’. It is intended that these provisions will be maintained and enhanced in the new plan.

High energy rated homes / insulation grants.

The current County Development Plan promotes and requires the building of energy efficient homes/buildings. Such objectives (CCE20, CCE21, CCE25 & CCE26) will be carried through to the draft CDP. It is not the role of the CDP to provide grants for retrofitting or insulation.

- CCE20** *To require all new buildings during the design process to incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 243 of 2012 European Communities (Energy Performance of Buildings) Regulations 2012 and the Building Control (Amendment) Regulations 2014.*
- CCE21** *To facilitate retrofitting of existing buildings with electricity saving devices and installations, where permission is required for such works.*
- CCE25** *To require all new buildings during the design process to incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 273 of 2012 European Communities (Energy Performance of Buildings) Regulations 2012 and the Building Control (Amendment) Regulations 2014.*
- CCE26** *To facilitate retrofitting of existing building with heat saving devices and installations, where permission is required for such works.*

Economic Development

The Economic Development chapter will set out the objectives relevant for the sustainable development of Wicklow’s economy, that are relevant to and implementable through a land-use plan. Similar to the current CDP economic development chapter, mitigation against and adaptation to climate change will be integrated throughout the economic development chapter of the new plan with policies, objectives and standards that promote and facilitate energy efficient design, environmentally sustainable layout and locations of new economic development.

The following economic development issues have been raised in a number of the submissions:

Agriculture

Agriculture is seen as a significant contributor to green house gas emissions with many submissions seeking that the CDP addresses the need to ensure climate change friendly agriculture practices are carried out. The current CDP objectives facilitate the continued operation of farming and where planning permission is required for a farm activity or structure the plan has a number of objectives in place to ensure that it is done so in a sustainable environmentally friendly manner. Such objectives will be carried through to the draft CDP. The role of the CDP is limited however with regard to ensuring farming practices are taking climate change on board; this would be a matter for the Department of Agriculture in conjunction with other agricultural bodies. Through the new Climate Action office, Wicklow County Council will endeavour to work with farmers and agriculture agencies to encourage change.

Industry

The current CDP provides policy, objective and standards that promote and facilitate the development of industry and commercial developments that are environmentally sustainable in their location, design and daily workings. It is intended that these provisions will be maintained and enhanced in the new plan.

Working from home / broadband

Wicklow County Council has adopted a ‘**County Wicklow Digital Strategy 2019 - 2022**’ with a vision *to advance our broadband and digital infrastructure, advance our citizen’s engagement and digital skills, further develop our Counties digital economy and digitally transform our local authority*. With the role out of broadband throughout the county, the strategy envisages that remote working and learning will increase and will lead to an increased demand for co-working facilities and digitally enhanced spaces, supporting the further development of local digital hubs is instrumental for local community sustainability.

The current County Development Plan objectives facilitates people working from home (Objectives T1 (Broadband) & EMP19) and such objectives will be carried through to the draft CDP.

T1 *To facilitate the roll out of the National Broadband Plan and the development/expansion of communication, information and broadcasting networks, including mobile phone networks, broadband and other digital services, subject to environmental and visual amenity constraints.*

EMP 19 *Home Based Economic Activity: To encourage, where appropriate, home-based economic activity including the provision of small-scale individual enterprises. Proposals which involve the change of use and/or new development for purposes of home-based employment will generally be considered favourably where it can be clearly demonstrated that:*

- *the nature of the proposed process or activity to be carried out shall be appropriate to and compatible with the character and amenity of the adjoining area;*
- *the proposed development is of an appropriate scale for its location;*
- *there is no adverse environmental, health and safety impacts; and*
- *the development is not detrimental to residential amenity.*

In dealing with applications for such developments, the planning authority will have regard to the following:

- *the nature and extent of the work;*
- *the effects on the amenities of adjoining properties particularly as regards hours of operation, noise and general disturbance;*
- *the anticipated level of traffic generation; and*
- *the generation, storage and collection of waste.*

Permissions for change of use shall be temporary for a period of five years, to enable the Planning Authority to monitor the impact of the development. Permission will not normally be granted for such changes of uses in apartments.

The Planning Authority will determine the appropriate number of employees that will be permitted at a development. In certain cases, it may be appropriate that a development is restricted to owner-operator use only, and no other employees will be permitted. In any case, no more than three people, including the owner-operator will be permitted to be employed at such a development.

Digital hubs

The development of digital hubs at appropriate locations is seen as a tool to address climate change, facilitating people working locally. The current CDP facilitates the development of all employment generating uses, including such hubs, at appropriate locations (Objective EMP1, EMP2, EMP4, EMP5, EMP7; it is intended that these provisions will be maintained and enhanced in the new plan.

The Local Authority’s economic development directorate is working to deliver such hubs through the county and recently under the URDF and RRDF received funding for such facilities in Arklow and Baltinglass.

Forestry

The county plan acknowledges the important role forestry has in the economic development, social infrastructure and environmental sustainability of the county. The existing plan has a number of objectives to facilitate the development of forestry and the management of the existing forestry in the county. It is intended that these provisions will be maintained and enhanced where necessary in the new plan.

Infrastructure

Similar to the current CDP infrastructure chapter, mitigation against and adaptation to climate change will be integrating throughout the infrastructure chapter with policies, objectives and standards that promote and facilitate energy efficient design, environmentally sustainable layout and locations.

The following infrastructure issues have been raised in a number of the submissions:

Energy

The County Development Plan provides policy, objective and standards that promote and facilitate the development of alternative and renewable sources of electricity to meet the electricity demand, with policy and objectives for reduction in electricity use, wind energy, solar energy, hydro energy, bio-energy and small scale renewable electricity generation. It is intended that these provisions will be maintained and enhanced in the new plan.

Renewable Energy and Windfarms

The current CDP has a number of objectives with regard to the development of renewable energy, which is facilitated throughout the county subject to proper planning and sustainable development criteria. The current CDP also has a wind energy strategy with areas of the county designated as appropriate for wind energy generation (Objective CCE6):

CCE6 *To encourage the development of wind energy in accordance with the County Wicklow Wind Energy Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:*

- *consideration of any designated nature conservation areas (SACs, NHAs, SPAs, SAAOs etc) and any associated buffers;*
- *impacts on Wicklow’s landscape designations;*
- *particular cognisance and regard being taken of the impact on wind turbines on residential amenity particularly with respect to noise and shadow flicker;*
- *impacts on visual and recreational amenity;*
- *impacts on ‘material assets’ such as towns, infrastructure and heritage sites;*
- *consideration of land cover and land uses on or adjacent to the site; and*
- *best practice in the design and siting of wind turbines, and all ancillary works including access roads and overhead cables.*

CCE7 *To facilitate the development of off-shore wind energy projects insofar as onshore facilities such as substations/connections to the grid may be required.*

CCE8 *To support community-based wind energy projects.*

Solar Energy Farms and other sustainable energy initiatives

The current County Development Plan facilitates the development of solar energy and other sustainable energy initiatives with objectives that facilitate the development of Wind, Hydro & Bio energy and Small Scale renewable electricity generation. Such objectives (CCE9, CCE10 & CCE11) will be retained and enhanced where necessary in the new plan:

CCE9 *To facilitate the development of solar generated electricity.*

CCE10 *To positively consider all applications for the installation of building mounted PV cells at all locations, having due regard to architectural amenity and heritage.*

CCE11 *To support the development of commercial scale ground mounted solar PV ‘Solar Farms’ subject to compliance with emerging best practice and available national and international guidance.*

Energy monitoring

Energy monitors are one of a number of technologies that are part of a suite of measures that can contribute to more effective energy management and efficiency in buildings (other aspects include improved construction methods, better insulation, sourcing energy from low or zero carbon fuels,

local generation and energy storage etc). In order to meet new Building Regulation standards for new dwellings (SI 183/2019), the installation of meters / energy monitoring equipment is an essential requirement. In recognition of the value of such technology, the Irish Commission for Regulation of Utilities (CRU) has tasked ESB Networks with the roll-out of the National Smart Metering Programme (NSMP), which involves replacing all existing electricity meters with Smart Enabled Meters. The roll out programme will be delivered in a phased approach, commencing with an initial delivery of 250,000 meters in 2019 - 2020, and approximately 500,000 meters in each of the 4 subsequent years. In light of the new Regulations and the CRU programme, it is not considered necessary for the County Development Plan to separately require the installation of monitors for new developments.

Flood risk

With respect to flood risk, a Strategic Flood Risk Assessment will be carried out for the new plan, as was carried out for the previous plan and all local plans since, in line with the current Flood Risk Guidelines and Best Practice.

Upper river management

There is of course value in this suggestion for dealing with downstream flood risk. However the management of upstream lands would be more appropriately addressed through an OPW lead upstream catchment policy at a national level rather than through the County Development Plan.

Buffers along water courses

The current County Development Plan provides for a minimum buffer of 10m along water courses, but in many cases, a more extensive buffer is provided based on avoiding areas at risk of flooding or to protect vulnerable ecology. In addition, a set back of 100m from soft shorelines is already in situ. These setbacks can be increased if necessary, but it is recommended that this is only on the basis of evidence supporting same.

Sustainable drainage / enhanced attenuation

The current County Development Plan addresses in some detail storm and surface water infrastructure and the need for attenuation in new developments and it is intended that the current policies and objectives will be retained and enhanced if necessary in the new County Development Plan.

Waste

The issue of waste comes up in a wide spectrum of areas from household compost bin facilities to the more strategic waste landfill sites and waste water treatment. The key role of the county development plan is providing land use objectives with regard to facilitating the management of waste and the location of waste facilities. It is intended that the current policies and objectives will be retained and enhanced if necessary in the new County Development Plan.

The key strategy influencing waste policy is the Eastern – Midlands Region Waste Management Plan 2015 – 2021, of which County Wicklow is part. The strategic vision of the regional waste plan is to rethink the approach to managing wastes, by viewing waste streams as valuable material resources can lead to a healthier environment and sustainable commercial opportunities for our economy. This plan provides policy direction, setting out what is to be achieved and a roadmap of actions to get there (this document is further discussed in the infrastructure (waste) part of this report).

Transport

The current County Development Plan provides policy, objective and standards that promote and facilitate a sustainable approach to transportation with strategies and objectives in place to facilitate the necessary actions, such as:

- reduction in the need to use vehicles, increased opportunities for walking and cycling;
- reduction in journey length and times, reduction in congestion;
- higher intensity of use of public transport;
- development and increased usage of alternative vehicle fuel sources, such as electricity, hydrogen and biofuels.

It is intended that these provisions will be maintained and enhanced in the new plan.

The following transportation issues have been raised in a number of the submissions:

Public Transport

The current CDP objectives promote the maintenance and improvement of public transport services. It is acknowledged that deficiencies exist within County Wicklow with regard to public transport. While Wicklow County Council is not itself a public transport provider, and cannot force providers to deliver services in any particular area, the current County Development Plan has in place the necessary policy framework to encourage and facilitate the improvement of public transport, such policy and objectives will be included and enhanced where needed in the new draft CDP (current objectives TR1 to TR7).

Park-n-ride

The current CDP objectives promote the maintenance and improvement of existing park-n-ride services and any future development of such services. The current plan has the following objectives (TR2) in place, and this will be enhanced where needed in the new draft CDP.

TR2 *To promote the development of transport interchanges and ‘nodes’ where a number of transport types can interchange with ease. In particular:*

- *to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies;*
- *to enhance existing parking facilities at and/or the improvement of bus links to the train stations in Bray, Greystones, Wicklow and Arklow;*
- *to promote the linkage of the LUAS extension or other mass transit to Bray town centre, Bray train station and Fassaroe;*
- *to encourage the improvement of bicycle parking facilities at all transport interchanges;*
- *to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and*
- *to allow for the construction of bus shelters, particularly where they incorporate disabled access and bicycle parking facilities.*

Promote cycling / walking

It is acknowledged that the provision of walking and cycling routes within and connecting towns and villages to each other forms an essential part of a linked-up transport system, involving a variety of transport modes, where public transport facilities can be availed of. These forms of movement are the

most environmentally and cost efficient form of transport for local journeys. A land-use plan such as this County Development Plan cannot influence whether one will walk or cycle to a destination, but through the implementation of the CDP objectives (such as those in the current plan TR9 – TR13), it is intended that facilities will be significantly improved, thereby promoting these forms of transport. Such objectives will be carried through to the new draft plan and enhanced if necessary.

Electric Vehicles

The current County Development Plan requires the provision of EV charging points in new developments. However, national standards in this regard are likely to increase, with the Government initiating public consultation on new Regulations in December 2019, which would require:

Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Ensure the installation of at least 1 recharging point. Ensure the installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Ensure the installation of ducting infrastructure for every parking space within property boundary.
New (single-unit residential) buildings	New dwelling with car parking space located within the property boundary.	Ensure the installation of appropriate infrastructure to enable the installation of recharging points for electric vehicles
Certain existing (non-residential) buildings	All non-residential buildings with more than 20 parking spaces within property boundary.	Ensure the installation of at least one recharging point by 2025

It is recommended that the new County Development Plan provides for enhanced standards along these lines but with the additional requirement that at least 1 charging point (not just ducting) be provided in any multi unit residential building car park (regardless of number of car parking spaces) and thereafter 1 charging point for every 10 spaces.

Heritage

Similar to the current CDP heritage chapter, mitigation against and adaptation to climate change will be integrating throughout the heritage chapter with policies, objectives and standards that promote and facilitate energy efficient design, environmentally sustainable developments.

The following heritage issues have been raised in a number of the submissions:

Zoning land for biodiversity / protection / nature (uplands, rivers, wetlands, forest)

The zoning of certain lands for 'biodiversity' would be difficult without detailed ecological studies providing an evidential basis for such designation and indeed might be considered to unduly impact on private property rights (for example the right of farmers to farm). There are however a wide range of existing mechanisms available to protect sites of special ecological value, or exhibit protected species of plants and animals, such as Special Areas of Conservation (SAC – EU Habitats Directive) and Special Protection Areas (SPA - EU Birds Directive) and Natural Heritage Areas (NHA – Wildlife Act), Wicklow County Council has no powers to apply such designations to lands. However it is important

to note that there are a significant number of such designations in Wicklow already which include many of the rivers, wetlands, forestry and uplands of the county.

It should be noted that the current plan does include an objective which aims to protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats or wildlife corridors (Objective NH8). Such an objective will be included in the new plan and enhanced if necessary.

Trees in urban spaces

It is acknowledged that trees, individually or in groups, make a valuable contribution to the biodiversity and amenities of a town. Trees in urban areas can act as an attractive visual relief to the built environment and as an absorber of carbon emissions. It is recommended to include an objective to encourage the provision of trees in urban areas (existing centres and new housing/ mixed use schemes).

Coastal Zone Management

The current County Development Plan includes specific coastal zone management objectives and it is intended that these will be maintained and enhanced where necessary, in line with higher tier policy and best practice.

CLIMATE CHANGE EFFECTS AT A LOCAL LEVEL

It is agreed that the effects of climate change are being seen at a local level and that lowering our carbon footprint will help to adapt to the effects of climate change and to mitigate against the future impact of climate change.

As stated initially in the response of the CE, there are a significant number of climate change actions and initiatives put forward, that albeit have merit in addressing climate change, they are not relevant to the County Development Plan and therefore have not been responded to individually. Here is a sample of some of these issues;

Carbon taxes - The County Development Plan has no role in allocating monies, this is a matter for the Department of Finance and Revenue Commissioners.

Energy/water saving devices - The provision of such devices to homeowners is not within the remit of the County Development Plan, however the plan fully facilitates the use of such devices.

Community Swap Shops - The CDP and LAPs fully facilitate the development of shop uses at appropriate locations subject to proper planning however the CDP has no role in incentivising such a shop to open.

Increase capacity of National Grid - The County Development Plan has no role in increasing the capacity of the National Grid.

Local food production - The CDP and LAPs fully facilitate the production of food locally, including allotments and local farmers markets, subject to proper planning however the CDP has no role in incentivising such schemes.

Recommendations of Chief Executive

1. To include a new chapter specifically on Climate Change in the draft County Development Plan. The strategy and objectives of the chapter will have a focus on the land use and planning aspects of adaptation to and mitigation of climate change.
2. In the development of the new plan, particular regard will be taken of the need to align with national commitments on climate change mitigation and adaptation.
3. To support the implementation of the Wicklow County Council Climate Change Adaptation Strategy and to support the land use aspects of the strategy.
4. To integrate climate change mitigation and adaptation as guiding principles throughout the plan and in particular to address the areas of:
 - Compact growth and crafting more sustainable settlement patterns
 - Sustainable and low carbon transportation
 - Enhancing public transport and access to same
 - Flooding, surface / storm water management
 - Natural resource management
 - Renewable energy
 - Low energy building design

Part 4.3.3 Housing

Name	Issue Raised
Ashford Development Association Ltd (C1)	<ul style="list-style-type: none"> • All new housing should be compliant with elderly and special needs. This being said, again we need to point out that Mt. Usher View is the most un-accessible site produced in the modern era. It would be impossible for those in a wheelchair to access green space or even to go to the bottom floor of one of the houses. The stairs are too narrow, steps on the outside, no parking near enough to houses for wheelchair access. This should be an immediate rejection of planning permission, and should never been allowed. • We believe it should be integrated with the housing being built. Ballinahinch Park was social housing build for the requirement of very expensive housing on the Macreddin Golf Course. This displacement of housing should not be standard practice. The community that builds, should be responsible for those that need, not another community. • Obviously, Ashford would not be a good place for this as will be seen over time now that we have 169 new residences. It must be a place with easy public transportation to Dublin like Bray and Greystones.
Wicklow PPN (C2)	<ul style="list-style-type: none"> • The historical move from a social housing provision model and the concept of a home, to the current concept of the property market and housing as a commodity has led to many challenges including the current increases in homelessness. Social and affordable housing is needed for our diverse communities and particularly the most vulnerable. A community cohesive and holistic approach should be adopted to encourage self-sustaining and resilient communities. • There are a range of people that find it difficult to access housing. • Type of houses that are required to meet housing demand - public owned and built social housing, accessible housing, affordable, small group housing schemes for members of the travelling community, environmentally sustainable houses, older persons housing, more sheltered housing – possibly high-rise with accessible services, modular, prefabricated houses with limited area, mix of housing types so people can change house and stay in the same development/area, eco-Housing like (Bray) Common Ground Eco-Housing Co-op, affordable. • Other measures required - granting local people planning so they can live in the area they grew up in, incentives to downsize for people on own, more investment in upgrading local authority housing stock (for energy efficiency and liveability), more rental properties and security of tenure and rent controls, get vacant housing stock back into use. • Housing – Should increase height and get more from the land.
West Wicklow Environmental Network (C7)	<ul style="list-style-type: none"> • Social housing, new and old, should have renewable energy heating systems.
Baltinglass & District Forum (C10)	<ul style="list-style-type: none"> • Increased housing is a priority for Baltinglass.
Newtownmount-kennedy Community Forum (C11)	<ul style="list-style-type: none"> • Disappointed that housing in County Wicklow’s towns bears no distinctive qualities. • CDP should identify some ‘Wicklow’ styles of housing or materials that can be used going forward to support a sense of place in the County. • New guidelines regarding higher densities will create smaller homes and this is a problem for communities as people see these homes as starter homes and are therefore reluctant to engage with their community. • Urban designs and densities are not compatible with rural lifestyles.

	<ul style="list-style-type: none"> • New houses should have higher roofs to cater for future attic conversions. • More homes required to cater for the elderly or people with disabilities. • If new guidelines require 10% of new developments to be social housing then at least 2% of those homes should be suitable for the elderly or people with disabilities. • Social housing should be distributed throughout a development and not put in one area segregated from the rest of the development. • High density development can only be justified when there are infrastructure and services in place to compensate for living in a smaller home. This includes a public park, recreation facilities, restaurants, shops, employment opportunities and effective public transport. • High density units are often undesirable because the urban style of living is not matched by the benefits of living in an urban environment. • The bulk sale of high density development to housing bodies in Newtownmountkennedy has resulted in anti-social behaviour and new residents haven’t integrated into the community. • The CDP should provide for exceptions whereby lower densities are accepted in cases where there are inadequate amenities and services to support high density.
<p>Wicklow Planning Alliance (C17)</p>	<ul style="list-style-type: none"> • Wicklow County Council should be creative like Norwich Council in England and issue inspirational briefs to architects for designs for social and public housing that are high density but low rise. • Goldsmith Street in Norwich illustrates the importance of orientation, good design, absence of tarmac and the car, priority to people, making space for children, tall windows facing south and loads of colour. • Visit the high-density low-rise charm of old Dublin with its narrow streets and small back gardens. • In order to achieve high density you do not need high rise. • An argument could be made that future housing on greenfield sites on the edge of the two key towns only could possibly secure densities of 35 plus units per hectare but with building height capped at four storeys. • The National Core Principles stipulate that the scale and nature of future housing provision should “<i>be tailored to the size and type of settlement where it is planned to be located</i>” – it is submitted that high densities in all other towns in County Wicklow is not appropriate because the other towns are not self-sustaining. • The new County Development Plan should therefore prioritise the location of new housing in the footprint of existing settlements and in particular, prioritise re-use of existing buildings, infill-development, regeneration. • Where an increase in existing building height is deemed necessary it should be no more than four storeys. • Volunteers doing the soup runs have observed the huge number of vacant buildings and the general dereliction. If the council concentrate on eliminating vacancy and dereliction you could create a great number of new homes. • Increased densities can be achieved by prioritising re-use of existing buildings, infill-development, regeneration and an increase in existing building heights to no more than four storeys. • Affordable houses are required. Too many houses are not affordable for working families. • The Council should make its own sites available for the construction of <i>affordable</i> homes. • The following is required: <ul style="list-style-type: none"> ○ Intergenerational communities; ○ High class public housing (not social housing) in the centre of town locations

	<p>so that working families would be happy to rent rather than buy;</p> <ul style="list-style-type: none"> ○ If the Council are not able to deal urgently with the issue then sell off existing vacant and boarded up council houses to families and let them restore, renew and regenerate them; ○ Homes for those on the Council’s Housing List. <ul style="list-style-type: none"> ● The groups in society that find it difficult to access housing include: <ul style="list-style-type: none"> ○ Working families that do not earn enough to get a mortgage to buy on the open market; ○ The elderly who would like to live in town near the shops and church; ○ Those that have special needs and require assisted or sheltered housing; ○ Young people leaving prison; ○ Travellers. ● Social housing should be provided in the centre of towns, within walking distance of schools, shops, church etc and social housing should be provided by the local authority not private developers. ● Social housing should be in locations where there are opportunities for employment, access to public services and good social networks. ● To provide affordable housing for local people the council should provide some serviced sites on the edge of villages, as in county Limerick. ● We do not understand your reference to “<i>genuine rural housing needs</i>”. Surely all children who want to leave the family home and become independent have genuine housing needs. The sons and daughters in most families have a preference to live in the locality where they grew up and near their parents. We find the inference that somehow the needs of rural families are more genuine is troubling. The children that grew up in Irish town and elsewhere in inner city Dublin would love to be able to afford to live beside their parents but cannot afford to do so because these areas have become gentrified. We should not be pitching rural families against urban families or suggesting that some areas should be exempt from planning law.
<p>Delgany Community Council (C19)</p>	<ul style="list-style-type: none"> ● Welcome the emphasis on mixed housing developments that allow people to remain in an area and move to a larger/smaller property as their needs change. This natural mix of ages and stages creates liveable communities and is an important contributing factor in placemaking. ● Affordability is a huge concern in our area and results in people moving away from the area and having to endure long commutes. ● The need to increase density is recognised in order to maximise land use and create more compact sustainable communities. However this should take into account the neighbouring densities as well as height of buildings to ensure that the amenities enjoyed by existing properties are not damaged. ● High density is best suited to areas which have good public transport or substantial local employment opportunities. High density and further expansion on a medium to large scale should be confined to Bray and Wicklow. ● There should be no increase to current housing density allocations in Delgany. ● Those who need specific types of accommodation include the elderly, those with mental health difficulties, young adults leaving care at 18 and carers. Carers often struggle to access affordable housing and frequently find themselves in a precarious position.
<p>Common Ground Co-Housing (C21)</p>	<ul style="list-style-type: none"> ● A co-housing community is typically made up of private dwellings and additional shared communal facilities such as a common house with a community kitchen and dining room. ● Co-housing communities are democratically self-managed with residents involved in the design and planning of the community from the outset. The design of co-

	<p>housing emphasises how homes and public space can be used to encourage community interaction, e.g. parking is positioned on the periphery of the site creating space for safe play. Costs are kept down and waste is minimised by sharing facilities, such as washing facilities, cars and tools.</p> <ul style="list-style-type: none"> • Inclusion and support of co-housing should be provided for in the development plan as a viable means of addressing housing demand and delivering affordable housing and sustainable community development in Wicklow. • Co-housing provides a model that meets housing demands, as well as providing both housing for certain groups in society that find it difficult to access housing and high-density development in Wicklow’s towns and villages. • Co-housing is a means for delivering Section 4.3.1 Sustainable Communities in the current county development plan. • Request to include the following principles in the development plan: <ul style="list-style-type: none"> ○ That population growth be concentrated in the 4 main towns and only very limited growth (10%) in villages with no car-dependent isolated housing in the countryside except where essential for economic need. ○ That only land is zoned for housing where there is access to public transport and to refrain from building commuter housing that is car-dependent. ○ That housing estates be pedestrian-friendly with high-quality housing (low energy and low water use). Where car parking spaces are needed, that these be located in one shared, separate area and not distributed beside every house. ○ That high density housing has good access to well-designed public open space. ○ That a plan for sustainable Wicklow public transport is adopted, as well as ambitious targets for an increase in public transport usage and a reduction in private (especially single-use commuting) transport usage. ○ That self-sufficient, sustainable and resilient communities are prioritised and encouraged. • Local authorities in Britain and other European countries have realised that supporting co-housing communities can address many of their priorities. • Co-housing brings many benefits including affordable housing, creating supportive neighbourhoods, includes shared community space which is available to the wider community, inclusion of co-working hubs or live-work units and active surveillance which results in crime prevention. • Common Ground Co-Housing (CGCH) is a group of 26 households who have come together to build an affordable, environmentally low-impact and mutually supportive cohousing community. CGCH comprises 35 adults and 24 children living or working close to North Wicklow. • Co-housing hope to locate in or near an existing town to access public transport and services and reduce car dependency. • We would be open to spearheading the creation of a Community Land Trust (CLT) in Ireland, if the legal structures could be accommodated here; this would be an alternative to full ownership of the land. • CGCH community are proposing a form of tenure used in LILAC Leeds called a Mutual Home Ownership Society (MHOS). A MHOS is a legal structure that enables groups of people to join together to buy or build homes that they might not otherwise be able to afford. • Another proposed component of CGCH is the use of Community Land Trusts (CLTs) which are non-profit, community-based organisations designed to ensure community stewardship of land. • Central to CGCH’s vision is the creation of a low-impact living community. • Propose that co-housing be included as a viable option to deliver affordable housing in the Wicklow County Development Plan 2021-2027 and that Wicklow
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	<p>County Council actively prioritise and pilot co-housing for sustainable shared resource use and community formation.</p>
<p>Common Ground Co-Housing (Hayley Farrell) C24</p>	<ul style="list-style-type: none"> • A co-housing community is typically made up of private dwellings and additional shared communal facilities such as a common house with a community kitchen and dining room. • Co-housing communities are democratically self-managed with residents involved in the design and planning of the community from the outset. The design of co-housing emphasises how homes and public space can be used to encourage community interaction, e.g. parking is positioned on the periphery of the site creating space for safe play. Costs are kept down and waste is minimised by sharing facilities, such as washing facilities, cars and tools. • Co-housing brings many benefits including affordable housing, creating supportive neighbourhoods, includes shared community space which is available to the wider community, inclusion of co-working hubs or live-work units and active surveillance which results in crime prevention. • Local authorities in Britain and other European countries have realised that supporting co-housing communities can address many of their priorities. • Common Ground Co-Housing (CGCH) is a group of 25 households. • Mutual Home Ownership is a new form of tenure. A MHOS is a legal structure that enables groups of people to join together to buy or build homes that they might not otherwise be able to afford. • Community Land Trusts (CLTs) which are non-profit, community-based organisations designed to ensure community stewardship of land. • Request that co-housing is included in the CDP 2021 – 2027 as one of the strategies to deliver affordable housing and sustainable communities.
<p>Wicklow Uplands Council (C27)</p>	<ul style="list-style-type: none"> • WUC welcomes the emphasis on planning new housing in existing settlements and avoiding urban generated housing in Wicklow’s scenic landscapes. • It is reasonable that people who would choose to live in rural areas of significant landscape quality should need to demonstrate ‘a functional, economic or social’ requirement (NPF policy). • Appropriate new housing provision in rural areas should encourage a further generation to succeed and thrive in rural areas, bringing new social potential to a changing economic environment. • The need for diversity of housing in rural areas is acknowledged. Social housing may need to focus on small towns and villages, but there will also be special requirements for people in the more remote areas.
<p>Blessington District Forum (C28)</p>	<ul style="list-style-type: none"> • In favour of housing being developed in the local area but this should be carried out in a sustainable manner and only built in parallel with community facilities. • Kildare Co. Co. grant planning permission for large scale housing on the periphery of the town, yet Blessington and more specifically the Municipal District of Baltinglass have to provide the services and facilities for these new residents. • All estates built in Blessington, and indeed within Co. Wicklow as a whole, should be built to a much higher standard than in the past, taking into account energy and resource consumption best practices. • Estates should be provided with well designed public open spaces, with properly planned inner roads, with ample off street parking. • Social housing should be provided within all private estates, and serious consideration needs to be given to the elderly and those with disabilities to ensure proper and suitable housing is provided. • Consideration should be given to encourage residents back into the centre of towns and villages; maybe this can be achieved by the use of grants to encourage shop owners to rent upper floors as residential units.

	<ul style="list-style-type: none"> The timeline between estate completion and taking in charge is too long. The current process is not fit for purpose and estates that were completed 5-10-15-20 years have not been taken in charge.
James Scott (D7)	<ul style="list-style-type: none"> Higher densities should be considered particularly in town cores. Many rural towns and large villages are very sparse and could support a higher density of three-story enclosed development on the main roads. Underground parking and indeed basements should be encouraged to further provide sustainable density.
Keith Scanlon (D12)	<ul style="list-style-type: none"> Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). Ensure high density housing has good access to well designed public open space. Acquire land on the edge of towns and prepare serviced sites. Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Eleanor O’Farrell (D13)	<ul style="list-style-type: none"> Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). Ensure high density housing has good access to well designed public open space. Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Igor Cusack (D14)	50 units per hectare is high.
Yasmin Fortune (D15)	<ul style="list-style-type: none"> Prioritise an innovative approach to housing development, making affordable, sustainable eco-friendly housing a priority. Prioritise homeless people, people on the verge of homelessness, people struggling with rent or mortgage. Relax planning options for temporary and community accommodation.
Ann Scanlon (D17)	<ul style="list-style-type: none"> Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). Ensure high density housing has good access to well designed public open space. Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Patricia Ryan (D18)	<ul style="list-style-type: none"> Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). Ensure high density housing has good access to well designed public open space. Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Tina Roche (D19)	<ul style="list-style-type: none"> Focus on building social and affordable housing for all citizens. Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). Ensure high density housing has good access to well designed public open space. Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
John Shorten (D22)	Facilitating low density high footprint housing estates on green field sites (distant from rail transport hubs) as preferred by property developers, instead of high density low footprint on brown field sites near existing or potential train stations, has contributed to the M11/N11 chronic congestion and is completely unsustainable.
Tessa Stewart (D26)	<ul style="list-style-type: none"> Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). Ensure high density housing has good access to well designed public open space. Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Noreen Keville	<ul style="list-style-type: none"> Build estates that are pedestrian friendly with very high quality housing (low energy

(D28)	<p>and low water use).</p> <ul style="list-style-type: none"> • Ensure high density housing has good access to well designed public open space. • Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Ann Teehan (D29)	<ul style="list-style-type: none"> • Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). • Ensure high density housing has good access to well designed public open space. • Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Isobel Connolly (D32)	<ul style="list-style-type: none"> • Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). • Ensure high density housing has good access to well designed public open space. • Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Alison Ryan (D34)	<ul style="list-style-type: none"> • Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). • Ensure high density housing has good access to well designed public open space. • Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Sinead Wallace (D35)	<ul style="list-style-type: none"> • Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). • Ensure high density housing has good access to well designed public open space with allotment space for watch residential unit. • Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Rosa Murray (D43)	<ul style="list-style-type: none"> • More homeless emergency units should be built to solve the homeless crisis. • This should only be a temporary solution and long term housing solutions should be addressed. • No family should be living in hotels long term.
Billy Timmins (D49)	<ul style="list-style-type: none"> • All housing developments should include a percentage for sale for first time buyers. • Public housing should not include one-bed upstairs units.
Mick Mulligan (D50)	<ul style="list-style-type: none"> • Adequate social housing must be provided in the County including emergency resources. • Past experience shows that social housing is best provided in mixed developments. • The major need is in urban areas. • Vacant housing needs to be brought back into use.
Disability Federation of Ireland (D51)	<ul style="list-style-type: none"> • People with disabilities make up 27.1% of the homeless population in Ireland, double the rate of disability in the general population at 13.5%. • According to the last census, 15% of people who have a disability lived in social housing compared to 10% of the general population. • The lack of suitable and affordable housing for people with disabilities is a crisis within the current housing crisis. • Wicklow County Council need to work with all stakeholders to tackle the crisis and commit to an open and transparent housing allocation process for people with disabilities, based on evidence of need. • Alternative and flexible housing solutions need to be explored, within the context of an ageing population, which includes people with disabilities, who want to live independently. • Among the various sub-populations of people with disabilities who need support are: <ul style="list-style-type: none"> • People under 65 years old who are placed into nursing homes due to a lack of adequate social care (1400 nationally).

	<ul style="list-style-type: none"> • 2,000 people nationally who remain in congregated settings • Those who remain on social housing waiting lists (7,600 nationally). • Others with disabilities who are currently living with older parents or family members. • The DFI are advocating to promote choice in living conditions for persons with disabilities, to ensure council members and members of the Strategic Policy Committee on housing are aware of the Disability and Housing Steering Committee and its remit, regularly provide updated and publicly available data regarding the number of persons with a disability on the social housing waiting list, create a specialized housing lists for persons with a disability and work with disability organisations, approved housing bodies, the HSE and other stakeholders to keep this up to date.
<p>Liam Kenna (D59)</p>	<ul style="list-style-type: none"> • Rural cluster design beside existing dwelling houses should be encouraged. • This would include using new or existing lanes for rural development so that through good planning and design; pockets of dwellings on family land will create small hamlet type developments and discourage, to a point, the conventional building on the roadside boundary that erodes the natural beauty in the area. • At present this development idea is called ‘haphazard backland suburban estate type development’ which is not correct. • This new policy would involve people who qualify for a rural house building as a cluster thus reducing the impact on the open countryside. • Currently building a second dwelling behind the existing dwelling (backland development) is discouraged. • HD23 – Housing in the Open Countryside – this should be reviewed and more detailed descriptions provided to provide clarity and remove scope for interpretation: <ul style="list-style-type: none"> ○ The 10 years included as part of the definition of a permanent native resident is good but this needs to be applied consistently. ○ Clauses 2 and 3 of the policy work well. ○ Clause 4 - more weight should be given to people who are trying to renovate or replace existing farm buildings as their own dwelling if they can prove they are tied heavily to agriculture. ○ People who qualify for a rural dwelling in an area where their parents may have a farm but, have purchased a farm in a separate location in rural Wicklow with a view to setting up their own farm occupation; should be given priority to build on the new farm instead of trying to coerce them back to their parents’ farm. ○ Clauses 4, 5 & 6 - Would like to see figures on income or land size being required to be classed under these sections. ○ Clause 7 - Would like to see figures on income or exact type of jobs required to classify under this section. ○ Clause 9 – Very open ended, should be merged with another clause. ○ Clause 11 – Clause should provide a more detailed definition. ○ Clause 14 - Would like to see figures on income required to classify under this section. ○ Clause 16 - there needs to be a definitive cut off point to this clause especially where the boundary has moved in the past 10 years. • Ribbon Development – CDP should include a definition for ribbon development as per the Rural Housing Guidelines. • Rural housing - Definition by distance from family home to site. This is a grey area and requires clarification. CDP should agree a distance to apply from the applicant’s home to a proposed site or alternatively agree that rural to rural is acceptable.

<p>Simon Murphy (D60)</p>	<ul style="list-style-type: none"> • Affordability is an issue. • Development contributions are the same all over the county – this is an obstacle to new housing in west and south Wicklow. • CDP should include a policy to review fixed structure set out in Development Contribution Scheme. • Contributions should reflect the varying values throughout the County. • While higher density should be adopted, appropriate unit types should be consistent with the characteristics of each community. • The absence of any significant new housing other than social housing schemes in mid and south Wicklow is making it difficult for people with a budget of approximately €200,000 to stay in their own locality. • The CDP should have a policy which assists with the delivery of new housing in towns, villages and hamlets. • Social housing should be an integral part of an overall housing policy and should be provided in every community where basic services exist and where private housing is also planned. • Providing social housing in locations where private housing is not permitted should be discouraged. • Encouraging private housing in conjunction with social housing should be an objective of the CDP. • Provision of water and wastewater services is essential for facilitating increased density. A mechanism to overcome ‘passing the book’ to Irish Water should be identified in the CDP. • Innovative policy for incentivising the provision of services throughout the County and enabling housing in all communities should be identified in the CDP.
<p>Annette Vaucanson (D61)</p>	<ul style="list-style-type: none"> • Support compact high density development in towns instead of greenfield sprawl. • Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). • Ensure high density housing has good access to well designed public open space. • Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation. • Prioritise co-housing as a third affordable method of housing delivery (rental and home ownership being the other).
<p>Sophia Meeres (D68)</p>	<ul style="list-style-type: none"> • Complete an inventory of vacant and derelict sites and identify priorities for their future use. Identify and tax owners that allow properties to stand vacant. • Encourage increased density in town centres including residential use of the Main Street and living over the shop.
<p>Charlotte Murray (D74)</p>	<ul style="list-style-type: none"> • The local residency requirements for rural housing should be addressed in the review of the CDP. • Currently HD23 outlines many circumstances where development will be considered. While HD23 looks realistic on paper, people trying to build a home on family farm land, and fulfilling circumstances of HD23 are being refused due to ‘local link’ issues. • Planning process and decisions are not transparent, with no dialog or sufficient communication. • Discriminatory measures framed around family connections to an area are likely to be found to breach EU law and should not be a blocking mechanism in genuine cases where a social or economic need is proven.
<p>Helen Howes (D78)</p>	<ul style="list-style-type: none"> • Social and affordable housing must be provided as a matter of urgency. • There needs to be a realistic definition of ‘affordable housing’. • The local authority must work more with housing associations such as O Cualann Co-housing Alliance and provide land for house building.

	<ul style="list-style-type: none"> • The local authority needs to look at land that is not in use and being used as a dumping ground or for bonfires e.g. Ballyguile housing estate in Wicklow Town. • Housing should be provided in a holistic way to support the most vulnerable in society to have a safe and secure place to live e.g. older people, people with disabilities (physical and mental), member of the Travelling Community, refugees.
Ciara King (D79)	<ul style="list-style-type: none"> • Provide a good mix of house to create neighbourhoods for people of different ages and lifestyles. The population is ageing and this should be properly planned for in any future housing developments. • A mix of house and accommodation types – and not just apartments - allows people the choice and opportunity to remain in the area they wish to live in - the ‘Lifecycle Approach’. It is vital that opportunities to downsize are provided. • Accommodation catering for older people should be located in existing residential areas well served by social infrastructure and amenities. • Plan for new sports, recreational, community and other support infrastructure - including active recreational space for children - as an integral part of any major housing proposal. • Ensure that development levies are used to improve this vital infrastructure in the area where the development takes place. • In the Greystones area it seems that huge amounts of housing developments have been granted planning / built / coming on stream in the last number of years without any of the associated infrastructure being considered properly. • There should be a strong focus on sustainability.
Anita Tuesley (D89)	<ul style="list-style-type: none"> • High rise development is not required to achieve high density. • National Core Principles stipulate that the scale and nature of future housing provision should <i>‘be tailored to the size and type of settlement where it is planned to be located’</i>. High density in towns, other than Bray and Wicklow-Rathnew, is not appropriate because they are not self-sustaining. • The new County Development Plan should prioritise the location of new housing in the footprint of existing settlements and in particular, prioritise re-use of existing buildings, infill-development, regeneration. • Where an increase in existing building height is deemed necessary it should be to no more than four storeys. • Recent developments in Delgany are of very poor design standards. They are not place-making, many homes have poor orientation and lack basic privacy.
KRA Visionary Project (D95)	<ul style="list-style-type: none"> • Build estates that are pedestrian friendly with very high quality housing (low energy and low water use). • Ensure high density housing has good access to well designed public open space as well as areas left to wild. • Prioritise and pilot eco-housing / co-housing for affordable sustainable shared resource use housing and community formation.
Richmond Homes (D100)	<ul style="list-style-type: none"> • The current level of housing need and demand is not at equilibrium, being augmented by the low level of housing completions since 2010. • A significant shortfall in housing has amassed which is reflected in the housing data particularly the household numbers. • The 2016 Census identified an increase in the average household size. • It is essential in assessing housing need requirements that the existing shortfall in housing provision is recognised and addressed. • The approach taken to date to link housing need over the plan period to forecast population growth is no longer a valid approach. • In terms of housing mix and density there is a very significant difference between in requirements between Dublin and the metropolitan part of Wicklow and the rest of

	<p>Wicklow. Apartment developments are only viable for certain parts of large urban areas such as those served by high quality transport. This should be reflected in the CDP.</p> <ul style="list-style-type: none"> Request that the CDP incorporates greater flexibility in developments standards for housing in order to deliver new forms of high density housing other than apartments.
<p>Cairn Homes (D101)</p>	<ul style="list-style-type: none"> Cairn Homes note that density standards in Wicklow are low and not in line with national guidance. The following densities are proposed for Wicklow: <ul style="list-style-type: none"> Town Centre and Public Transport Corridors – 50 units / ha; Outer Suburban and Greenfield – 35 to 50 units / ha; Small towns and villages – 20 to 35 units per hectare. A target density range of 35 to 50 units per hectare on all residential land is advocated for particularly within Greystones and Blessington. In smaller settlements such as Enniskerry a lower density of 35 to 50 units / ha would be more appropriate. Densities outside the requested ranges should be permitted where site specific constraints may prevent achieving the stipulated density to allow an appropriate design response. Reluctance in Wicklow to permit multi-family unit typologies such as duplex units and apartments outside the immediate town centre. A review of density and policies surrounding typology would help deliver compact growth. Greater diversity is needed in Wicklow’s housing stock. Request that the CDP does not include standards for specific unit mixes unless it is evidence based and allows for flexibility to respond to changing societal and market demands. This is consistent with SPPR 1 of the Sustainable Urban Housing: Design Standards for Apartments 2018. Request that the following policies be removed: <ul style="list-style-type: none"> Policy HD15 which requires the inclusion of bungalows; Policy HD13 which stipulates that apartments should not be permitted outside town centre locations. Request for CDP to include policy advocating for a mix of unit types. Cairn Homes have the capacity to continue to contribute significantly to the delivery of social housing units going forward. Request that the CDP considers variety of housing types for meeting social housing need. The alignment of the CDP with national policy, particularly around the areas of density and unit mix, is essential and will greatly assist Cairn in the delivery of new homes. Flexible policies will be key to allow both Wicklow County Council and Cairn to respond to changing societal and market demands.
<p>Plan 8 Architects (D102)</p>	<ul style="list-style-type: none"> Policy HD23 – Housing in the Open Countryside, Clause 16 should be amended as follows: <i>‘Consideration for rural housing will also be given to those persons who were permanent native residents of a rural area but due to the expansion of an adjacent town / village, the family homeplace is now located within the development boundary of the town or village. A person whose lands have been zoned or designated as development lands in the extension of the development boundary shall not benefit from such consideration in this regard. This shall relate to lands subsumed within individual development boundaries of settlements adopted in the previous 12 years’.</i> Current standards that apply to own door duplexes are too onerous and prohibit the development of duplexes. Shared living accommodation should be identified as an objective of the CDP for the larger towns such as Bray, Greystones-Delgany, Wicklow-Rathnew and Arklow.

Response of Chief Executive

A wide range of housing related issues are identified in these submissions. While the County Development Plan is one of the primary policy documents to address these issues, a number of submissions raise issues that are outside of the scope of the County Development Plan, for example, social housing allocation priorities or the development contribution scheme. The response hereunder will address those issue raised that are relevant to the County Development Plan.

(a) Housing Need, Demand & Mix

A number of submissions raised matters pertaining to the affordability of houses, access to housing for particular needs including the elderly and people with disabilities and localised demand for particular types of housing. In response, it is noted that, as per the requirements of Section 94 of the Planning and Development Act, 2000 (as amended), the development plan shall include a Housing Strategy. The purpose of the strategy is to ensure that provision is made for the housing needs of the existing and future population of the plan area. The Act stipulates that the housing strategy shall take into account:

- a. *‘the existing need and likely future need for housing to which subsection (4)(a)² applies,*
- b. *the need to ensure that housing is available for persons who have different levels of income,*
- c. *the need to ensure that a mixture of house types and sizes is developed to reasonably match the requirements, of the different categories of households , as may be determined by the planning authority, including the special requirements of elderly persons and persons with disabilities, and*
- d. *the need to counteract undue segregation in housing between persons of different social backgrounds’.*

The Strategy shall include an estimate of the amount of social and affordable housing required during the plan period and shall provide that as a general policy a specified percentage (not exceeding 10%) of the land zoned in the development plan for residential use, or for a mixture of residential and other uses, shall be reserved for those in need of social housing in the area.

While the County Development Plan is not directly responsible for the delivery of affordable homes there are a number of things it can do to create the right environment for the delivery of affordable homes, removing development bottlenecks and enabling a continuous supply of housing. These include:

- Providing a robust development framework and core strategy;
- Zoning land for development that is serviced and in appropriate locations which gives a greater degree of certainty to developers and infrastructure providers;
- Providing a clear and articulate longer term development strategy that facilitates the coordinated and efficient provision of enabling infrastructure;
- Including policy to support active land management;
- Providing for higher densities that ensures more efficient use of land and enabling more units coming to the market;
- Providing flexibility in terms of design particularly in urban cores to enable more cost-efficient construction and variety of homes;
- Including policy which encourages infill development and the densification of existing built up areas.

The delivery of sustainable communities will be a core aim of the new County Development Plan. In order to enable the development of sustainable communities, it is considered that the new Plan

² Social housing support and affordable housing

should include a policy to encourage a wide variety of housing types, sizes and tenure that reflect the County’s household composition. As part of the Housing Strategy, an analysis of existing demographics will be undertaken to inform future housing mix requirements and policy. By providing a good mix of house types it will be possible to create sustainable neighbourhoods that cater for a variety of people and allow people the choice and opportunity to remain in their community while availing of accommodation that caters to their changing needs at particular stages of their life. It is noted that a number of Specific Planning Policy Requirements (SPPRs) in relation to housing mix are included in the *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018)* - SPPRs were introduced in 2015. In accordance with **Section 28** (1C) of the Planning and Development Act 2000 (as amended) SPPRs are required to be applied by Planning Authorities.

A number of submissions referred to the benefits of shared housing and co-housing and request that the CDP supports this format of housing. All formats of housing will be supported in the CDP subject to it being located on appropriate lands, providing a high standard of living for future occupants and respecting the residential amenity of neighbouring residents. The plan shall include an objective to facilitate a range of housing formats that meet the needs of the local community, subject to providing a high standard of living for future occupants.

The current development plan includes policy that apartments generally will only be permitted within designated centres in settlements (HD13) and that within medium to large scale housing developments, a range of unit types / sizes shall be provided, including bungalows (HD15). These policies will be reviewed in line with new national policy and ministerial guidelines.

In accordance with the National Planning Framework the Council is required to carry out a comprehensive Housing Need Demand Assessment (HNDA) that will support the preparation of the housing strategy and all related housing outputs. NPO 37 states *‘A Housing Need Demand Assessment (HNDA) is to be undertaken for each Local Authority Area in order to correlate and accurately align future housing requirements. The HNDA is:*

- *to be undertaken by Local Authorities with coordination assistance to be provided by the Regional Assemblies, and also at a Metropolitan scale, particularly where inter-county and inter-regional settlement interactions are to be planned for and managed;*
- *to primarily inform housing policies, housing strategies and associated land use zoning policies as well as assisting in determining where new policy areas or investment programmes are to be developed; and*
- *to be supported, through the establishment of a coordination and monitoring unit to assist Local Authorities and Regional Assemblies in the development of the HNDA (DHPLG, Regional Assemblies and the Local Authorities). This will involve developing and coordinating a centralised spatial database for Local Authority Housing data that supports the HNDA being undertaken by Local Authorities’.*

According to the NPF the purpose of the HNDA is:

- *‘Assist local authorities to develop long-term strategic views of housing need across all tenures.*
- *Provide a robust evidence base to support decisions about new housing supply, wider investment and housing related services that inform an overall national housing profile.*
- *Inform policies about the proportion of social and affordable housing required, including the need for different types and sizes of provision.*
- *Provide evidence to inform policies related to the provision of specialist housing and housing related services’ (NPF, 2018:96).*

The guidance on how to prepare HNDAs has not been published to date. Until such guidance is produced, the Planning Authority will continue to prepare a Housing Strategy in accordance with current guidelines that will inform County Development Plan housing policy.

With regard to housing for persons with disabilities it is noted that all new housing must comply with the requirements of the Buildings Regulations Part M.

‘Part M aims to foster an inclusive approach to the design and construction of the built environment. The requirements of Part M (M1 - M4) aim to ensure that regardless of age, size or disability:

- (a) new buildings other than dwellings are accessible and usable;*
- (b) extensions to existing buildings other than dwellings are where practicable, accessible and useable;*
- (c) material alterations to existing buildings other than dwellings increase the accessibility and usability of existing buildings where practicable;*
- (d) certain changes of use to existing buildings other than dwellings increase the accessibility and usability of existing buildings where practicable; and*
- (e) new dwellings are visitable.’*

While acknowledging that it sets out the minimum level of provision for compliance with Part M of the Building Regulations, the Technical Guidance Document for Part M also states that: *‘those involved in the design and construction of buildings should also have regard to the design philosophy of universal design and consider making additional provisions where practicable and appropriate’*. Universal design is defined in the Disability Act 2005 as *‘the design and composition of an environment so that it may be accessed, understood and used to the greatest practicable extent, in the most independent and natural manner possible, in the widest possible range of situations and without the need for adaptation, modification, assistive devices or specialised solutions, by persons of any age or size or having any particular physical, sensory, mental health or intellectual ability or disability’*. The National Disability Authority Centre for Excellence in Design has produced *Universal Design Guidelines for Homes in Ireland (2015)*. These Guidelines are a first step in the process of raising awareness and inspiring people to think differently about the benefits of Universally Designed homes and the potential opportunity to address some of the challenges society faces by future-proofing our homes through embracing Universal Design thinking. The County Development Plan will include a policy to require, where practicable, new development to incorporate the principles of universal design as set out in the guidelines.

In the Council’s social housing delivery programme, the types of housing developed is based on the needs that are presented by those on the housing list, and the Council endeavours to meet the needs of all in society in need of housing with its programme, whether that be single persons or large households, those with disabilities or older persons. The provision of housing for people with a disability is informed by the *County Council’s Strategic Plan for Housing People with a Disability 2015 – 2020*.

New developments are required to meet the highest quality standards, which include recognition of the needs of those with disabilities, as set out in various guidelines such as:

- Development and Design Standards of the County Development Plan
- Best Practice Urban Design Manual DoEHLG 2009
- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities’ DoHPLG 2018
- Sustainable Residential Development in Urban Areas DoEHLG 2009
- Quality Housing for Sustainable Communities, DoEHLG 2007

The current County Development Plan requires new developments (both private and public) to adhere to these standards.

There would be no statutory basis for the Council to include a requirement that a certain proportion of houses in new private developments be specially designed or reserved for those with disabilities; however in the development of the new plan and associated Housing Strategy, further examination of this issue can be carried out, with a view to determining what, if any, additional demands the Council can make of private developers in this regard.

(b) Density

Higher density development has the potential to deliver sustainable and inclusive communities provided it is well designed and at the right locations. The objective should be to create high quality places by achieving an efficient use of land appropriate to its context, while avoiding the problems of over-development. The National Planning Framework (NPO 35) requires that increased residential densities be achieved in existing settlements *‘through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights’*.

SPPR 4 of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) states:

‘It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more’.*

In order to comply with SPPR4 the new County Development Plan shall include a policy on residential density that requires all new multi-unit residential development to comply with the standards set out in the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG 2009). The standards set out are as follows:

- For large towns (defined as those with a population of 5,000 or more), minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station and 35 - 50 dwellings per hectare on outer suburban / greenfield sites. Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares.
- For small towns and villages (defined as those with a population ranging from 400 to 5,000) the Guidelines indicate the following standards:
 - Centrally located sites – 30 to 40 + units per hectare for mainly residential schemes may be appropriate or for more mixed use schemes.
 - Edge of Centre Sites – 20 to 35 dwellings per hectare.
 - Edge of small town / village – densities of less than 15 – 20 dwellings per hectare (as an alternative to one-off housing) as long as such development does not represent more than 20% of the total new planned housing stock of the small town or village.
- For villages under 400 population the guidelines state that any individual scheme for new housing should not be larger than 10 – 12 units.

Higher density does not necessarily mean high-rise. It requires a more considered approach to the layout and design of development ensuring that there is less unusable open space and may include a greater variety of housing formats. Terraced housing offers an opportunity to achieve relatively high density. The new Plan will include policies to require that all new development is of a high quality and respectful of its setting in terms of visual and residential amenities. In terms of density in rural towns, the NPF states *'Rural town living requires a proportionate and tailored approach to residential development. This means that it is necessary to tailor the scale, design and layout of housing in rural towns to ensure that a suburban or high density urban approach is not applied to a rural setting and that development responds to the character, scale and density of the town'*. This shall be reflected in the policy of the County Development Plan to ensure that higher density development is tailored to and respectful of its local context.

The provision of underground car parking and basements are currently assessed on their own merits based on best practice guidance. The Planning Authority will review the County Development Plan with a view to including objectives encouraging the provision of underground parking and basements where feasible.

(c) Design, Height, Layout, Open Space

The current County Development Plan includes policy and development standards that inform the design, layout and height of new buildings. These policies and standards will be reviewed to ensure their compliance with new policy particularly the Specific Planning Policy Requirements (SPPRs) of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) and Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018).

The design and layout of new residential development should relate successfully to the structure and character of the settlement. Each site presents its own challenges and opportunities. The design response for each housing development should be informed by the site’s characteristics. The Plan shall expand on the housing design objectives contained in the current plan (HD2, HD3) and include objectives requiring a tailored design approach which is responsive to local context and the submission of a design statement with applications for residential schemes which shall outline the design rationale.

The Plan shall include a policy to require that the design and layout of new residential development achieves highly permeable, well connected streets in accordance with best practice as set out in the Design Manual Urban Roads and Streets (DTTS & DECLG 2013).

The County Development Plan cannot include height restrictions. This is following on from SPPR1 in the Urban Development and Building Height Guidelines for Planning Authorities (2018) which states:

'In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height'.

The County Development Plan already includes open space standards and these standards will be reviewed and modified as required for new residential development in the new plan

(d) Existing Housing Stock

Vacant or underused building stock has the potential to bring about transformational change in existing towns and villages in addition to addressing housing need and demand. The County Development Plan shall incorporate policy to support active land management including giving effect to the *Urban Regeneration and Housing Act, 2015* and the *Urban and Rural Regeneration and Development Funds*. The *Urban Regeneration and Housing Act, 2015* introduced measures to incentivise the development of vacant sites in urban areas for housing and regeneration purposes. In accordance with this the Planning Authority maintains a vacant site register.

The County Development Plan will include a compact growth policy that will focus development efforts within existing town and village centres and encourage the reuse and adaptation of existing buildings. In accordance with NPF NPO3c, the County Development Plan will include a policy requiring that 30% of all new homes are delivered within the built-up footprint of existing towns and villages.

Objective RT15 in the current development plan promotes the active use of above ground floor levels in principal shopping streets including living over the shop. This policy shall be continued in the proposed draft plan.

The Development and Design Standards in the current County Development Plan outlines the Council’s standards with regard to extension and adaptation of existing dwellings. The section on building design states *‘In the design of new residences, cognisance shall be had of the changing space demand of households over time. For example, apartment formats should allow for either the future subdivision of larger units or the merging of two or more smaller units (either horizontally or vertically) and houses (including bungalows) should have attics capable of conversion to habitable rooms’*. This shall be retained in the new County Development Plan.

(e) Energy Efficient Housing

Part L of the Building Regulations sets the energy and carbon dioxide emissions requirements for new and existing buildings. Amendments to Part L transpose Directive (EU) 2018/844 of the European Parliament and of the Council of 30 May 2018. The Directive sets requirements for Member States to improve the energy performance of buildings and make an important contribution to the reduction of greenhouse gas emissions. The Directive defines a Nearly Zero Energy Building (NZEB) as a building that has a very high-energy performance. It states that the nearly zero or very low amount of energy required should be covered to a very significant extent by energy from renewable sources, including energy from renewable sources produced on-site or nearby. Article 9(1) of the Directive requires Member States to ensure that by 31 December 2020, all new buildings are nearly zero energy buildings. Under the previous 2011 regulations, a typical new dwelling is built to an A3 Building Energy Rating (BER). The NZEB requirements will equate to an A2 BER. This represents a 70% improvement in energy efficiency and a 70% reduction in CO2 emissions compared to 2005. It also introduces 20% renewables as a percentage of the total building energy use. The new CDP shall include policies requiring all new buildings during the design process to incorporate sustainable technologies capable of achieving a Building Energy Rating of at least A2 in accordance with the Building Regulations.

The Directive requires that where major renovations (defined as a renovation where more than 25% of the surface envelope of the building undergoes renovation) are carried out on a building, the building should achieve a cost optimal energy performance B2 BER.

With regard to retrofitting existing social housing stock to make them more energy efficient, the Social Housing Investment Programme allocates capital funding each year in respect of a range of

measures to improve the standard and overall quality of social housing stock. The programme includes a retrofitting measure aimed at improving the energy efficiency of older apartments and houses by reducing heat loss through the fabric of the building and the installation of modern heating systems. Between 2013 and 2019 in County Wicklow, €5.4 million had been drawn down in funding and 2,005 units have been retrofitted.

(f) Rural Housing

‘Strengthened Rural Economies and Communities’ is identified as one of the 10 National Strategic Outcomes in the NPF. With regard to future growth and development of rural areas the NPF states *‘In support of the overall pattern of rural and small town development in Ireland, this Framework seeks to protect areas that are under strong urban influence from unsustainable over-development on the one hand, and to encourage population to be sustained in more structurally weak areas, that have experienced low growth or decline in recent decades, on the other, while sustaining vibrant rural communities’*. County Development Plan policy on rural development and rural housing will be reviewed in accordance with NPF policy and any subsequent guidelines. In particular the CDP policy will be reviewed having regard to NPO 15 and NPO 19:

NPO 15 *Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.*

NPO 19 *Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:*

- *In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;*
- *In rural areas elsewhere, facilitate the provision of single rural housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.*

The viability of smaller towns and rural settlements is an important factor in determining the best approach for rural housing. An unrestrictive housing policy in rural areas is likely to undermine small towns and villages. This is contrary to the NPF, which seeks to arrest the declines of rural towns and villages and sustain vibrant rural communities.

The RSES requires that *‘Core strategies for county development plans shall identify areas under strong urban influence in the hinterlands of settlements and set the appropriate rural housing policy response to avoid ribbon and over spill development from urban areas, support revitalised towns and villages, achieve sustainable compact growth targets, sustainably address rural decline and protect the rural resource for rural communities’*.

Circular SP 5/08 states *‘It is important to emphasise that all planning applications for houses in rural areas, regardless of where the applicant comes from or whether they qualify under specific criteria, must continue to be determined on the basis of the proper planning and sustainable development of the area, in accordance with development plan policies regarding over-arching environmental concerns, including the protection of natural assets, landscape, siting and design, traffic safety etc’*.

In terms of house design, the current County Development Plan includes a comprehensive design guide for rural housing and it is intended that this will be maintained and enhanced if necessary in the new County Development Plan.

(g) Backland Development in Rural Areas

Policy in relation to development of rural housing in backland sites will be reviewed in accordance with national policy and guidance.

(h) Taking in Charge

The implementation of taking in charge is outside the remit of the county development plan. However it is noted that the Council have a taking in charge policy and are implementing it as resources allow. This entails working with developers to bring estates up to standard before they can be taken over by the Council.

Recommendations of Chief Executive

1. Prepare a new Housing Strategy to inform housing policy in the County Development Plan.
2. Include a new policy on residential density that requires new residential development to comply with the standards set out in the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG 2009).
3. Include a policy to require a mix of house types, house designs and sizes in new residential and mixed-use schemes to cater for the varying household needs in the County.
4. Review policies HD13 and HD15 in accordance with recent ministerial guidelines.
5. Include a policy to require, where practicable, new development to incorporate the principles of universal design in accordance with the *National Disability Authority Centre for Excellence in Design Universal Design Guidelines for Homes in Ireland (2015)*.
6. Review the rural housing policy to ensure it complies with the NPF and RSES.
7. Retain policy RT15 in the new development plan which promotes the active use of above ground floor levels in principal shopping streets including living over the shop.
8. Review policy and design standards relating to height and design of new residential development to ensure their compliance with new policy particularly the Specific Planning Policy Requirements (SPPRs) of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) and Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018).
9. Expand on the housing design objectives contained in the current plan (HD2, HD3) and include objectives requiring a tailored design approach for new residential development which is responsive to local context and the submission of a design statement with planning applications which shall outline the design rationale.
10. Include a policy to require that the design and layout of new residential development achieves highly permeable, well connected streets in accordance with best practice as set out in the Design Manual Urban Roads and Streets (DTTS & DECLG 2013).
11. Include policy to support active land management including giving effect to the Urban Regeneration and Housing Act, 2015 and the Urban and Rural Regeneration and Development Funds.
12. Include policy to identify obsolete and potential renewal areas within town and village centres and where feasible pursue measures to regenerate and bring these areas back into use.
13. The core strategy shall also be developed having regard to compact growth and the infill/brownfield targets set out in the National Planning Framework (NPO3c) and shall include an objective to give effect to this.

14. Review policy in relation to development of rural housing on backland sites in accordance with national policy and guidance.
15. Review current Development & Design Standards Appendix document.

Part 4.3.4 Economic Development & Employment

Name	Issue Raised
Ashford Development Association (C1)	<ul style="list-style-type: none"> • Build a strategy suitable for Wicklow that focuses on small businesses, work from home, non-commute opportunities. • New ways of working including co-working hubs, working from home and live-work units is where we have most to offer. • Rural Economy – opportunities with organic farming and production of vegan products and foods. • Light, specialised, Artisan industry that can fill the unused industrial units. • Bray has potential to expand economic possibilities.
Wicklow PPN (C2)	<ul style="list-style-type: none"> • Critical mass is important to provide employers with a staff and customer base. This needs to be backed up with adequate structures and services for business development, particularly in relation to broadband and transport. • Supports must be made available to indigenous business and local retailers to boost local economies. • Issues identified to make towns more self-sustaining: <ul style="list-style-type: none"> ○ Broadband; ○ Employment and Tax incentives to encourage industry; ○ Tax vacant properties to combat dereliction; ○ Incentive schemes to support local producers. • Shared Offices in every MD/town (plus lobby Dublin high tech). • Reduce Rates and Rental Costs. • Zone commercial close to residential.
Baltinglass & District Forum (C10)	<ul style="list-style-type: none"> • Concentrating on tourism as industry is not proving feasible.
Keep Ireland Open (C16)	<p>Agriculture:</p> <ul style="list-style-type: none"> • Recognise the increasing demand for recreational space, commonage and other rough grazing land and to regard this land as a recreational and amenity resource. • Farmers should be encouraged to see themselves as custodians of the landscape. • Include objective to protect and conserve rural amenities, archaeological and natural heritage, visual amenities, eco-systems, landscape, scenic views and environment from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, ensure that it does not have an undue negative impact on the visual/scenic amenity of the countryside and identify mitigating measures where required. Integrate into the landscape, including the minimal use of signage. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines. <p>Forestry:</p> <ul style="list-style-type: none"> • Forestry development must be compatible with the protection of the rural environment and not cause pollution, degradation of wildlife habitats and natural waters or areas of ecological importance and is appropriate to the nature and scale of the surrounding area, does not have a negative visual impact on the scenic quality and character of the countryside and is not detrimental to the archaeological or other historic features and must not be visually obtrusive in the landscape so as to ensure that development is appropriate in its character, and that it is carefully managed so that it doesn’t result in damage to visual amenity and that it must enhance and be in harmony with the landscape. Protect scenic and

	<p>exposed/elevated landscapes, protected scenic views and scenic routes, nature designations, vistas (including to water and valley approaches to the hills), geological sites.</p> <ul style="list-style-type: none"> • Develop, provide, protect, improve and encourage greater public access to new and existing forestry, both state and private, for recreational activities such as walking, hiking, cycling, and other non-noise generating activities and the provision of nature trails, as part of connected network of walking and cycle routes in cooperation/consultation with Coillte, the Forest Service, private landowners, local interest groups and other stakeholders and agencies. • Protect and encourage access to forestry and woodlands, in co-operation with Coillte, private landowners and other stakeholders for walking routes (including long distance and looped walks) mountain and nature trails and hiking. • New or replacement coniferous forests will not be allowed on summits generally above 250 metres. • Ensure that existing public rights of way, traditional walking routes are not obstructed. <p>Extractive Industry:</p> <ul style="list-style-type: none"> • Protect, conserve, preserve and safeguard recorded monuments and areas in their vicinity, World Heritage Sites, archaeological sites and features and zones of archaeological potential, natural heritage, natural environment, listed views and prospects, features of natural beauty or interest, designated and prescribed sites, geological sites and areas of geological/geomorphological interest and areas of high scenic amenity from inappropriate development. Applicants must recognise that the aggregates (stone and sand/gravel deposits and mines) from concrete products industry have a particularly sensitive role in relation to the environment. Any development of aggregate extraction, processing, delivery must be carried out so that it minimises adverse effect on the environment and visual amenities to the greatest possible extent must be carried out during all life cycle stages, whether in respect of new quarries or extensions to existing ones and development will be prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or there is a reduction of the visual amenity of areas of high amenity. All working should be landscaped either by the retention of existing vegetation or by screening. • Applications for new development for aggregate extraction, processing and associated processes, shall identify existing public rights of way and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/walking route. Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected. • Restrict development of aggregate extraction, processing and associated concrete production which could impinge or impact on matters of public importance, public rights of way or walking routes and satisfactorily address the potential impact on recreational or tourist activities and protect tourism amenities.
<p>Wicklow Planning Alliance (C17)</p>	<ul style="list-style-type: none"> • There is a critical link between the quality of urban place-making and business investment/job creation. • The County Council could improve the quality of urban place-making in all towns. • County Wicklow should be ambitious and aim to be the leader in Ireland in the transition to a net zero-carbon economy. • The transition to a net zero-carbon economy will enable a shift in the location of new jobs. • It will be necessary to create employment to reverse human degradation of the

	<p>planet, for example, regenerative farming, rewilding and re-wetting our bogs.</p> <ul style="list-style-type: none"> • There is an opportunity to create an Eco Park in Wicklow with the Wicklow National Park at its core, spreading out to include urban areas and villages. The proposal envisages farmers being paid to manage their land in ways that benefit the environment; a ‘Green Wicklow’ brand under which business can trade at a premium; the Government showcasing its initiative on an international stage and being seen to take the initiative at a time when it is being fined heavily in Europe for failing to reach its emissions targets. • Suggested objective - Support the provision of proposed long distance walking trails that provide access to scenic uplands, riverine and coastal features. • Opportunity to create new jobs from ‘Green’ industry / sustainable energy projects. • Make the Claremont Campus the place to invent new batteries for our homes. • To make Wicklow a more attractive employment base the public realm must be improved. • Deliver compact growth with a concentration of workers in Wicklow’s two Key Towns. • Brownfield sites should be prioritised for development. • New ways of working should be facilitated. Hubs should be located in town centres. • Rural economy can be diversified by concentrating on delivery of the jobs required to de-carbon our economy. The current economic model with its emphasis on global markets is pushing our farmers out of business. We could pay them exactly the same farm assistance and other taxpayer supports but request them to stop growing cows and instead help us build a county that is entirely self-sustainable and independent of the global markets.
<p>Delgany Community Council (C19)</p>	<ul style="list-style-type: none"> • Economic development in North Wicklow has been limited. • The vast majority of residents in Greystones/Delgany commute to the Dublin area for work. This is unsustainable and does not lead to the creation of strong communities. • Large I.D.A. site in Greystones has been zoned for at least 20 years and has lain idle throughout that period. It needs to be developed to provide sustainable, local employment. • To improve Wicklow’s suitability as an employment base the Council should apply recognised best practice: <ul style="list-style-type: none"> ○ Social and educational climate (Council funded and supported affordable and social housing, better community and leisure facilities, better linkage with third level institutions, Government funded relevant retraining programmes for workers looking to transition) ○ Development of the entrepreneurial ecosystem - develop facilities with supports for start-up businesses, remote working hubs that are serviced, expand Local Enterprise centre, fund and support start up facilities with admin support, provide and incentivise co-working and remote working. ○ Employer Retention – develop processes and subsidies to attract and retain local employers. ○ Technical Infrastructure – continue the expansion and development of high speed internet connectivity. • The spread of residential and light industrial development along the N11 does not lend itself to the creation of a traditional high density employment zone such as a Central Business and Financial District. Instead Wicklow has the opportunity to develop ‘Alternative Business Districts’ which are neatly integrated into or adjacent to residential centres. This approach works particularly well with information economy work and areas with high levels of education and internet connectivity. • Some ideal locations for Alternative Business Districts: Southern Cross between

	<p>Bray and Greystones, Kilcoole, Wicklow Town, Ashford.</p> <ul style="list-style-type: none"> • These alternative business districts can also help to facilitate alternative employment opportunities for more rural communities. • There is no reason an information economy cannot work side by side with an agricultural economy in rural areas. • Food industry is also suitable as craft and tourism. • Proper development to stimulate economic growth in Wicklow in general and rural area in particular is dependent on adequate public transport development and the ability to access a suitably skilled workforce.
Wicklow Uplands Council (C27)	<ul style="list-style-type: none"> • Economic development and retail strategies should aim to support the survival of retail outlets and other services in more rural towns and villages throughout the county. • There is no obvious solution but the County Development Plan must aim to support local business and rural enterprise by every means possible. • The lack of good broadband facilities across the majority of rural Wicklow is an obvious limitation for new and existing businesses which should be addressed in the new plan.
Blessington and District Forum (C28)	<ul style="list-style-type: none"> • Deliver a plan that will support small business and start-ups. • Support the creation of Enterprise Hubs. • Deliver free WIFI within town centre public spaces.
James Scott (D7)	<p>Forestry:</p> <ul style="list-style-type: none"> • Planting new woodland mitigates climate change and adds huge amenity value when done in close proximity to population centres. • Greenfield sites should be offset with planting of additional woodland and the county should pursue afforestation in the green belt areas between villages when the opportunity presents itself. • Every settlement should have woodland where local people can go to experience the unmatched well-being benefits that come from human contact with this habitat. • The county should have afforestation goals and be as specific in these goals as with housing development action plans.
Keith Scanlon (D12)	<ul style="list-style-type: none"> • Establish and support Green economy start-up, co-working (satellite) and education hubs. • Sponsor CIT Wicklow (Clermont Campus) Hub to become the national biodiversity Emergency Mitigation and Adaptation Hub and Ireland’s Global Networking hub for Climate and Biodiversity Emergency Mobilisation.
Dr. Igor Cusack (D14)	<p>Need to develop more industrial estates, on brownfield sites where possible, to provide local employment and reduce the need to commute.</p>
Yasmin Fortune (D15)	<ul style="list-style-type: none"> • Prioritise sustainable and humane farming practice. • Prioritise the management of dog breeding facilities. • Prioritise traditional farming methods and crafts, historical farm buildings and practices, heritage farm animal breeds.
Tessa Stewart (D26)	<ul style="list-style-type: none"> • Establish and support Green economy start-up, co-working (satellite) and education hubs. • Sponsor CIT Wicklow (Clermont Campus) Hub to become the national biodiversity Emergency Mitigation and Adaptation Hub and Ireland’s Global Networking hub for Climate and Biodiversity Emergency Mobilisation.
Adam Calihman (D38)	<ul style="list-style-type: none"> • Growth of local business and enterprise to decrease need to travel to Dublin. • University in county Wicklow or annex of Dublin based university. • Promote local produce and products.
Eileen Wetherall (D39)	<p>Need more local jobs for many reasons including to reduce the amount of people commuting.</p>

<p>Billy Timmons (D49)</p>	<ul style="list-style-type: none"> • Co-working hubs should form part of a policy and WCC should lead the way. • Increased engagement with the private sector is required. • A core economic area in the south-west should be identified e.g. light engineering or food and agriculture and links established with Carlow institute of Technology. • Agriculture – There should be proactive engagement with farmers who seek to diversify. • Forestry – The protection of views should be considered when examining proposals. • Fishing – Reference should be made to the various rivers. • Extraction industry – heritage of Ballyknockan villages needs to be highlighted and a proposal to build on its heritage formulated.
<p>Mick Mulligan (D50)</p>	<p>Major issues in relation to economic development are poor transport infrastructure and poor internet access including rural broadband.</p>
<p>Disability Federation of Ireland (D51)</p>	<ul style="list-style-type: none"> • Only 24% of people who have a disability in Wicklow were at work, compared to 54% of the general population in the county (CSO, 2017). • Wicklow County Council should aim to be a leader in promoting an accessible workplace and employing people with disabilities. • Initiatives aimed at increasing employment opportunities should work to target people with disabilities and other groups who are vulnerable to being discriminated against or becoming unemployed. • Ways of doing this include creating and promoting opportunities for employment that are flexible and allow for people to work reduced hours or work remotely, improving access to broadband and assistive technology, making employers aware of the benefits of employing a person with a disability, including eligibility for the Workplace Equipment/Adaptation Grant (WEAG) and the Employee Retention Grant Scheme.
<p>Simon Murphy (D60)</p>	<ul style="list-style-type: none"> • Perseverance with the outdated objective that every community be capable of providing adequate local employment should be reviewed in detail. • The zoning of large quantities of land for employment in areas where evidence shows that no significant increase in employment will occur. • Box ticking to have unrealistic targets for traditional employment included in the Development Plan should be firmly resisted – should such need arise such unexpected development can be readily dealt at review stage or via a material change if an exceptional opportunity arose. For example, allocating hectares of lands for industrial development on Towns and Villages of West Wicklow can only be seen as a failure of the process to face up to the commercial reality of where future large employment will be based. In addition, assuming that the Towns and Villages of West Wicklow are going to attract significant Employers excuses the Development Plan from identifying how the communities of West Wicklow can grow economic development. • Recognition by the Local Authority that if employers don’t have ready access to an acceptable level of public transport and ease of access to the national primary routes, it is certain that employers will not locate in much of County Wicklow. • Recognition that the Local Authority is allowing County Wicklow become a microcosm of the East / West divide happening at national level, a decision to reverse this imbalance and provisions in the Development Plan. • A move by the Local Authority to recognise that the Wicklow Mountains are an unmovable obstacle to Wicklow developing as if the Wicklow Mountains were not there. The economic development of West Wicklow will be influenced to a significant extent by what happens in Co. Kildare and Co. Carlow. The Towns and Villages of West Wicklow are obvious residential hubs to serve Naas, Newbridge,

	<p>Kilcullen, and Carlow.</p> <ul style="list-style-type: none"> • A move from the view that the vast percentage of County Wicklow is an attractive location for significant employers. To secure economic development throughout County Wicklow the Development Plan must provide for measurable objectives and targets for all arms of the Local Authority relating to enterprise, to include tourism related bodies. • Immediate, proactive approach to the upgrading of the R747 from Baltinglass to the R448, the county road from Dunlavin to the R448, the R410 from Blessington to Naas, advance the deferred proposed upgrade to the N81 from Brittas to Hollywood. • Recognise obstacles to economic development and have provisions in place to address these. • Incentivise new enterprise and promote economic opportunities – encourage entrepreneurship. • Identify how the local authority will lead micro development of economic opportunities throughout the county. • Economic development should be targeted for every Town and Village throughout the county, but the expectations should be aligned through realistic reasoning as to what is possible. • In the Rathdangan area, a cottage industry may evolve into an employer of a small-medium sized employment numbers, but it is more likely that a number of tourism related outlets serving the tourism potential of the Glen of Imaal, Michael Dwyer history and the Wicklow Way will be where the economic development of Rathdangan may lie. • Co-working hubs will help address the Climate Change challenges and may lead to increase population in certain areas where broadband and community services are established and deemed to be attractive and accessible locations, but it is unlikely to be a significant contributor to economic development. • Co-working hubs, working from home, live-work units, should be part of the plan for economic development but not identified as the main plank. • Focused assessment of rural communities as to what is necessary to sustain existing services. The past 3 Development Plans have set out targets for Towns, Villages and Hamlets which were based on ideology but absent of commercial reality. The result is that most communities in West Wicklow have regressed during the lifetime of the past Development Plans. • The Development Plan must include methodology as to how rural communities in West Wicklow must progress to ensure that at least the existing services survive but with a realistic aspiration that local services will improve between now and 2040. • Micro entrepreneurship must be encouraged in the agricultural and tourism sectors.
William Quinn (D64)	Policy in development plan to facilitate certain types of economic development including agri-stores on land outside settlement boundaries.
Edel Corcoran (D65)	Plan innovation pilots with possible support from CIT Wicklow Campus and UCD Earth Institute to find sustainable models for business employee co-hosting / satellite centres.
Sylvester Bourke (D77)	CDP should encourage alternative farm enterprise. The agricultural sector is facing huge challenges.
Anita Tuesley (D89)	<ul style="list-style-type: none"> • There is a critical link between the quality of urban place-making and business investment/job creation. • Wicklow County Council could improve the quality of urban place-making in all towns by doing the following: <ul style="list-style-type: none"> ○ Provide proper regular cleaning and maintenance of the public realm. ○ Create lots of pedestrian only streets. Give priority at all times to

	<p>pedestrians and cyclists. Create safe walking and cycling routes.</p> <ul style="list-style-type: none"> ○ Create out of town or edge of town parking facilities and restrict or prohibit cars in town centres. Getting rid of motor vehicles and the associated noise and pollution will make town centres a place that is attractive to visit and linger in. When you are not distracted by traffic congestion you are more likely to notice and appreciate streetscapes and architectural heritage. ○ Make more proactive use of legislation on Vacant Sites and Derelict Sites. ○ Enforce the planning laws on advertising hoardings, sandwich boards and unauthorised developments like smoking tents. There is a need for more active planning control on the erection of big tents for smokers and the sort of advertising that is on the seafront in Bray. There is nothing anywhere in planning law that requires the public to report unauthorised development before the Planning Enforcement Section can act and do its job. <ul style="list-style-type: none"> ● County Wicklow should be ambitious and aim to be the leader in Ireland in the transition to a zero-carbon economy. The transition to a zero-carbon economy will enable a shift in the location of new jobs. ● There will be jobs in the work required to reverse human degradation of the planet, for example, regenerative farming, rewilding and re-wetting our bogs. ● In the power sector, it will be easy to provide a dispersed pattern of jobs in generation, installation and maintenance of renewable energy systems. ● Transport - need investment on local transport provision between settlements. ● Electrification of railways and private cars requires planned, co-ordinated action, but will provide jobs all over the county. ● The installation of electric vehicle charging points and the retrofit of buildings will be best done through local authority-led street-by-street programmes funded by public money. ● In the waste sector recycling, upcycling, re-use will create new jobs. Need to identify appropriate locations and facilitate access to low cost space for people who have the imagination to drive this. ● Make the Claremont Campus the place to invent new batteries for our homes. ● To make Wicklow a more attractive employment base the public realm needs to be improved. ● New economic opportunities will follow if the objectives and principles of the NPF are implemented and if Wicklow concentrates on creating a critical mass of residents and workers in its two Key Towns. ● Economic development should be concentrated in the two key towns but as stated above many of the new jobs required to de-carbon our economy can be located all across the county. ● Brownfield sites should always be prioritised for development. ● Hubs should be located in town centres. ● The county’s rural economy can be diversified by concentrating on delivery of the jobs required to de-carbon our economy. The current economic model with its emphasis on global markets is pushing our farmers out of business. ● Need more active planning enforcement to protect the countryside. ● 95% of the beef that our farmers produce is exported and 83% of the stuff Irish people buy in supermarkets is imported. Farmers should produce what Irish consumers want to buy. Instead of building fancy milking parlours Irish farmers should build glass houses and grow flowers for our florists so that when we buy a bouquet it is made with Irish flowers.
Coillte (D92)	<ul style="list-style-type: none"> ● Coillte grows forests sustainably to produce quality wood and wood products.

	<p>Ireland’s forestry industry will approximately double in size over the next 10 years and Coillte will be at the core of this initiative with an innovative supply chain and a consistent reinvestment in the next generation of forests. The forest sector is providing around 12,000 jobs today, mostly in rural Ireland.</p> <ul style="list-style-type: none"> • Within Coillte, Land Solutions and Renewable Energy are active asset development and management businesses providing innovative commercial solutions to enable the attainment of key national policy objectives particularly those that are prescribed by the National Planning Framework (2018). • It is considered that Coillte Land Solutions and Renewable Energy businesses have the experience and expertise to support Wicklow County Council and the Eastern and Midlands Regional Assembly to realise one the Region’s key principles around climate action, namely ‘Climate action, by enhancing the climate resilience and accelerating the transition of the Region to a low carbon society’. • Continue to support sustainable rural based enterprises such as forestry and tourism in the County and make adequate provisions and objectives to facilitate their delivery. • Promote the use of sustainable timber products where possible.
<p>Judy Osborne (D98)</p>	<p>CDP has improved over the years. However there is no analysis of the impact of the current plan. The issues have not changed. Copies of submissions to previous development plans have been submitted. The relevant issues from these are as follows.</p> <ul style="list-style-type: none"> • The northern part of the county is unable to compete with the Dublin metropolitan area for industry. The IDA lands in Greystones, which have lain idle for years, are a prime example of this. It does not mean that some effort might be made to attract industry to the north of the county, but to fail to acknowledge the reality gives people unrealistic expectations. • Excessive zoning of land. • In deciding how much land to zone for industry it was assumed that each hectare of developed land would provide 40 jobs. Has this figure been checked against 2006 census figures? • The development control of industrial development should include polices requiring a percentage of land to be set aside for natural habitat. Hedgerows in development areas should have 6ft strips of fallow land running along them to provide wildlife corridors like they do in some farms in England. Ecological networks need to be maintained across the County. • The importance of developing opportunities to provide employment for those already living in rural Wicklow to provide employment for local people and to find alternatives to commuting is recognised. The criteria for the control of industrial and commercial development in disused buildings needs to be better codified to encourage good sustainable development. Checklists of criteria need to be agreed by which to assess each individual proposal that comes before the Council. • While the principle of re-use of existing farm buildings is supported, proper planning and environmental controls need to be in place and enforced along with such changes. Noise, smells, and increased traffic can adversely affect neighbours, and this needs to be taken into account. The potential degradation to the landscape, especially in the proposals for breakers’ yards for end-of-life vehicles, and similar enterprises, poses a threat to the overall continued potential for Wicklow to retain and grow its tourist sector, not to mention the continued quality-of-life for current residents. • The storage of waste materials, especially sludge and municipal compost, needs to be carefully considered, as the impact on local residents is not only noxious, but threatening to health. • It is considered that these will primarily revolve around alternative energy,

	<p>recreation/tourism, wood based industries and quarrying. The criteria would include:</p> <ul style="list-style-type: none"> ○ Ecological management of the site ○ Waste, energy and resource management ○ Siting and Structure of Buildings ○ Vehicle use ○ Impact upon the surrounding community (visual and environmental) ○ Public access <ul style="list-style-type: none"> • There are many challenges with encouraging rural sustainable development at present. Inefficient planning and transport systems are affecting the ability to reach climate emission targets, maintain strong community, ensure social inclusion and develop commerce with rural areas. • Food security will become a major concern in the near future and those counties which prepare for this will be providing true leadership and vision. • Good soil needs to be identified, mapped and protected in order to secure local access to food supplies which are likely to become increasing scarce. • A County Policy identifying the quantity of anaerobic digesters and other means of dealing with agricultural waste needs to be prepared with suitable search areas also identified. • Opportunities to gain added value using agro-forestry systems, coppice woodlands, community woodland projects, biomass, biochar, etc. should be included. • Need to monitor the acres under forestry in different categories. • It could be an objective to encourage mixed forest cover suitable for sustainable local industry to monitor the success of such an objective it will be necessary to measure forestry today and at the end of the Plan period. • Forest management can be environmentally appropriate and socially beneficial but it can also be damaging. This policy recognises the responsibility of local authorities as a consumer of forest products to ensure that they have neutral if not positive effect on the world’s forest. Should give preference to timber and timber products that have been independently certified by a credible globally applicable forest certification scheme and can demonstrate that the producers are derived from well managed sources.
<p>Cairn Homes (D101)</p>	<ul style="list-style-type: none"> • The nature of the Irish economy has changed with the result that there has been a move away from industrial and manufacturing uses which require large units towards a service economy based in open plan offices. • Office based uses have a much higher jobs yield per square metres of commercial floorspace. This may reduce the requirement for the quantum of commercial or industrial zoned land in peripheral locations. • Land owned by Cairn in Greystones (6.6ha) could yield 1,500 jobs. This yield exceeds the employment target for the site in the current LAP which is 660 jobs. • Consideration should be given to the requirements of different industries. Policies and zonings may need to be reviewed to ensure targets and yields are realistic.

Response of Chief Executive

General

The County Development Plan is a land-use framework and therefore provides the planning policy for all forms of economic development. The objectives and design standards identified in the CDP are necessary to assess applications for economic development and are intended to ensure that economic development is developed at appropriate locations. The land-use objectives of the plan aim to

support the strategies of the Local Economic and Community Plan (LECP) and the Local Enterprise Office, all of which have a wider remit than the County Development Plan in the area of economic development.

A number of issues raised in the submissions relate to financial supports and incentives for certain business formats or sectors, to training, commercial rates, the delivery of free wifi. These suggestions, although important and insightful, are outside the remit of the County Development Plan. Similarly, the Development Plan is not the appropriate tool for providing measurable objectives and targets for enterprise. Such issues are best addressed in an economic strategy such as the Local Economic and Community Plan (LECP), the Mid East Regional Enterprise Plan or any other economic development strategies prepared by the Economic Development sections of the Council, the LEO and the Department of Business Enterprise and Innovation.

Notwithstanding this, the County Development Plan through the core strategy and a range of detailed objectives will play an important role in creating the right environment for new economic development and making the county attractive to investors. The locations considered most suitable for economic development will be identified, providing a greater degree of certainty for developers and employers in terms of investment.

While the Planning Act does not require the core strategy to address economic development explicitly, this is considered an essential element of the overall development strategy for the County. The core strategy in the current development plan includes an ‘*Economic Development Hierarchy*’ and a broad assessment of the County’s employment requirements up to 2028. This will be reviewed and updated as part of the preparation of the new Draft Plan.

The core strategy and development plan objectives for economic development and employment will be informed by the *NPF* and the *RSES*. Relevant National Policy Objectives (NPOs) and Regional Policy Objectives (RPOs) include:

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

RPO 6.2: *Support local authorities to ensure their LECPs and city and county development plans are sufficiently agile to account for unexpected opportunities, to accommodate valid propositions for enterprise development that may emerge and for which there are strong locational drivers that do not apply to the same extent elsewhere.*

In accordance with the *NPF*, the Eastern and Midland Region will accommodate around 320,000 additional people in employment by 2040. It is important that the objectives in the County Development Plan are sufficiently agile to accommodate new employment opportunities in the county thereby improving resilience and reducing the number of people undertaking daily long distance commutes. The *RSES* recognises that one of the key challenges facing the Region is the need for better alignment between population growth, location of residential development and employment to create healthy and attractive places.

The RSES identifies key towns on the settlement hierarchy below Dublin and the regional centres. These are defined as large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. Bray and Wicklow-Rathnew are identified as Key Towns in the RSES settlement hierarchy. Significant population and employment growth will be directed into the key towns. The remaining towns have capacity for continued commensurate growth to become more self-sustaining and to attract high quality employment at strategic accessible locations. Unlike previous regional plans, the RSES does not identify core economic areas. The RSES identifies the IDA lands in Greystones as a strategic development site with potential to strengthen the economic base in North Wicklow.

Employment growth has not been commensurate with population growth in many towns throughout the County. This will be addressed as part of the County Development Plan by suitably managing the population growth of towns to that commensurate with the services, including employment, available and placing emphasis of growing employment and services. The RSES acknowledges that *‘in general, there is a challenge of satisfying the developmental needs of Dublin so that it can continue to fulfil its role as an international and national driver and economic entity in its own right, while at the same time addressing the economic potential of the rest of the areas in the Region’*. In order to address this, the RSES proposes orderly growth of the region and placemaking to facilitate the development of resilience and competitiveness of the economic base. The RSES also identifies Guiding Principles to Identify Locations for Strategic Employment Development and Guiding Principles for Investment Prioritisation in Placemaking for Enterprise Development. These will be applied in the new draft development plan when identifying employment locations.

In accordance with the planning and Development Act 2000 (as amended), a two year review will be carried out. Section 15 (2) of the Planning and Development Act, 2000, states that *‘...a Planning Authority shall, not more than 2 years after the making of a Development Plan, give a report to the Members of the Authority on the progress achieved in securing the objectives’* of the Plan.

Location of Economic Development

Sustainable economic development requires balance in terms of location and diversity of economic activity in addition to protection of the environment and people’s quality of life. A key policy of the current development plan is that *‘new employment development shall be required to locate on suitably zoned / designated land in settlements’*. This policy will be retained in the new development plan.

It is important that the policy contained in the County Development Plan clearly articulates the Council’s vision for economic development in terms of what type of development should be facilitated and where this development should be facilitated. The current plan (Chapter 5 Economic Development) includes a suite of policies for economic development and different types of employment. These policies will be reviewed and strengthened where necessary.

Zoning

A number of submissions questioned the approach to zoning land for economic development. At present there is no model or ministerial guidance in place for determining the exact amount of land that should be zoned for employment uses. Furthermore there is no data available on the number of employees per hectare of zoned land. The current plan indicates that *‘the priority location for new jobs growth shall be in the existing town centres and existing developed lands (such as brownfield lands). In circumstances where the total jobs growth cannot be met within the existing town centre / brownfield lands or where certain uses are not suitable to locate in existing built up areas, this growth will be targeted to occur in ‘greenfield’ locations’*. The amount of land to be zoned in each settlement is

determined on a case by case basis having regard to the particular characteristics of the settlement and the strategy for job creation. As part of the preparation of the new Plan, the zoning of all employment land in the County Development Plan will be reviewed.

The current Plan requires that *‘the zoning / designation of greenfield land for new employment shall adhere to the following principles:*

- *Application of the ‘sequential approach’ whereby zoning extends outwards from centres, contiguous to the existing built up part of the settlement;*
- *Promotion of a sustainable land use and transportation pattern, whereby ‘people intensive’ employment forms are located close to public transport routes (mostly relevant to larger towns such as Bray and Greystones), in centres and mixed use areas or within easy accessibility of residential areas, whereas ‘goods based’ employment types shall have good access to transport corridors;*
- *Lands already or easily serviced by appropriate standard of roads, surface water sewerage and a gravity fed water supply and waste water collection system;*
- *Cognisance will be taken of the need to provide upmost protection to the environment and heritage, particularly of designated sites, features and buildings; and*
- *The need to maintain the rural greenbelt between towns’.*

These principles shall be retained in the new plan subject to a detailed review in accordance with new national and regional policy.

The County Development Plan also requires that *‘the development of zoned / designated land should generally be phased in accordance with the sequential approach:*

- *Development should extend outwards from centres with undeveloped land closest to the centres and public transport routes being given preference, i.e. ‘leapfrogging’ to peripheral areas shall be discouraged;*
- *a strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and*
- *areas to be developed should be contiguous to existing developed areas’.*

The sequential approach shall be retained in the new plan.

Policies contained in the current county development plan include a certain amount of flexibility to meet the different employment needs of towns and villages. The new County Development Plan will continue to incorporate flexibility to cater for a broad range of employment options.

Any proposals for alternative business district would have to comply with the zoning principles and sequential approach identified in the County Development Plan.

Placemaking

Placemaking is about, planning, developing and creating attractive places to live, work and visit. The elements of place-making transcend many chapters of the County Development Plan. Public realm improvements, the creation of better walking and cycling infrastructure, control of signage are acknowledged as important elements of placemaking.

Placemaking is identified as a key economic principle in the RSES – *‘From an enterprise development perspective, investment in the creation of place is key to realising regional potential’* The RSES notes that *‘In general, companies are attracted to invest in locations where they can access human capital (skills and talent), higher education institutes and lifelong learning prone environments, where people will*

want to live and work and where the surrounding infrastructures are supportive of business’. Relevant RPOs include:

RPO 6.12: *Local authorities shall include objectives in development plans and local area plans supporting emphasis on placemaking for town centres, for example through inclusion of a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans.*

RPO 6.13: *Local authorities shall support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces for example with cost effective, temporary uses that build on the longer-term vision for space.*

The new County Development Plan will include policy to pursue and strengthen placemaking measures in the County’s towns and villages and make them attractive to future investment.

Policies that facilitate new ways of working and reduce the need to commute

The increase in people working from home and the development of working hubs or shared working offices has become popular as a result of better broadband infrastructure and the need to address unsustainable commuting patterns. The new County Development Plan will include new policy in relation to the provision of working hubs.

With regard to home working/home based industries it is noted that the current County Development Plan as set out under objective EMP19 encourages the development of this form of employment subject to certain criteria. It is intended that this objective will be carried forward and strengthened in the new plan.

In terms of supporting new enterprise and start-up business in the County it is considered the new Plan should include an objective to support the creation of enterprise and incubation hubs.

Economic Development in Rural Areas

The section on rural development in the current development plan will be reviewed having regard to the national policy objectives and regional policy objectives identified in the NPF and RSES. In accordance with national and regional policy towns and villages will continue to be the main focus for economic activity and employment. Relevant NPOs and RPOs include:

NPO 15: *Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.*

NPO 16: *Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

RPO 6.7: *Support local authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy, tourism, and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.*

The current County Development Plan includes a strategic objective *'To preserve the amenity, character and scenic value of rural areas, and to generally require employment-generating development to locate on zoned / designated land within existing settlements. Notwithstanding this, it is the objective of the Council to support the diversification of the rural economy through the development of appropriate rural based enterprises, which are not detrimental to the character, amenity, scenic value, heritage value and environmental quality of a rural area'*. The plan also contains a comprehensive suite of objectives with regard to rural employment, agriculture, forestry, fishing and extractive industries.

These objectives are worded to facilitate the sustainable development of agriculture, forestry, fishing and extractive industry while ensuring that rural amenities and environmental quality is protected. These shall be retained in the new plan and strengthened where required.

With regard to agriculture the current Plan includes a strategic objective *'to facilitate the diversification of the agricultural economy through the support of appropriate alternative farm enterprises'*. Agricultural diversification and alternative farm business will be supported and facilitated in the new Plan. With regard to the request for soil maps, it is noted that soil maps are available from Teagasc.

The State currently has a target to increase plantation rates to 8,000 ha per year in order to increase forest cover to 18% by 2050. The total area under forestry is currently estimated to be 770,020 hectares or 11% of Ireland’s total land area; the highest level in over 350 years. According to the Department of Agriculture, Food and the Marine (DAFM), the total area under forestry in County Wicklow is approximately 35,860 hectares or 18% of the County’s total land area. Afforestation targets are set at national level by the Department and not at county level. The Forest Service (DAFM) is responsible for ensuring the development of Forestry within Ireland in a manner and to a scale that maximises its contribution to national socio-economic well-being on a sustainable basis that is compatible with the protection of the environment. Forestry has many benefits including removing and storing carbon dioxide from the atmosphere, providing an important resource for the bioenergy supply chain and the wider bioeconomy, including timber products, which can act as a less carbon-intensive substitute for materials in construction and related sectors. Forests provide recreational spaces for people, bringing community, wellbeing and tourism benefits and mixed plantations (e.g. of broadleaf and conifer) in particular can help to address the biodiversity crisis by providing space for wildlife habitats and species diversity. Afforestation provides an opportunity for farmers to diversify their production bases and farm income for the future. The current plan includes a number of objectives (FTY1 to FTY7) to promote and facilitate the forestry sector. These will be reviewed and strengthened where possible.

With regard to access to forestry for walking, FTY3 in the current plan states *'to promote the use of forests for appropriate recreation purposes and to facilitate the development of appropriate recreation facilities at suitable locations'*. This shall be retained in the new plan.

With regard to fishing, it is noted that all rivers, lakes and reservoirs are mapped in the Green Infrastructure Strategy (Appendix 8 in the current Development Plan). The current Plan also includes objectives to protect waterways (NH20 to NH24). These will be reviewed and strengthened where considered necessary.

With regard to extractive industry the current Plan includes a strategic objective *'to support and facilitate the exploitation of County Wicklow’s natural aggregate resources in a manner, which does not unduly impinge on the environmental quality, and the visual and residential amenity of an area'*. Objective EX1 states *'To facilitate and encourage the exploration and exploitation of minerals in the County in a manner, which is consistent with the principle of sustainability and protection of residential, environmental and tourism amenities'*. It is considered that these objectives afford protection to the

environment and recreational usage. However all of the objectives will be reviewed in accordance with new policy and ministerial guidelines and amended / improved if deemed necessary.

With regard to biomass, Section 9.5 of the current Plan includes policy on bio-energy.

CCE14 *To facilitate the development of projects that convert biomass to gas or electricity.*

CCE15 *Other than biomass installations that are location specific to the rural area, biomass conversion installations / facilities shall be located on suitable zoned industrial land in settlements.*

These policies will be reviewed and strengthened where considered necessary.

Section 10.3.7 of the current County Plan contains a number of objectives in relation to recreational use of natural resources. These objectives will be retained and strengthened where necessary.

All development within rural areas that requires planning permission is subject to the standards set out in the section on Development and Design Standards. These standards will be reviewed and amended where necessary.

Development and Design Standards

The *Development and Design Standards (Appendix 1 of the current County Development Plan)* set out standards, guidance and environmental controls for all types of new development including economic development and waste disposal. They are in place to help evaluate development proposals and ensure that new development is designed to a high standard and makes a positive contribution to the County.

Infrastructure

High quality infrastructure is important for a successful economy. The RSES recognises that quality infrastructure *‘strengthens economic growth through enhancing efficiency, productivity and competitiveness’*. RPO 4.2 states *‘Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded’*.

The County Development Plan shall support and encourage investment in new infrastructure in accordance with the core strategy and settlement strategy. While external bodies provide much of the County’s strategic infrastructure, for example the NTA and TII, the County Development Plan will include a policy to encourage and facilitate the development of infrastructure provided by external agencies.

The National Broadband Plan is the Government’s plan to deliver high-speed broadband services to all businesses, farms and households in Ireland. It will ensure that people living and working in rural areas have the same digital opportunities as those in urban areas. With regard to telecommunications including broadband, the current county development plan (Section 9.4) recognises that *‘the expansion of these services is key to the future development of the County of Wicklow with the facilitation of higher capacity speed broadband is key to meeting the needs of the County’s ever growing population and a modern digital economy’*. The plan includes a strategic objective *‘to promote and facilitate the development of telecommunications infrastructure throughout the County’*. This shall be retained and strengthened in the new plan.

The integration of good land use planning with transportation is essential for economic development and quality of life. The need for better public transport facilities throughout the county is acknowledged. While the County Development Plan facilitates such facilities, it is not within the scope of the plan to deliver these service improvements and new infrastructure. The Current plan includes objectives to improve regional roads (TR24 to TR27). These improvements are carried out as funding allows. The objectives will be reviewed and improved where considered necessary.

Low Carbon, climate resilient, environmentally sustainable economy.

In 2014, the Government adopted the National Policy Position on Climate Action and Low Carbon Development, which established the national objective of achieving transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050. The transition to a low carbon or carbon neutral economy is a significant challenge and will require many changes. However, a report prepared by IBEC entitled *Building a Low Carbon Economy: A roadmap for a sustainable Ireland in 2050* recognises that *'it presents a unique opportunity to build greater energy resilience, boost competitiveness, improve quality of life, and create thousands of sustainable jobs across the country'*. The Planning Authority recognises the importance of ensuring that Wicklow is well positioned to make a positive contribution to achieving a low carbon economy.

The NPF identifies planning as an established means to implement and integrate climate change objectives at local level and recognises that in order to meet this national target, it will be necessary to make choices about how we balance growth with more sustainable approaches to development and land use. The review of the Plan will include the integration of climate change objectives and the identification of policies to support the transition towards a low carbon economy.

RPO 6.23 in the RSES states *'Support enterprise development agencies and LEOs on the development of industries that create and employ green technologies and take measures to accelerate the transition towards a low carbon economy and circular economy'*. The current development plan includes a policy on green industry (EMP17) *'to encourage and facilitate the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies, waste recycling and conservation'*. This policy will be reviewed and strengthened where possible.

Specific objectives with regard to Clermont will be addressed in the Wicklow Local Area Plan, which is due to be prepared following adoption of the County Development Plan. The current development plan includes an objective (EMP 20) *'to further develop Wicklow County Campus, Clermont House in conjunction with the Carlow Institute of Technology and other stakeholders as a third level education facility and as a centre of excellence for enterprise development, education, training, research and development'*. This objective will be reviewed and amended where considered necessary. Clermont is currently home to the Local Enterprise Office, the Wicklow Film Office, Teagasc and the Life Long Learning faculty run by Institute of Technology Carlow. Wicklow County Council aims to develop Wicklow County Campus as a Centre of Excellence in Enterprise, Education and Innovation in Co. Wicklow and to act as a catalyst for economic development in the county. There is a Wicklow County Campus Strategic Plan in place with objectives and actions in place to achieve the goals of the campus over a 5 year period. It is earmarked to be a full third level college campus with all associated uses; however this is a work in progress with new additions and developments that help to meet the overall vision.

Third Level Education

Chapter 5 of the current development plan includes a section on *'supporting education facilities and the knowledge economy'*. This section will be reviewed and expanded to take into account

opportunities to strengthen links with third level institutions and investigate opportunities in relation to climate change, biodiversity and developing a carbon neutral economy.

Accessibility in the Workplace

Accessibility standards for new buildings are set out in Part M of the Building Regulations. Part M aims to foster an inclusive approach to the design and construction of the built environment. The requirements of Part M (M1 - M4) aim to ensure that regardless of age, size or disability new buildings other than dwellings are accessible and usable. *Technical Guidance Document M* states:

'Buildings should be designed so that they are easy for people to use and to reflect the fact that all people experience changes in their abilities as they progress through the different stages of life. It is important for designers to take all of the users of buildings into account throughout the design process in order to avoid the creation of a built environment that excludes certain groups from participating in normal everyday activities'.

The document recognises that *'Experience has shown that meeting the needs of people with disabilities or elderly people frequently generates design solutions which benefit a wider range of user groups, including people with young children in buggies, people with temporary injuries or carrying heavy luggage'* and while *Technical Guidance Document M (TGD M)* sets out guidance on the minimum level of provision to meet requirements M1-M4, *'those involved in the design and construction of buildings should also have regard to the design philosophy of Universal Design and consider making additional provisions where practicable and appropriate'.*

The *National Disability Authority's 'Building for Everyone: A Universal Design Approach'* provides comprehensive best practice guidance on how to design, build and manage buildings and spaces so that they can be readily accessed and used by everyone, regardless of age, size ability or disability. The new plan shall include a policy to encourage where practicable, new development to incorporate the principles of universal design in accordance with the *National Disability Authority* guidance.

Recommendations of Chief Executive

1. Recognise that one of the key challenges facing the County is the need for better alignment between population growth, location of residential development and employment and include policy to address this and create sustainable, healthy and resilient places.
2. Include policies to support new employment development in appropriate locations that will improve economic resilience and reduce to need for unsustainable commuting patterns.
3. Include policy to direct significant employment growth into the key towns, Bray and Wicklow-Rathnew, and onto the IDA lands in Greystones, which is identified as a strategic development site for employment to strengthen the economic base of north Wicklow.
4. Review the objectives of the current Economic Development Chapter and strengthen where necessary.
5. In accordance with *RPO 6.2* ensure that policy objectives are sufficiently agile to account for unexpected opportunities, to accommodate valid propositions for enterprise development that may emerge and for which there are strong locational drivers that do not apply to the same extent elsewhere.
6. Review all land zoned for economic development in accordance with national, regional and local policy.
7. The new County Development Plan shall clearly articulate what uses are permitted or open for consideration on employment zoned land and shall ensure that such uses afford adequate flexibility to cater for a wide range of employment uses subject to respecting residential amenity and environmental protection.

8. In accordance with *RPO 6.1* include an objective to support job creation and enterprise development with an emphasis on: an enterprise base with increased productivity and more diversification, with high levels of innovation and applying the ‘Guiding Principles’ for strategic employment and investment prioritisation in placemaking for enterprise development presented in the RSES.
9. To build upon and strengthen the goals and objectives of the current County Development Plan with regard to start up businesses, niche market industry, tourism and small and medium enterprises.
10. Include policy to promote and facilitate shared working hubs.
11. In accordance with *RPO 6.12*, include objectives on placemaking for town centres, for example through inclusion of a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans.
12. In accordance with *RPO 6.13*, include an objective to support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces for example with cost effective, temporary uses that build on the longer-term vision for space.
13. Review and expand the section on third level education in the Chapter on *Economic Development and Employment* to take into account opportunities to strengthen links with third level institutions and investigate opportunities in relation to climate change, biodiversity and developing a carbon neutral economy.
14. Integrate climate change objectives into the development plan and identify policies to support the transition towards a low carbon economy including objectives to support green infrastructure.
15. Include a policy to require, where practicable, new development to incorporate the principles of universal design in accordance with the *National Disability Authority Building for Everyone: A Universal Design Approach (2012)*.

Part 4.3.5: Tourism and Recreation

Name	Issue Raised
Ashford Development Association (C1)	<ul style="list-style-type: none"> • Need to make more of the tourist facilities that we already have. • Guided tours of the history of Wicklow e.g. gunrunning in Kilcoole, site where St. Patrick first landed, walking beyond the ‘Pale’ with animated robbers and thieves. • Need a concentrated effort to combine outdoor activity other than walking. Could use outdoor climbing walls and climbing centres.
Wicklow PPN (C2)	<ul style="list-style-type: none"> • More accommodation options. • Spread tourist gain across the county. • Small local artisan attractions for small villages. • Join up walking and cycle trails to connect all settlements. • Recreational facilities for locals. • Green public accessible spaces. • Prioritise walkers and cyclists. • More trails in west Wicklow.
BirdWatch Ireland (C3)	<ul style="list-style-type: none"> • BirdWatch Ireland has participated in the workshop on the Wicklow Coast Greenway feasibility study. The organisation is deeply concerned about the potential impacts of the suggested greenway route along the Wicklow coastline due to impacts on the Special Protection Areas for birds and also because of the location of the Little Tern colony on the shingle beach near Kilcoole. This colony is the most important Little Tern breeding colony in the country. It is being squeezed by the sea and by people. During the Little Tern breeding period BirdWatch Ireland wardens undertake 24 hour/7 day a week monitoring of the colony to protect it and do our best to ensure a successful breeding season. This has involved a significant amount of investment by Birdwatch Ireland and the National Parks and Wildlife Service. Encouraging more people to this area through a coastal greenway will be detrimental to the conservation efforts at the site and the long term viability of this colony. • BirdWatch Ireland supports greenways that help people get out of cars and moving physically; that help people enjoy nature and live more healthily, but we are fundamentally opposed to greenways that threaten already vulnerable waterbirds and seabirds. • Greenways are important and should be built within a framework of cycling infrastructure within towns and villages. We suggest that greater focus is put on creating much more liveable, accessible and nature-filled towns and let our threatened wildlife have their safe spaces.
West Wicklow Environmental Group (C7)	<ul style="list-style-type: none"> • Encourage tourists and individuals to enjoy but also respect our natural environment with awareness initiatives and positive signage. • The options for food and snacks for visitors to Glendalough in the upper car park are completely limited to only heavily fried foods such as chips, burgers, ice cream and other extremely unhealthy options. With consumer awareness and eating habits shifting and with a lot of health-conscious outdoor loving people visiting this wonderful world-renowned heritage site we are lucky to have in Wicklow, surely other options, including plant-based options can be provided instead of or alongside the current offerings by the company in charge of this car park. • Planning should enable the development of community-based walking trails so that Wicklow residents have opportunities for healthy physical activity without having to use their cars.
Baltinglass & District Forum (C10)	<ul style="list-style-type: none"> • Concentrate on Tourism and on the natural points of historic and scenic attraction and this approach might stand a better chance of achieving progress towards a

	viable community.
Newtownmount-kennedy Community Forum (C11)	<ul style="list-style-type: none"> • It is important to protect existing outdoor recreational amenities. • Existing tourism facilities should be supported and their potential maximised. • Most tourist facilities are not accessible by public transport, which makes them expensive to get to for tourists. • Traffic is an issue for Glendalough and a park and ride which links to Dublin based public transport should be a priority. • To capitalise on Ireland’s Ancient East the CDP should identify greenway links between attractions. Supported by bike rentals, hostels, camp sites, glamping, coffee huts along the routes would boost the local economy in the surrounding areas. • Domestic sports tourism such as walking holidays, biking holidays and horse riding trails should be facilitated and promoted. • Considering the success of various Hell and Back and Ironman events it is suggested that there is a market for outdoor natural sports facilities. A permanent facility that can cater for a variety of sports such as cross country running, assault courses, mountain biking, off road biking and horse riding would be very welcome in the county.
Keep Ireland Open (C16)	<p>Tourism</p> <ul style="list-style-type: none"> • Objective T29 should be reviewed having regard to climate change emergency and driving should not be encouraged. • Cycling and Walking covers a wide range of aspects other than tourism and recreation such as physical activity, health, safety etc. This topic is worthy of a separate chapter. • Develop a further loop north east of the link road between the R755 and the R765. • Objective T33 should be amended to delete touring having regard to the impacts on climate change. • Objective T33 should be located in the section on Coastal Zone Management. <p>Recreation</p> <ul style="list-style-type: none"> • Include a table with maps of way-marked ways of medium/long-long distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hill walks, forest walks and other defined walking trails with accompanying maps and a database should be set-up and up-dated as new trails emerge. • Promote and facilitate the continuing development of a regional and local network of Ways and Permissive Access Routes that provide a network of long distance walking, running and hiking trails and routes. Encourage the re-routing of existing trails off public roads. • In contrast to public rights of way, long distance walking routes exist on a permissive access basis and are not to be confused with designated public rights of way as consent can be withdrawn at any time by the landowner. • In view of the obesity and diabetes crisis, support, improve, develop, upgrade and facilitate Slí na Sláinte routes. These should be waymarked/signposted, where feasible. A table should be included. • Promote walking through the development and expansion of a network of safe walking trails within towns and villages and their environs. Such routes can link with existing waymarked trails, Sli na Slante and the Green Infrastructure Network and existing or new public rights of way. • Support the provision of proposed long distance walking trails that provide access

	<p>to scenic uplands, river and coastal features.</p> <ul style="list-style-type: none"> • Research and map existing network of traditional paths used for leisure purposes to determine their legal status. • Employ a full time Walks Officer at an appropriate senior level. • Include objective – <i>‘The Council will co-operate with relevant agencies, both public and private, including the National Trails Office, FI, NWMWAC, Coillte, the Heritage Council, adjoining councils and local landowners, to support the development, maintenance, facilitation and enhancement of medium and long distance hiking/walking routes, community walks and off-road trails particularly in the uplands. This will include consultation with adjoining councils with a view to promoting routes extending beyond the county boundary’.</i> • Establish a Recreational Trails Committee to plan, develop and implement a recreational trail network throughout the county in association with relevant stakeholders, landowners and community interest groups and develop a recreational Trails Plan within the lifetime of the Plan. This plan shall set out a coordinated strategic framework for future recreational trail development. • Lobby the appropriate Government Department to agree and implement a scheme to indemnify private landowners with regard to recreational users of their land. Taken from Action Plan for Rural Development 2017 Pillar 3 Act 176. • Include a table of cycle routes with maps. • Support the development, maintenance and enhancement of trails and routes in co-operation with FI, Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity. • Develop a Cycling Strategy during the lifetime of the Plan. • Support, promote and actively encourage the provision, development, extension and design of off road interlinked cycleways and walkways, walking and cycling routes (mention routes), including medium and long distance walkways, in conjunction with IW and other stakeholders to link a strategic network of trails in adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors. • Support, promote, facilitate and develop a comprehensive network of greenways, linking parks and public open spaces to regional and national Greenway Networks and work with the NTA, and adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists. • Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards. • Develop themed heritage trails and suitable walking routes and cycle tracks along historic access routes in co-operation with communities and landowners. Explore the potential of inter- county trails (named). Based on Action Plan for Rural Development 2017 Pillar 3. • Actively encourage, support, promote and facilitate the development of disused railways (named) for greenways, walkways and cycleways and other recreational activity to develop a network including medium and long-distance walking and cycling routes with related signage and waymarking. Based on Smarter Travel 2009-2020 Act 17. • Where feasible, provide separate trails for walkers and cyclists in the interests of safety and convenience with appropriate surfaces for each type of user. • The separation of walkways and cycleways is the practice in other countries particularly in Austria, Germany and Switzerland.
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	<ul style="list-style-type: none"> • Protect and preserve routes of former railway lines (named) for recreational development free from development by protecting, enhancing, conserving, safeguarding and preserving potential greenway routes as long distance walking and cycling routes along or near these rail lines which could compromise their development as walking/cycle routes in the future. Along these corridors other uses shall not be considered. Where these corridors have been compromised by development, adjacent land which could provide opportunities to bypass such an impediment and reconnect these routes for walking/cycling shall be protected for this purpose. • While it should be possible to provide most routes on existing track alignment, there may be a need for diversions and deviations following detailed survey and design work and consultation with landowners. The aim is to include these routes in a map in the Plan. Meanwhile adequate protection needs to be given to abandoned rail lines so as to avoid inappropriate development that could compromise their viability. • Provide adequate car parking and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark. • The absence of car parks can cause unnecessary friction between landowners and recreational users. • The primary responsibility for the provision of car parking lies with councils. • Establish new walkways and cycle routes on a legal and permanent basis. • Protect the integrity of established and future walking and cycling routes from development which would adversely impact upon them or their settings. • Protect the routes of, and prohibit development which would hinder the creation and development of future greenways, walking and cycling routes including those identified in the plan. • Ensure that development proposals protect the routes of potential linkages such as linear paths footpaths trails, greenways and cycleways through a site where the Council considers that an opportunity to provide a linkage to or between adjoining areas.
<p>Wicklow Planning Alliance (C17)</p>	<ul style="list-style-type: none"> • Need strict planning enforcement and control. • Need to support the work of the Pure Mile. • Encourage and develop outdoor activity tourism for example walking and cycling trails with high class B&B facilities on the trails with wet rooms where visitors can hang up wet clothes to dry out over-night. • More greenways are needed. • Can capitalise by protecting both the natural and built heritage.
<p>Delgany Community Council (C19)</p>	<ul style="list-style-type: none"> • Develop a local greenway in Delgany that could connect in with a greenway between Greystones and Wicklow, the Three Trout’s Stream Delgany to Greystones Greenway. • A traffic management plan is needed for Glendalough. • Need for tourist accommodation in north Wicklow. • Develop and promote the Wicklow Way walking route. • A lot of work has been carried out to develop and promote local walks such as the Delgany Heritage Walk and The Fairy Walk. • Financial support is needed from the Council to help with maintenance and signage of these walkways. • The development of a series of greenways or coastal walking and cycling paths would be a great amenity.
<p>Wicklow Uplands Council (C27)</p>	<ul style="list-style-type: none"> • Tourism and recreation opportunities must be developed carefully and sustainably to prevent compromising our valuable resource and our rich and diverse heritage.

	<p>The review of the Wicklow Outdoor Recreation Strategy will be important in this regard.</p> <ul style="list-style-type: none"> • Majority of visitors to Wicklow are day trippers and provide little towards the local economy. • This is exacerbated by the lack of accommodation and public transport facilities. • Tourism must be developed that encourages independent visitors and more overnight stays. • The recently launched 183 Local Link bus service between Glendalough and Wicklow town is a welcome development. • The CDP should look to improve public transport including east west links. • As outdoor recreation grows in popularity erosion damage becomes a common feature and growing problem across the majority of upland paths. This has impacts in terms of the environment and the visitor experience. Funding must be earmarked and invested in repairing, maintaining and promoting upland paths and walking trails. • Spinoff rural tourism opportunities can contribute to the local economy. • Lack of parking is having a negative impact on tourists especially at Glendalough, the Pier Gates (Luggala) and around the Vartry Loops. Options for new car-parking should be investigated. • Lack of connectivity with public transport is identified as a weakness of the current upland trail network. • Strategic long distance trails for walking and cycling which link directly with towns and villages should be encouraged. • Trails with links to public transport should be prioritised as this promotes more independent visitors who are less reliant on car transport and stay for extended periods. • Cycling and mountain biking is growing in popularity throughout the county. There is demand for more off road long distance cycle routes in the county. • The anticipated greenway developments are welcome. • The growing number of large organised cycle events can be a point of contention and need to be planned properly with sufficient notice for residents.
Blessington & District Forum (C28)	<ul style="list-style-type: none"> • Completion of Blessington E-Greenway around lakes and provision of support facilities. • Develop and enhance the public realm in Blessington. • Expansion of tourist accommodation facilities. • Development of Culture and Heritage activities. • Development of Viking TV series links with West Wicklow. • Develop a walkway for Blessington into and through Glen Ding Woods.
Jimmy Murray (D1)	The walking routes in Wicklow should be better waymarked.
Fintan Clarke (D6)	Concern raised over the permanent padlocking of the Lighthouse Road which provides access to Wicklow Head, one of the most scenic areas of the county.
Liz Tiernan (D8)	Food and snacks provided at the upper lake car park n Glendalough are unhealthy. Council should look for another provider that can offer healthy options.
Yasmin Fortune (D15)	Prioritise heritage tourism as a means of generating revenue as it is an untapped resource.
Veronica O’Reilly (D27)	<ul style="list-style-type: none"> • Potential to grow tourism in Wicklow town. • Some areas of the town need attention. • South Quay – lights along the river. • Potential to develop interpretative centres at Captain Halpin’s monument and Black Castle.

	<ul style="list-style-type: none"> • Potential to develop a walking tour - a journey from the jail to the harbour. • Potential generated by town’s use as a film location. • More development on a food trail. • Container hotel is a unique concept and will raise Wicklow’s town’s profile. • Council should look at ways other than car parking and rates to raise funds.
Vera Walsh (D30)	<ul style="list-style-type: none"> • Appreciation for local link bus to Glendalough which benefits tourists and locals. • A similar bus link to Greystones would be beneficial and would improve links to the DART.
Cressida Lynch (D33)	<ul style="list-style-type: none"> • More investment into arts and culture. • Improve trails infrastructure. • Improve maintenance, signage and interpretation. • Educate local communities on litter. • A visitor centre and classroom at Birdwatch Ireland site in Kilcoole is needed. • Make more of Lugnaquilla and improve parking and facilities. • Potential for a café at Tomnafinogue woods. • Have more events celebrating the Celtic festivals.
Deirdre Burke (D41)	<p>Significant potential for Arklow when the river is cleaned up. It will be the main attraction in the town and can facilitate a range of recreational activities (sailing, kayaking, birdwatching).</p>
Kevin & Eleanor Lee – Coollattin Canadian Connection (D42)	<ul style="list-style-type: none"> • Genealogy tourism plays a major part in bringing visitors to Ireland and this should be recognised in the development plan. • Heritage needs to be remembered and celebrated. • Genealogy tourism is local. It celebrates the rich history of the area. • The development of rural based tourism is a mechanism for stimulating the rural economy. • Would be good to see investment and innovation in heritage research initiatives, for example the development of a Famine village / interpretative centre in South Wicklow.
Billy Timmons (D49)	<ul style="list-style-type: none"> • The Statement of Tourism Strategy 2017 – 2026 should be amended and added as an appendix to the CDP. There is insufficient focus on the south-west of the County and there are major omissions in the document. The importance and potential of the Hillfort complex in the south west is not mentioned – details that should be included are attached to the submission. • A plan to increase, enhance and link all walks should be outlined. • The potential of the Wicklow Way needs to be realised.
Mick Mulligan (D50)	<ul style="list-style-type: none"> • Lack of serviced camp sites and/or caravan parks in the County considering the level of tourism in the county. • A major threat to tourism is the level of crime.
Disability Federation of Ireland (D51)	<ul style="list-style-type: none"> • Article 30 of the UN CRPD states that people with disabilities should have equal opportunity to participate in cultural life, recreation, leisure and sport. • By making our tourism services accessible we can attract more and more people with disabilities to Ireland as it will be seen as an accessible Tourist destination. More than 46% of people over 60 worldwide have a disability. Older people made over 225 million day trips and 217 million overnight trips over the 12 months surveyed by the European Commission. These figures are likely to have increased in the last number of years as the population ages and countries around Europe slowly become more accessible. • If Wicklow caters for the ageing population and makes tourism services and facilities accessible for all it will lead to greater numbers of people travelling to the county and increased revenues for the tourism providers. This is not to mention the number of families and carers who could be attracted that do not currently travel because of a lack of appropriate facilities, accommodation and poor access to

	<p>attractions, local services and businesses.</p> <ul style="list-style-type: none"> • Wicklow County Council needs to work to ensure that its many tourist attractions are fully accessible to people visiting the county as well as to its own citizens. This needs to extend beyond physical accessibility. It should also include, for example, audible headsets being available for people who may struggle to hear a guide or have sight loss and need audio description of the environment and attraction. Investments should be made into assistive technologies such as interactive screens, which include text and sign language interpretation at attractions. Wicklow cannot continue to lose out on valuable revenue from a sizeable proportion of the market because it fails to take accessibility into account. • Tourist accommodation is already lacking in certain parts of the county and accessible tourist accommodation is even more difficult to find. Hoteliers, local businesses and those providing tours and accommodation need to be incentivised and encouraged to be more accessible. They also need to be made aware of the economic benefits of being disability friendly. • Working to make tourist attractions more accessible will only be an effective way to increase revenue for tourism, if consideration is given to the infrastructure of the county. • People with disabilities visiting the county, like any other tourists, will need somewhere to stay, eat, use the toilet and a way to travel from one location to another. • Towns and villages across the county need to be more accessible and hotels, restaurants and shops need to be encouraged to make their services more accessible. • Publicly funded buildings, which are being newly developed, should contain a Changing Places facility and a large accessible toilet. • Multiuse community facilities should be encouraged. Many mainstream sports facilities in towns and villages have their roots in small voluntary organisations. It is beyond the reach of many of these clubs to immediately upgrade their facilities to make them accessible to all. Multi use community facilities would provide greater opportunities for people with disabilities to be involved in mainstream sports clubs and groups in their community. • As well as ensuring access to mainstream sports facilities and tourist attractions, people with disabilities should have the opportunity to participate in disability-specific sports in the county. The Wicklow Local Sports Partnership as well as disability-specific clubs and individual disabled athletes should be supported to ensure they can continue to provide these opportunities. Other areas of recreation, such as children’s playgrounds, should also be accessible to all and should encourage interaction between children with disabilities and their peers, as has already been done in Greystones recently.
<p>Robert Neill (D57)</p>	<ul style="list-style-type: none"> • Greater flexibility is needed in the new CDP to sustain Integrated Tourism / Leisure / Recreational complexes. • Objective T22 is overly restrictive. Request that it be replaced with the following: ‘Development shall be carried out on the basis of an integrated, comprehensive master plan and business plan, to be agreed at the outset of the development with the Planning Authority. Any future proposals for development will be assessed against the carrying capacity of the estate and its ability to absorb development without detracting from the landscape and built and natural heritage context of the estate’. • The objective should be to regulate and order development rather than presume against it.

	<ul style="list-style-type: none"> • The continued use of Rathsallagh Country House and Golf Club as a leisure facility is crucial for the success of Objective DUN3 in the Dunlavin Plan. • The golf course, on its own, is not viable. A broader perspective is required. • Greater flexibility is needed in the CDP to sustain the continued use of the golf club. There needs to be an element of subsidy from compatible development that is capable of achieving sustainability.
Simon Murphy (D60)	<ul style="list-style-type: none"> • Developing tourism does not necessarily mean compromising the valuable tourism resource. • Thousands of Irish people annually are spending significant money to walk Camino de Santiago – a significant volume will have never set foot of the Wicklow Way let alone walk its full length. Adopting the approach taken in other counties or utilising the expertise of the OPW should be looked at. • The Development Plan must be aggressive in committing the Local Authority to delivering specific tourism related results for each local area. Such targets must not remain unfulfilled and if the Local Authority does not have the expertise or is not disposed to the importance of delivering on such targets, external agencies must be engaged with to assist the Local Authority. • Significant growth in tourism facilities in West Wicklow must be included in the Development Plan. • Baltinglass Town is a designated Heritage Town surrounded by the highest density of historical sites of any town in the country. Baltinglass Abbey is the mother house of Jerpoint Abbey. As you drive from the Capital City along the N81, there is not one mention of Baltinglass Town as a tourism destination. • Link the West Wicklow area to the tourism traffic travelling the M9. • Outdoor tourism and recreation facilities that are lacking - casual glamping and weekend facilities in or adjacent to towns, cycling routes, feeder walks to the Wicklow Way, tourism accommodation. • The Development Plan must provide for the development of tourism related micro facilities can be readily achieved, which are sustainable and which are reflective of the rural and rugged aspect of the Wicklow countryside.
Craig Bishop (D62)	<ul style="list-style-type: none"> • The rugged landscape is what defines Wicklow and is its unique selling point. • The Garden of Ireland Project – Wicklow developed as one large green entity. • Mountains to the Sea Green Sector: <ul style="list-style-type: none"> - Greenways - Camino from Dublin to Glendalough - Green Tourism Projects
Justin Ivory (D63)	<ul style="list-style-type: none"> • Restrict human recreational activities to designated areas and have areas that are undisturbed by human activity.
Richard Mulcahy and Stephen Tracey (D66)	<ul style="list-style-type: none"> • Coastal area south of Arklow is underutilised and the coastal zone management plan can be improved to further promote tourism, recreation and the natural heritage of the area. • Encouraging Irish residents to holiday at home will help reduce air travel and hence reduce our carbon footprint. • Amend Objective CZ12 to include the following: <ul style="list-style-type: none"> - As noted in the current CDP, the area has limited tourist facilities. The promotion of new recreational activities should be encouraged and promoted as part of the new CDP. Water based activities such as angling, sea kayaking & surfing are high value, and low impact activities that make the most of the coastal setting and can cater for the day visitors to the locality. - The decline of the traditional farm due to slowing agricultural output should be off-set by encouraging farmers to diversify and use their lands for other

	<p>activities. Promoting a new greenway along with a coastal walkway from Arklow Rock to Kilmichael Point should be explored and landowners encouraged to provide access to their lands in exchange for other tourist development infrastructure on their land subject to proper planning.</p> <ul style="list-style-type: none"> - Promote sustainable tourism in accordance with World Tourism organization goals for sustainable tourism (physical integrity, biological diversity, resource efficiency); - Any new development should minimize the pollution of air, water and land and the generation of waste by tourism enterprises and visitors; - Landowners should be encouraged to open their farms and lands to educational course covering farming, bird watching, marine life, forestry etc. - Innovative and sustainable tourist accommodation should be encouraged with a focus on renewable energy, water management, biodiversity and reducing and recycling waste. The rural design guidelines with a focus on vernacular architecture should be employed with farmyard style courtyard tourist accommodation promoted allowing for new accommodation in a clustered development. - Landowners should be encouraged to provide access to the beach in exchange for being allowed to develop other tourist related activities. <ul style="list-style-type: none"> • Request that landowners be given the opportunity and encouragement to provide sustainable tourism development and activities subject to proper planning and sustainable development. • It should be noted that the lands outlined in cell 12 are unique in that its east coast location has a catchment area of 1.9 million people within 100km of the area. Along with an excellent transport infrastructure from motorway to rail between Dublin and Wexford, the proposals are economically viable, socially responsible and environmentally friendly to both visitors and locals.
<p>Sophia Meeres (D68)</p>	<ul style="list-style-type: none"> • Tourist amenities (hotels and restaurants etc) should be based in towns and villages. • The development of Arklow as a tourist hub will require the preservation of the historical quaint open character of the Main Street, riverfront and harbour. • Access to the coastline is an asset that has been partially lost but Arklow’s beaches could be restored by the removal of Roadstone jetties and the completion of the sea defences. • The caravan park in Arklow should be removed and the lands renaturalised as a transition zone between land and sea. • The Roadstone Quarry at Arklow should be closed. • Arklow lacks a good hotel, cafes and restaurants. • The potential of the river, the marsh and the riverside walks has yet to be realised as part of a green and blue infrastructure plan. • Shelton Abbey could be converted into a hotel. • Riverside walks should be created between Avoca and the sea as well as along the coastline between Wicklow and Arklow. • The creation of greenways should be a priority realised through CPO if necessary.
<p>Michael Higgins (D88)</p>	<ul style="list-style-type: none"> • Identify actions to prevent further erosion of sand dunes at Brittas Bay. • Brittas Bay has a huge amount of visitors but very few amenities. • More parking facilities are required at Brittas Bay particularly at the north end of the beach. • A footpath should be provided on the R750 between Ballynacarrig village and the north end of Brittas Bay beach. There is a significant volume of traffic using this road and it is very dangerous for the many pedestrians who also use it to access the village.
<p>Anita Tuesley</p>	<ul style="list-style-type: none"> • Need strict planning enforcement and control, for example do the stalls at

(D89)	<p>Glendalough have planning permission? We need to support the work of <i>the Pure Mile</i>.</p> <ul style="list-style-type: none"> • Should encourage and develop outdoor activity tourism for example walking and cycling trails with high class B&B facilities on the trails with wet rooms where visitors can hang up wet clothes to dry out over-night. • Need more greenways • Can capitalise by protecting both the natural and built heritage.
Judy Osborne (D98)	<ul style="list-style-type: none"> • Monitoring of tourism objectives. • If it is good for local residents it will be good for tourists. • Children’s recreation areas in tourist areas add to the tourism value. • Many walking experiences are deteriorating. This is quite marked along the Murrough but forest walks may be impacted by the siting of telecommunication masts and associated works. • It is proposed that miles of walks be identified and monitored in each plan period to ensure no further deterioration. • Other walks that should be listed are the truly excellent Sli around the Vartry reservoir and any other Slis in the county though we note there is no route from Roundwood village, which is a great pity. • It is suggested that the Council also promote a walkway around Poulaphouca reservoir either partly or totally as a board walk. • There should be an indicator monitoring how many access routes exist in the county and how many miles of walks are included. • An indicator is also required to monitor the erection of fences around hitherto open land and ask that the council consider the following points: • It is a requirement of the Planning Regulations – 2001 - 9.(1)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure, for recreational purposes or as a means of access to any seashore, mountain, lakeshore or other place of natural beauty or recreational utility requires planning permission • There has been a large increase in the amount of new fencing in the upland areas of the County which impacts on recreational users in terms of access and the overall ambience. • Traditional hill-sheep farming rarely required fencing, but since the introduction of REPS, sheep-farmers must stock-proof their land. Traditional fencing methods: hedgerows, ditches and stone walls are now rarely used. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of REPS without impinging on access for hill walkers and other recreational users. • Having regard to changes to agriculture much wire fencing that has been erected will become redundant. • Request for objective: Fencing in upland or amenity areas will not normally be permitted unless such fencing is essential to the viability of the farm and conforms to best agricultural practice. The sole reason that fencing is required to comply with requirements of the Rural Environmental Protection Scheme or any other Government regulation will not constitute a sufficient reason for it being permitted. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account. Barbed-wire will not be used for the top line of wire. Stiles or gates at appropriate places will be required. All permissions will be for a maximum period of ten years. At the end of that time unless the planning permission is renewed all materials must be removed. • It should be noted that the EU is taking legal proceedings against Ireland for permitting the unnecessary erection of fencing in the uplands.

Response of Chief Executive

The content of these submissions are noted and welcomed. The new County Development Plan, as with previous plans, will acknowledge the importance of tourism and recreation and the positive contribution they make to the economic and social well-being of the County. The current County Development Plan includes a chapter dedicated to tourism and recreation and it is intended to retain this in the new plan.

The County Development Plan is a land use framework plan and includes objectives to deal with the land use matters pertaining to the planning and development of tourism and recreation – it is not the ‘Tourism Plan’ for the County. Issues for example raised in relation to setting up guided tours, the sale of certain products at tourist locations, the provision of financial supports and the identification of tourism targets are outside the remit of the development plan.

The County Development Plan does not deliver new tourism or recreation projects or facilities – it is a land use plan that set the framework (location, design etc) for new developments and standards that would be applied when either the private market or state agencies wish to carry out development. The actual delivery of new facilities can be either by private developers or state agencies including the Council; the actual projects undertaken by the Council in this regard would be determined by operational and budgetary / funding considerations.

However, many of the issues raised are addressed in the **Wicklow Tourism Strategy & Marketing Plan 2018 – 2023**. This Tourism Plan sets out a vision of what can be achieved in Wicklow, identifies priorities, targets and detailed actions to ensure the County realises its tourism potential. The **Statement of Tourism Strategy 2017 – 2026** identifies a number of goals for tourism in Wicklow including the establishment of Wicklow as a year round destination, capture more overnight tourism, encourage the provision of alternative forms of accommodation, convert day visitors to staying visitors, integrate development of tourism infrastructure and assets and deliver sustainable development. These goals reflect many of the issues raised in the submissions. All of these submissions will be brought to the attention of the ‘Implementation Groups’ that are now in operation to deliver on the actions of the Wicklow Tourism Strategy & Marketing Plan 2018 – 2023

The objectives in the Tourism and Recreation Chapter of the County Development Plan will be reviewed and improved in accordance with the Tourism Statement and Tourism Strategy.

Harnessing the potential of existing amenities / facilities

A number of submissions noted the importance of harnessing the potential afforded by the County’s heritage, natural amenities and existing tourist facilities. In particular, it is considered by many that the County’s potential in terms of outdoor activity tourism is not being fully realised. The County’s rich heritage and wealth of natural amenities are significant assets and need to be managed in a sustainable manner. There are significant opportunities to capitalise on the potential of these assets, grow tourism and enhance the development of outdoor pursuits in a manner that respects and protects the intrinsic character of the County. The new Plan, subject to environmental assessment, will include additional objectives to harness untapped tourism potential.

The current plan (Objective T3) requires that tourism and recreation related developments locate in existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable. Objective T4 ensures that tourist development will only be permitted in rural areas where the product or activity is dependent on its location and will not adversely affect the environmental quality and amenity of the area. These policies are considered sufficiently agile to support a strong

tourism sector while protecting the environment, heritage and natural amenities. It is intended to continue these policies in the new plan.

Policy T22 relates to the development of Integrated Tourism / Leisure / Recreational complexes. Having regard to concerns raised that this is overly restrictive, the policy will be reviewed and amended if considered necessary.

The potential to develop an outdoor tourism base with indoor activities e.g. climbing walls is acknowledged. It is considered that the development plan could include an objective to support such a facility subject to proper planning in terms of location, design and impact on amenities.

While the development plan will not directly pursue the development of interpretative centres, it does include a policy (Objective T8) to facilitate interpretative centres and cultural venues at appropriate locations where they can be integrated within existing settlements or existing tourism facilities.

The development plan requires that in all cases, applications for tourist development must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability.

The quality of the public realm and the control of litter are important elements in creating an attractive tourist product. The Plan will include objectives to support the implementation of the Pure Mile and enhance the public realm in the County’s towns and villages and make them attractive for tourists. With regard to litter, the Environment Section has measures in place to deter littering and to address it when it does occur.

Accommodation

Many submissions noted that the level and range of tourist accommodation options in the County is inadequate. The current Development Plan supports and promotes development that would increase dwell time and includes objectives (T10 to T19) to facilitate the development of a variety of accommodation types throughout the County. It is considered that this existing policy is sufficiently agile to facilitate a range of types of new tourist accommodation but nevertheless, it will be reviewed in detail and improved where necessary.

Infrastructure serving tourist and recreation sites

The current County Development Plan includes objectives to support the delivery of enhanced public transport throughout the County for both residents and tourists and it is intended that these provisions will be retained and enhanced if necessary in the new plan. However, it is noted that the delivery of public transport services is outside the remit of the plan.

With regard to traffic and car parking issues at certain tourist locations, notably Glendalough and Brittas Bay, the current County Development Plan includes objectives with regard to supporting infrastructure such as visitor parking, toilets, cafés etc and it is intended that these provisions will be retained in the new Plan and enhanced where necessary. Furthermore, with regard to Glendalough, the Council have approved a Part 8 to improve car-parking facilities serving Glendalough.

The licensing of food operators and the type of food sold at tourism sites is not a matter for the County Development Plan.

Walking trails / cycling routes / greenways

Many submissions noted the need for additional walking trails, cycling paths and greenways. Such infrastructure will not only improve the County’s tourism resources but will contribute to the creation of healthier communities and attractive places to live. The NPF acknowledges that *‘the maintenance of access to our landscapes and the creation of new accesses are dependent on maintaining good links with the agricultural sector’*. The NPF also notes that *‘the development of greenways, blueways and peatways offer a unique alternative means for tourists and visitors to access and enjoy rural Ireland’* and the *‘development of a strategic national network of these trails is a priority’*.

Objective T29 in the current plan supports the development of new and existing walking, cycling and driving routes / trails and ancillary facilities. It is intended that the new plan will include additional focus on walking routes, cycling routes, greenways and blueways where possible and include an objective to support the development of a strategic national network of trails.

With respect to maps, while the current County Development Plan address green infrastructure in detail it is in a strategic, county wide manner given that scale of plan making (Appendix 8 of the current plan). While maps are included in this strategy, it is acknowledged that it is difficult at a county scale to show in meaningful way all GI assets and the connections between them, but this will be considered in the preparation of the new plan to determine if enhanced maps can be provided.

With respect to identifying and mapping amenity walking and cycling routes, the options in this regard will be examined as part of the plan review - however it is only within the remit of the plan to map or identify existing routes that are already legally established for example as public rights-of-way, and state / Council developed greenways or to include objectives for the development of new routes in certain locations without being route specific until a full design and consultation process has been carried out; the plan cannot ‘designate’ new routes as this requires the invocation of separate processes. With respect to identifying existing or promoting the development of new localised walking and cycling routes, for example to access public transport nodes or schools / community / local employment locations, this will be examined in each local plan.

With regard to amenity routes / loops suggested in submissions, these will be considered the development of the new plan – please see also Part 4.3.10 of this report that addresses Public Rights of Way and Amenity Routes. It also is recommended that that the sections of the current County Development Plan relating to ‘recreational use of natural resources’ and ‘public rights of way’ be move from the current ‘heritage’ chapter of the plan to the revised and updated ‘tourism and recreation’ chapter of the new plan.

With regard to fencing in uplands areas, this would appear to be an enforcement matter, rather than a matter for the County Development Plan. Wicklow County Council has an active planning enforcement department, which will investigate and take action where necessary where any unauthorised fencing is brought to its attention. The Planning Authority is cognisant of the need to balance agricultural requirements with the protection of amenity particularly in sensitive upland areas.

Environmental Impacts

The development of tourism and protection of the environment requires careful management and a balanced approach. Protection of the environment and natural amenities is a key focus of the County Development Plan. The objectives in the current development plan ensure that natural resources are protected from unsustainable development and that development occurs within environmental limits, having regard to all the requirements of environmental legislation. It is intended to review the policies in the current plan and strengthen where necessary.

With regard to the development of greenways and other tourism development, it is noted that applications for such development is subject to environmental assessment including appropriate assessment screening and in some cases environmental impact assessment. Regardless of the location of a development, all planning applications are assessed in terms of their impact on the local environment. Development which gives rise to adverse impacts on Natura 2000 sites will not be permitted.

In terms of the impacts on climate change, the current County Development Plan includes a climate change audit. It is intended to take that a step further in the new plan and include a chapter on climate change. In accordance with the NPF (NPO 54), the County Development Plan will integrate climate considerations in support of national targets for climate policy mitigation and adaptation.

Accessibility

The objectives in the Tourism and Recreation chapter and the design standards will be reviewed and improved taking into account the need to make tourism facilities and the built environment including the public realm more accessible to all.

Recommendations of Chief Executive

1. To review and update / strengthen the objective in the Chapter on Tourism and Recreation in accordance with national, regional and local policy and strategies.
2. Having regard to NPO14 in the NPF, include an objective to protect and promote the sense of place, culture and the quality, character and distinctiveness of the Irish rural landscape that make Ireland’s rural areas authentic and attractive as places to live, work and visit.
3. Have regard to the Wicklow Tourism Strategy & Marketing Plan 2018 – 2023 and the Statement of Tourism Strategy 2017 – 2026 and facilitate the development of a sustainable tourism industry that is economically viable and respectful of the natural landscape and built heritage.
4. To provide greater focus for walking trails, cycling infrastructure, greenways and blueways taking into account the potential benefits for local people and tourists.
5. Include an objective to support the development of a strategic national network of trails.
6. Where possible identify walking trails / cycling routes and possible greenways, including showing links to public transport.
7. Ensure that the objectives contained in the County Development Plan give adequate protection to the environment and ensure that the very resource which tourism depends upon is not depleted by inappropriate development.
8. Review the policies and objectives in the development plan taking into account the need to make tourism facilities and the built environment including the public realm more accessible to all.

Part 4.3.6: Towns and Retail

Name	Issue Raised
Ashford Development Association (C1)	<ul style="list-style-type: none"> • Need to understand the assets and what each settlement has to offer. • The Plan should inspire retailers to look towards designs that would meet an overall style and look enhancing the town or village – example of Marin County, California is provided. • In response to vacant units it is suggested that someone need to look at each individual situation and see what’s missing from that community and then look for tenants. • Scale of retail development depends on the town or village, the space available and the economics of the situation. • Retail can bring new people to the County. • Promote artisan shops with an aim to source most produce in Wicklow.
Wicklow PPN (C2)	<ul style="list-style-type: none"> • Supports must be made available to indigenous business and local retailers to boost local economies. • Vibrant retail areas and well-designed streetscapes will encourage people to shop local. • Pedestrianised shopping streets. • Rent upper floors of retail for residential. • Live over shop schemes. • Critical mass of consumers and retailers. • Broadband. • Focus on design of streetscapes. • Not allowing big outlets on the outskirts of towns. Keep in towns/villages. • Fairs and local markets and WW brand. • Parking an issue – research best practice and alternatives. • Decentralised parking with shuttle. • Incentives for small business/enterprises. • Charity shops to pay rates. • Increase public realm spaces. • Making streets safe and attractive to encourage pedestrians. • Provision of adequate parking and link buses. • Start-up business incentives by reducing rates and corporate profit tax for first 5 years. • Special deals to expand trendy café’s and health shops in Wicklow (they go to Gorey and Dublin now).
Baltinglass & District Forum (C10)	<p>Greater competition in the retail sector by introduction of one of the leading grocery chains would help to keep costs down for shoppers many of whom are living on very low incomes.</p>
Wicklow Planning Alliance (C17)	<ul style="list-style-type: none"> • To make our towns and villages more vibrant and attractive the Council need to: <ul style="list-style-type: none"> - Regularly clean the public realm. - Be more pro-active in the use of Derelict Sites Legislation. - Be more pro-active in the use of Vacant Sites Legislation. - Be more pro-active in the use of Planning Enforcement. - Prioritise reuse and regeneration of existing vacant and underused buildings. - Make use of CPO powers - Vibrancy could be improved by cleaning and improving the public realm, pedestrianising town centres and restricting access for motor vehicles. - Use Vacant Sites and Derelict Sites Law to address vacant units. - Encourage living over the shop. • Large shopping centres are inappropriate in Wicklow’s towns and villages.

	<ul style="list-style-type: none"> • When the new development is completed in Bray there will be no shortage of retail in the County. The centre in Arklow is not a success. • Previous plans have not been successful in guiding retail. • Improving the public realm will help retain spend in the county.
Delgany Community Council (C19)	<ul style="list-style-type: none"> • Areas of architectural heritage should be protected and grants for restoration provided, public realm plans to ensure shopfronts are tasteful and in harmony with heritage towns. • Vacant units – incentivise new units to set up by reduced rates / no rates. • Encourage pop-up shops and support prospective start ups. • The appropriate scale of retail varies on the size of the town / village, population base and proximity to other towns / villages. • Consider free parking at certain times of the day.
Arklow and District Chamber of Commerce (C22)	<ul style="list-style-type: none"> • The current CDP places a large emphasis on preservation and development of retail within the town centre. • The NPF widens out the debate as to what should be expected of the town centres. • It is acknowledged that retail is part of the mix but small scale residential development is just as important and the encouragement of residential, even at ground floor is logical and supportive of existing retail. • Recent changes to exempt development legislation for conversion from commercial to residential is welcomed and a step in the right direction. • It is not realistic or financially viable to expect small infill town centre development / changes of use to compete with new suburban estates in terms of development standards, planning permission costs, RFIs, expert reports, traffic studies, flood experts, levies, bonds, SUDs, DACs etc. • Request that the new CDP would give a presumption of planning for the repurposing of existing building stock and recognise the overall benefit of use versus vacancy and dereliction. • A Living Town Initiative is required. Request that the new CDP would recognise the very real costs associated with smaller town core development and operate policies to minimise Local Authority costs including an extension of the Development Contribution Scheme commercial rebate to non residential for smaller sites. • That the new CDP would encourage use of temporary permissions where appropriate for smaller developments within the town core.
Wicklow Uplands Council (C27)	<ul style="list-style-type: none"> • Economic development and retail strategies should aim to support the survival of retail outlets and other services in more rural towns and villages throughout the county. • The decline of services such as post offices, Garda presence, local shops, and health facilities is clearly evident in many small villages. • The fabric of rural communities depends on these services. • As more and more people are travelling to larger towns on the fringes of the county, outside the county or shopping online it is putting a further strain on these economies.
Blessington and District Forum (C28)	<ul style="list-style-type: none"> • Invest in better public realms and works that improve rather than simply maintain and patch what exists. • Enforcement of dereliction orders and increased vacant site levies to minimise the impact of these empty sites, many of which may never be developed. • Consider the introduction of shop front improvement schemes as a directive from WCC to all districts. • Encourage the provision of pedestrian areas and open spaces in town centres, such an example would be the pedestrianisation of the market square in Blessington as opposed to its current status as a car park. • Prioritise and encourage the delivery and maintenance of town centre retail units to

	ensure communities remain resilient, active and alive.
Keith Scanlon (D12)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities. • Issue and pursue dereliction orders and vacant site levies, especially in town centres and historic buildings.
Eleanor O’Farrell (D13)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
Ann Scanlon (D17)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
Patricia Ryan (D18)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
Tina Roche (D19)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
Kathleen Snell (D20)	People living over shops may help the shop with rates but this would involve providing separate access for the resident.
Tessa Stewart (D26)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities. • Issue and pursue dereliction orders and vacant site levies, especially in town centres and historic buildings.
Noreen Keville (D28)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
Ann Teehan (D29)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
Isobel Connolly (D32)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
Cressida Lynch (D33)	<ul style="list-style-type: none"> • Every town and village should have a cafe that serves organic plant based food. • More investment in the arts culture. • Free rental schemes / pop up shops to encourage new shops opening. • Have a Wicklow currency to encourage local shopping.
Alison Ryan (D34)	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
Billy Timmons (D49)	It is acknowledged that the core of the town is most important and its viability should be protected. However if town centre objectives are not realised, secondary options must be made available after a certain period of time. Failure to address this will lead to stagnation and eventually decay.
Mick Mulligan (D50)	<ul style="list-style-type: none"> • Levels of commercial rates should be reviewed with a view to encouraging retailers to open and retain existing businesses. • Adequate nearby parking must be provided. • Insufficient retail in the County will lead to money, jobs and businesses moving to Dublin.
Disability	<ul style="list-style-type: none"> • Any planned upgrades or new developments in town and village centres should be

<p>Federation of Ireland (D51)</p>	<p>universally designed. The number of older people and people with disabilities continues to rise and the local environment needs to reflect their needs and be accessible to all.</p> <ul style="list-style-type: none"> • A holistic view should be taken to ensure towns and villages are not only safe spaces to get around but also provide local amenities, retail and transport options that are accessible. For example, there should be an area for buses to use which is level with the ground or footpath to ensure it is suitable for a ramp to be extended from the bus and used safely. • The development of accessible multipurpose community spaces and sports facilities should be encouraged. They can provide a social outlet for people who are isolated or need support to live independently in the community. They also offer people with disabilities and others the opportunity to participate in a range of community activities, sports and clubs that they may currently be excluded from because of the inaccessibility of facilities. • New retail areas should be universally designed. Retailers should be encouraged to make their premises accessible and open to all potential customers. This has the dual benefit of the business enjoying the economic benefit of opening themselves up to the 14% of the population in Wicklow who have a disability and their families and carers and the customer with a disability being able to access local shops and services. • Retailers should be encouraged to keep their shops and the paths outside them clear from obstructions. The council have a role in encouraging retailers and members of the public to keep paths in towns and villages clear from obstructions such as: <ul style="list-style-type: none"> - sandwich boards for advertising, - cars parking on footpaths, - wheelie bins and skips, - Street furniture, - Flowerpots, - bikes chained to railings, - overhanging hedges. • The Council should continue to lend its support to the Make Way Day Campaign which highlights this each September. • The Council should commit to improving the general accessibility on towns and villages. This includes mending cracked paths and kerbs, providing dished paving, ensuring traffic lights and pedestrian crossings are accessible tactile, audible, easy to see and use etc. It also includes tackling the issue of dog fouling which can be particularly problematic for wheelchair users, those with mobility aids and people who experience sight loss. • The council should also make commitment to universal design and accessibility as a condition of planning for all developers building new public spaces. There are several areas of the county where public spaces in town centres, belonging to developers, cause difficulties for people with disabilities. Paving slabs are poorly chosen and dangerous when wet or icy, tree roots are cracking pavements and creating trip hazards and there is poor colour contrast meaning grey stone bollards or steps cannot be seen against the surrounding environment and are a threat to people with sight loss. Developers should be held to account when they are granted planning for large public spaces. • The inclusion of Changing Places facilities should be a condition of planning for large retail units being constructed in town centres. Changing Places are different from standard accessible toilets. They include a ceiling track hoist, a centrally
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	<p>located toilet bowl with space either side for transfers or assistants, and a height-adjustable adult sized changing bench. The facilities offer added support and safety to both the person with a disability and their assistant or carer and maximise independence and comfort for people with complex needs. The UK has almost 1,400 Changing Places Facilities in public places, which they consider inadequate. Changing Places Ireland make a very conservative estimate that there are more than 11,000 people who need the use of 15 existing changing places toilets in Ireland. The figure excludes tourists with mobility differences and fails to capture the impact of changing places on those close to the direct user.</p> <ul style="list-style-type: none"> Planners should also encourage applicants to go beyond Part M regulations in new buildings. The building regulations state: <i>‘The guidance is based on providing a minimum clear turning space of 1800 mm x 1800 mm for a wheelchair. This space provision will be adequate for many wheelchairs, however some powered wheelchairs and scooters may require larger turning spaces.’</i> (p.61, 1.4.3). As a growing number of people use larger powered chairs or are themselves larger, it is advised that the space is widened. This will also accommodate carers or personal assistants who need to support a person with a disability as well as people who are the parents of small children and need space for their own wheelchair.
<p>Simon Murphy (D60)</p>	<ul style="list-style-type: none"> Ascetic appearance – the CDP must provide targets for communities throughout the County to improve the physical appearance. Significant improvement in the effectiveness of the Joint Policing Committee on developing mechanisms within communities to assist the Gardai in reducing/preventing anti-social behaviour. Focused approach to the commercial realities of operating a business in the more rural communities of the county and assisting business which requests assistance prior to business closing – concession on commercial. Rates - A traffic lights system where any business can highlight difficulties. Improved access and improved public transport are required to makes towns and villages more vibrant. An assessment of where retail development has taken place over the past 20 years and is still operating would be a very helpful exercise to determine whether previous plans have been successful in guiding retail development.
<p>Annette Vaucanson (D61)</p>	<ul style="list-style-type: none"> Sufficient large retail infrastructure in Wicklow. Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
<p>William Quinn (D64)</p>	<ul style="list-style-type: none"> Agri-stores typically include the sale of animal feed, fertilizers, sprays, seed, farming hardware, animal health, fuel, general hardware, gardening supplies, paint, DIY, pet and equine feed, homewares. Such a use does not fall neatly into any of the use classifications (retail, industrial, manufacturing, retail warehousing, farm shop, agriculture, leading to a business risk when investing in lands and applying for planning permission. More clarity is needed in terms of this use and on what land / zoning it would be permitted.
<p>Sophia Meeres (D68)</p>	<ul style="list-style-type: none"> Encourage residential occupation of failing Main Streets including living over the shop. The urban areas of Wicklow’s larger towns must be reduced to encourage town centre densification and renewal. Carry out a study of each town, an inventory of constraints and opportunities. Encourage small scale local enterprise, local shops and local products. Stop building out of town or edge of town shopping centres. Encourage small and local artisanal retail activities by reducing local taxes.

<p>Helen Howes (D78)</p>	<ul style="list-style-type: none"> • Develop and implement legislation that will invigorate vacant and derelict sites. • Discourage traffic and / or ensure decent traffic management. • Increase public transport connectivity. • Develop real jobs in maintenance and care for our towns and environment.
<p>Anita Tuesley (D89)</p>	<ul style="list-style-type: none"> • To make our towns and villages more vibrant and attractive you need to regularly clean the public realm, be more pro-active in the use of Derelict Sites Legislation and Vacant Sites Legislation, be more pro-active in the use of Planning Enforcement Legislation, prioritise reuse and regeneration of existing vacant and underused buildings and make use of CPO powers. • Vibrancy could be improved by cleaning and improving the public realm, pedestrianising town centres and restricting access for motor vehicles. • Encourage living over the shop. • Large shopping centres are inappropriate in Wicklow’s towns and villages. • When the new development is completed in Bray there will be no shortage of retail in the County. The centre in Arklow is not a success. • Previous plans have not been successful in guiding retail. • Improving the public realm will help retain spend in the county
<p>KRA Visionary Project Partners (D95)</p>	<ul style="list-style-type: none"> • Sufficient large retail infrastructure in Wicklow. • Prioritise and encourage local town and village centre retail and self-sufficient, resilient communities.
<p>Judy Osborne (D98)</p>	<ul style="list-style-type: none"> • Leakage to Dublin. • The revised retail strategy for the county needs to clarify what capacity exists in each area and a hierarchy of needs. • The approach adopted is essentially reactive in that reference is constantly made to “facilitating” or “encouraging” particular types of development. In this it fails to address the Councils responsibility to “ensure” that certain types of retail facilities are provided for communities. • The Council should include clearly in its objectives the principal of ensuring through zoning and, if necessary, refusal of planning applications that important commercial activities are provided in all communities and that these are not lost because a particular individual seeks a short term personal gain. • Reference is made to the leakage of spending out of the county and the need to address it. The plan fails to acknowledge the inevitability of this undesirable phenomenon and to that extent is impractical and encourages unrealistic expectations among the business community and public representatives. A significant proportion of the community in the North of the county works in Dublin city. This group will, inevitably, avail of retail facilities in Dublin. The strategy should recognise this and encourage alternative retail activities that do not have to compete with Dublin city. • There is a lack of emphasis on attracting spend into the county. Wicklow’s proximity to Dublin will lead to a leakage of spending. However that proximity offers an opportunity to attract tourist related spending. (An excellent example of this is Avoca Handweavers). Provided that tourism, residential development and other strategies are coordinated to ensure that towns do not lose their physical attractiveness, it is possible to encourage this type of spending by day trippers from Dublin and so to compensate for any losses to Dublin retailers.

Response of Chief Executive

Town and Village Centres

Towns and villages have experienced significant challenges to retain vibrancy and vitality. The NPF acknowledges the importance of towns and villages in terms of their economic, administrative and social functions and seeks to activate the potential for renewal and strengthen their role as places to live, work and visit. This includes encouraging new roles and functions for buildings, streets and sites within our towns and villages. The NPF requires a major new policy emphasis on renewing and developing existing settlements rather than continual expansion and sprawl. It targets a significant proportion of future development to occur on infill and brownfield sites within the built footprint of existing settlements. In accordance with national policy for compact growth, the core strategy will put in place measures to ensure a critical mass of people living and working in towns and villages that will in turn create vibrant settlements and support retail vitality.

The following national policy objectives are relevant for towns and village:

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

NPO 16: *Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

NPO 18a: *To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.*

The RSES recognises that retail plays a key role in placemaking and can play an important role in the regeneration of areas. Relevant regional policy objectives include:

RPO 6.12: *Local authorities shall include objectives in development plans and local area plans supporting emphasis on placemaking for town centres, for example through inclusion of a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans.*

RPO 6.13: *Local authorities shall support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces for example with cost effective, temporary uses that build on the longer-term vision for space.*

The current County Development Plan includes a chapter on ‘Centres and Retail’. The main focus of this chapter is retail policy. It is proposed that the chapter in the new development plan should provide a stronger focus on town and village centres, recognising the potential for renewal, the need to accommodate more development and in some cases expand or reinvent their roles. The chapter should also include policy to pursue and strengthen placemaking measures in the County’s towns and villages and make them attractive to future investment. Heritage plays an important role in defining

the character and appeal of many of the County’s settlements and is an important element in placemaking. The local plans (Local Area Plans, Town Plans and Settlement Plans) will include more detailed objectives in relation to placemaking, town and village improvement, parking strategies, potential pedestrianisation and public realm enhancement.

A lot of work is carried out by the Council in conjunction with local communities to improve towns and villages and enhance the public realm through different funding mechanisms including the town and village renewal scheme, RRDF and URDF. The new chapter on Centres and Retail will include a stronger emphasis on regeneration, rejuvenation of vacant and derelict sites, town and village centre renewal and public realm enhancement.

Retail

The Planning Authority recognises that a strong retail sector is a key element in the vitality and vibrancy of the County’s towns and villages. Apart from creating employment, the retail sector plays a significant role in attracting people to towns and villages thereby contributing to overall economic vitality. It is important that the county development plan provides a clear framework for the development of the retail sector. The policy contained in the CDP must have regard to the Retail Planning Guidelines for Planning Authorities’ (DoECLG, 2012). The Guidelines identify 5 policy objectives which shall inform the Centres & Retail Chapter including ensuring the retail development is plan-led, promoting town centre vitality through a sequential approach to development, securing competitiveness in the retail sector by actively enabling good quality development proposals to come forward in suitable locations, encouraging sustainable travel and requiring a high quality approach to urban design.

A detailed review of the retail chapter will be carried out and existing objectives will be amended strengthened where required. The review will include an analysis of planning applications for retail development that were submitted under the current development plan. The amount of retail development permitted since the current plan was adopted will also be determined and used to analyse the retail capacity of settlements. The different types of retail available and any shortcomings will also be identified. Leakage of retail spend from the County has been recognised as a problem for many years and is an issue that has been raised in several development plans and retail strategies. The current development plan provided for an expansion of comparison retail floor space in order to try to address leakage. The new retail chapter will aim to create the appropriate conditions necessary to foster a healthy and vibrant retail environment in the county and will include an updated retail hierarchy.

In accordance with the *Retail Planning Guidelines*, the current County Development Plan promotes a sequential approach to retail development as is set out in Objective RT10 and RT11. This means that the preferred location for retail development is within town centres. Only in exceptional circumstances will edge of centre or out of town sites be considered. It is proposed to retain these policies in the new plan.

RT10 *To vigorously protect and promote the vitality and viability of town centres. Development proposals not according with the fundamental objective to support the vitality and viability of town centre sites must demonstrate compliance with the ‘sequential approach’ before they can be approved. The ‘sequential approach’ shall be applied and assessed in accordance with the ‘Retail Planning Guidelines, (DoECLG, 2012). The Planning Authority will discourage new retail development if they would either by themselves or cumulatively in conjunction with other developments seriously damage the vitality and viability of existing retail centres within the County. In the application of the ‘sequential approach’ due regard shall be paid to RT11 below which prioritises the ‘core retail area’ for new retail development.*

RT11 *To promote developments which reinforce the role and function of the ‘core retail area’ as the prime shopping area of town centres. The ‘core retail area’ shall be promoted as the area of first priority for new retail development. In settlements where no ‘core retail area’ is defined, regard shall be paid to the designated ‘town centre’ area, the location of the traditional/historical centre and the location of other retail units. Where an application is made for a new development with street frontage either in the defined retail core of a larger settlement or on the ‘main street’ of a smaller town, retail or commercial use will normally be required at street level.*

In terms of retail development in small towns and villages, the current plan includes an objective RT28:

RT28 *‘Small scale retail development appropriate to the scale and needs of the settlements and its catchment will be positively considered subject to the following control criteria:*

- *There shall be a clear presumption in favour of central or edge of centre locations for new development, i.e. the traditional historical centre; out of centre locations will not be considered suitable for new retail;*
- *New development shall be designed with utmost regard to the historical pattern of development in the centre and the prevailing character, with particular regard to building form, height, material and shall generally be required to incorporate a traditional shop front.*

This objective will be retained in the new Plan and strengthened where considered necessary.

Vacancy

Vacant or underused building stock has the potential to bring about transformational change in existing towns and villages in addition to addressing housing need and demand or facilitating new commercial development. The current County Development Plan incorporates policy to support active land management including giving effect to the *Urban Regeneration and Housing Act, 2015* and the *Urban and Rural Regeneration and Development Funds* and it is intended this will be retained and enhance if necessary in the new plan. The *Urban Regeneration and Housing Act, 2015* introduced measures to incentivise the development of vacant sites in urban areas for housing and regeneration purposes. In accordance with this the Planning Authority maintains a vacant sites register.

Living over the Shop

Objective RT15 in the current development plan promotes the active use of above ground floor levels in principal shopping streets including living over the shop. This policy shall be continued in the draft plan and broadened or strengthened if considered necessary.

Design

The Planning Authority recognises the importance of good design in terms of retail development having regard to the dominant visual and use role it plays in town and village centres. The Retail Design Manual which accompanies the Retail Planning Guidelines for Planning Authorities (DoECLG, 2012) provides guidance and all new retail development is required to have regard to this (Objective RT19). The current plan includes objectives for the design of new retail developments (RT19 to RT22) and also includes a section on retail design in the Design & Development Standards. These objectives and design standards will be reviewed and strengthened where necessary, including accessibility for all considerations

Agri-stores

An agri-store is a form of retail development. The suitability of a site will be influenced by the scale of the agri-store and the nature of the business that is proposed. Rural towns and villages are a focal point for rural communities and have developed as retail and service centres to serve the surrounding rural community. The town or village is therefore the most suitable location for an agri-store. As with all forms of retail development, the sequential approach to site selection will apply. The objectives in the development plan will be reviewed and amended if necessary to clarify policy in relation to agri-stores.

Accessibility

The *National Disability Authority’s ‘Building for Everyone: A Universal Design Approach’* provides comprehensive best practice guidance on how to design, build and manage buildings and spaces so that they can be readily accessed and used by everyone, regardless of age, size ability or disability. The new Plan shall include a policy to encourage where practicable, new development including public open space and realm improvements, to incorporate the principles of universal design in accordance with the *National Disability Authority* guidance. For further information on accessibility in the workplace please refer to section 4.3.5 of this report.

Changing Places Facilities

Changing Places facilities are different from standard accessible toilets. They have many features and additional equipment that make them even more accessible than the standard accessible toilets. They include both a full room coverage ceiling track hoist, a centrally located toilet bowl with space either side for transfers or assistants, and a height-adjustable adult sized changing bench. Changing Places facilities are designed to enhance the health, safety, comfort and dignity of someone who may need extra support and additional equipment during personal care tasks and also offer added safety and support features for assistants. It is considered that the Development Plan should include an objective to encourage these facilities where practicable.

Other Issues

Some issues raised in the submissions, such as rates, financial incentives, finding occupants for vacant retail units and opening particular types of retail units are outside the remit of the county development plan.

Response of Chief Executive

1. Review the objectives of the Centres and Retail chapter in accordance with national policy and guidelines and strengthen where necessary. Provide a stronger focus on towns and villages acknowledging their potential to develop stronger roles and accommodate more development.
2. In accordance with NPO 6, include an objective to regenerate and rejuvenate towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.
3. Include an objective to give effect to NPO 4 to ensure the creation of attractive, liveable, well designed, high quality towns and villages that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

4. In accordance with NPO 16 and NPO 18a and to support applications for RRDF funding include objectives to:
 - a. Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.
 - b. Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.
5. Include objectives to create the appropriate conditions necessary to foster a healthy and vibrant retail environment in the county.
6. Update the retail hierarchy in accordance with the new retail hierarchy set out in the EMRA RSES.
7. Ensure that the new county development plan clearly articulates what retail uses are permitted or open for consideration on zoned and unzoned land.
8. Include objectives to support proposals for regeneration, rejuvenation of vacant and derelict sites, town and village centre renewal and public realm enhancement. In accordance with *RPO 6.12*, include objectives on placemaking for town centres, for example through inclusion of a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans.
9. In accordance with *RPO 6.13*, include an objective to support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes for use by all and for revitalising vacant spaces for example with cost effective, temporary uses that build on the longer-term vision for space.
10. Review and strengthen the section on retail design where necessary.
11. Include a policy to require, where practicable, new development to incorporate the principles of universal design in accordance with the *National Disability Authority Building for Everyone: A Universal Design Approach (2012)*.
12. Include an objective to encourage Changing Place facilities where practicable.

Part 4.3.7: Infrastructure

Name	Issue Raised
Ashford Development Association Ltd (C1)	<p>What transportation improvements are needed throughout the County?</p> <p>There are two main corridors for Road infrastructure, the N81 and the M11. The M11 has for a long time been overused and unsuitable for traffic growth. Those of us who are lucky to not have to commute to Dublin, wonder how anyone can survive and stay sane doing that journey twice a day. We feel so sorry for those neighbours that HAVE to make that suffering and pilgrimage to Dublin. Those that do it, can only swear “Why did I ever move to Wicklow?” It is an impossible situation getting worse when you add 169 house and 300 cars to Ashford alone.</p> <p>The bus service does not run regularly enough, nor sufficient buses to accommodate the needs of a commuting public. In the morning it runs every 15 or 20 minutes to Dublin. From Dublin the bus runs every half hour from 14:00 to 18:00 otherwise every hours. The train from Wicklow leaves at three times in the morning 6:33, 7:30 and 9:00 and is very crowded by the time it reaches Wicklow and misses the peak times when transport is necessary. It is 6.2 kilometres from Ashford, outside of the planning radius to be considered public transport for residents of Ashford.</p> <p>Ashford cannot be considered for future development in the new Plan until the public transportation is improved in some way. We cannot subject new residents, who buy houses on Saturday and Sunday, to face the impossible gridlock on their first Monday morning. Some creative thinking must be done to solve this which faces all of the M11 corridor.</p> <p>How can we encourage more people to walk and cycle and use public transport?</p> <p>There has to be public transport and there must be cycle paths. As we know Ashford best, we can only give examples from here. Ballinahinch Woods, 169 houses, a new cycle path which takes you to a roundabout on the R764. From there, there is no footpath to the village and a road just wide enough for two cars without a shoulder. How many of those cars will drive into the Village and expect parking? If it is raining?</p> <p>We do not have full solutions which can support walk and cycle.</p> <p>Where should major public transport facilities such as park and ride or transport interchanges be located to cater for journeys to Dublin and within County Wicklow?</p> <p>First you need the transport. For Ashford only Wicklow Town has transport and that is lacking as well for an easy journey to Dublin. We are not near to any Park and Ride and none could be envisaged. We can get to the bottom of the Dart at Greystones or the bottom of the Luas but this would require better transportation at these hubs and clear roads to reach Park and Ride. The Luas is 30 km in traffic and the Dart 19 km also in traffic.</p> <p>Are there any issues in relation to water or wastewater facilities in your area?</p> <p>There is a shortage of water in the River Vartry and at times it severely endangers the Salmon in this EU Salmonoid protected river. Conservation is not made a top priority and should be emphasised in the Plan. Toilet flushing habits, although often not discussed, should be as a small matter to solve, multiplied by every resident. Calculations on how much water can be saved might encourage a 3 or 4 to 1 flush regime.</p>

	<p>Surface Water is an issue in Ashford with a proposed new Surface Water Sewer being recommended by the Council to be dumped into the river. We have great reservations on this proposed sewer that it can be done with protecting the River just above Mount Usher Gardens. For Ashford The River Vartry is a vital resource and damage to the fish and the cleanliness of the river, threatens its survival. We need to know with 100% certainty that nothing will happen to the river. Putting surface water into the wastewater system is frowned upon, but are there exceptions where this is the safer path?</p>
<p>County Wicklow Public Participation Network (C2)</p>	<ul style="list-style-type: none"> • Prioritise public transport – hubs for parking (park and ride) • In the west of Wicklow, a bus service to access major centres – Naas, Carlow, Newbridge needed • Public transport solution to reduce carbon and commute congestion on N11 and N81, not more lanes • Local Link shared school bus and cycle bus • Commuter buses to City Centre or Luas (Citywest) • 65 and 133 bus never turns up and needs to be more regular • Local bus routes connecting settlements • Free public transport • Free/good value regular public transport • More reed bed and natural waste water treatment • Arklow Sewage Plant urgent • Proper improved infrastructure for Traveller halting sites • Make decisions about local infrastructure locally • To facilitate public transport on the N81 the County Council could expedite the planning permission for a bus stop (footpath with stop sign) at Hollywood (which has been in for planning for over a year), gain planning permission for and provide similar facilities at Stratford bridge (Building Bridge), Whitestown and Annalecky, and introduce park & ride facilities along the route of the 132. • Currently the 132 does not stop at the Building Bridge or Whitestown but it did in the distant past and if the County Council is serious about reducing car usage for environmental purposes the provision of extra stops along the way is important. It would also make the route more sustainable. • The 132 has a spur to Carnew (via Baltinglass, Kiltegan, Tinahely) that travels only once a week. The County Council should "put in place the necessary policy framework to encourage and facilitate sustainable transport" on that supplemental route, and encourage Bus Éireann, or the National Transport Authority, to provide an expanded service to that area
<p>Birdwatch Ireland (C3)</p>	<ul style="list-style-type: none"> • In relation to town and village development, appropriate planning supported by excellent public transportation is critical. Bray is identified as key town in the EMRA RSES yet it is choking in traffic on most days which impacts on quality of life as well as air quality. Wicklow County Council must address the issue of car-focused development in the county and to enable a move to much greater use of public transport and cycling. • The proposed upgrade of junctions on the N11/M11 to facilitate car use is not in line with what is needed to address greenhouse gas emissions in the county. It would be preferable if studies were undertaken to address the issues with congestion through public transportation and cycling options instead. • There are insufficient safe and connected cycling routes in Co. Wicklow. Increased cycling infrastructure should be seen as priority to get people out of cars and this must be significantly ratcheted up in the next Development Plan. We need towns and villages in Wicklow that have the physical grey and green infrastructure to encourage

	people to physically move their bodies and enjoy nature in their immediate surroundings.
Glencormac Community Group (C5)	This submission is made by the community of Glencormac, following meetings of its residents over the past number of weeks arising from the publication of the 2 nd public consultation phase of the N11/M11 improvement scheme in the Glenview Hotel on the 12 th November 2019. The submission raises a number of observations on the yellow and blue corridor options. This covers: the impact on the families and the community, the impact on natural woodlands and wildlife habitat, contravening the objectives of the National Planning Framework and the current state of the N11.
Avoca Tidy Towns & Community Courthouse CLG (C8)	Avoca Village is approximately 6 miles NW of Arklow Town and an equal distance from Rathdrum, both of these towns are serviced by the Irish Rail mainline trains, however because of the lack of a public transport link the community of Avoca are unable to access the trains at these stations. Avoca Tidy Towns would request that representations be made to Irish Rail to undertake a feasibility study as to the viability of opening the railway line at Avoca so that commuters from Avoca could access the train for their daily commute, in the meantime the provision of a daily local/rural link to the nearby railway stations and also a daily link to & from the Glendalough National Park would greatly benefit the people of Avoca and provide a much needed service for tourists who visit the village.
Baltinglass & District Forum (C10)	There is a requirement of improved transport in the area. The very limited transport facilities work against the governments avowed policy of reduction in greenhouse gases in that the major part of the population is totally dependent on private petrol or diesel cars.
Newtownmountkennedy Community Forum (C11)	<ul style="list-style-type: none"> • Wicklow needs all forms of public transport. Park and rides with efficient and effective bus service are needed along the N11. • The community of Newtownmountkennedy has to contend with the traffic along the N11 on a daily basis. We do not think that the cost to Homes, Heritage and Habitats involved with the proposed upgrades are worth what little relief the works will offer. We want better public transport to offset the traffic along the N11. • More people would be encouraged to walk and cycle if there were appropriate paths to do so. • We suggest a park and ride at the Texaco Junction 13 in Newtownmountkennedy with an electric bus service directly to the DART in Greystones or Luas in Sandyford or both.
Keep Ireland Open (C16)	<p>9.1.3 Cycling and Walking Objectives</p> <p>Objective TR9 We submit that:</p> <p>1 you should delete as funding allows as many other Objectives have financial implications and it is invidious to single out this Objective AND</p> <p>2 It should be merged with TR10 and replaced by: <i>Walking and Cycling will be promoted, facilitated and encouraged in accordance with initiatives contained in “Smarter Travel 2009” by improving existing cycleways and by identifying and developing a network of safe and guarded cycle routes and footpaths on existing roads, and, in particular, between towns and villages. Ensure, where possible, that cycleways and footpaths are effectively separated from major vehicular carriageways. Provide, promote, improve and extend the network of off road cycle and walking routes on all new road improvement schemes (including regional and local roads, on roads being up-graded), to ensure personal safety, particularly at night and a more convenient, pleasant, attractive environment. Support the installation of infrastructure measures e.g. new/wider pavements, road crossings, retrofitted, if necessary, which would facilitate and encourage safe walking and cycling.</i></p> <p>Based on Smarter Travel 2009 - 2020 Cycling and Walking 1st para 2nd sentence last phrase, Kildare 6.5 WC 2, Carlow 5.3.2 Pol 8 13th pt, Wexford 8.3 Obj TO10 last pt 1st phrase, Meath 6.9 POL 22, DLR 12.1.12 Walking 2nd para, Louth 7.4 TC 22 & 23 and many other counties.</p>

TR11 We submit that:

1 it should be merged with TR13 AND TR2 the 1st phrase should be replaced by: *Create, provide, promote, improve, plan, develop, support, enhance, encourage, extend and facilitate walking, rambling and cycling in conjunction the Irish Sports Council and other agencies by identifying/defining more dedicated walking and cycling routes(named) to enable the creation of a high quality, coherent, pleasant, integrated and comprehensive dedicated off road countrywide network of local and regional cycling/walking routes, footpaths, greenways that link communities to key destinations and including looped walks, local walks, community walks medium/long distance walks and established rights of way, through open spaces, strategic green corridors(including river corridors) and other off-road routes), particularly those with historic connections or associations or other areas of interest. Expand and extend existing routes by utilising links from residential areas to provide access to coasts, mountains, lakeshores, rivers and scenic areas. Bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off road paths and cycleways that are attractive and facilitate casual walkers and cyclists. Investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity.* Based on

DPG 3.5 Box 3 B **Infrastructure** 3rd pt, **National Physical Activity Plan** App 1 36, **Smarter Travel 2009 - 2020 Cycling and Walking** 1st para in line 6, **Kildare** 14.12.1 CR 4, **Meath** 4.6.8 2nd para 1st & 2nd sentences & 4.6 POL 40 1st sentence, **Sth Dublin** 4.5.0 Pol 6.1, 6.3.0 Pol 3.1 & 9.4.0. Pol 16.5, **Louth** 7.4 TC 24 and many other counties.

WALKING AND CYCLING

The following objectives are suggested:

*Support, promote and actively encourage the provision, development, extension and design of off road **interlinked cycleways and walkways**, walking and cycling routes (mention routes), including medium and long distance walkways, in conjunction with IW and other stakeholders to link a strategic network of trails in adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors.*

Based on **Louth** 6.5.11 EDE 23 1st sentence, **Carlow** 8.11.10 Pol 5 2nd pt and many other counties.

*Support, promote, facilitate and develop a comprehensive **network of greenways**, linking parks and public open spaces to regional and national Greenway Networks and work with the NTA, and adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists.*

Based on **NPF** App 1 Obj 22, **Kildare** 5.19 EO 49 and many other counties.

Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards

Based on **Kildare** 14.12 CR 10, **Carlow** 5.3.2 Pol 8 12th pt 2nd line and many other counties.

*Develop themed heritage trails and suitable walking routes and cycle tracks along **historic access routes** In co-operation with communities and landowners. Explore the potential of inter- county trails (named).*

Based on **Action Plan for Rural Development** 2017 Pillar 3 Action 200, Leitrim 3.6.3 Obj 29, Longford 4.5 **Mid-Shannon Wilderness Park** (sic) last para & **Heritage Plan** 2.1.

	<p>Cycling The following objectives are suggested: <i>Promote, facilitate and encourage the development, enhancement and expansion of safe cycle routes by facilitating the construction of cycleways. Support the development of the National Cycle Network and The National Cycle Network Scoping Study (2010) and enhance and maintain these routes with better signposting, lighting and road surfaces separated from vehicular traffic. Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. Routes should, where possible, follow off-road tracks and quiet country roads.</i></p> <p><i>Assign a full-time officer at appropriate senior level as a ‘Cycling Officer’.</i></p> <p><i>Promote and facilitate the development of cycle routes in accordance with the National Cycle Network Scoping Study 2010.</i></p> <p><i>Develop a Cycling Strategy during the lifetime of the Plan.</i></p>
<p>Wicklow Planning Alliance (C17)</p>	<p>You must prioritise compact urban growth that concentrates on urban regeneration rather than green field sprawl and the creation of walkable communities and reduced congestion on our roads</p>
<p>Delgany Community Council (C19)</p>	<ul style="list-style-type: none"> • As population has increased we have seen a worsening of public transport options in the Delgany/Greystones area. When DART services to Bray improved, this happened at the expense of the service to Greystones, all at a time of ever increasing demand. • Provide a local loop bus service, this could be done on Chapel Road in Delgany. The road between Delgany and Blacklion is adjacent to 5 schools with a school-going population of about 3,000 pupils. A local service has been proposed in the Bus Connects plan but it may be a low priority for that system which is very focused on provision of arterial routes to the city. • Safe cycle routes need to be provided to encourage cycling. A cycle project officer in the Council would be a welcome addition. • Park and Ride on N11 with bus lanes and a shuttle to connect rapid bus service on the N11 with the DART station • Park and Ride on N11, interchange at Loughlinstown as against the Bus Connects proposal to provide same at Bray DART station. How can the traffic delays in Bray town centre be solved? • We need connections to the Luas • Commission an audit of walking and cycling routes to local schools. Identify and document safe routes with appropriate crossing points if needed. Allocate resources to local schools to develop safe routes to schools. Refer to NTA, provide bike shelters and cycling lessons in schools in conjunction with the Local Sports Partnership • When schools are on holiday there is a significant reduction in traffic • A copy of the Delgany Community Council submission on the N11/M11 Junction 4 to 14 Improvement Scheme as it ties into various aspects of the CDP is attached to the submission. • There are areas in Delgany where adjacent development has made connection to a public foul sewer possible. Unfortunately the fees charged by Irish Water are prohibitive. The council should examine some sort of subsidy to make connection possible and to minimise the possibility of polluting a water course. There is sufficient capacity in the system to allow such connections. While this is no longer the remit of the council, planning applications could include conditions to facilitate such

	<p>connections.</p> <ul style="list-style-type: none"> • It is worth noting that if the orange/pink routes (N11/M11 Scheme) go ahead there is a high likelihood that the hydrology and aquifer will be impacted so people in the area who rely on well water will be affected by this proposed development.
Bray Head Residents Association (C23)	<ul style="list-style-type: none"> • BHRA welcomes the emphasis placed on Transportation in the Issues paper on the provision of sustainable transportation in the forthcoming County Development Plan. In existing residential areas, where there is inadequate provision of road space to pedestrians, a higher priority should be given to these, and to cyclists. Re-engineering of roads in these areas should be based on a design approach which creates self-enforcing low speed environments in housing estates and settlements. • The haphazard evolution of transport networks in existing developed areas, particularly mature residential areas, has created incentives for rat-running by car drivers that considerably damages residential amenities and significantly reduces road safety. This is frequently aggravated by new developments feeding into an existing deficient road network. BHRA requests that the Development Plan provide for a comprehensive traffic management review and plan for affected areas of the County, with specific provision for enhancing existing residential amenities and improved road safety in existing housing estates, as part of the overall objective of providing sustainable transport in Wicklow.
Blessington and District Forum (C28)	<ul style="list-style-type: none"> • Blessington is served by the N81 and serious consideration and pressure needs to be applied to TII for a much improved and safer road network for the residents of West Wicklow. Housing is being planned, but no road network improvements are planned, the N81 and Blessington town are at times bottle necks and this is only going to get worse as housing is delivered without adequate improvements to the road network. More housing = More Residents = More Cars = More Traffic Congestion. • Improved bus services are required, along with edge of town developed park and ride facilities, to ensure towns like Blessington are not cluttered with commuter parking. • The inner relief road in Blessington should be completed without delay; it will serve to alleviate town centre bottle necks. At times Blessington can be simply described as a town choked by traffic.
Jane Jackson (D5)	<p>Jane Jackson represents a group called ‘80max’.</p> <ul style="list-style-type: none"> • Wicklow Co Co recently declared a climate and biodiversity emergency and the county development plan should reflect this, especially in transport. • Road Transport, of all sectors in Ireland, has seen the greatest increase in greenhouse gas emissions at 140% while all other sectors have reduced. As 80km/hr is regarded as the optimum speed for both fuel consumption and greenhouse gas emissions, propose that the top speed limit be cut to 80km/hr across the county. • The environmental and social benefits would be profound. With 85,000 registered vehicles in Co Wicklow this could equate to 85,000 tonnes of CO2 being cut from the carbon budget. From a social perspective the reduction in deaths and catastrophic injuries on the road would be very welcome. It would also mean money saved from reduced fuel consumption would stay in the pocket and hence the local communities rather than be taken out by a carbon tax. • The group has been working for the past year asking people to pledge to cut their driving emissions by cutting their top speed on all roads to 80km/hr. We now have 1321 people pledged to keep to 80km/hr on all roads and countless more using our steering wheel sticker to remind them to slow down to cut their emissions. The response has been very encouraging. If implemented it would mean 85,000 drivers would become part of the solution for cutting our emissions. It is time for bold decisions to be taken. We now have less than 11 years to cut our emissions by 45% below 2010 figures.
James Scott	<ul style="list-style-type: none"> • A number of older wastewater treatment plants are discharging into our coastal

(D7)	<p>streams which undoubtedly has an impact on fish stocks and coastal health. The development plan should contain strategies on how to reduce and eliminate wastewater discharge to our sensitive water bodies and also how to mitigate against future development which will impinge on water quality. We should have buffer requirements in our development plans which allow for native vegetation along streams to an appropriate distance. We should also be working to replace over the coming years bridges which obstruct the free flow of trout and salmon from the sea.</p> <ul style="list-style-type: none"> • Density is far too low to sustain the high building rates happening in some parts of north Wicklow. Park and rides, increased train frequency and cycle path connections to public transport are required to sustain this growth.
Keith Scanlon (D12)	<p>A ‘pro-forma’ submission on a range of County Development Plan issues has been received from a number of people. Each individual issue is addressed under the relevant topic and in relation to Transport the submission states:</p> <ul style="list-style-type: none"> • Plan for sustainable Wicklow public transport and adopt ambitious targets for increase in public transport usage and reduction in private (especially single- use commuting) transport usage.
Eleanor O' Farrell (D13)	
Patricia Ryan (D18)	
Tina Roche (D19)	
Tessa Stewart (D26)	
Noreen Keville (D28)	
Ann Teehan (D29)	
Isobel Connolly (D32)	
Alison Ryan (D34)	
Sinead Wallace (D35)	
Annette Vaucanson Kelly (D61)	
KRA Visionary Project Partners (D95)	
Dr. Igor Cusack (D14)	<ul style="list-style-type: none"> • There should be an effort to increase pedestrian areas and open spaces in towns. • The rapid development of Greystones, and other towns down as far as Arklow, has not been matched by adequate provision of infrastructure. There is an urgent need to improve rail and bus services to reduce the need for commuting by car to Dublin. A more frequent DART service is essential and more and longer trains to and from the commuting areas in the south of County Wicklow. Twin rail tracks are needed where possible and the extension of the Luas to Bray. This would be an expensive programme but might be less so than the proposed N11/M11 improvements. • Land should only be zoned for housing where adequate public transport is available.
Yasmin Fortune (D15)	<ul style="list-style-type: none"> • Please prioritise an exceptional Public Transport system so people in our county want to choose public transport over their car, knowing that they will be guaranteed a space in the park and ride, excellent shelter from our wild weather, a comfortable place on the bus or train or tram which arrives on time, personal safety during their whole public transport experience and will arrive to their destination relaxed, warm and dry. Please try to encourage as many commuters to opt for this exceptional

	<p>public transport service as possible.</p> <ul style="list-style-type: none"> • Please only build environmentally and heritage sensitive roads when all public transport has been put in place
Ann Scanlon (D17)	<ul style="list-style-type: none"> • You must protect Wicklow natural heritage and resources and communities, protect Glen O The Downs / Three Trout’s Stream Nature Reserve and our other local nature reserves, stop ad-hoc local development except in main hubs, stop any N11 road expansion before trying all public transport solutions to reduce rush hour congestion, and give a planning lead to other Counties, • Plan for sustainable Wicklow Public Transport and adopt ambitious targets for increase in public transport usage and reduction in private (especially single-use commuting) transport usage
Kathleen Snell (D20)	<p>Submission relates to Wicklow Rathnew Development Plan: About 2 plans ago we were told that in a proposed zone 10 there was to be a transport hub here in Rathnew behind the railway line from me-not where the houses are but the other side of the Old Arklow Road. It was to have a new station, buses like 02 ,133, Wexford bus and now 183 + all related shops that would service the same-but they said then it was on the long finger-I guess they were right, but the land was zoned at least 2 plans ago. The rest of the stuff is continuing as the plan I was talking about so maybe that is to happen eventually too.</p>
John Shorten (D22)	<ul style="list-style-type: none"> • Since the DART extension to Greystones, there has been no development of the east coast rail line. • There appear to be no plans for off road public transport development serving Co. Wicklow - either east coast heavy rail, or extension of light rail south of Brides Glen. This is despite the chronic congestion on the M11/N11. Assessing a road only based solution is clearly deficient. • While stipulating 2 car park spaces per new dwelling, but having no requirement per new dwelling on public transport, especially off road heavy rail where an existing asset remains chronically underused, is counter to proper land use and transport planning and is unsustainable. • Facilitating low density high footprint housing estates on green field sites (distant from rail transport hubs) as preferred by property developers instead of high density low footprint on brown field sites near existing or potential train stations has contributed to the M11/N11 chronic congestion and is completely unsustainable. • If the planning authority cannot address the public transport deficit, despite a railway asset lying chronically underused in its jurisdiction, then it should not pass on this deficit to Co. Wicklow residents.
Tessa Stewart (D26)	<ul style="list-style-type: none"> • We are losing out on transport all the time here in Wicklow, regarding trains and buses. We need a new train line going south, and more buses south. We should use public transport solutions to deal with the crowding on the N11. • Regarding the much needed N81 for West Wicklow, again we are being badly let down by the Transport Department. It is a safety hazard, especially for cyclists who use it as a main southbound road, but also for drivers. When it is built it needs a cycle lane separate from the road.
Vera Walsh (D30)	<ul style="list-style-type: none"> • First, must thank you for arranging LOCALINK bus to Glendalough; much appreciated by tourists and locals too. • A similar Bus link to Greystones if possible. • Always a difficulty to connect from Wicklow town to Greystones. • This would be a great help as forming a link with Dart station.
Cressida Lynch (D33)	<p>An airport bus service running down the N81.</p>
Adam Calihman (D38)	<ul style="list-style-type: none"> • Improved public transport and mobility within and between towns in Co. Wicklow and with Dublin.

	<ul style="list-style-type: none"> Improved school bus infrastructure
Shane Stokes (D40)	<ul style="list-style-type: none"> I am writing to request you to prioritise biodiversity and climate considerations in relation to the Wicklow County Development Plan. I'm very concerned at talk of building major roadways, which has been proven in other countries and areas to lead to an increase in traffic rather than a reduction of cars. Ireland is already falling behind its commitments in relation to climate change and facilitating more cars at the expense of nature will only exacerbate this problem. I would urge an improvement in public transport to be a priority rather than building more roads; for example, I live in Newtownmountkennedy and the bus service is unpredictable and limited in the destinations it services. The roadside screen displays notifying arrival times of buses such as the 133 are wildly incorrect and, at times, aren't working at all. If people were able to avail of more frequent and reliable public transport, this would greatly reduce the need for car journeys. Another example: to connect to the Luas line requires taking a bus to Loughlinstown and then walking 15 minutes to Brides Glen. It seems logical that there should be feeder buses connecting towns to the Luas (not least because the Brides Glen stop never offered adequate parking). Other countries subsidise public transport or, in some cases offer it for free. If the money planned for construction of new roads was instead put into subsidising, improving and expanding public transport, there would be less traffic, less pollution, less damage to Wicklow's environment and much greater compliance with Ireland's carbon targets.
Rosa Murray (D43)	<p>All public transport options to be looked at, existing ones improved and new ones used wherever possible. Car usage, in particular single use, needs to be decreased to reduce carbon emissions. Less new roads built but when necessary to take into account EIS results and avoid any destruction to the environment and local biodiversity. Try to reduce the amount of traffic travelling to the capital every day and create work hubs and employment locally.</p>
Marie Demirsay (D44)	<ul style="list-style-type: none"> Bike depot outside Cafe Gray should be moved and delivery vans should have 7 mins time frame Introduce a council app designed to encourage car sharing for school runs and more state subsidised school buses. Tax breaks for bicycles Better bus services to encourage less cars The Glen of the Downs is a protected Nature Reserve and should not be altered or infringed on in any way to expand the dual carriage way - alternative ways to deal with the traffic must be found; it has been compromised enough already in the past.
Elizabeth Battye (D46)	<p>Access to water and wastewater treatment should be prioritised within villages, rather than encouraging sporadic development outside the villages by default. In the village of Ballycoog, I have been waiting for 14 yrs for access to the wastewater treatment facility. This wastewater facility is importing waste from outside its catchment as local access is impossible. Proper collection infrastructure is required. The County Council should be working with Irish Water to progress this matter.</p>
Art Ó'Laoghaire (D48)	<ul style="list-style-type: none"> In view of the current climate-carbon crisis, ALL development in the immediate future must aim to discourage dependence on private cars. There must be NO further development of dual carriage ways or motor-ways, as they only encourage people to use private cars. Instead there has to be a massive expansion of public transport: rail and long-distance bus services for longer-distance / nation-wide travel, with integrated local bus services (including minibus) connecting to national networks. Promoting cycling, walking and public recreation facilities Promoting public transport to connect all settlements in the county with each other and to connect settlements with national public transport routes;

<p>Billy Timmins (D49)</p>	<ul style="list-style-type: none"> • The N81 project and the link of the R747 (and its upgrade) to the M9, Dunlavin to the M9, and the Luas to Blessington should be included. The M11 plan may be completed by the time this document comes to fruition. If not the proposal should be aimed at widening the current route and increasing the public transport options. • Road signage should include facilities e.g. the golf links at Arklow • Consideration should be given to identifying and developing a number of electronic notice boards around the county which could be hired out by WCC for commercial and civic use. Imagine no election posters.
<p>Mick Mulligan (D50)</p>	<ul style="list-style-type: none"> • The M11/N11 is the main road artery from the south east, through Wicklow to Dublin. The viability of all areas of development and sustainability depends on this. The chronic congestion at a few choke points (that are within Co. Wicklow) need to be tackled as a matter of urgency. The main choke points are within the greater Bray area (the Glen of the Downs, Kilmacanogue and Bray South). Junctions need to be redesigned (some closed) and made safer, quicker flowing and faster - this can be done relatively quickly and at a reduced cost in comparison to the proposed road realignments. Any evidence on the N11 forces even more traffic through Bray for example as people from the Greater Greystones area try to avoid the incident. • At the same time, the council must ask why do so many people drive - because they have to. The public transport south of Bray Daly Station is slow, expensive and inefficient. Timetables need to be revised so that people from Wexford and Wicklow can get to work via mainline rail and bus in time for work in the city centre or elsewhere and so avoid the need to use a car. Works on the mainline rail to increase train speeds would also assist with this. • Many Bus Eireann buses fail to appear at all resulting in a service that is not reliable. The possible location of a park and ride facility at "The Beehive" (for cars from Wexford) and/or Charlesland in Greystones would be encouraged.
<p>Disability Federation of Ireland (D51)</p>	<ul style="list-style-type: none"> • 19% of people who have a disability in Wicklow did not have access to a car or van compared to 8% of the general population at the time of the last census. • This means that almost 1 in 5 people with a disability are forced to rely on taxis, buses and trains. In 2017, an elected representative in Wicklow highlighted the fact that there were only 20 wheelchair accessible taxis to be shared across the entire county. Wicklow had the fourth lowest provision in the country. • A number of bus routes in and around the county are not accessible to people with disabilities. Wicklow County Council need to work with Bus Eireann and other providers as well as the Gardai, who have some responsibility for the placement of bus stops, to ensure that there is adequate bus stop infrastructure to safely operate wheelchair lift on buses. An audit of existing bus stops with cooperation from bus operators should be considered. • There are numerous problems with the DART and rail services in the county, which have been highlighted by disability activists before. Among these problems are the fact that <ul style="list-style-type: none"> - Notice must be given to travel - A ramp is needed to board and exit the train and staff are not always available to assist with this, - Lifts needed to cross the platform are out of order, people cannot access their destination and are forced to return. - Works and upgrades to stations can temporarily render them inaccessible • Wicklow County Council should work with relevant stakeholders to improve transport options for people with disabilities. Specialised transport options should not be introduced at the expense of improving the accessibility of mainstream transport options. However, where necessary the 'local link' bus service could be expanded to

	support an increased number of people with disabilities who lack transport alternatives.
Justin Ivory (D63)	Greatly enhance public transport options
Sophia Meeres (D68)	<ul style="list-style-type: none"> • Arklow WWTP: Construction of an oversized technically suboptimal combined WWTP in sites threatened by sea level rise is short sighted and positively foolhardy. Future WWTPs should require tertiary treatment. Multiple small plants that cater to current capacity should be favoured over single oversized plants. No further combined systems should be built, Storm water and waste water should be treated separately. • SUDS MUST become a vital part of every settlement's planning strategy, it's not enough to note "potential". Funds must be put into place to realize plans, and future development should be conditional on SUDS status of a settlement. • Wicklow should lead the way by favouring rail and other public travel over private cars. • More frequent, faster trains to Dublin • More frequent, more reliable intercity buses • Efforts must be made to remove boundary walls that prevent movement of people between housing estates. The CDP should include plans to improve local pedestrian greenways and cycleways enabling locals to travel to work/ school by foot/by bike.
Lorna Kelly (D69)	<ul style="list-style-type: none"> • It is only right that with the expansion of our population and the now rooted commercial consumer society that we deliver sustainable management of the waste that is generated. • It is only right that we deliver sustainable management of all our natural resources including the fundamental supply of water.
Aine Stokes (D75)	<ul style="list-style-type: none"> • My husband is one of those commuters, who suffers from the stress of tailbacks and traffic chaos from Delgany to town. He drives to work, with much guilt. He cannot realistically get in to work any other way because the foresight of Governments has been so shockingly poor, as to not create solutions to public transport demands. • Ask the people! Read the alternative suggestions. They are there if you are interested. Think outside the box for once, and do not go ahead with these plans. You will be met with huge resistance. Young and old. • We are not going to let our natural heritage, our right to our natural heritage be destroyed, uprooted, bulldozed and flattened, covered over by cement and hidden forever. Our children have the right to also enjoy these beautiful parts of North Wicklow, and with them we will join to say NO, however loud that NO needs to be and wherever we need to say it, if it needs to be outside the Dáil so it shall. • We are facing a crisis with climate change. As you probably know. We need to be creative. If you cannot come up with sustainable, green, eco-friendly and commuter-friendly solutions to the traffic chaos (that we are not denying) please seek advice and ideas from our European neighbours, most notably the Scandinavians and German/Austrian/Swiss for example where fjords and glacial valleys and mountains aren't destroyed for cars, but where clever engineering finds a kinder way. More roads and these disgusting routes are not the answer. Please go back to the drawing board and come up with real, long-term, sustainable and environmentally friendly alternatives. • And aren't we trying to get to zero? With emissions. why with all of these new challenges would you ever even dream of more road? More car? More fumes? More carbon? More concrete? There will still be congestion - or do you all think otherwise? The hundreds of new houses newly built in Greystones and now sadly up near St Laurence's School are only going to add to the problem. More road won't fix it. • Focus your energies and ideas on public transport for us. That's what we want. In this

	day and age and then you will have achieved something great!
Helen Howes (D78)	Plan to make private transport increasingly less necessary. In the first instance by significantly improving opportunities and connectivity of public transport and secondly by developing self sustaining communities.
Ciara King (D79)	<ul style="list-style-type: none"> • There is a vital need to reduce reliance on car-based travel and to ensure more sustainable patterns of travel, transportation and development. • The Council should work with the NTA and national government to ensure that the public transport is upgraded and increased before new housing developments commence. More park and ride facilities, increased service from Greystones Dart station, more carriages on the Wexford train, better bus services.
Justin Tallon (D82)	<ul style="list-style-type: none"> • In order to comply with our obligations for a decrease in our carbon emissions, it is essential that all development and zoning must be thoroughly assessed for Climate and Biodiversity impact. • Only zone land for housing where it has access to reliable frequent public transport. • The M11/N11 is now chronically congested as a result of poor planning where large housing developments were constructed with no access to public transport. Current proposals to upgrade the N11 by adding a 3rd lane or putting a road through environmentally sensitive landscapes are outdated, counterproductive and will lead to even more car dependency and corresponding pollution. • The solution must be an increased investment in public transport. There has been little investment in our rail network on the east coast south of Bray. The NTA seems to have abandoned us. We must plan for sustainable Wicklow Public Transport and adopt ambitious targets for an increase in public transport usage and a reduction in private (especially single use commuting) transport use.
Karen Kennedy (D83)	The LAP refers to public transport and how Rathdrum has a limited rail service and only 2 bus services per day- this needs to be seriously reviewed to ensure we have a transport service that is fit for purpose. With the project population growth (3,500 by 2028), employment increase (to c1400 by 2028) and the massive investment (8 million +) in Avondale House a substandard public transport system, for residents and tourists, will only hinder the development and enhancement of Rathdrum. The development plan should have clearly defined actions to address this issue.
Elizabeth Battye (D84)	Cycle lanes, separated where possible, should be created on all main town and village thoroughfares. All planning should be cognizant of the need for cycle connectivity.
Lorraine Ni Fhlannagain (D93)	<ul style="list-style-type: none"> • A cycle super highway from Greystones/Bray to Dublin - include provision or people to cycle extensively. My partner commutes daily from Bray to Dublin Quays. He loves it. Make it so that more people will do it. It makes sense - healthier, takes single occupancy cars off the road, less emissions - it's a NO brainer! • The road to Roundwood - encourage cyclists off that road and onto alternate routes - OR make provisions on the Kilmac to Roundwood road for cycling. • Make roads and footpaths and town centres - the focus for everyone - especially pedestrians and vulnerable road users - lets get away from their car driven mentality. Some towns in Europe have gone totally car free • Make it easy for kids to walk/cycle/scoot to school
KRA Visionary Project Partners (D95)	Plan for sustainable Wicklow Public transport and adopt ambitious targets for increase in public transport usage and reduction in private (especially single use commuting) transport usage. Increase scale and frequency of public transport in Dublin, and incentivise public transport usage (provide a consistent service, free parking and low cost services).
Judy Osborne (D98)	As a member of the Wicklow Planning Alliance (WPA) I have contributed to many pre-draft submissions to county development plans in 1998, 2003, 2007, and 2013. The plans that were adopted following these consultations have improved each time with the vision, goals and objectives better constructed, incorporating contemporary

understanding of issues and government guidelines. Despite this most of the WPA proposals have been ignored and I can see no analysis of the impact of the existing plan. The issues have not changed though the need to produce a plan that will reduce the carbon emissions and loss of biodiversity of the settlement strategy and all other goals becomes ever more urgent. Meaningful indicators which can be used to monitor the impact of the final plan become ever more important.

Transport

- The strategy purports to provide and promote an integrated transport network and the encouragement of sustainable transport modes, to deliver high quality water supply, drainage and waste management facilities within the period of the plan...to promote the use of Green energy such as wind, and hydro-electricity...and to facilitate widespread telecommunication
- Probably necessary to identify search corridors to keep free from one off rural housing for a new inland railway. The existing railway line is likely to be under water in 50 years or sooner. The train should stop at Glenealy and Avoca
- A coastal or county cycling lane would be consistent with eco-tourism and generate local business such as cycle hire, stop over points
- A bus corridor from Arklow to Dublin would help reduce commuter travel. Reopening Avoca rail station, but not to facilitate further housing development as Iarnrod have indicated they might reopen it if further housing was allowed in area.
- We would not accept that an outer orbital route would be sustainable development.

Waste

- A new approach is needed to this section.
- Wicklow county council has Ballynagran Dump taking mixed waste (which cannot continue) and the council has started to build a new waste water treatment for Wicklow. There are promises to bring Luas to Bray and a new waste water treatment plant in Shanganagh.
- Probably need to identify search areas for a new waste management site so as to be ready for when Ballynagran is full and for a new site for compostable material.
- It is not beyond our wildest imaginations that many of the houses currently unoccupied could deteriorate to such an extent as to make their restoration and retrofitting for adaptation to climate change unfeasible. There will be a need to quantify and identify additional recycling facilities including construction and demolition recycling. Are existing site zoned for industry and employment suitable for this use or should additional sites be identified?
- Greater use of anaerobic digesters should be anticipated and planned for across the county and adjoining counties
- The Wicklow Planning Alliance submit that it is beholden on the Council to designate a suitable site or sites for landfill in the County, other than Ballynagran which has been rejected by the community, the Councillors and the Courts as a suitable site.
- Separation of the waste streams is essential to the proper management of this resource.
- Whilst the Waste Management Plan may deal with many issues, this must be properly integrated into the County Development Plan in order that there is no conflict of interest here. For example all new housing should be designed to include facilities for the storage of recyclables and for composting. Similarly, the reduction of waste must be seriously considered in those development controls that deal with construction methods,
- There would also be a need to refer to waste management in the retail section with regards to their ability to manage the extra waste streams created through their

	<p>business.</p> <p>Wastewater</p> <ul style="list-style-type: none"> • Regulations currently under review regarding the septic tanks of one off rural housing are likely to require stringent assessment and licensed monitoring of all septic tanks. This will be expensive. The issues in county Wicklow would commonly be thin soils over bedrock resulting in the possibility of surface water pollution ending up in rivers. This risk is likely to increase with climate change and heavy bursts of rain. • The use of integrated wetland systems should be encouraged for new development. • Constructed wetlands are increasingly been used in water and land management. They address the ever more apparent need for joined-up approaches to land and water management, with this need having International, European and National support i.e. the United Nations Environmental Programme (UNEP) and its Convention on Biological Diversity (CBD) and the Ramsar 1971 Convention for the protection of wetlands and European Union Directives, particularly that of the Water Framework, Nitrates, Bathing Water, and Ground Water Directives. • There are a number of different types of constructed wetland in use in Ireland over the past 50 years or so. Notwithstanding this, it is only in the past 20 years that a wider application of this approach to water management been integrated into the needs of natural resource management, culminating in the development of the Integrated Constructed Wetlands (ICW) concept. This more holistic approach places emphasis on the need for explicit integration of water management with landscape-fit and associated improved site values, and the facilitation of habitat and biological diversity. This purposeful integration enhances processing synergies, robustness and sustainability that are not generally available in most other single-focused constructed wetland designs. Integration benefits are primarily due to relatively larger scaling patterns and the greater biological complexity. This robust, sustainable and multi-benefit yield from ICW systems has been successfully applied throughout the country to a range of effluent types in different situations when appropriate assessment, design and construction are conducted. • Wetlands should be considered as a possible solution for the following situations; <ul style="list-style-type: none"> • Treatment of agricultural runoff and wash waters • Treatment of industrial runoff and wash waters, e.g. recycling facilities, meat processing facilities etc • Treatment of sewage waters for single houses, hotels, guesthouses, schools, villages, towns, housing developments, industrial and commercial developments. • Treatment of in-stream waters • Treatment of storm water, including roads, housing developments, commercial/industrial developments, golf courses. • Creation and enhancement of habitats and biodiversity. • A detailed site assessment and design should be undertaken by a suitable qualified person/body, examining the suitability of a site and determining the most appropriate layout and discharge type option. <p>Water</p> <ul style="list-style-type: none"> • The problems around the county need to be clearly identified including the lack of water in most of the east coast towns. Detailed maps need to be included to identify aquifers and areas subject to flooding. Implications of the Water Framework Directive need to be summarised in a form and language that can be understood by those developers and citizens wishing to use the plan to guide their own proposals. • Policies need to be included to ensure proper assessment of all water abstractions. The impact of lowering river flows, particularly in the warmer summer when rivers are
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	<p>already reduced, will have a serious impact on river fish stock and other species.</p> <ul style="list-style-type: none"> • Management of water has always been is one of the core responsibilities of the sanitary authorities. The legislation for water management is very wide ranging. This has been consolidated under the EU Water Framework Directive. • The purpose of the directive is to establish a framework for the protection of inland surface waters transitional waters, coastal waters and ground water which: • Prevent deterioration and protect ecosystems. • Promotes sustainable water use • Aims at enhanced protection and improvement. • Ensures the progressive reduction of pollution of groundwater and prevents its further pollution. • Contributes to mitigating the effects of floods and droughts. • The directive entered into force in 2000. It will be transposed into the legislation this year. The timeframe for its implementation is from Dec2000 – Dec 2015. • Wicklow Co. Council will inevitably be part of one of the Competent Authorities. • The timeframe for the directive straddles this Co. Development plan. • This development plan should begin the incorporation of the framework directive into the management of the county.
<p>Cairn Homes (D101)</p>	<ul style="list-style-type: none"> • Proposed upgrades to the N11 from Junction 4 to Junction 14 have recently been placed on public display and it is understood this project will likely progress, subject to planning, during the lifetime of the next development plan. These proposed upgrade works are welcome and will address the significant traffic delays experienced along the N11 particularly at peak times. However, there is also a requirement to improve public transport connections within Wicklow to help encourage more sustainable modes of transport. • While Greystones benefits from its location along the DART line, the rail line remains a single line into Greystones which limits capacity on the line. Cairn is aware that the upgrading of the rail line has long been an objective of both CIE and Wicklow County Council. We trust Wicklow will continue to pursue the upgrading of the train line with a view to increasing capacity for Greystones and other towns in Wicklow located along this vital rail corridor. The park and ride facility at Greystones is also at capacity and we would suggest that consideration should be given to enhancing the park and ride facilities in Greystones. • Interconnectivity between different forms of public transport and modal choice is essential in encouraging more sustainable modes of transport. Wicklow generally is underserved by bus services. Greystones is served by two bus routes; 84A which runs approx. once an hour and 84X and express service which runs at peak times to Dublin. A more frequent service which connects which Greystones and Bray rail stations would greatly improve connectivity in Greystones. Blessington is served by one bus route to Dublin which generally runs every two hours except at peak times. There is no bus route to Naas despite the proximity of the two towns. Enniskerry is similarly underserved with only one bus route which runs once an hour. All the towns would greatly benefit from improved bus services within the towns and to connect to other nearby large towns. We are aware public transport is outside the remit of Wicklow County Council but would encourage the Council to work with TII to improve services to these towns. • The Blessington Wastewater Treatment Plant has been at capacity for some time, which has curtailed development in the town. Planning permission has recently been granted to upgrade the treatment plant which will facilitate new development. Cairn request that the upgrade of this facility is prioritised in order to stimulate new development. It is essential the infrastructural deficits do not delay or curtail development of much needed new housing.

Plan 8 Architects (D102)	<ul style="list-style-type: none"> • Private wastewater treatment plants should be acceptable in small towns and villages within the county where current treatment plants are non-existent or running at capacity. This should be an objective of the CDP 2021. The specific towns and villages at present would be towns and villages such as Newcastle and Glenealy. To assist in the promotion of small towns that have been stagnated for new development in recent times. • To include an objective of providing a Northern Access Road linking Greystones with Junction 09 of the N11. The reason for this is to provide an alternative access in and out of Greystones. To reduce the traffic demands on the existing Southern Access route into Greystones.
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Response of Chief Executive

TRANSPORT

The integration of good land use planning with transportation in Wicklow is key to leading to increases in the quality of life of the county’s residents, however it has long been identified that car dependency and commuting are both major drawback to living in the County. Reducing the need to travel long distances by private car, and increasing the use of sustainable and healthy alternatives, can bring multiple benefits to both our environment and communities. Wicklow County Council (WCC) continues to provide for all components of the transportation system which are within its own remit and encourages and facilitates the development of those other elements provided by external agencies, such as the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII).

In addition, Wicklow County Council works on an ongoing basis with the transport agencies to deliver projects particularly those identified in the strategic plans for the NTA and TII and to prepare Local Transport Plans / Studies for settlements / areas throughout the county, with the first of these completed in 2019 (Bray and Environs) and two more scheduled for preparation in 2020 (Arklow and Greystones - Delgany).

A number of submission in this part of the report relate to specific infrastructure issues in particular towns / settlements. Further assessment of such local issues can be found in this report under each town’s heading.

Public Transport

It is agreed that investment in public transport is essential and as set out in the recommended new Core Strategy, the growth framework for the County will be framed around ensuring housing growth is commensurate with services already available or that will be provided within the lifetime of the plan. The Council will continue to work with and support the public transport providers to improve services in Wicklow. The County Development Plan already contained objectives to that effect and it is recommended that same be retained and enhanced where necessary in the new County Development Plan:

TR1 *To cooperate with NTA and other relevant transport planning bodies in the delivery of a high quality, integrated transport system in the Greater Dublin Area.*

TR2 *To promote the development of transport interchanges and ‘nodes’ where a number of transport types can interchange with ease. In particular:*

- *to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required*

coordinated, plan-led transport studies and consultation with the appropriate transport agencies;

- *to enhance existing parking facilities at and/or the improvement of bus links to the train stations in Bray, Greystones, Wicklow and Arklow;*
- *to promote the linkage of the LUAS extension or other mass transit to Bray town centre, Bray train station and Fassaroe;*
- *to encourage the improvement of bicycle parking facilities at all transport interchanges;*
- *to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and*
- *to allow for the construction of bus shelters, particularly where they incorporate disabled access and bicycle parking facilities.*

TR3 *To continue to work with Iarnrod Eireann and the NTA on the improvement of mainline train and DART services into Wicklow and in particular, to facilitate all options available to increase capacity through Bray Head and along the coastal route south of Greystones.*

TR4 *To ensure that possibilities for improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and would facilitate future improvements. In particular:*

- *to resist any development within 20m of the railway line;*
- *to resist demolition or removal of any former train station structures or apparatus, other than for safety reasons; and*
- *to require any development proposals in the vicinity of former train stations to be so designed to facilitate future access to the station and to reserve adequate space for future car parking.*

TR5 *To facilitate, through both the zoning of land and the tie-in of new facilities with the development of land and the application of supplementary development contributions, the extension of the LUAS or other mass transit to Bray town centre, Bray train station and Fassaroe.*

TR6 *To improve the capacity of the N11 / M11 from Rathnew to the County boundary at Bray in a manner capable of facilitating greater free flow of public transport.*

TR7 *To promote the delivery of improved and new bus services both in and out of the County but also within the County by:*

- *facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);*
- *requiring the developers of large-scale new employment and residential developments in the designated metropolitan and large growth towns in the County that are distant (more than 2km) from train / LUAS stations to fund / provide feeder bus services for an initial period of at least 3 years;*
- *promoting the growth of designated settlements to a critical mass to make bus services viable and more likely to continue;*
- *to work with Bus Eireann and the NTA to improve services in south and west Wicklow.*

Wicklow County Council and the NTA are committed to the delivery of more ‘park-n-rides’, with the NTA recently having established a dedicated park-n-ride team to look at this issue. It is considered that it would be more effective to have a coordinated county / regional strategy for park-n-rides rather than allowing the delivery of such facilities on an ad-hoc and uncoordinated basis without the backing and support of the transport agencies.

The need for an enhanced DART/Rail service and bus service (including a local link service) to serve areas including west Wicklow (including the N81), Blessington, the N11, Greystones, Delgany, to the city centre and to the LUAS is acknowledged, the County Development Plan facilitates such a service; however it is not within the scope of the plan to ‘deliver’ these service improvements and new infrastructure.

Issues with the existing 133 and 65 bus service quality are not issue for the County Development Plan. Issues around the pricing or the delivery of a free bus service is not within the remit of the plan. The delivery of bus stops at certain locations is facilitated by the County Development Plan at appropriate locations, subject to proper planning and road safety; however the delivery of bus stops is a matter for the bus service provider. Overall many of these issues are a matter for the Department of Transport and the public transport providers themselves.

BusConnects Dublin

The National Transport Authority has commenced a project called BusConnects Dublin. This is a major investment programme to improve transport in Dublin and surrounding counties. It aims to overhaul the current bus system through a 10 year programme of integrated actions to deliver a more efficient, reliable and better bus system for more people. This will be achieved by;

- Building a network of new bus corridors to make journey's faster and more reliable.
- New network of cycle lanes/tracks.
- Redesign of the Dublin area bus network to provide a more efficient network with high frequency spines, new orbital routes and increased bus services.
- Develop a state -of-the-art ticketing system.
- Implementation of a cashless payment system.
- Simpler fare structure.
- New bus stops and shelters with better signage and information
- Provision of bus based Park and Ride sites in key locations.
- New bus livery providing a common style across different operators.
- Transitioning to a new bus fleet with low emission vehicle technologies.

The BusConnects project has had a number of draft proposals out on display and is currently continuing with public consultation on different elements of the project. The County Development Plan has no role in the BusConnects project however where necessary will address any land use aspect of this project.

Local Link

The local link bus service is an initiative of Transport For Ireland and is a development of the Rural Transport Programme (under the National Transport Authority) which provides a nationwide bus service in rural areas around Ireland. The aim of Local Link is to address rural social exclusion and integrate bus services where possible with Bus Éireann and Iarnrod Éireann networks. The services are operated and managed by 15 transport coordination units throughout the country. Each office manages the day to day requests and delivery of bus services in that area. The County Development Plan has no role in the Local Link service but fully supports and facilitates it.

Rail to Avoca

There is a call for a feasibility study to be undertaken to see if there is a possibility to re-open the station in Avoca and in the meantime to provide a local link bus service to the nearby train stations and to Glendalough. The current county plan facilitate the re-opening of the railway station at Avoca with objective TR4, such an objective will be retained in the draft plan. The delivery of such an

initiative is not a matter for WCC, this is an issue for the Department of Transport and the TII. The plan also facilitates the delivery of a local link service in lieu of the train service.

***TR4** To ensure that possibilities for improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and would facilitate future improvements.*

Transport Hub in Rathnew

As part of the drafting of the Wicklow Town – Rathnew Development Plan 2013, the existing ‘Action Area 10’ designation at Rathnew, which included a proposed transport interchange, was reviewed, and the Action Area / proposed transport interchange was omitted. The Wicklow Town – Rathnew Development Plan 2013, in line with the draft NTA Transport Strategy (it was in draft format at the time) focused on consolidating existing development and placed the focus back on the existing train station in Wicklow Town, hence the omission of the transport interchange.

Providing bus services in existing residential areas

The negative impact on residential amenity and traffic safety of providing a bus route through an existing residential estate, which was not initially designed to incorporate a bus route, is noted however the location of bus routes is not an issue for the county plan. The redesign of existing roads to facilitate the bus route and to enhance walking and cycling facilities is not within the remit of the county plan however the county plan would facilitate any such works from a land use point of view to be carried out, subject to proper planning and road safety.

Disability access of public transport

The issue of enhanced accessibility of public transport is not within the remit of the County Development Plan, this is a matter for the transport provider.

LUAS to Blessington

There are no national transport proposals to bring the LUAS to Blessington therefore it is not considered reasonable or appropriate to include such an objective to bring the LUAS to Blessington in the plan.

Bus stop in Hollywood

Bus Eireann N81 service traditionally stopped at this location however it was never an official stop and a number of years ago stopping at this location was halted. Wicklow County Council prepared plans for an official stop at this location over 2 years ago which were submitted to the TII for approval. This has not been approved to date as TII has indicated that it is conducting a review on the siting of all bus stops along national routes, which has not been completed to date. This project is being progressed alongside a plan to provide a footpath from the village of Hollywood to the garage at the junction with the N81.

Cycling and Walking

There are a number of objectives in the current County Development Plan with respect to walking and cycling paths / lanes, and it is recommended that same be retained in the new plan and strengthened where necessary i.e.

TR9 *To improve existing or provide new foot and cycleways on existing public roads, as funding allows.*

TR10 *To require all new regional and local roads to include foot and cycleways, except in cases where shared road space is provided³.*

TR11 *To facilitate the development of foot and cycleways off road (e.g. through open spaces, along established rights-of-way etc), in order to achieve the most direct route to the principal destination (be that town centre, schools, community facilities or transport nodes), while ensuring that personal safety, particularly at night time, is of the utmost priority.*

TR12 *To encourage the provision of secure covered bicycle-parking facilities at strategic locations such as town centres, neighbourhood centres, community facilities and transport nodes.*

TR13 *To facilitate the development of a cycling and walking amenity routes throughout the County.*

The Council is committed in its annual roads delivery programme to improve footpaths and cycling paths / lanes. The delivery of footpaths and cycling paths / lanes is an operational matter and is dependent on the allocation of funding through the annual budgetary process or allocations from other agencies, such as the NTA.

Significant work is ongoing on the provision of walking and cycling facilities. The recent IPB dividend funding was spent improving footpaths throughout the county. This is in addition to NTA funding for footpaths and cycleways. In relation to schools, the NTA have a designated ‘permeability’ fund. This is aimed at creating safe routes to schools and removing barriers such as walls and gates blocking direct access to schools. Several projects have been completed under this programme and others are currently being progressed.

National Cycle Network / The National Cycle Network Scoping Study (2010)

The National Cycle Network and the National Cycle Network Scoping Study (2010) are two initiatives of “Smarter Travel – A New Transport Policy for Ireland 2009-2020”. The existing County Development Plan acknowledges this current Government policy document as well as the “National Cycle Policy Framework 2009-2020”. Any land use aspect of these policy documents have been underpinned with the cycling objectives TR9 to TR13, which will be reviewed and updated where necessary in the new plan making process.

Cycling Strategy / Cycling Project Officer

The need for a Cycling Strategy to be included in the County Development Plan is raised. The existing plan includes objectives on cycleways / bicycle parking and cycling routes in the context of a land use plan and such objectives will be reviewed and updated where necessary in the new draft plan, however given the scale of plan making (County / strategic level) it is considered that specific improvements to the cycling network may be best dealt with at a local level through the preparation of a local cycling network plan (such as that prepared for Bray in 2012) and this will be supported in the new plan.

The assignment of a ‘cycling officer’, while a worthwhile suggestion, would not be matter for the County Development Plan.

Creating walkable communities

It is acknowledged in the existing county plan that the creation of walking communities is a key to a sustainable community. Reducing the need to travel long distances by private car, and increasing the

³ Streets where real and perceived barriers to movement within and between modes of transport are removed to promote improved interaction between users in a safe and traffic calmed environment.

use of sustainable and healthy alternatives, like walking, can bring multiple benefits to both our environment and communities. It is the infrastructure strategy of the current plan to “*Craft land use policies to produce settlements of such form and layout that facilitates and encourages sustainable forms of movement and transport, prioritising walking and cycling*”. This strategy along with the objectives will be reviewed and updated where necessary in the new plan making process.

Public Roads

N81

The need for the upgrading of the N81 is acknowledged in the existing county plan with the necessary land use objectives in place (TR17 – TR23) however the delivery of such projects is a matter for Transport Infrastructure Ireland.

N9 links

The existing plan has an objective to link the R747/ Baltinglass / Dunlavin to the M9. This objective will be reviewed and updated where necessary.

Objective TR26 *To improve regional road links between Wicklow and other counties, in particular the Blessington to Naas route and routes from Dunlavin and Baltinglass to the M9/N9.*

Blessington Inner Relief Road

The County Plan and the Blessington Local Area Plan 2013 (*Objective S7 - To facilitate the completion of the Inner Relief Road*) facilitate the development and completion of the inner relief road in Blessington. Wicklow County Council and Kildare County Council (as much of route passes through Kildare), are working closely on a programme to deliver this road, and have already commenced the design process and are investigating delivery and funding options.

Northern Access Road Greystones

Provision of such a link is an objective of the current County Development Plan and the Greystones LAP (Objective R01):

Objectives for the M/N11

- *Upgrading of the N11/M11 between the County boundary and Ashford including road capacity and safety improvements to the main carriageway and all necessary improvements to associated junctions;*
- *Improving the M11 / M50 merge;*
- *Upgrading of the N11 to motorway status between Bray and Cullenmore;*
- ***Upgrading the N11 interchange at the Glen of the Downs to facilitate the provision of a northern link road from the N11 to Greystones;***
- *Upgrade Ballyronan Interchange to facilitate improved access to Newtownmountkennedy and a possible link road from Ballyronan to Kilcoole; and*
- *The provision of a third interchange on the Arklow by-pass, linking the M11 to Vale Road*

However it should be noted that the TII is not supportive of this proposal, and has not at this time factored this into its plans for N/M11 upgrade. In light of this, this objective will be reviewed at part of the new plan preparation process.

Speed limit of 80km per hour

The positive effects on reducing vehicular emissions by reducing the max speed limit to 80km per hour is noted however speed limits are not an issue that the County Development Plan deals with. This is a matter for the Minister for Transport.

Roadside Signage

Certain roadside signage is facilitated by the County Development Plan subject to proper planning as well as visual amenity and traffic safety.

WATER INFRASTRUCTURE

The issue of proper / improved water infrastructure for traveller halting sites is a matter for the Municipal Districts along with the Housing Section of WCC.

Waste Water

The delivery of the Arklow Waste Water Treatment Plant is a priority for Irish Water (IW). IW is currently in the process of tendering the works to enable the appointment of contractor. The project will take approximately three years to construct (commencing early 2021). The delivery of this waste water treatment plant, as well as others, is a matter for IW.

Private wastewater treatment plants in villages

It is acknowledged that there is an ongoing deficiency in some of the County’s wastewater systems may lead to increased demand for private treatment plants. While it is not the intention of the Development Plan to stymie development activity, the plan must in the first instance direct development to the right locations, and in terms of wastewater disposal, this means locations where wastewater collection and treatment facilities are in place. Where there are persuasive arguments for allowing private systems (such as a rural native needing to build on family landholding), the current plan has a number of objectives in place that apply. Such objectives will be reviewed, in consultation with IW and updated where necessary in the new plan making process.

Public foul sewer connection fees

The County Plan facilitates such connections however the issues around fees to connect is a matter for IW.

Constructed Wetlands

The use of constructed wetlands in waste water treatment is noted, and the current County Development Plan would facilitate such a form treatment. Irish Water is the body responsible for wastewater treatment in Ireland and it is noted that they are currently working with a number of other local authorities on such projects.

Wastewater discharge to water bodies

The County Plan fully facilitates and is in support of the upgrading of older wastewater treatment plants to ensure that any discharge to water bodies is of an appropriate standard however the delivery of such initiatives is a matter for IW.

Buffers along streams

The County Plan has an existing objective (NH23) which requires a buffer to be maintained along watercourses. Such objectives will be reviewed and updated where necessary.

Storm and Surface Water Infrastructure

The need for separate storm and waste water systems is acknowledged. The efficiency and capacity of wastewater collection and treatment systems can be radically improved through the removal of uncontaminated storm and surface water from the system. Many drainage systems in our settlements have combined systems (foul and surface) and the extent of these older systems means that retrospective separation would not be feasible. However, all new development are required to minimise surface water discharges through **Sustainable Urban Drainage Systems (SUDS)**, to separate foul and surface water and not to dispose of surface water to the foul drainage system. This development standard along with the objectives will be reviewed and updated where necessary in the new plan making process.

WASTE AND ENVIRONMENTAL EMISSIONS

Waste

The need to deliver sustainable management of the waste that is generated in society is noted. The Eastern–Midlands Region Waste Management Plan (WMP) 2015-2021 provides the framework for solid waste management in the region and sets out a range of policies and actions to meet specified mandatory and performance based targets. With regard to waste and emissions it is the strategy of the plan “*To promote and facilitate best practice in prevention, re-use, recovery, recycling and disposal of all waste and environmental emissions produced in the County*”. This strategy along with the objectives will be reviewed and updated where necessary in the new plan making process.

New Waste Management facility / site

The identification of new waste management sites is not within the remit of the county plan however the county plan facilitates the development of such facilities if needed. The Eastern–Midlands Region Waste Management Plan 2015-2021 provides the framework for solid waste management in the region and sets out a range of policies and actions to meet specified mandatory and performance based targets. The following existing county plan objectives are current in place and will be reviewed as part of the new plan making process.

- WE3** *To facilitate the development of existing and new waste recovery facilities and in particular, to facilitate the development of ‘green waste’ recovery sites.*
- WE4** *To facilitate the development of waste-to-energy facilities, particularly the use of landfill gas and biological waste.*
- WE5** *To have regard to the Council’s duty under the 1996 Waste Management Act (as amended), to provide and operate, or arrange for the provision and operation of, such facilities as may be necessary for the recovery and disposal of household waste arising within its functional area.*
- WE6** *To facilitate the development of sites, services and facilities necessary to achieve implementation of the objectives of the Regional Waste Management Plan.*

Keep Ireland Open

Keep Ireland Open’s submission provides a lengthy and detailed submission on a significant number of the existing objectives and topics contained in the 2016-2022 County Development Plan. With regard to walking and cycling, the submission makes numerous alternative or additional wording suggestions for many of the objectives. This stage of the plan review process is more ‘strategic’ in nature, and the development of specific objectives will follow once the overall strategy and key aims of the plan are agreed.

During the review of the detailed policies, objectives and development standards contained in the existing plan, it is intended that the new County Development Plan will update and strengthen these existing objectives taking into consideration any new national policy and guidelines as well as the suggestions in this submission for new policies or existing policy amendments. In this regard it should be noted that particular care will need to be taken to ensure that policies and objectives are appropriate, rational, reasonable, have a basis in Government policy and are legally sound.

The N11/M11 Junction 4 to Junction 14 Improvement Scheme

Many submissions have been received on the issue of the N11/M11 Junction 4 to Junction 14 Improvement Scheme. One submission (D101) is in favour of the scheme with most generally not in favour of the whole scheme, with many not in favour of an element of the scheme, for example a specific route option (C5, C19, D17, D26, D40, D43, D48, D49, D50, D69, D75, D82). The reasons put forward cover a variety of issues:

- Such a scheme is not in line with what is needed to address greenhouse gas emissions in the county.
- It would be preferable to address congestion through public transportation and cycling options,
- The negative environmental impact on the Glen of the Downs
- The general negative environmental impact.

The scheme has been identified in Project Ireland 2040 as one of the 20 priority National Roads to be progressed in order to enable the continued economic development of the state. The scheme has also been identified in relevant regional and local planning policy. The National Transport Authority’s “Transport Strategy for the Greater Dublin Area (2016 – 2035)” envisages a number of specific developments, including enhancements along the N11/M11 corridor between Junction 4 and Junction 14.

This is a separate process to the County Development Plan and is lead by Transport Infrastructure Ireland. The initial stages of the process of developing this scheme commenced with ARUP who were appointed in November 2018 as the lead consultants to progress the project. Currently the scheme is at Phase 2 (option selection) which involves the examination of feasible alternative options in order to determine a preferred option. A lengthy public consultation stage with submissions invited commenced in December 2019 with an open day public consultation in November 2019.

The County Plan will support the delivery of this scheme and underpin any necessary land use matters however the County Plan has no role in the route options or the scheme development in general.

Recommendations of Chief Executive

1. To review and update / strengthen the objectives on infrastructure, including roads, transportation, water infrastructure, flooding, waste and environmental emissions, in accordance with national, regional and local policy and strategies.

2. To retain existing foot and cycle way objectives in the new County Development Plan and to enhance in accordance with any advice or updated strategies / requirements of the NTA.
3. To retain existing public transport objectives in the new County Development Plan and to enhance the policy framework to encourage and facilitate the improvement of public transport in accordance with any national advice or updated strategies / requirements.
4. To continue to facilitate Irish Water in the provision and expansion of the water services infrastructure required to support the social and economic growth of County Wicklow, including targeted demographic growth and economic development as identified in the Core Strategy of the plan.

Part 4.3.8 Energy and Communications, including the Wind Energy Strategy

Name	Issue Raised
<p>Birdwatch Ireland (C3)</p>	<p>BirdWatch Ireland supports the deployment of renewable energy to meet our greenhouse gas emissions targets. However, this deployment has the potential to significantly impact bird species and habitats if located in areas that are sensitive to birds. BirdWatch Ireland has developed a bird wind sensitivity mapping tool which was rolled out in 2016 to all the local authorities and planning authorities in Ireland. It is a pre-planning tool (GIS based and available for free) in the toolbox which should assist wind farm developers, ecologists and communities to make good decisions on where to locate wind farms. The associated Guidance Document also provides important information on the sensitivity of bird species to wind farms. We suggest that this tool be referenced in the County Development Plan and the GIS layer is used by local authority planners to support any future renewable energy development strategies and applications.</p> <p>In addition, offshore renewables also have the potential to impact bird species and so we have trialled a bird sensitivity mapping tool for marine renewables for 6 bird species in the Irish Sea. The final report outlining the factors to consider in relation to marine renewables as they relate to seabirds can be found online. We hope to finalise this mapping tool for all species in Irish waters.</p>
<p>Irish Wind Energy Association ('IWEA') (C4)</p>	<p>The IWEA welcomes the opportunity to make this submission to Wicklow County Council on the Wicklow County Development Plan 2021-2027 Issues Paper. One of the key objectives of the RSES is to support renewable energy opportunities by harnessing natural resources that will support decarbonisation, energy security, and allow the region to take advantage of the economic benefits of greener energy.</p> <p>The National Climate Action Plan (CAP) 2019 has set out an ambitious 70% target for renewable energy production out to 2030. To meet this target, the amount of electricity generated from renewables will have to be doubled on current figures. Figures 4.4 and 7.5 (see below) of the CAP illustrate Ireland's current and projected renewable electricity production requirements to meet the 70% target. Based on the CAP assumptions, on-shore wind will provide the majority of the required electricity yield out to 2030. Taking account of this, WCC and all Local Authorities should be cautious when considering the zonation of areas for renewable energy development going forward, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.</p> <p>The Office of the Planning Regulator (OPR) which was established in 2019 with the aim of enhancing the proper oversight of the planning system in Ireland has already written to Local Authorities within the EMRA advising them to maximise the output of renewable energy sources in line with national government policies on climate change. We would urge WCC to take cognisance of this guidance when developing the 2021-2027 CDP.</p> <p>IWEA strongly promotes the delivery of a Regional Renewable Energy Strategy to facilitate the implementation of Regional Policy Objective (RPO) 7.35 and 7.36 of the Mid and Eastern RSES in the short term, as a matter of high priority and urgency. Such an approach would ensure consistency across the entire region and minimise duplication of effort and resources at a local authority level.</p> <p>However, in the absence of any certainty around the realisation of this and in response to</p>

	<p>the advice of the OPR, the targets in the COP2019 and the key challenges and questions outlined in the Issues paper by WCC, we believe a local renewable energy strategy is an absolute requirement as part of the CDP review.</p> <p>In response to some of the key challenges and questions set out in the Issues paper by WCC, specifically in relation to Critical Infrastructure; Economic Development; Rural Development; Green Infrastructure and Climate Change and Energy, we believe that the correct spatial planning and development of a Renewable Energy Strategy for Co. Wicklow can support the transition to a low carbon society, as well as increase awareness of climate change while at the same time, helping to reduce its impacts by facilitating plan led renewable energy development in the County. In addition, by developing a robust and well-informed plan, WCC will be facilitating rural based enterprises and ensuring employment in rural areas into the future.</p> <p>The inclusion of Appendix 6 titled "<i>Wicklow Wind Energy Strategy</i>" and Appendix 7 "<i>Climate Change Audit</i>" in the 2016 CDP are noted and welcomed.</p> <p>As acknowledged in the Wicklow CDP Climate Change Audit, one source of greenhouse gas (GHG) emissions is from the process used to produce electricity, with the Energy Sector contributing to 21.9% of GHG emissions in Ireland. Therefore, we ask WCC to develop a Renewable Energy Strategy for the County that incorporates the methodologies outlined in the SEAI Local Authority Renewable Energy Strategy (LARES) as indicated in the current Plan, the current Wind Energy Guidelines (2006), objectives in the RSES and any future guidelines adopted.</p> <p>We urge WCC to carry out a full assessment of Co. Wicklow for renewable energy development potential and zone accordingly to ensure that there is no planning ambiguity surrounding any un-zoned areas. In addition, we ask WCC and all Local Authorities to develop a consistent and transparent renewable energy zoning methodology for all Counties. We suggest the following standard for renewable energy zones: 'No-Go', 'Open to Consideration', and 'Preferred' Areas.</p> <p>In relation to landscape, as per above, we also ask that WCC and all Local Authorities develop consistent Landscape Character Assessment (LCA) criteria and apply it across all counties. We ask that a 'Low', 'Medium', and 'High' weighting table for landscape sensitivity types be considered for renewable energy development potential. We note the inclusion of the Appendix 5 entitled 'Landscape Assessment' in the 2016 CDP and the utilisation of a 'Low', 'Medium', and 'High' scaling range is noted. Would seek for the revised 'Landscape Assessment' to take account of the same methodology. This is as we believe it will provide clear guidance for developers and eliminate uncertainty surrounding areas un-suitable for renewable energy development at project inception.</p> <p>Given that turbine technologies have advanced significantly in the past decade, we would recommend WCC and all Local Authorities that the SEAI Wind Atlas or any similar general wind resource data not be used as a constraint when developing and zoning areas for renewable energy development. We believe wind resource to be a developer's constraint, and a variable to be assessed as part of each individual project. As technologies have advanced, turbines have been developed which can yield the same energy from lower wind sites than their older counter parts.</p> <p>We also believe that grid constraints should not be considered by Local Authorities when preparing their Renewable Energy Strategies, again we believe this to be a developer's</p>
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	<p>constraint. We ask that WCC to consider this suggestion. IWEA believe that we have outlined and detailed above, the Best Approach to be considered by WCC and all Local Authorities when drafting future Renewable Energy Strategies for their Counties. We urge WCC to consider above observations when producing the 2021- 2027 CDP.</p>
<p>West Wicklow Environmental Network (C7)</p>	<p>A huge part of living sustainably is sustainable development and having sustainable homes. Social housing built now and retrofitting of old stock should have renewable energy heating systems.</p> <p>The West Wicklow Environmental Network notes that there are very few electric car charging points on the West Wicklow side of the county. More charging points for electric cars would make it possible and more attractive for people to transition to electric cars thereby reducing their carbon footprints. Other councils such a Fingal County Council have led the way by installing electric charging points at train stations and on public streets. It would be great if Wicklow County Council could follow their example. With other important simple actions, it would really make us the ‘Green Garden County’.</p>
<p>Keep Ireland Open (C16)</p>	<p>This submission relates primarily to objectives of the current County Development Plan and makes the following suggestions:</p> <p>Objective T23 KIO submits that the last phrase should be replaced by:</p> <p><i>3 Prohibit construction of telecommunication masts, antennae, support structures and ancillary equipment in primary and secondary amenity areas, designated conservation areas at locations detrimental to designated protected views and/or prospects and scenic routes or within views or settings of national monuments, archaeological sites or in close proximity to public amenity areas. Where feasible, proposed development pertaining to the installation of potentially obtrusive technology shall be located in non-sensitive landscapes. Protect areas of significant landscape importance from the visual intrusion of large scale telecommunications infrastructure. Safeguard the sensitivity, open character and amenities of high amenity and mountain areas. The latest technology to minimise their size and visual impact should be used. Structures must be located to limit visual impacts especially in areas of sensitivity and historic importance, AONBs, scenic amenities and geological sites. It shall be necessary to minimise and /or mitigate any adverse impacts on communities, and the built or natural environment as far as practically possible where the location could adversely impact on the visual amenity. Except in exceptional circumstances, locations along major tourist routes must be avoided. Where appropriate, masts, antennae and fencing should be in harmony with their surroundings and should be of dull or neutral sky grey colour so as to be less visually obtrusive. Green or black is the preferred at ground level. They should, where possible, be located to take advantage of the screening and backdrop afforded by existing trees or topography. The infrastructure must be adequately screened by utilising an appropriate backdrop (including camouflaging/disguising) and where possible locate in forest plantations or grouping of trees and this cordon of trees will not be felled during the lifetime of the mast and landscaped to minimise adverse visual impacts on the environment and natural heritage, provided that the landscape is able to support additional screening measures. Support structures should be kept to the lowest feasible height and due to the size of the mast structures and the materials used to construct them (especially latticework versions), they can impact on landscapes. They should be of monopole or square structure rather than latticework unless such structures have a clear and/or simple design or where it is judged by the Council to incorporate high sculptural design quality. Colours of mast structures and fencing shall be appropriate to their surroundings. Appropriate landscaping and screening will be required. The number of</i></p>

	<p><i>ancillary buildings/containers shall be kept to the minimum and the need for each structure must be clearly justified.</i></p> <p>Based on Kildare 8.13.1 TL 9 1st pt, Wexford 9.3.1 Obj TC06 1st para, Meath 2 4th para 3rd sentence, Carlow 6.11.3 4th para last pt, 7th para, 10th para 1st sentence & 6.11.3 Pol 1 1st pt and many other counties.</p> <p>KIO submits that WCC should include additional Objectives:</p> <p>1 Existing Public Rights of Way and established walking routes will be identified prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or impact thereon or on recreational amenities or public access to the countryside.</p> <p>Based on Roscommon 4.7 Pol 4.70, Cavan 4.8 PIO123 & Laois 6.6.5.2 TELE10. See also Sth Dublin 2.5.15, DLR 8.2.9.9 last pt, Kildare 8.13 TL 7, Wexford 9.3.1 Obj TC07, Carlow 6.1 Pol 1 7th pt & Meath 8.2.3 3rd para 3rd sentence.</p> <p>Note: Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected.</p> <p>2 <i>The Council shall, in assessing an application, take into account the impact on established walking routes.</i> Taken from Mayo Vol 2 55.3 4th pt.</p> <p>KIO submits that WCC should include an additional objectives in section on Renewal Energy:</p> <p>1 <i>Developments must be appropriately located.</i> Taken from Sligo 11.1 SP EN 2 1st para 4th line.</p> <p>2 <i>The development including any ancillary facilitates or buildings, considered individually or taking into account their scale and layout, their incremental/cumulative effect due to other proposals, the degree to which impacts are highly visible over a vast area, their visual impact on protected views and prospects, designed scenic landscape as well as local visual impacts, impacts on archaeology, should not create a hazard or nuisance, including the risk land instability and take into account the character and appearance of the surrounding area, the openness and visual amenity of the countryside, landscapes designated for their nature conservation, Natura sites and amenity values and sites of historic or archaeological interest or in proximity to National Monuments. Development will be subject to suitable locations and will only be permitted where they will not have an adverse impact on the environment including natural heritage and the protection of amenities and landscapes. Ensure proper integration with their surroundings. Where impacts are inevitable what mitigation features have been taken into account.</i></p> <p>Based on Meath 8.1 EC POL 3 last phrase, DLR 8.2.10.1 2nd para last sentence 2nd, 3rd & 4th pt 1st phrase, Louth 9.4 Pol EnCo 9 2nd phrase, Sth Dublin 10.2.10 E12 Obj 2 and many other counties.</p> <p>3 <i>In assessing development proposals the Council will take into account public access to the countryside and the impact on public rights of way and walking routes.</i></p> <p>Based on Meath 11.15.1 1st para 4th pt, DLR 8.2.10.1 2nd para last sentence 4th pt last phrase and many other counties.</p> <p>Wind Energy Objectives - CC6 1st & 2nd pts & 7th pt 1st phrase: KIO submits that these should be merged and replaced by:</p>
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The siting and layout of turbines should be suited to the landscape setting and site context and should minimise visual and environmental impacts and the impact on heritage sites, sites of archaeological importance, protected views and prospects, designated conservation areas and sensitive amenity areas including those beyond county boundaries should take advantage of existing screening and, where possible, should, follow and respect existing landforms and should follow best practice in the design and siting of turbines and all ancillary works, in order to contribute to effective mitigation. Design criteria will contribute to effective mitigation if the layout of turbines complements existing landscape patterns. The finish of turbines shall ensure minimum visual impact and integration with the landscape setting in so far as practicable. Land and uses on or adjacent to the site should be considered.

Based on Monaghan 8.15 1st para 2nd sentence 3rd line, 2nd para 3rd line, Limerick 10.13.2.1 2nd pt, **Galway County** App 4 5.2.7c) 1st pt, 3.1 1st para, a) 2nd pt. See also **Wexford** 5.2.4 1st pt.

4th pt KIO submits that this should be replaced by:

Take into account, when assessing planning applications, the impact on public access to the countryside including public rights of way, walking routes, recreational activities and amenities and the openness and visual amenity of the countryside and the impact on surrounding tourism. The Council will liaise with Failte Ireland and regional and local tourism bodies and will consider any representations received.

Based on **DLR** 8.2.10.1 last para 4th pt, **Meath** 11.15.1 1st para 4th pt and many other counties.

7th pt last phrase

KIO submits that WCC should include additional objectives:

1 Identify existing public rights of way and established walking routes and maintain them free from development, preserve them as public rights of way or walking routes. Taken from Cavan 4.7.3 PIO117.8.

2 Take into account, when assessing planning applications, the impact on public access to the countryside including public rights of way, walking routes, recreational activities and amenities and the openness and visual amenity of the countryside and the impact on surrounding tourism. The Council will liaise with Failte Ireland and regional and local tourism bodies and will consider any representations received. Based on **DLR** 8.2.10.1 last para 4th pt, **Meath** 11.15.1 1st para 4th pt and many other counties.

3 All applicants should include a LIA dealing with possible impacts on any existing rights of way or established walking routes.

Taken from Kilkenny 10.5.3 **Landscape Impact Assessment** 1st para 1st sentence.

Solar Energy Objectives

KIO submits that WCC should include additional Objectives:

1 Request the appropriate government department to formulate Planning Guidelines for ground mounted solar PV “Solar Farms”.

2 In assessing development proposals ensure that it does not have a negative effect on the character of the landscape, natural heritage, views and prospects, scenic routes, archaeology, local amenities, tourism areas and the potential for mitigation through screening with hedges.

Based on **Kildare** 8.7 SE 1 2nd sentence, **Sth Dublin** 10.2.5 Pol 7 2nd sentence & 2 1st &

	<p>5th pt 5th lines and many other counties.</p> <p>Hydro Energy Objectives</p> <p>KIO submits that WCC should include additional Objectives:</p> <p>1 <i>In assessing hydro energy schemes proposals the Council will take into account the impact on public rights of way and walking routes.</i> Taken from Meath 11.1.5.1 4th pt & Carlow 6.3.2 Pol 6 2nd pt.</p> <p>2 <i>In assessing development proposals ensure that it does not have a negative effect on the character of the landscape, natural heritage, views and prospects, scenic routes, archaeology, local amenities, tourism areas and the potential for mitigation through screening with hedges.</i> Based on Kildare 8.7 SE 1 2nd sentence, Sth Dublin 10.2.5 Pol 7 2nd sentence & 2 1st & 5th pt 5th line and many other counties.</p> <p>Small-Scale Renewable Electricity Objectives CCCE16</p> <p>KIO submits that WCC should include additional an additional section: Off-shore Energy: <i>Request the appropriate government department to formulate Planning Guidelines.</i></p> <p>Transmission and Distribution Objectives</p> <p>KIO submits that WCC should include additional objectives:</p> <p>1 <i>Ensure that electricity infrastructure (including transmission lines) protect, maintain and safeguard environmental designated sites, the open character and amenities of high amenity and mountain areas by following natural features and by avoiding areas of high landscape sensitivity, protected views including views of special amenity value, possible effects on tourism and the natural environment. Where impacts are inevitable mitigation measures to minimise their visual obtrusiveness must be provided for.</i> Based on Meath 11.15.4 4th pt and many other counties.</p> <p>2 <i>The undergrounding or re-routing of transmission lines (including telephone and TV cables) shall be considered first as part of a detailed consideration and evaluation of all available options Where technically feasible and environmentally appropriate, HV and other powerlines (including existing powerlines) and associated equipment should be placed underground to reduce the visual impact on the natural environment especially in sensitive areas to preserve significant landscape and significant views from the visual intrusion of energy infrastructure. Protect areas of recognised landscape importance and significant views from visually intrusive large scale energy transmission infrastructure by using alternative routing. Demonstrate that where impacts are identified mitigation feature have been included.</i> Based on Louth 9.2 EnCo 5 ,Kildare 8.12.2 TN2 & 8 last sentence, Meath 8.1.10 EC POL 19 and many other counties.</p> <p>Appendix 6 Wind Energy Strategy</p> <p>Once again the layout is confusing and should be re-assessed</p>
Wicklow Uplands Council	<p>Renewable Energy</p> <p>The new County Development Plan should support the development of small scale</p>

(C27)	energy production in businesses and homes throughout Wicklow. However, it is not currently possible to sell energy into the national grid from such small scale production. This is contrary to government targets to move away from non-renewables and to a greener economy. While WUC understands this is outside of the power of the County Development Plan, this is a serious national issue which all local authorities need to be raising with central government. The ability to sell into the national grid would encourage the generation of energy through solar energy, photo voltaic energy and small scale wind energy production. There are many examples in Europe of community energy projects whereby the communities produce their own electricity and have developed numerous local initiatives, co-ops and innovative business models.
Blessington and District Forum (C28)	Consideration should be made to make all towns, including Blessington to become more self sustaining by delivering on high speed broadband and encouraging working from home or from within community run enterprise hubs.
Keith Scanlon (D12)	<p>A ‘pro-forma’ submission on a range of County Development Plan issues has been received from a number of people. Each individual issue is addressed under the relevant topic and in relation to Renewable Energy the submission states:</p> <p>The County Development Plan should zone for Windfarms/Community Renewable Energy development</p>
Eleanor O' Farrell (D13)	
Ann Scanlon (D17)	
Patricia Ryan (D18)	
Tina Roche (D19)	
Tessa Stewart (D26)	
Noreen Keville (D28)	
Ann Teehan (D29)	
Isobel Connolly (D32)	
Alison Ryan (D34)	
Sinead Wallace (D35)	
Annette Vaucanson Kelly (D61)	
KRA Visionary Project Partners (D95)	
Adam Calihman (D38)	
Billy Timmins (D49)	Areas suitable for solar farming need to be identified. Charging points for EVs should be provided as appropriate.
William Quinn (D64)	<p>Natural Gas Availability – Baltinglass</p> <p>Natural gas is a clean and cost effective fuel. We would like to see the development plan aim to include a feed of natural gas coming into the West Wicklow corridor – specifically</p>

to Baltinglass. See map below for current gas pipelines in and around Wicklow (Red X = Baltinglass):



Link for national gas pipeline map: <https://www.gasnetworks.ie/corporate/company/our-network/pipeline-map/>

Quinn’s feed mill and grain processing facility on Mill Street Baltinglass is a huge user of energy and would benefit greatly from access to natural gas. As part of our 2017 development of our feed mill (€4M invested – only pellet mill within 4 counties) we had to invest in a new ESB sub power station (no grant/subsidy) as the towns existing power supply would not have been able to cope. The lights in Baltinglass houses would have flickered every time we hit high production if we had not had the resources to invest in this. As a county who is striving to attract larger business investment from outside the county (and internationally) this kind of lacking infrastructure is simply not good enough. If we were not a native Baltinglass business with a local site, we simply would have looked further afield to Carlow or Kildare to acquire a more suitable location for our mill.

As you can see from the map above – the gas lines currently serve Blessington, Ballymore Eustace and Carlow. With Wicklow bordering County Carlow only a few miles from Baltinglass, an extension from the Carlow line may be more viable than extending the lines south from Ballymore/Blessington.

In order to attract more large scale businesses in manufacturing and industry (who will require natural gas, high speed broadband, good road links etc) in the future we would strongly encourage you to include natural gas availability in West Wicklow/Baltinglass area in the development plan strategy.

<p>Con Nyhan (D87)</p>	<p>No further land based Wind Farms expansion in County Wicklow No offshore Renewable Energy that will exacerbate flooding in the Arklow Town.</p>
<p>Innogy Renewables Ireland Ltd (D90)</p>	<p>Innogy Renewables Ireland Ltd (IRIL) was established in 2016 and is owned by Innogy SE, a leading European energy company, with revenue of around €36.9 billion (2018), more than 42,900 employees and activities in 15 countries across Europe including Ireland. Innogy has a current renewable generation capacity of over 3.9GW, including over 1.9GW of onshore wind and over 1GW of offshore wind, producing over 9.6 billion kWh per annum, across ten European Countries. Innogy has recently expanded into new European and global markets, including, Ireland, the USA, Australia and Asia.</p> <p>In Ireland, Innogy are active in the development of our onshore and offshore wind and battery storage projects pipeline. Innogy currently operate a 10MW windfarm at Dromadda Beg in County Kerry and we are in the process of growing our onshore wind pipeline to include new greenfield developments, consented sites and operational wind</p>

	<p>farms. In March 2018, Innogy acquired an equal share in the ca. 600MW Dublin Array Offshore Wind Farm Project, partnering with another Irish company, Saorgus Energy.</p> <p>Action #2: Policy Statements clearly implementing the National Planning Framework and the Regional Spatial and Economic Strategy as it relates to new renewable energy generation projects</p> <p>The Wicklow County Development Plan must be consistent and support the delivery of the National Planning Framework’s National Strategic Outcomes and the 16 Regional Strategic Outcomes. The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region (operational since June 2019), is underpinned through the three principles of Healthy Placemaking, Climate Change and Economic Opportunity. As the RSES states, a key challenge facing the Region, along with all other regions, is the transition to a low carbon society – and we welcome the recognition that renewable energy is one of the five primary areas highlighted. The RSES makes clear that “The Strategy supports an increase in the amount of new renewable energy sources in the Region. This includes the use of wind energy – both onshore and offshore, biomass, and solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites in accordance with National policy and the Regional Policy Objectives outlined in this Strategy”.</p> <p>As set out in the National Climate Action Plan (CAP) 2019, the Government has set out an ambitious target for 70% of Ireland’s final demand to come from renewable energy by 2030. This will include almost a doubling of the onshore wind capacity as well as delivering 3.5GW of offshore wind from almost zero within 10 years. Whilst challenging, the economic and climate benefits of this transition will be significant.</p> <p>We would urge WCC to develop a Renewable Energy Strategy for the County that incorporates the methodologies outlined in the SEAI Local Authority Renewable Energy Strategy (LARES) as indicated in the current Plan, the current Wind Energy Development Guidelines (2019) and any future guidelines adopted. We would encourage WCC to discontinue the current position of placing landscape classification above all other criteria. This would support a regional strategy approach to identifying potential wind development sites across the region.</p> <p>Support for IWEA submission: As a member of the Irish Wind Energy Association (IWEA), Innogy also endorse the submission made by IWEA in December 2019 – and in particular their suggestions regarding the need to ensure that wind resource data is not regarded as a constraining factor when developing and zoning future areas for renewables. Recent advances in turbine technology are enabling better utilisation at lower wind speeds than was previously achievable. We note also their suggestion that grid constraints are not considered within the future Renewable Energy Strategy as this is a risk that can and should be managed by project developers.</p>
<p>Coillte (D92)</p>	<p>Within Coillte, Land Solutions and Renewable Energy are active asset development and management businesses. The businesses span a wide range of industries including renewable energy. Coillte has a significant track-record in the renewable energy arena (specifically onshore wind through the development and construction of four wind farms totalling 230MW representing a total investment of over €400 million between 2010-2017).</p> <p>Strategic Energy Zones: Coillte strongly believes the identification of ‘Strategic Energy</p>

	<p>Zones’ as areas suitable for larger energy generating projects should be set in the context of a plan-led approach, namely a holistic Renewable Energy Strategy for the entire EMRA Region (in line with the RSES RPO7.35 ‘EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones’).</p> <p>Coillte believes that this approach would ensure inter county consistency in relation to designating renewable energy zones, identifying landscape sensitivities and required set-back distances.</p> <p>Renewable Energy Strategy: Planning needs to step forward and frame a plan-led ‘Renewable Energy Strategy’ (RES). The Strategies need to be incorporated into the making of County Development Plans. Coillte recommends that each local authority in the Region incorporate a RES into the making of its individual County Development Plan.</p> <p>In so doing each local authority must engage closely with neighbouring local authorities and with other local authorities in the EMRA. A regional steering group comprising planners from each local authority and potentially led by Wicklow planners and/or EMRA, would be optimum. A representative from the DHPLG should also be requested to join the steering group. To this end the methodology and principles set out in “SEAI’s Local Authority Renewable Energy Strategy” [2013] remain valid and should be used.</p> <p>Based on Coillte’s extensive experience of developing and facilitating wind farms in Ireland we suggest that the following recommendations complement the principles in the SEAI document:</p> <ul style="list-style-type: none"> • Each local authority carry out a full assessment of all lands within their County and classify areas for renewables using terminology which is agreed in advance with the Steering group (referred to earlier). Such terminology could include: ‘No-Go’, ‘Open to Consideration’, and ‘Preferred’ areas. • Each local authority consider/reconsider its Landscape Character Assessment (LCA) and identify landscape sensitivities vis a vis renewable energy developments. As above an approach and terminology should be agreed in advance with the Steering group. Such terminology could include ‘Low’, ‘Medium’, and ‘High’ sensitivity. <p>It should be noted that turbine technologies have advanced significantly in the past decade and this trend is set to continue. For this reason we suggest the SEAI Wind Atlas, or any similar general wind resource data, is not used as a hard constraint when identifying suitable areas for on-shore wind. In addition, we recommend that existing grid constraints are not considered hard constraints when preparing RESs.</p>
<p>KRA Visionary Project Partners (D95)</p>	<p>Zone for Windfarms/Community Renewable Energy development and remove planning restrictions for installation of rooftop solar photovoltaic / thermal in residential developments.</p>
<p>Judy Osborne (D98)</p>	<p>ENERGY: The same corridor might be used to improve electricity grid to facilitate more individual use of alternatives that require access to the grid for picking up top ups or returning unused energy. The whole areas of alternative energy supply needs to be considered NOW. Recently announced proposals to bring a commercial electricity interconnector on land at Arklow will be assessed in a vacuum unless these matters are worked out in an integrated fashion. It would be appropriate to assess total need in the</p>

	<p>region and to propose suitable search areas for development of the necessary infrastructure.</p> <p>The existing Plan is inadequate in this very serious matter. The existing policy EN6 section 5.6.2 to extend natural gas grid should be removed as opportunities to import gas are reported to be shrinking rapidly and be unavailable by 2030. The previous plan promised an indicative wind policy. This did not happen. We now need a comprehensive plan for the county taking on board energy supply and distribution within the county and promoting the local production of energy as an element of the sustainable economy of the county. The energy agency that was discussed for the county could be asked to prepare a draft strategy for public consideration. The widespread use of bio fuels is now generally considered unsustainable however some production of bio-fuels for local consumption might be part of an overall strategy</p> <p>TELECOMMUNICATIONS: Large areas including areas of the primary Development Centre of Wicklow still cannot access high speed broadband. This will seriously undermine the opportunities to reduce the commuting ratio, to encourage home working or small local industries. If this cannot be remedied it should be acknowledged and alternative strategies prepared.</p>
<p>SSE (Scottish and Southern Energy plc) (D99)</p>	<p>At SSE, we are committed to playing our part in ensuring society realises the ambition of the Paris Climate Agreement to bring net greenhouse gas emissions down to zero. Since 2008, SSE has invested over €2.5 billion in growing our energy business here – creating jobs in Ireland, sustaining employment, driving competition and greening our economy. Our 29 onshore wind farms have a combined generation capacity of 740MW, making us the largest generator and provider of renewable energy in the integrated all-island Single Electricity Market.</p> <p>Our portfolio includes Ireland's largest onshore wind farm, the 174MW Galway Wind Park, which was jointly developed with Coillte. We forecast that Galway Wind Park will produce over 600GWh of green energy each year – enough renewable energy to power over 140,000 Irish homes, the equivalent of every home in Galway City and County and offsetting over 220,000 tonnes of harmful CO2 emissions.</p> <p>As a leading developer and operator of offshore wind energy in Great Britain, we believe offshore wind has the potential to transform Ireland’s ability to respond to climate change. SSE is currently progressing the development of a consented offshore windfarm of up to 800MW off the coast of Co. Wicklow - Arklow Bank Wind Park Phase 21. SSE will invest around €1-2bn in capex to develop the project which could generate around 1.75TWh annually. EirGrid estimate that electricity demand in Ireland will increase between 25-47% in the next 8 years, with the most significant growth being along the East Coast; an area which can be ideally served by the new wind park.</p> <ol style="list-style-type: none"> 1. In 2004, SSE and GE co-developed Phase 1 of the Wind Park which consists of 7 turbines with an installed capacity of 25 MW; this is Ireland’s only offshore wind farm. 2. EirGrid All-island Generation Capacity Statement 2019: http://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid-Group-All-Island-Generation-Capacity-Statement-2019-2028.pdf <p>SSE wishes to make this submission for consideration as part of the <i>Wicklow County Development Plan – Issue Paper</i> consultation. SSE welcomes the publication of this draft and supports the central role that County Development Plans will play in implementing</p>

the National Planning Framework (NPF) which aims to guide spatial planning while prioritising objectives including compact growth, sustainable mobility and the low carbon transition. Local authority planning will also be crucial to ensuring Ireland can deliver the objectives of the Government’s Action Plan to Tackle Climate Disruption.

SSE would like to highlight the following areas for consideration.

Reflecting climate action in local authority planning

Alignment and consistency in relation to climate action is critically important. The Climate Action Plan commits to reaching 70% renewable electricity by 2030 through doubling Ireland’s onshore wind capacity and installing at least 3.5GW of offshore wind. Arklow Bank Wind Park will allow County Wicklow to make a significant contribution towards this offshore wind target, putting the county in a leading position nationally in regard to its response to climate change. Offshore wind development will also bring significant socio-economic benefits to the County, which we have outlined later in our response. The Climate Action Plan also aims to drive the decarbonisation of heat and transport through electrification with ambitions for 1 million EVs and 500,000 deep retrofits by 2030.

SSE welcomes the priority given to climate action in the East and Midlands Regional Assembly Regional Spatial and Economic Strategy (RSES) and the 16 Regional Strategic Outcomes described in the strategy which are aligned to those identified in Ireland’s NPF and the UN’s Sustainable Development Goals. SSE welcome the EMRA’s identification of climate action as a key principle underpinning the region’s RSES.

These priorities and objectives need to be reflected in Wicklow’s County Development Plans. Failure to prioritise implementation of the appropriate policy measures at a local level will only increase the costs of measures in the future and exacerbate the impacts of climate change.

Aligning national, regional, local and marine planning

Alignment between national, regional and local planning policies is of critical importance to all those involved in infrastructure development. Consistency at local authority level is needed to provide clear guidance for wind energy project promoters and other stakeholders, who make large investments in bringing to planning phase projects which will support Ireland in meeting its climate targets.

The electricity sector has been one of the most successful at decarbonising due in large part to the deployment of onshore wind. Emissions related to the power generation sector have approximately halved since 1990. With the rollout of a new Renewable Electricity Support Scheme (RESS), wind energy – onshore and offshore - will play a key role in Ireland achieving its 70% renewable electricity target.

Onshore wind

In the case of onshore wind, EMRA RSES RPO 7.35 states that planning policy at a local authority level should adhere to the Wind Energy Guidelines, the DCCA Code of Practice for Wind and other relevant policy. This needs to be clearly reflected in Wicklow’s County Development Plan. While the changes proposed in the draft Wind Energy Guidelines may present challenges for wind development, we would encourage their consistent application. Divergence at a local level creates uncertainty for developers and makes the proposition of seeking permission for new wind farms a challenging prospect. As a responsible developer, SSE is committed to best practice in developing our projects.

Clear standards enable us to progress projects with confidence; unclear standards discourage investment. SSE strongly believe in playing our part by contributing to the social, environmental and economic well-being of communities surrounding all of our wind farms and operate community benefit funds for all 29 of our wind farms in Ireland. To date, we have given over €6.5m to community projects close to our wind farms across the country.

Offshore wind

Integrated land and sea planning is also critical. We believe offshore wind in particular presents a significant opportunity for Co. Wicklow and the East Coast as conditions in the Irish Sea are particularly conducive to fixed-bottom offshore wind turbines. SSE is currently progressing the development of Arklow Bank Wind Park Phase 2, a consented offshore windfarm of up to 800MW off the coast of Arklow, Co. Wicklow. The wind park is ideally located to feed large energy demand centres along the East Coast.

SSE recently completed the construction of 588MW Beatrice Offshore Wind Farm off the coast of Scotland. The construction of the offshore wind farm has delivered significant local economic benefits including increased local spend in the region during construction, hotel use particularly during the winter months and a significant uplift in income and employment. There was gross average of 890 people employed during the construction phase as well as sustained operations roles. In addition, the project represents a £2.6bn investment which is expected to add £1.13bn to UK GDP³. We aim to bring the benefits of offshore wind, such as these, to County Wicklow with our proposed development at Arklow Bank Wind Park.

An offshore wind industry in Ireland can deliver sustained economic benefits to County Wicklow while contributing to the decarbonisation of the Irish economy. SSE will invest between €1bn and €2bn in capital investment to develop the project which could generate around 1.75TWh annually. In Great Britain, it has been estimated that every 1GW of offshore wind capacity installed delivers an economic boost of €2bn to the economy⁴. SSE estimates that a development on the scale of Arklow Bank Wind Park could sustain around 80 operation and maintenance (O&M) jobs once the project moves to its operational phase. Typically, this could involve a range of companies within the O&M supply chain, including vessel services, wind turbine technicians, fuel, technical inputs, and loading and unloading of project cargoes. Arklow Bank Wind Park will also bring benefits to the county in the form of increased commercial rates.

EMRA RPOs 6.19 and 7.1 and the National Marine Planning Framework seek to ensure consistency and alignment between land and ocean-based planning. SSE believe this should be clearly reflected in Wicklow’s County Development Plan as offshore wind development requires the construction of enabling onshore infrastructure such as substations, port/harbour and grid infrastructure which need to be taken account of. In order to facilitate the expansion of offshore wind generation the grid itself will require development and expansion. It’s important that these strategic pieces of infrastructure are protected from inappropriate development in the surrounding area and their scope for further development and interconnection is maintained and facilitated by Wicklow County Council.

Port infrastructure will also need to be upgraded to facilitate offshore wind development. This has the potential to stimulate new employment, investment opportunities and supply chain development. The operation and maintenance for Arklow Bank Wind Park Phase 2 will be located in either Arklow Harbour or Wicklow Port. Given the anticipated

scale of investment in Phase 2 there will be a significant level of personnel and support services to support the wind farm. SSE is assessing location options for the new base which will result in targeted investment in the early 2020’s. Given the scale of investment in offshore wind it is expected that the socio-economic benefits will not be restricted to the chosen port and that there will also be further benefits and opportunities for areas and towns all along the Wicklow coastline.

Energy efficiency and the electrification of heat

SSE believes that energy efficiency should be seen as a critical infrastructure priority in Wicklow’s County Development Plan. Energy efficiency not only helps Ireland achieve its climate action objectives, it also reduces energy bills and improves health and social inclusion. The Climate Action Plan contains ambitious plans to improve energy efficiency and drive the electrification of Ireland’s housing stock with 500,000 deep retrofits. Meeting our EU obligations and the ambition set out in the Climate Action Plan will require the establishment of a new delivery model. ‘A very significant scaling up of effort, capacity, investment and engagement’ will be needed to deliver our energy efficiency goals as acknowledged in Ireland’s draft National Energy and Climate Plan.

SSE believes that the electrification of heat has a significant role to play in realising Ireland’s decarbonisation potential and reducing air pollution. We welcome the ambitious plans for heat pump installation in the Climate Action Plan. The on-going decarbonisation of electricity supply and recent innovations in electricity based renewable technologies including air source pumps, make electricity an attractive option as the clean, low carbon energy choice for heating.

A partnership approach and continued collaboration between energy suppliers, the SEAI and local authorities will be vital given the scale of energy savings required in the next decade. SSE are proud of the work we have undertaken with Local Authorities to date and look forward to continuing this as part the ‘one-stop-shop’ to energy efficiency being developed. SSE believe Wicklow’s County Development Plan should reflect Action 64 in the Climate Action Plan which seeks to introduce minimum BER standards in the Local Authority social housing stock as part of retrofit works being carried out on older stock or refurbishment of vacant dwelling.

Electrification of transport

Transport as a sector is one of the significant contributors to our national Green House Gas (GHG) emissions. The need to transition to a low carbon society by reducing transport usage and move to lower carbon options is a key aspect of Ireland’s response to climate change. SSE welcomes the ambition to have one million Electric Vehicles on Ireland’s roads by 2030. Spatial planning will be critical to achieving this. Funding for the deployment of targeted electric vehicle charging infrastructure across the region will be vital to meet the changing needs of commuters with particular emphasis in public parking areas and employment locations.

Conclusion

The Wicklow County Development Plan is an opportunity to define the focus of future investments in the County and to ensure that employment opportunities and the services needed to support them will be delivered. The implementation of Project Ireland 2040 and the Climate Action Plan will deliver a long-term strategic planning and economic framework for the development of the County.

SSE is available to discuss any aspect of our response if helpful to Wicklow County Council.

Response of Chief Executive

Regional Spatial and Economic Strategy (RSES)

The Midlands East Regional Assembly has identified climate action as a key principle of the RSES with 16 climate action Regional Strategic Outcomes (RSOs) described in the strategy which align to those identified in the NPF and the UN’s Sustainable Development Goals. These objectives of the RSES will be reflected in Wicklow’s County Development Plan.

RPO 7.36 refers specifically to wind energy:

RPO 7.36: *Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to ‘Wind Energy Development’ and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions.*

National Marine Planning Framework

The draft National Marine Planning Framework (NMPF) was published in November 2019. The Wicklow County Development Plan will underpin the objectives of the NMPF. Section 11 of this framework covers the area of Energy – Offshore Renewable Energy with the following draft policies relevant to wind energy.

ORE Policy 1 *Proposals that assist the State in meeting the Government’s target of generating at least 3.5GW of offshore renewable electricity by 2030 and proposals that maximise the longterm shift from use of fossil fuels to renewable electricity, in line with decarbonisation targets should be supported.*

ORE Policy 2 *Preference will be given to proposals for offshore wind farms, including relevant enabling projects and infrastructure, in areas identified as designated zones for offshore wind, under the zoning process set out in the Marine Planning and Development Management Act. (The draft NMPF does not set out spatial designations. Arrangements are being made to include provisions in the Marine Planning and Development Management Bill to provide for a system of designation of Strategic Marine Activity Zones.)*

ORE Policy 3 *Any non-ORE proposals that are in or could affect sites held under a permission or that are subject to an ongoing permitting or consenting process for renewable energy generation (wind, wave or tidal should demonstrate that they will in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts, d) if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.*

ORE Policy 6 *Proposals for infrastructure enabling local use of excess electricity generated from emerging marine technologies (wave, tidal, floating wind) should be supported.*

Zoning for Renewable Energy

With regard to zoning areas for renewable energy, to either encourage or to not constrain any areas which may have renewable energy potential, the Wicklow County Development Plan does not zone areas for renewable energy. Through the written objectives of the county plan, renewable energy production is facilitated and encourage at the appropriate location subject to proper planning.

The wind energy strategy provides a map showing areas of wind energy potential with the county designated into one of 3 areas, ‘not favoured’, ‘less favoured’ and ‘most favoured’. This is similar to the IWEAs ‘No-Go’, ‘Open to Consideration’, and ‘Preferred’ Areas’ suggestion. The areas ‘not favoured’ are designated so as having regard to the high amenity and heritage value of this area and the areas ‘less favoured’ are designated so as these areas display some sensitivities, but may still include areas that are suitable. The designations are in line with national Government guidance from the Wind Energy Guidelines of 2006 where it is recommended to produce a map showing the areas where wind energy developments would be ‘acceptable in principle’, where they would be ‘open for consideration’, and where they would be ‘not normally permissible’.

Draft Wind Energy Development Guidelines 2019

Draft Wind Energy Development Guidelines 2019 have been published and any revisions to the existing wind energy strategy required on foot of the final document will be made during this plan process.

As part of the first stage to identify suitable locations for wind energy development in development plans, the draft guidelines recommend the use of the SEAI’s online ‘wind mapping system’ which identifies wind speeds and directions across the country (the wind atlas). The guidelines state *“Assess the areas of wind potential ranging from areas with extensive wind energy resources to lesser wind resources using SEAI’s Wind Atlas for Ireland. This wind mapping tool provides detailed information on wind speeds, direction, electricity transmission and distribution networks for specific locations around Ireland at national and county levels.”*

The Irish Wind Energy Association, Innogy Renewables Ireland Ltd and Coillte suggests **not** using the SEAI’s Wind Atlas, as it is felt that technology is advancing to show that wind strength is not as important a requirement as it was previously; however this is recommended in the draft Wind Energy Guidelines and it is a requirement that the Local Authority follow the recommendations of the guidelines. Therefore in the crafting of the wind energy strategy, the guidelines will be used unless otherwise advised by Government policy. It is important to note that the Guidelines are in draft format and if there are changes in the final Guidelines to reduce the importance of the Wind Atlas, this will be reflected in the Wicklow Wind Energy Strategy.

Landscape Character Assessment

The IWEAs suggestion to continue to categorise our Landscape Character Assessment into the ‘Low’, ‘Medium’, and ‘High’ scaling range is noted.

Innogy Renewables Ireland Ltd would encourage WCC to discontinue the current position of placing landscape classification above all other criteria. Using the landscape classification is the requirement of the current Wind Energy Guidelines, hence the use of the landscape classifications in our current Wind Energy Strategy.

The draft Guidelines proposes a ‘sieve mapping process’ to be undertaken with a step by step guide to analyze suitable areas for wind energy. It is stated that this will *“assist planning authorities to identify, on development plan maps, key areas where there are good wind energy resources capable of exploitation in a manner consistent with proper planning and sustainable development. A key component of the sieve mapping process relies on the undertaking of landscape character assessment and sensitivity analysis. A Landscape Character Assessment (LCA) is recommended by the guidelines. This ordered approach involves a sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development.”*

Wicklow County Council will undertake the review of the wind energy strategy in line with the relevant approved Wind Energy Guidelines. However, there is no intention to review the current LCA as this underwent a major review for the last County Development Plan and is considered robust.

Local Renewable Energy Strategy

The need for a Local Renewable Energy Strategy to be included in the county plan is raised in a number of submissions. The existing county plan includes a wide range of objectives on renewable energy and in effect it is considered that these in combination espouse a clear strategy. However, these objectives will be reviewed and updated where necessary in the new draft plan.

Objective 9.1 of the Wicklow Local Economic and Community Plan is to “*Support the development of renewable energy and a low energy future for Wicklow*” with Action 1 of this to “*Prepare a Wicklow County (climate change) Adaptation Strategy to include a renewable energy strategy*”. The Wicklow Climate Change Adaptation Strategy, which addresses how Wicklow County as an organisation responds to the impacts of Climate Change, was adopted in September 2019

The SEAls Methodology for Local Authority Renewable Energy Strategies is noted.

RPO 7.35 of the RSES states that: *EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.*

Wicklow County Council will work closely with the RSES in the crafting of these zones and any regional landscape strategy.

Sensitivity Mapping Tool

The availability of the Birdwatch Ireland sensitivity mapping tool as a GIS pre-planning tool is noted. The tool is also identified in the Draft Wind Energy Guidelines (December 2019). The wind strategy for Wicklow will be reviewed in accordance with the ministerial guidelines when adopted. The use of the tool in the development management decision making process is noted.

The soon to be completed marine bird sensitivity mapping tool is noted.

Natural Gas

The extension of the natural gas network throughout the county is facilitated by the existing county plan and such issues will be retained in the new plan.

Housing

The current county plan fully supports and encourages the use of renewable energy heating / electrical systems in new housing or in retrofitting any housing (including social housing) and these provisions shall be retained and enhanced where necessary in the new plan.

It is a matter for the Housing Department of WCC, as part of the drafting of the Energy Plan/Energy Performance Strategy for Wicklow County Council in consultation with the Wicklow County Council Climate Action Team to allocate resources and carry out such works.

The affordability of energy smart homes is not an issue that the county plan deals with. This is a matter for the National Government through their national housing plans.

The introduction of a minimum BER standards in the Local Authority social housing stock as part of retrofit works being carried out on older stock or refurbishment of vacant dwelling is a matter for the Housing Department of WCC.

Electric car charging points

The current County Development Plan requires the provision of EV charging points in new developments. However, national standards in this regard are likely to increase, with the Government initiating public consultation on new Regulations in December 2019, which would require:

Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Ensure the installation of at least 1 recharging point. Ensure the installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Ensure the installation of ducting infrastructure for every parking space within property boundary.
New (single-unit residential) buildings	New dwelling with car parking space located within the property boundary.	Installation of recharging points for electric vehicles.
Certain existing (non-residential) buildings	All non-residential buildings with more than 20 parking spaces within property boundary.	Ensure the installation of at least one recharging point by 2025.

It is recommended that the new County Development Plan provides for enhanced standards along these lines but with the additional requirement that at least 1 charging point (not just ducting) be provided in any multi unit residential building car park (regardless of number of car parking spaces) and thereafter 1 charging point for every 10 spaces.

Keep Ireland Open

Keep Ireland Open’s submission provides a lengthy and detailed submission on a significant number of the existing objectives and topics contained in the 2016-2022 County Development Plan. The submission makes numerous alternative or additional wording suggestions for the majority of the objectives. This stage of the plan review process is more ‘Strategic’ in nature, and the development of specific objectives will follow once the overall strategy and key aims of the plan are agreed.

A review of the detailed policies, objectives and development standards contained in the plan shall occur as part of the plan making process, and all suggestions for new policies or existing policy amendments will be given due consideration. In this regard it should be noted that particular care will need to be taken to ensure that policies and objectives are appropriate, rational, reasonable, have a basis in Government policy and are legally sound.

With regard to energy and communications, a number of wording suggestions are put forward in relation to the following topics: Telecommunications, Electricity Generation, Wind Energy, Solar Energy, Hydro Energy, Small Scale Renewable Electricity & Transmission and Distribution. The existing County Development Plan contains objectives which relate to all of these themes. It is intended that the new County Development Plan will update and strengthen these existing objectives taking the contents of this submission and any new national policy and guidelines into consideration during this process.

Small Scale Energy Production

The current plan supports small scale energy production. Such objectives will be carried through to the new draft plan and enhanced if necessary.

National Grid

Issues around connecting to and the capacity of the National Grid are not within the remit of the plan.

Broadband

The current county plan facilitates the land use aspects of the National Broadband Plan and the role out of broadband throughout the county.

Recommendations of Chief Executive

1. The new County Development Plan shall be drafted to be consistent with the provisions of the Regional Spatial and Economic Strategy.
2. To ensure consistency and alignment between land and marine based planning with particular reference to the (draft) National Marine Planning Framework.
3. To update the Wind Energy Strategy in line with the new guidelines (if adopted prior to the publication of the draft CDP).
4. To retain existing policy support for the development of renewable energy developments at appropriate locations.
5. To retain and enhance existing policy support and requirements in new developments for the development of electric vehicles charging points.
6. To update and strengthen the objectives of the existing County Development Plan. In this regard consideration shall be given, as appropriate, to the suggestions/amendments proposed in Keep Ireland Open’s (C16) submission in relation to the wording of policies/objectives and development standards where applicable to a County Development Plan.
7. To retain and enhance existing policy support for the development of broadband throughout the county.

Part 4.3.9 Community and Open Space

Name	Issue Raised
Ashford Development Association (C1)	The open space requirements should be expanded in rural settings.
Wicklow PPN (C2)	<ul style="list-style-type: none"> • Communities must be enabled to look after themselves and each other. This means developing and maintaining local facilities and services as much as possible and where services cannot be accessed locally there needs to be complete accessibility and connectivity. • Need community centres like Kiltegan. • Better facilities on sites for members of the Travelling Community. • Green play spaces for children. • Doorstep recreation opportunities in every village. • More space for Men’s Sheds. • Youth cafes, no name clubs, community area with several rooms for activities, upcycling centres. • Home care packages inaccessible to those living in rural areas. • Funding to maintain community facilities. • Domestic violence shelters needed. • Affordable childcare.
West Wicklow Environmental Network (C7)	<ul style="list-style-type: none"> • Public open space taken in charge by the Council should be better managed with biodiversity in mind i.e. creating bee-friendly areas, planting native flowers suitable for bees. • They should, where possible, always keep trees as they are vital in providing and supporting habitat for insects and birds. Not cutting existing mature trees can be more beneficial to the environment than planting new trees or shrubs and this should be recognised now before contracts are given for tree maintenance and constant cutting. • All unused Council land can and should be given back to nature. Wicklow has an opportunity to lead the way with this initiative. The ‘All Ireland Pollinator Plan’ is a great start but in a ‘biodiversity emergency’ it needs to go a step further. • Request that the Council start with the non-profit ‘We are the Ark’. The time has come to move away from garden centre ornamental plants, to stop using herbicides and pesticides and to start to give this land back to nature. Any council land given over to this cause will need its sign saying ‘This is an Ark’ with the website details underneath for people who are curious. • The Council should consider providing allotments in built-up areas for residents.
Newtownmountkennedy Community Forum (C11)	<ul style="list-style-type: none"> • CDP should include a phasing scheme so that development is phased in line with community facilities, infrastructure and services. • Current CDP contains a list of community amenities considered necessary for different sized settlements. There appears to be no requirement to provide these amenities before development proceeds. • Development should be phased along with the necessary amenities. • Community facilities should be clustered together and located as centrally as possible. • Open space standards are not adequate to accommodate the needs of residents. • Development contributions for community use and a percentage of the LPT should be ringfenced for community and recreational facilities. The community can apply for match funding. A fully transparent statement of account should be made available at year end.
Community Pool	<ul style="list-style-type: none"> • Baltinglass MD is the only district in Wicklow without a swimming pool.

<p>for West Wicklow (C12)</p>	<ul style="list-style-type: none"> • According to Census 2016, the MD has a population of 26,167 which is similar in size to the other districts. • Residents of west Wicklow must travel outside the County to access swimming facilities. • The Community Facilities Hierarchy (Section 8.2 of the CDP) indicates that a swimming pool is a necessary part of the infrastructure for a level two settlement with a population range between 7,000 and 15,000. Blessington has a population of 5,500. Taking into account the surrounding villages, Blessington would meet the criteria for a swimming pool. • The submission sets out a detailed justification for a swimming pool having regard to benefits associated with education, sport, health, local economy and safety. • The people of West Wicklow have been campaigning for a pool for over 50 years. • Water Safety Ireland carries our lifesaving training on Blessington Lakes during the summer and has indicated that a community pool in the area would enable them to carry out lifesaving training during the winter months. • There is a lot of public support for a pool. Approximately 49 letters of support have been submitted as part of the submission. • Recommend the inclusion of a swimming pool in West Wicklow in the new development plan.
<p>Blessington Allotments Campaign (C15)</p>	<ul style="list-style-type: none"> • Legislation for allotments passed in 1926, Acquisition of Land (Allotments) Act, 1926. • Local Government Act 2001 and the Planning and Development Act 2010 cover the provisions of allotments. • Over 40 members of the Blessington community have registered their interest with the Blessington Allotment campaign. • Allotments are good for people, families, the environment, pollinators and the climate. • The submission details the many benefits to having allotments including community benefits, mental and physical health, social inclusiveness, climate change, biodiversity, food poverty, food sustainability, diet and nutrition, all Ireland pollinator plan. • The fee for allotments should be affordable and provision should be made for those on limited incomes. • The location of allotments should be close to the town centre. • Expansion opportunity in the future should be accounted for. • Details on the design and management of allotments is provided. • Allotments should be provided in every community in County Wicklow. • Chapter 8 should be updated to provide for the following. <i>The Council should adopt a strategy for allotments and an official policy for allotments. The Council should acknowledge the many benefits of allotments and should encourage local communities to make use of allotments. The Council should celebrate the next European Day of Sustainable Communities by increasing the number of allotments in the County.</i>
<p>Delgany Community Council (C19)</p>	<ul style="list-style-type: none"> • The way in which audits of available childcare places is conducted needs to be reviewed. There is a need to examine the impact of cumulative development on local provision as there are instances of multiple, phased development that may be planned to circumvent the need for providing a childcare facility. • All new development should be landscaped with biodiversity and natural play spaces in mind. This is particularly important if density standards increase and rear garden sizes reduce. • Access to local amenities for the elderly and persons with disabilities should be provided.

	<ul style="list-style-type: none"> Residential and daycare facilities for persons with dementia are very limited and are not secure. This needs to be addressed. There is a delay in the provision of educational facilities. Need to ensure that sites zoned for education are passed to the Department of Education as early as possible to avoid unnecessary delays. Underprovision of early years education. Most Wicklow students commute to Dublin for third level education. Public transport connections need to be improved. Alternative learning facilities for young people not attending school should be provided. In terms of open space, developer should be required to set aside an area of land as part of any planning application in the vicinity.
Blessington & District Forum (C28)	<ul style="list-style-type: none"> Ensure sufficient land in appropriate locations is zoned for social and community needs. Promote the shared use of educational and community facilities. Planning should consider the needs of everyone including children, people with disabilities and the elderly by promoting universal accessibility in all community facilities. Ensure that community buildings are flexible and adaptable and can be used by all age cohorts. Promote social inclusion through equality of access to services and facilities and assist in the removal of barriers. Support and encourage communities in the restoration of community halls / centres, thereby facilitating a greater level of social and community inclusion. Planning should participate in a multiagency approach to deliver adequate services in West Wicklow.
James Scott (D7)	<ul style="list-style-type: none"> Wicklow has not been proactive in the provision of allotments. This Plan presents an opportunity to address this. Some people think of Wicklow as rural in nature and not needing allotment gardens but this is far from the case. High density town and village developments are generating unmet demand for spaces in which communities and individuals can grow their own food in close proximity to their homes. Greenfield developments should provide a portion of their space for allotment gardens and the county should adopt a policy to develop allotments on a per-capita basis. These spaces have extremely positive knock-on effects on health and well-being and can mitigate against unemployment or under-employment.
Keith Scanlon (D12)	<ul style="list-style-type: none"> Ensure high density housing has good access to well designed public open space. Temporarily vacant units should be given over to community use.
Eleanor O’Farrell (D13)	Ensure high density housing has good access to well designed public open space.
Dr. Igor Cusack (D14)	<ul style="list-style-type: none"> The Council should insist that private developers provide sufficient tree and bush planting, adequate non-paved gardens and allotment space. There should be an effort to increase open space in towns. The Council should consider establishing the equivalent of a Parks Department to encourage a focus on biodiversity in housing developments.
Yasmin Fortune (D15)	Prioritise the construction of sustainable schools of exceptional quality.
Ann Scanlon (D17)	Ensure high density housing has good access to well designed public open space.
Patricia Ryan	Ensure high density housing has good access to well designed public open space.

(D18)	
Tina Roche (D19)	Ensure high density housing has good access to well designed public open space.
Kathleen Snell (D20)	Need to think about graveyards, crematoriums and facilitating environmental funerals.
Tessa Stewart (D26)	<ul style="list-style-type: none"> • Ensure high density housing has good access to well designed public open space. • Temporarily vacant units should be given over to community use.
Noreen Keville (D28)	Ensure high density housing has good access to well designed public open space.
Ann Teehan (D29)	Ensure high density housing has good access to well designed public open space.
Isobel Connolly (D32)	Ensure high density housing has good access to well designed public open space.
Alison Ryan (D34)	Ensure high density housing has good access to well designed public open space.
Sinead Wallace (D35)	<ul style="list-style-type: none"> • Ensure high density housing has good access to well designed public open space with allotment space for each residential unit. • Require all residential developments to have allotments.
Adam Calihman (D38)	<ul style="list-style-type: none"> • Improved availability of local health services, clinics and hospitals. • Improved parks and recreation management, amenities and infrastructure. More public parks and spaces. • University in Co. Wicklow.
Rosa Murray (D43)	<ul style="list-style-type: none"> • Increase respite and care centres. • Prioritise and increase funding for animal rescue shelters. A larger pound with a vet in residence and greater focus on rehoming is needed.
Nicola Kenny (D45)	<ul style="list-style-type: none"> • The delivery of new sports and other outdoor community facilities will not happen if the Council and developer continue to build on suitable spaces. • New housing developments must include more open space to benefit children.
Art O’Laoghaire (D48)	Require all residential developments to have allotments in order to reduce carbon footprint.
Billy Timmons (D49)	Graveyard policy should permit the purchase of double and treble graves.
Disability Federation of Ireland (D51)	<ul style="list-style-type: none"> • Multi-use community facilities should be encouraged. This would provide greater opportunity for persons with disabilities to participate in mainstream sports clubs and groups. • The development of accessible multi-use facilities and accessible playgrounds should be supported by the Council. • People with disabilities should also have the opportunity to participate in disability-specific sports in the County.
Michael Hayden (D56)	<ul style="list-style-type: none"> • The County Development Plan should identify the infrastructure needed for specific population sizes as in the previous plan. • For example, a town the size of Greystones, the second largest in the county (Census 2016) should have a Multi-purpose Community Resource Centre, which has not been delivered in the life of the previous plan. A strategy should be put in place to ensure that the infrastructure is delivered rather than simply listed. This is even more urgent, with the continuing expansion of the population in the greater Greystones district since 2016. • There is an onus on the County Development Plan to ensure that land use is strategically managed in such a way that it promotes equity across social groups in terms of access to community infrastructure and services. This includes equality proofing planning, housing, infrastructure and economic development. All socio-economic development in the County should be guided by community development principles. • Communities need to find more and new ways of developing social outlets which

	<p>bring people together and reduce isolation. This means developing and maintaining local facilities and services as much as possible. These spaces must be accessible to all hence transport and affordability must be factored into development.</p> <ul style="list-style-type: none"> • The plan should include a focus on the use of primary and secondary school buildings for community use, particularly since many families in localities have fundraised and paid for their development/upkeep. • The plan should incorporate policies which fully support the ongoing improvement in the provision of Community Facilities, Education, Childcare, Arts and Culture and facilitates and complements the implementation of the forthcoming Local Economic and Community Plan. • The plan should facilitate the maintenance, restoration and upgrading of cultural and natural heritage of communities, environmental upgrading and general actions to enhance the environmental, amenity and physical attributes of communities. • Community facilities should be integrated with environmental and cultural amenities to provide a more strategic and cohesive approach to community development in the county. • The county development plan can support accessible arts in the community by continuing support for and increasing resources to the voluntary and community sector for art and culture initiatives. • The County Development Plan should continue to include high level goals to ensure the provision of adequate community and social infrastructure as well as providing open space for recreation, environmental and civic benefits. The Greystones Family Resource Centre and multiuse community space should be considered a core part of support infrastructure in the county and should be provided with adequate space and resources to contribute to continued sustainability and community development in the county.
<p>Annette Vaucanson Kelly (D61)</p>	<p>Ensure high density housing has good access to well designed public open space.</p>
<p>Edel Corcoran (D65)</p>	<p>Please define and measure community and ecosystem wellbeing.</p>
<p>Ciara King (D79)</p>	<ul style="list-style-type: none"> • Plan for new sports, recreational, community and other support infrastructure - including active recreational space for children - as an integral part of any major housing proposal. • Ensure that development levies are used to improve this vital infrastructure in the area where the development takes place.
<p>Lorraine Ni Fhlannagain (D93)</p>	<p>Request for Parks for Older people. A play park - same as a kids playground - but built for older people (or a combination) - one where grandparents can play with grand children. The request is not for exercise facilities such as those on Bray Seafront.</p>
<p>KRA Visionary Project Partners (D95)</p>	<ul style="list-style-type: none"> • Ensure high density housing has good access to well designed public open space in addition to areas left to wild and revert to their natural state. • Include guidelines for community gardens / allotments in towns and villages.

Response of Chief Executive

Community and Social Infrastructure

Community and social infrastructure is recognised as a fundamental element in creating resilient, sustainable and healthy communities. The County Development Plan will include objectives to support the delivery of community facilities and social infrastructure and will ensure that adequate land is identified in settlements for community facilities. As per Section 8.2 of the current plan the County Development Plan facilitates the delivery of community infrastructure through:

- *‘The reservation of land for the development of new or enhanced social and community infrastructure in County and local development plans;*
- *Managing the expansion of residential development commensurate with the community infrastructure available;*
- *Requiring the delivery of new community infrastructure as part of development proposals; and*
- *Co-operating with other services providers in the delivery of new infrastructure’.*

The delivery of community facilities including community centres, men’s sheds, youth clubs etc is outside the remit of the County Development Plan. This is more appropriately addressed in the County’s *Local Economic and Community Plan (LECP) 2016 – 2022* which supports and promotes community development and contains goals, objectives and for the delivery of the community development.

The current county development plan includes a community facilities hierarchy model. This is *‘a list of social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal’.* The development plan provides that *‘where a new significant residential or mixed used development is proposed, the Planning Authority may require certain social and community facilities to be provided as part of the proposed development and/or may require a special financial contribution to be made to contribute to the development of such facilities’.*

CDS *Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.*

It is considered necessary to continue this policy in the new development plan to facilitate the delivery of community and social infrastructure aligned with new residential development.

The Planning Authority agrees with the submission that community facilities should be suitably located within the development limits of the relevant settlement and should be easily accessible for all sections of the community. It is considered that the development plan would benefit from such an objective.

Funding for Community Facilities and Amenities

The Annual Budget establishes the budgeted expenditure and income for the coming year for the County Council. The County Council determines its own spending priorities in the context of the

annual budgetary process having regard to both locally identified needs and available resources. The County Development Plan is not the Council’s operational or spending plan. Annual delivery programmes and budgetary allocations determine the delivery of community facilities and open space.

Multi-use of Community Buildings

The multi-use of new community buildings is required by the current development plan.

CD32 *New community buildings / facilities shall be designed to facilitate a wide range of uses including active uses (e.g. basketball, badminton, gymnastics / dance, martial arts etc), meeting / club use and the operation of youth clubs and youth services.*

This policy should be retained and strengthened if necessary. It is considered that a review of the policy should consider amending the wording to require that any such building is universally accessible.

Childcare

Childcare facilities are integral to economic and social wellbeing. Wicklow County Childcare Committee was formed in 2001 and is funded by the Department of Children and Youth Affairs to improve the quality and quantity of childcare in Co. Wicklow. In 2001, the DoEHLG published Childcare Facilities: Guidelines for Planning Authorities, which require the provision of 20 childcare places for every new 75 housing units. The current development plan includes the following policies with regard to childcare:

CD22 *To facilitate the provision of childcare in a manner which is compatible with land-use and transportation policies and adheres to the principles of sustainable development.*

CD23 *To facilitate the provision of a network of childcare facilities that reflects the distribution of the residential population in the County, in order to minimise travel distance and maximise opportunities for disadvantaged communities.*

CD24 *Where considered necessary by the Planning Authority, to require the provision of childcare facilities in all residential developments comprising 75 houses or more (including local authority and social housing schemes). In accordance with Department of Environment, Heritage & Local Government guidelines, childcare places shall be provided at a ratio of 20 places per 75 residential units, having regard to cumulative effects of permitted development, (unless it can be demonstrated that having regard to the existing geographic distribution of childcare facilities and the emerging demographic profile of the area that this level of childcare facilities is not required). Without substantial cause, it is the policy of the Planning Authority not to allow a change of use of these premises within five years.*

These policies will be reviewed and strengthened where necessary. Apart from ensuring that adequate land is available for childcare facilities and implementing the childcare guidelines, it is not within the remit of the County Development Plan to influence the cost of childcare.

Education

The Department of Education and Skills (DES) is responsible for the delivery of educational facilities and services. Through the County Development Plan and local area plans, the Council must ensure that adequate serviced or serviceable land is available to meet current and future requirements.

Specific sites may be reserved in local plans. However, it is considered important that education and related uses should be favourably considered within a variety of land-use zoning categories, thereby ensuring sufficient flexibility to accommodate future needs. The RSES notes that schools need to be located along sustainable transport corridors (i.e. walking, cycling, public transport). The current plan includes the following policies:

CD6 *To facilitate the provision of schools by zoning suitable lands in local plans capable of meeting the demands of the projected populations. Prior to the identification of lands for primary and secondary school provision the Planning Authority shall consult with the Forward Planning and Site Acquisition and Management sections of the Department of Education.*

CD7 *Where lands are zoned for educational use, to facilitate the development of facilities that provide for linkages between schools types. For example, particular encouragement will be given to primary and secondary school campuses, the linking of pre-school services with primary schools and the linking of secondary schools with vocational training facilities.*

RPO 9.21 in the RSES states that ‘where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations’. It is considered that a new objective should be included in the development plan to give effect to RPO 9.21.

The Council will continue to work with the DES with regard to the provision of schools. The community use of school buildings is a matter to be agreed between the schools / Department of Education and Skills and the local community.

Healthcare

The provision of new healthcare facilities is a matter for the HSE. RPO 9.23 in the RSES states ‘Facilitate the development of primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with RSES settlement strategy and core strategies of development plans’. The Draft Plan will continue to support the development of health care facilities at appropriate locations in accordance with RPO 9.23.

Open Space

The current development plan recognises that the delivery of new sports and other outdoor community facilities and spaces is dependent on adequate ‘open space’ being reserved and developed. The plan distinguishes between the different types of open space including residential open space (open space provided as part of housing developments), active open space, passive open space and allotments. The current plan includes the following open space objectives:

CD42 *Through the local plan process to designate suitable open space in all settlements, commensurate with its needs and existing facilities, in accordance with the provisions of the Wicklow County Council Play, Sport & Recreation and Active Open Space policies.*

CD43 *To require open space to be provided in tandem with new residential development (in accordance with the standards set out in the Development & Design Standards Appendix)*

CD31 *All new neighbourhood parks or active open space zones shall include a ‘mixed use games area’ (MUGA) of an appropriate size and nature to be determined in, pre-consultation with the Community, Cultural & Social Development Office of Wicklow County Council.*

The Development and Design Standards (Appendix 1 of the current CDP) sets out the minimum standards for open space.

‘In accordance with the Planning Authority’s Active Open Space Policy, active open space shall be required as a rate of 2.4ha per 1,000 population divided into:

- 1.6ha outdoor play space (pitches, courts, sports grounds)
- 0.6ha casual play spaces (parks)
- 0.2ha equipped play space (playgrounds and MUGAs)

Normally, public AOS in accordance with this standard will be zoned through the local plan process and individual development will be required to either deliver some or all of the space required (through an action area agreement) or via development levies. However, where such provision has not been made in a local plan, any application or Action Area Plan which would result in a resident population of 1,000 or more, compliance with this standard will be required’.

The Development and Design standards also include detail on the location, siting and design of open space facilities. These standards apply to the whole county.

The RSES requires Local Authorities to follow the following *Guiding Principles* in planning for recreation and open space:

Facilitate a sufficient supply of good quality sports and recreation facilities, including networks for walking, cycling and other activities and shall maximise the multiple use of such facilities by encouraging the co-location of services between sports providers, schools, colleges and other community facilities.

- *Support play policies to address the play and recreation needs of children and young people and ensure the integration of play provision and child-friendly neighbourhoods.*
- *Provide for the development of dedicated youth spaces in key urban areas and the development of multi-function spaces in smaller communities / rural areas.*

RPO 9.17: *To support local authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region.*

The policies and design standards for open space will be reviewed and strengthened where possible. The emphasis on the quality of open space areas should be strengthened. The delivery of open space facilities including parks and playgrounds is dependent on financial resources.

Children’s Play Areas

Wicklow County Council’s Play Policy informs the facilitation and delivery of play facilities in the County. The Play Policy recognised that *‘Play is not just about the provision of facilities. It is also about creating the conditions that facilitate children’s play not only in playgrounds but in the wider environment. In addition facilities for children’s play do not always have to consist solely of the traditional playground equipment – they can be an interesting and natural environment with features such as a sensory garden, bushes, an interestingly placed tree trunk’.* The current development plan includes the following policy:

CD26 *To facilitate opportunities for play and support the implementation of the Wicklow County Council Play Policy and its objectives, including the collection of development levies.*

CD27 *In all new residential development in excess of 50 units, where considered necessary by the Planning Authority, the developer shall provide, in the residential public open space area, a dedicated children’s play area, of a type and with such features to be determined following consultation with Community, Cultural & Social Development Office of Wicklow County Council.*

The location of any such proposal shall be situated within a centrally located area capable of being passively supervised by surrounding developments.

CD28 *All new estates, streets, open spaces/parks and community facilities shall be designed with the needs and safety of children as a priority.*

These objectives will be reviewed and strengthened where necessary.

Biodiversity & Open Space

Biodiversity is the variety of living things around us, from mammals and birds to plants and microbes, and the habitats they live in. It includes but is not limited to wildlife as the latter is often thought to refer to animals only. The issue of biodiversity is addressed in detail in **Part 4.3.11** of this report. In addition, the Development and Design Standards include a section on landscaping of open space. However, it is considered that the development plan would benefit from an objective to encourage greater consideration for biodiversity in the design, layout and planting of open space areas. Additional detail could be included in the Development & Design Standards. This will be guided by the Heritage & Biodiversity Plan and any advice or recommendations from the Climate Change and Biodiversity SPC.

Allotments

The submissions raise two elements in terms of allotments – public allotments provided by the Council and private allotments provided by developers as part of housing developments. The current County Development Plan supports and facilitates the development of allotments by either route.

Objective D45 states *‘To facilitate the development of allotments of an appropriate scale on lands which meet the following criteria:*

- *Lands situated within or immediately adjacent to the edge of towns/villages;*
- *lands that are easily accessible to the residents of a particular town or village;*
- *where an adequate water supply can be provided;*
- *where adequate road infrastructure and access exists/can be provided;*
- *and where adequate parking facilities can be provided’.*

It is considered that this objective should be retained in the new development plan to facilitate allotments.

The current County Development Plan does not generally promote the delivery of allotments as part of the public open space in new residential development – such lands are intended to be used by all residents of a new development and therefore it is not appropriate to reserve what would have to be large proportion of the open space for one group of users only.

Burial Facilities and Crematoriums

The need for burial facilities is addressed in the local plans. Land may be zoned or specific sites identified where the need arises.

Recommendations of Chief Executive

1. Review the objectives of the Chapter on ‘Community and Open space’ in accordance with national policy and guidelines and strengthen where necessary.

2. Include an objective requiring that community facilities are appropriately located in towns and villages and are easily accessible for all sections of the community.
3. Amend Policy CD32 to require that new community buildings / facilities shall be designed to be universally accessible.
4. Include an objective to give effect to RPO 9.21 in the RSES *'in areas where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations'*.
5. Review and update the policies and design standards for open space having regard to the *RSES Guiding Principles* in planning for recreation and open space:
6. Having regard to RPO 9.17, include an objective to support the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region.
7. Include a new objective to encourage greater consideration for biodiversity in the design, layout and planting of open space areas. Additional detail should also be included in the Development & Design Standards.
8. Include an objective to give effect to RPO 9.23 in the RSES which states *'Facilitate the development of primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with RSES settlement strategy and core strategies of development plans'*.

Part 4.3.10 Heritage

Name	Issue Raised
Ashford Development Association (C1)	This submission relates to a wide range of issues, including heritage issues, relevant to Ashford specifically. Therefore this submission is addressed in Part 4.3.20 of this report.
Wicklow PPN (C2)	<p>Co Wicklow is fortunate in its great natural resources on land and in our natural waterways and coastal areas. In all Co Wicklow PPN consultations the importance of caring for our environment and maintaining it for future generations has been at the forefront of all responses. Climate Change and the loss of biodiversity is having a worrying impact in Co Wicklow communities and people are calling for mitigation measures to be front and centre in all developments. Land, coast and the marine environment must receive equal attention in relation to biodiversity and climate mitigation measures.</p> <p>Wicklow’s natural resources and built heritage draw tourism to the county. This should continue to be developed but in a manner that includes and involves the local communities and protects the built and natural environment for future generations.</p> <ul style="list-style-type: none"> • Stop N11 motorway • Expand Green schools i.e. explain/offer An Taisce Climate Ambassador Programme to every school • The uplands: overgrown heather, manage sheep numbers, allow controlled burning • Protect our coast • The biodiversity in the sea is our heritage, it should be appreciated and protected. A breakdown of marine ecosystems will lead to the death of these ancient forms of life and a loss of the fish that feed on them and which we may also need to rely on for our food • Negotiate access to old trails etc. Stop members of public suing • Hedges, wall, street fences (old style) • Protect rivers, wetlands and uplands from development and sheep (like Wexford) • Open old mass paths and walkways • Restore and keep old shopfronts in villages/town • Stop developers letting old buildings to rack and ruin to overcome planning regulations. Enforce the regulations • Unique villages character to be preserved • Walls that are old should be maintained and/or re-built using the original materials • Built heritage of Bray (ACA) • Reinstate market squares for various users • Protect the landscape (visual amenity) avoid forestry, large farms • Need more rights of way (permissive access at least) • Ensure that all sites of historical interest are preserved and accessible • Protect greenway habitat to stay green • Wicklow Climate and Biodiversity • Review/Study of protected structures in the County
BirdWatch Ireland (C3)	BirdWatch Ireland submits the following points in relation to the next Development Plan for Co. Wicklow. BirdWatch Ireland is Ireland’s largest conservation organisation. Our mission is the conservation of birds, their habitats and other biodiversity in Ireland. In 2019 we celebrated our 50 th anniversary and for most of this time our headquarters has been based in Co. Wicklow. In addition one of our most visited reserves is in Wicklow-the East Coast Nature Reserve. So not only are we making a submission focusing on addressing concerns in relation to biodiversity and climate change in the

context of Co. Wicklow, we will make points as an employer in the area where many of our employees live and work.

Overarching Messages

Our overarching message for the next County Development Plan for Wicklow is that significant efforts must be made to address the Wicklow County Council declared (May 2nd 2019), Dáil declared (May 9th 2019) and European Union Parliament declared (November 29th 2019) biodiversity and climate emergencies. We are running out of time to address both. In order for the world to stay below 1.5 degrees of warming, emissions must be halved by 2030 yet Ireland’s ambition is falling far short of this. Ireland is also failing to halt biodiversity loss and we will not meet our 2020 targets. Wicklow County Council led in its declaration of the biodiversity and climate emergency and now it has the opportunity to lead again in its ambition on both.

The National Planning Framework and the next layer of Regional and Economic Strategies are not in line with meeting our climate and biodiversity goals. The Wicklow Co Development Plan will follow the policies and strategies laid out in these plans and strategies but we urge caution that the Council should aim higher and seek to be a leader in the country in its policies and objectives in the next development plan and subsequent plans. The following overarching issues should be addressed within the next County Development Plan:

- Climate mitigation to achieve the level of emissions reduction action required at county level.
- Climate adaptation actions to address projected increased sea level rise, storm surge, flooding and animal fodder impact which the County will face with global temperature average increase reaching 1.5 degrees.
- Applying UN Sustainable Development Goals (SDGs) at county level.
- Enhancing local food security enablers as well as low carbon and local food production networks to address the fact that 80% of Irish people buy food which is imported.
- Achieving health and wellbeing standards with regard to access to clean air and water, services and recreation.
- Reducing resource consumption and waste generation advancing Circular Economy principles.
- Addressing the level of habitats and species with “Bad” or “Unfavourable” status as evaluated under the Habitats Directive.
- Ensuring that the conservation efforts are directed to the bird species that are of conservation concern (those Red and Amber listed on the BirdWatch Ireland Birds of Conservation Concern List (will be revised in 2020) and species listed on Annex 1 of the Birds Directive.
- Ocean/sea acidification, ocean/sea plastic dispersal, and meeting marine ecosystem protection obligations of Marine Strategy Framework Directive.
- Meeting EU Directives and other obligations on air, water quality, waste, nitrates and other chemicals.
- Addressing unsustainable settlement and transport generation patterns.
- Meeting objectives of Council of Europe Conventions on landscape, archaeology and architectural heritage.
- Enhancing general quality of life standards, such as reduction in commuting time and access to parks, recreational and sporting facilities.
- Giving consideration to all, including wellbeing of children and an aging population

Biodiversity loss

- Globally biodiversity is facing significant pressure with 1 million species threatened with extinction according to the most recent report from IPBES. Analysis of the IUCN Red List shows that there has been a steady and continuing deterioration in the status of the world’s birds since the first comprehensive assessment in 1988, and at least 40% of bird species worldwide are in decline. The reasons behind these declines are many and varied but agricultural changes and expansion, overexploitation, pollution, disturbance, habitat loss and modification are all thought to be driving declines worldwide, while climate change may prove to be the most serious threat of all. In Ireland two-thirds of our regularly occurring wild birds are red or amber listed Birds of Conservation Concern in Ireland; there has been a 40% decline in waterbird species in less than 20 years; and several of our most important species of which Ireland hosts regionally important numbers in a European context are under serious threat.
- In addition to the above details on the status of Ireland’s birds, the following is known:
 - One third of our 99 wild bee species are threatened with extinction.
 - 91% of our internationally important habitats have ‘bad’ conservation status;
 - Water quality is in decline according to the most recent report by the Environmental Protection Agency
 - Data from 17 County Hedgerow Surveys show that only 1/3 of hedgerows are in good condition for birds and other wildlife¹⁴

The next County Development Plan must set Wicklow on a path of truly sustainable development where biodiversity protection is integrated into all facets of planning and development. This means that development proposals MUST avoid sites that are important for bird species and other biodiversity. There needs to be greater monitoring of planning conditions to ensure that developments are not impacting bird species. Use of the precautionary principle must be strengthened significantly. In addition, there must be a coordinated effort, with other authorities, to address practices that are impacting bird species, habitats and water quality (i.e. including burning of vegetation by landowners in the Wicklow uplands).

Ireland’s National Biodiversity Action Plan (2017-2021) has a vision that *‘biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally’*.

Specific objectives are contained with the National Biodiversity Action Plan that related to the local authorities and the county development plans. Objective 1.1.6. states that *Local Authorities will review and update their Development Plans and policies to include policies and objectives for the protection and restoration of biodiversity*. In addition, local authorities are called upon in Objective 6.2.1. *to increase connectivity of the protected areas network using appropriate buffer zones, corridors, stepping stones and/or flyways*.

Hedgerows

- Hedgerows are incredibly important features in the Irish landscape yet inappropriate cutting and removal of hedgerows is still a major issue and one that raises the ire of the public.
- According to the December 2019 published Irish Wildlife Manual 116 ‘Countryside Bird Survey (CBS): Status and Trends of Common and Widespread Breeding Birds 1998-2016’ *‘Ireland’s substantial network of hedgerows supports a rich biodiversity*

ranging from small rodents, badgers and hedgehogs to birds, invertebrates and fruits. These vegetated field boundaries, which in today’s Ireland, largely define the borders of grass fields grazed by livestock, act as a substitute for scrub and woodland in otherwise relatively monoculture landscapes. They provide important habitat for a range of bird species both for nesting and feeding. Hedgerows, especially older ones, contain a diverse variety of plants which in turn produce a diversity of berries, seeds and nuts, many of which are a direct food source for birds. Hedgerows also support a diverse range and abundance of invertebrates – an important source of food for many bird species, including those normally granivorous species (finches and buntings) which need a ready supply of invertebrates to feed developing young during the breeding season. The complete removal of hedgerows or the cutting back of the foliage and branches during the breeding period, depletes the availability of these foods and can directly destroy nests of many species within the hedgerows. The Yellowhammer, a red- listed species which has declined and contracted its range significantly in the last fifty years and whose nesting behaviour extends well into August would be particularly vulnerable to ill-timed hedgerow management activities. Therefore the conservation of Ireland’s hedgerows and their management, underpinned by appropriate legislation and agri-environment schemes is integral to the conservation of many of Ireland’s countryside bird populations’.

- As noted earlier only one third of Ireland’s hedgerows are in good condition for birds and other wildlife. We urge the Council to strictly enforce national legislation in relation to hedgerows and to ensure that County Council hedgerow contractors have the skills and qualifications to undertake appropriate management of hedgerows to benefit wildlife as well as road safety. A review of the Section 70 of the Roads Act notification procedures should also be undertaken. Sightlines are important for developments but too often hedgerows are removed when there is no need and also there is no mitigation for the loss of habitat. While a new hedgerow will not replace like-for-like an old hedgerow, at the very least they should be replaced on the same site. Sightline policies should be reviewed within the Council to ensure maximum preservation of County Wicklow’s hedgerows.
- EPA research suggests that hedgerows and non-forest woodlands could potentially sequester 0.66– 3.3t CO₂/ha/year. Greater protection and retention of Wicklow’s hedgerows would provide a double impact of helping wildlife and reducing greenhouse gas emissions.

Upland Burning and Peatland Management

- According to the December 2019 published Irish Wildlife Manual 116 ‘Countryside Bird Survey : Status and Trends of Common and Widespread Breeding Birds 1998-2016’ ‘*Illegal closed-season burning of agricultural lands, particularly upland and lowland bog and scrub areas, has been well- documented in Ireland in recent years. Such activity results in direct losses of early nests in such areas as well as losses in extent of suitable bird nesting and feeding habitats for several years. ‘Food Wise 2025’ plans to significantly increase agri-food exports in Ireland in the coming years leading to more intensive agricultural activity at various spatial scales. Although Food Wise 2025 highlights the need for sustainability, there are concerns that such a significant and rapid increase in agricultural outputs will come at a cost to birds and biodiversity. Burning as a ‘grassland management tool’ for agriculture in Ireland, particularly of scrub habitats, is likely to continue in the foreseeable future in a bid by landowners to avail of more grazing lands, to meet production targets and to increase the area included under the Single Farm Payment schemes (DAFM 2019). The CBS species most affected by upland burning, particularly uncontrolled burning,*

	<p><i>include Skylark, Meadow Pipit, Stonechat, Reed Bunting and Linnet. Given that these are widespread and relatively numerous species, burning for agriculture is currently considered a low-level pressure and threat, although there may be more noticeable effects at local level depending on the extent and frequency of burning and habitat removal. Mechanical extraction of peat, at an industrial and/or individual/private scale, is similarly damaging to species such as Skylark, Meadow Pipit and Skylark, and constitutes direct loss in extent of nesting and feeding habitat’.</i></p> <ul style="list-style-type: none"> • Over 28,000ha of Natura land (SACs and SPAs) have been burnt between 2011-2016 releasing carbon into the atmosphere, degrading habitats, impacting on the species supported by these habitats including critically endangered Hen Harrier and Curlew who breed in the uplands and stymying our goals to achieve favourable conservation status of these habitats as per the Habitats Directive. • BirdWatch Ireland undertook research in 2017 which identified the costs to the exchequer of the deployment of fire fighters to address out-of-control fires in upland areas. Results from Freedom of Information requests to all local authorities resulted in responses from 10 local authorities on the scale of the expenditure. Wicklow County Council did not provide any information. The costs to the exchequer between 2010-2016 for local authorities to deploy fire services to fight 5889 fires was (conservatively) 6.1 million euro. • Upland burning not only impacts on bird species but it releases carbon and increases greenhouse gas emissions, and impacts water quality. Degraded peat habitats continue to release carbon unless they are restored. Peatland restoration, in conjunction with the other authorities, should be considered by the local authority where possible. It is critical that farmers are encouraged and supported to farm in harmony with the habitats they operate in.
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<p>Residents of Beresford Terrace Arklow (C6)</p>	<p>In the recent past two public rights of way were closed illegally, these closures have caused much anger and frustration in our town.</p> <ul style="list-style-type: none"> ▪ The route to Shelton Abbey from Ferrybank Arklow was closed illegally. This route has been a right of way since 1690, and was used by Arklow Residents until the gate was padlocked and shuttered some years ago. ▪ In 2016 the public right of way to North and Seabank Beaches was also illegally blocked, This was the only access to the seashore. <p>We would ask you to list the public rights of way throughout the County in the next Development Plan to ensure the rights of the citizens of our County are respected</p>
<p>West Wicklow Environmental network (C7)</p>	<ul style="list-style-type: none"> • As the first county to declare a “biodiversity and climate change emergency” in April 2019, Wicklow County Council now has the opportunity to lead the way in showing how these vital considerations can be carried through in the new County Development Plan, and in the Council’s own actions across a range of activities. • Wicklow County Council, where they have care of Green Open Spaces should better manage these spaces now with biodiversity in mind i.e. creating bee-friendly areas, planting native flowers suitable for bees. They should, where possible, always keep trees as they are vital in providing and supporting habitat for insects and birds. Not cutting existing mature trees can be more beneficial to the environment than planting new trees or shrubs and this needs to be recognised now before contracts are given for tree maintenance and constant cutting. • With a “biodiversity and climate change emergency” declared, Wicklow County Council can now create what is needed for the biodiversity to flourish on council owned land. All unused council land can and should simply be given back to nature. • Wicklow has an opportunity to lead the way with this initiative. The ‘All Ireland Pollinator Plan’ is a great start but in a ‘biodiversity emergency’ like the one declared by the council we need to go a step further also. • Please start with the non-profit ‘We are the Ark’ set up by one-time Wicklow resident Mary Reynolds. The time has come to move away from garden centre ornamental plants, to stop using herbicides and pesticides and to start to give this land back to nature. Just like in the ‘All Ireland Pollinator Plan’ any council land given over to this cause will need its sign saying ‘This is an Ark’ with the website details underneath for people who are curious. It is a meaningful and positive step the council can make now and it is easily achievable to stop the purchase and planting of ornamental garden centre plants, most of which are treated with chemicals and are not what the local biodiversity and wildlife need to thrive, they need local native plants. Wicklow County Council should when planting consider edible landscapes i.e. Hedges that could provide food for foraging and also birds. Where possible plant organic nut or fruit trees that can be of benefit for humans and animals alike. • The Council can and should lead the way with a ban on glyphosate and other such substances now. We need to give as much land as we possibly can back to nature as we have all taken too much and this is an initiative we can get onboard with. The ‘We Are The Ark’ website has an entire section for ‘Public Land’ with steps and information to implement the mission. Please visit the website ‘www.wearetheark.org’ for further information. • The landscape in Wicklow is heavily planted with extensive commercial monoculture conifer plantations. Our old wonderful native woodland in Glendalough and Clara Vale should obviously be preserved and protected now and for the future but it should also serve as an inspiration for other land in Wicklow. We need to take back land in Wicklow for native woodland for a multitude of reasons - to reduce water pollution and soil erosion, increase carbon storage, increase biodiversity, improve recreation experiences and for our heritage. Wicklow Council should lobby Coillte

	<p>and the government to change Coillte’s mandate and to plant more native trees rather than conifer plantations that don’t support biodiversity or create suitable habitat for our insects or birds that need it now. Coillte is a major landowner in Wicklow, owning approximately 14% of our land area (a higher proportion than any other county). Coillte, and the wider statutory sector, need to show leadership to private landowners in terms of how land can be managed in a way that works for nature and delivers more of the ecosystem services that we all depend upon.</p> <ul style="list-style-type: none"> • Wicklow County Council should where possible and requested to by residents in built-up areas consider providing allotments to residents. Growing our own food can help us be more sustainable and also is beneficial to our own health. It also reduces food mileage and therefore our carbon footprint. • Wicklow County Council should work with other agencies to ensure enforcement of legislation to prevent illegal hedge-cutting and hedgerow removal, to address off-road vehicle damage on the Wicklow Mountains, to protect our rivers and lakes and prevent the spread of invasive species. • Other measures important to the network that need to be considered: <ul style="list-style-type: none"> - Protection and restoration of damaged peatlands so as to reduce emissions and improve carbon storage. - Forests to be securely fenced off from sheep and cattle, waterways also to be protected from livestock, with riparian zones as corridors for wildlife and recreation. - Farmers encouraged to farm with nature, to diversify, to grow organic plant produce and to protect biodiversity and water - Encourage tourists and individuals to enjoy but also respect our natural environment with awareness initiatives and positive signage - Greenway habitats and other walking / cycling trails need to be adequately protected and kept ‘Green ‘with no herbicides and pesticides and less strimming and cutting. - The use of blue-rich LED lighting should be avoided so as to mitigate the impact of light pollution on biodiversity. - Planning should enable the development of community-based walking trails so that Wicklow residents have opportunities for healthy physical activity without having to use their cars.
<p>Avoca Tidy Towns & Community Courthouse CLG (C8)</p>	<ul style="list-style-type: none"> ▪ The Red Kite Walk in Avoca has been a huge success and is used by locals and visitors on a daily basis, the upgrading of this facility to a 10km trail with picnic and recreation areas would be a great asset to the area and something that should be researched with Coillte. • A greenway from Avoca to Woodenbridge to join the Tinahely/Shillelagh Greenway also requires research.
<p>Bray Tidy Town (C9)</p>	<ul style="list-style-type: none"> ▪ This submission relates to built heritage (ACAs) in Bray only and therefore is dealt with in Part 4.3.13 of this report.
<p>Baltinglass & District Forum (C10)</p>	<p>This submission generally relates to Baltinglass only and a complete response to same can be found in part 4.3.21 of this report. With respect to heritage generally, the following point is raised:</p> <ul style="list-style-type: none"> ▪ We need greater access to our Historic Sites. Properly managed the Neolithic ring forts would generate huge interest for visitors both domestic and from abroad.
<p>Keep Ireland Open (C16)</p>	<p>This is a very detailed submission that contained a significant number of suggestions for alterations to existing policies and for new objectives. The matters summarised here are those that relate specifically to the existing heritage chapter of the current plan (this submission is laid out in chapter format).</p> <p>We submit that Heritage should be sub-divided into:</p>

	<p>A Heritage – General; B Natural Heritage (including bio-diversity); C Archaeological Heritage; D Built Heritage.</p> <p>Heritage - General</p> <p>Suggested objectives:</p> <p>1 <i>Liaise with key stakeholders to support the preparation of conservation and visitor management plans for the Glendalough Valley including the monastic complex, historic graveyard, monuments and natural landscapes and The Murrough, Wicklow Town. Taken from Heritage Plan 3.3.</i></p> <p>2 <i>Liaise with the OPW, National Monuments Service, landowners and other stakeholders to address the conservation, management of significant heritage sites including but not limited to the Glendalough Monastic Complex and Baltinglass Hillfort Complex. Taken from Heritage Plan 3.4.</i></p> <p>Archaeological Heritage</p> <p>Objective BH1: <i>Submit that this should be merged with BH3 and replaced by: Promote the protection of archaeological heritage as defined in the Heritage Act, including the intrinsic value, character, amenity, visual integrity, context and settings of National/Recorded Monuments, caves, Zones of Archaeological Potential, Zones of Archaeological Notification or newly-discovered archaeological sites and/or sub-surface archaeological remains, including underwater sites, known and unknown, either above or below ground, including those identified in the RMP, RHM & SMR, castles, monuments and features of historic interest and National Monuments that are the subject to Preservation Orders in the ownership or guardianship of the State or the Council, by supporting, conserving, sympathetically enhancing, preserving, properly managing and safeguarding it for present and future generations by implementing the County Heritage Plan. Proposed developments which would be seriously injurious to the settings, character or cultural value of sites or RPMs, including those within or adjacent to sites or which might affect them, in particular, those within a 20m radius of National Monuments, Zones of Archaeological Potential will not be permitted and those within 75m will be discouraged. Ensure that development, adjacent to or in the vicinity of an archaeological monument shall not detrimental to its character be or setting and shall be sited and designed in a manner which minimises its impact settings, is resisted. Planning decisions will take account of the archaeological heritage of the area and will take cognisance of the potential for subsurface archaeology. Extend this protection to cover additions or alterations that may arise during the adoption of this Plan. Impose conditions on development that might impact on sites of Archaeological Potential to ensure that appropriate measures are taken and that archaeology is suitably integrated into new development, in co-operation with the relevant Government Department.</i></p> <p>Objective BH4: <i>submit that this should be replaced by: Recognising the importance of archaeology and National Monuments as part of our heritage and important elements in long term economic development, promote, enhance, facilitate, encourage, support, improve and protect public access to National Monuments, Archaeological Sites, castles, sites of historic interest and to archaeological landscapes, in the direct ownership, guardianship or control of the Council, and/or the State or private ownership, including those listed in the RMP, in co-operation with landowners and promote walking routes thereto.</i></p>
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Objective BH 6: We submit that this should be re-positioned in a proposed additional Sub Sec: World Heritage Sites and be replaced by: *Recognise and respect potential of the Glendalough Site and support, pursue, progress, facilitate and promote its designation as UNESCO WHS in collaboration/partnership with the appropriate Government Department, landowners, local communities and other stakeholders, to assist in the preservation of the natural heritage.*

We submit that you **should include an additional Objective:** *Traditional access routes will be designated as public rights of way. In other cases, routes will be acquired by agreement with landowners or by way of compulsory powers.*

Natural Heritage

Natural Heritage Strategy

2nd pt We submit that this should be re-positioned in 10.3.9 Wicklow’s Landscape.

3rd pt We submit that this should be re-positioned in 10.3.5 Soils and Geology, merged with NH26 and replaced by: *Recognising the significant geological value of County Geological Sites, work with stakeholders, consult with the GSI and be in accordance with the National Heritage Plan and the “Geological Heritage Guidelines for the Extractive Industry” to protect sites of geological or geomorphological interest from inappropriate development by prohibiting development at or in their vicinity that would detract from or would damage or threaten their existence, integrity, value or result in their deterioration. Preserve, enhance, maintain, manage, conserve, and where appropriate, restore the character, conservation value and integrity of these sites for their amenity, scientific, heritage and historic values(including County Geological Sites and sites that may become designated), designated or proposed NHA’s, areas near sites and areas of geomorphological interest. Ensure that any plan or project affecting karst formations or other important geological and geomorphological systems are adequately assessed for their potential geophysical or ecological impacts.*

4th pt We submit that this should be replaced by: *Prohibit intrusive development that would detrimentally impact on natural heritage which could or might have a negative impact on natural amenity assets or natural heritage features or might unduly damage or take away from its character. Promote appropriate enhancement of the natural environment as an integral part of development. Engage with stakeholders, including local communities, to protect, conserve, preserve, manage, enhance, safeguard, facilitate, maintain and, where appropriate, restore, visual and scenic amenities, the quality and character of the natural heritage features and the natural environment including rivers, streams and other waterways, wetlands, woodlands and forests, scenic areas and the general amenity of the countryside and in recognition of its importance as a non-renewable resource, from intrusive development that would detrimentally impact on it, for the benefit and enjoyment of future generations, while maximising the recreational amenity, tourism potential and quality of life for present generation by the provision of visual relief from the built environment. Avoid unnecessary harm and reduce its effect where it cannot be avoided by replacing like with like.*

We submit that you should include additional Objectives:

1. *Recognizing the role played by natural amenities and landscapes as major resources for visitors and local people and as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, improve, safeguard and enhance public access to heritage sites and features, natural*

heritage and amenities including Natura 2000 sites, nature reserves, mountains, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for activities such as mountaineering and hill-walking, which have been traditionally used for outdoor recreation, and to the countryside generally, by creating a meaningful network of access routes as the opportunity or need arises and by designating traditional walking routes thereto as public rights of way. This will be done in co-operation with state agencies, landowners, community groups other interested bodies.

2. Strive to create a network of natural heritage areas and recreational open spaces/amenity areas by promoting linkages and accessibility by using walkways/cycleways.

Biodiversity Objectives

NH 7 We submit that you should include an additional sentence: *Ensure that the character of the National Park is protected, conserved and enhanced and prohibit any development which would impair its character.*

1) Woodlands, trees and hedgerows

NH14 We submit that the 1st two lines should be replaced by: *Protect woodlands, in particular native species and those associated with demesne planting, and groups of trees from inappropriate development that would impact adversely on them and affect their amenity value. Manage and promote the preservation and enhancement of the existing network of woodlands as they contribute to the environment including landscape character and landscape conservation.*

NH15 We submit that this should be replaced by: *Designate TPOs to protect trees and woodlands of high value where they might be in danger of being felled.* Taken from Monaghan 6.15 TWP 2 last phrase.

NH16 We submit that this should be replaced by: *Where appropriate, protect mature trees of environmental and/or amenity value that are not protected under TPOs.* Taken from Cork County 12.2. HE 2 5.

We submit that you should include an additional Objective: *Protect and encourage access to forestry and woodlands, in co-operation with Coillte, private landowners and other stakeholders for walking routes (including long distance and looped walks) mountain and nature trails, bridle paths, orienteering and hiking for the benefit of local people and visitors.*

2) Soils and Geology

NH26 We submit that this should be replaced by: *Work with stakeholders, to protect sites of geological or geomorphological interest including County Geological Sites, sites that may become designated, proposed NHAs areas near sites and areas of geomorphological interest from inappropriate development by prohibiting development at or in their vicinity or threaten their existence, integrity and conservation value. Protect, preserve, enhance, maintain, manage, conserve, and where appropriate, restore the character. (Schedule 1o.10 and Map).*

NH28 We submit that the 1st phrase should be replaced by: *Promote, encourage, facilitate and support access and public rights of way to geological and geo-*

morphological features of interest inter in consultation with landowners (where appropriate).

3) Recreational Use of Natural Resources

NH40 We submit that this should be replaced by: *Recognizing the role played by natural amenities and landscapes as major resources for visitors and local people and as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, improve, safeguard and enhance public access to heritage sites and features, natural heritage and amenities including Natura 2000 sites, nature reserves, mountains, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for activities such as mountaineering and hill-walking, which have been traditionally used for outdoor recreation, and to the countryside generally, by creating a meaningful network of access routes as the opportunity or need arises and by designating traditional walking routes thereto as public rights of way. This will be done in co-operation, consultation and consensus with state agencies, landowners, community groups other interested bodies.*

NH43 We submit that this should be re-positioned in Chpt 11- COASTAL ZONE MANAGEMENT as additional Obj 3.

NH44 We submit that this should be repositioned in a proposed additional Sub Sec: SAAO.

4) Public Rights of Way

Intro text: 2nd para We support, with the exception of the last pt. Note: We have taken legal advice on this and have been advised that the law in this regard is not totally clear.

Post adoption note: We submit that this should be deleted as it is unnecessary and it will tend to encourage landowners to challenge the inclusion of a particular PROW. No other county plans include this provision

We submit that you should include additional text:

1. *It is intended that listing and mapping will preserve Public Rights of Ways for recreational purposes for current and future generations.*
2. *If an Interim list is included in the Plan the following should be appended to the list or provided in the written statement: This is not an exhaustive list and the omission of a right of way from this list shall not be taken as an indication that such a right of way does not exist.*
3. *Public Rights of Way enable enjoyment of high quality landscape and are important for tourism development and recreation. To which you should add: The listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of the failure of walking tourism to reach its full potential.*
4. *There is an excellent modus operandi for listing taken from Wexford and many other counties: Identify the existing public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity using the following methodology:*
 - *Place an advert in local papers seeking submissions from the public to identify public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational utility.*

- Identify existing rights of ways, paths, and access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity.
 - Identify access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity which the Council have maintained or repaired with a view to identifying public rights of way.
 - Carry out a desktop analysis of public records, maps, aerial photographs and newspaper accounts to identify reputations of public rights of way.
 - Once the list is compiled, advertise and put it on display. The public will be invited to make submissions on the validity of the public rights of way.
 - Endeavor to verify and list the public rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended). Vary the Plan to include the list and map showing the public rights of way.
5. Public Rights of Way have existed over the centuries constitute an important recreational amenity for local people and visitors and are an economic and social asset. They enable the enjoyment of high quality landscape, natural and archaeological heritage and provide links to valuable amenities such as rivers lakes, bogs, forests and places of natural beauty.

Table 10.3 Public Rights of Way

We submit that you should examine further traditional walking routes for possible designation by adopting the modus operandi as set out in Text 4. In particular, we submit that the route through the Luggala Estate from “Pier Gates” to Lough Dan on the Sally Gap to Roundwood road merits consideration. Also in Glenealy from the local road along Ballymanus Lane, to the entrance to Coillte’s wood on Carrick Mountain.

Public Rights of Way Objectives

NH 47 We submit that:

- 1 1st sentence you should delete *where resource permit* on 1st line;
- 2 2nd sentence AND
- 3 3rd sentence You should delete re-routing on 2nd last line as it is dealt with in proposed additional Obj and that it should be replaced by: *In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational importance and to the coast, uplands, seashores, lake shores, river banks, forests, heritage and scientific sites, areas of historic, archaeological and recreational importance and National Monuments, to create a meaningful network. Promote their greater use and designate traditional walking routes to the coast as public rights of way. Provide linkages from built up areas to the countryside and to link with public rights of way in adjoining counties.*

NH48 We submit that this should be deleted.

Reason: There is clearly a flaw in existing legislation on this topic in that, as it stands, there is a lacuna regarding who is responsible for the maintenance of prors designated

after 21st Jan 2002. We submit that, in order to ensure that prows are kept open, so that users can exercise their rights the Council must decide who is responsible. There are three possibilities: the Council, the landowners or recreational users? It is clearly impractical for recreational users to be held responsible. We feel that it is unfair for landowner to be held liable as she/he already has to bear the inconvenience of a prow crossing their property. That leaves the Council. To sum up, if this problem is not dealt with it could well result in prows becoming unsafe leading either to their becoming unusable or used with difficulty. In the latter case it could lead to safety issues and possible litigation. Surely funding should not be a major problem in the context of their overall budget. Another approach would be for the Council to organise periodic maintenance days for volunteers which we feel would be quite feasible. See proposed additional Obj 8.

We submit that you should include additional Objectives

1. *Provide, and where necessary, improve signposting and waymarking on all public rights of way. Note It is most important that public rights of way are marked on the ground because:*
 - Walkers need to know of their existence to encourage usage
 - Signage would alert local residents to planning applications affecting the integrity of rights of rights of way
 - Directional signage during the course of the route would prevent involuntary trespass on private property and prevent walkers getting lost which might impinge on walker safety.
2. *Protect and promote Greenways and consider designating them as public rights of way.*
3. *Identify and map, on an ongoing basis, public rights of way and incorporate them in the Plan by way of a Variation. Where appropriate links to established public rights of way in adjoining counties will be identified.*
4. *Designate Pilgrim Paths such as St Kevin’s Glendalough to Hollywood as public rights of way. Note: We submit that as these Paths have been walked for many centuries their case for designation is surely irrefutable.*
5. *Identify mass paths and routes to holy wells, mass rocks and penal mass stations and consider designating them as public rights of way.*
6. *Encourage the provision for the common good of a network of Public Rights of Way to traditional outdoor amenities, including heritage sites and features of archaeological interest, national monuments, mountains, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, places of natural beauty and other natural amenities.*
7. *Identify public rights, under the provisions of Sec 14 of the Planning and Development Acts 2000(as amended), by marking them on a at least one map forming part of the Development Plan and by indicating their location within one year of the adoption the Plan which will be amended by way of a variation.*
8. *Recognizing the importance of protecting and maintaining public rights of way especially in tourist and coastal areas and those which provide access to archaeological sites, National Monuments, seashores, lakeshores, riverbanks, upland areas, water corridors or other places of natural beauty or recreational activity and to encourage and facilitate the development of cycling and walking in areas of high amenity, identify, maintain, preserve, protect, enhance, support, promote and improve them for the common good and ensure that development does not impinge thereon. Ensure that they are effectively maintained by controlling undergrowth, trees and bushes.*
9. *Prohibit development and keep free from obstruction public walking routes and*

	<p><i>public rights of way, particularly those at seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity and take legal action if necessary, to prevent any attempt to close them off.</i></p> <ol style="list-style-type: none"> 10. <i>Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way.</i> 11. <i>Existing Public Rights of Way and established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments.</i> 12. <i>Development will not be permitted where a public right of might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrate that the level of amenity is maintained by:</i> <ul style="list-style-type: none"> - <i>the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;</i> - <i>Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.</i> - <i>the diverted route is of at least equal character and convenience.</i> 13. <i>Where, in the interests of proper planning and development, the extinguishment of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative.</i> <p>5) Wicklow’s Landscape</p> <p>NH 50 We submit that this should be re-positioned in AONB in proposed Obj 6.</p> <p>We submit that you should include additional Objectives:</p> <ol style="list-style-type: none"> 1. <i>Provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes.</i> 2. <i>Preserve, maintain, enhance and protect the amenity value, visual integrity of upland areas. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Ensure that development will not materially interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts (including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Protect the positive contribution that views across adjacent lowlands areas and landmarks make to the overall landscape character. Have particular regard to the potential impacts of development on sensitive upland areas and consider the difficulty of establishing and maintaining screening vegetation.</i> 3. <i>Protect, conserve, preserve, maintain, identify and enhance the visual integrity, uniformity, scenic quality, general amenity and recreational values and the visual quality of areas of intrinsically important and outstanding, highly sensitive, designated, natural, unspoilt, visual vulnerable and open landscapes (named), scenic areas, high amenity areas and the environs of archaeological or historic sites(named) from intrusive, inappropriate, injurious or unsympathetic new, or additions to, existing developments and reinforce their character and distinctiveness by prohibiting development where it could unduly impinge or impact on such landscapes or would be injurious to, or detract from natural amenities or introduce incongruous landscape elements.</i> <p>We submit that you should include additional Sub Sections:</p>
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	<p>A) Fencing Of Hitherto Open Land</p> <p>Suggested text</p> <p><i>It is a requirement of the Planning Regulations 2001 Art 9(1)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain or other place of natural beauty or recreational utility, requires planning permission. Wire fencing constitutes visual pollution and destroys the “away from it all” feeling which makes upland areas such an attraction for both local people and visitors. There has been a large increase in the amount of new fencing in upland areas. Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. Traditional hill-sheep farming rarely required fencing, but since the introduction of AEOS, sheep-farmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of AEOS without impinging on access for walkers and other recreational users.</i></p> <p>Policy suggestion:</p> <p><i>As new fencing of land open to or used by the public during the ten years preceding is not exempt development in accordance with Art 9(1)(a)(x) of the Planning and Development Regulations the following criteria will be used when considering planning applications for new fencing: Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm and that it conforms to the best agricultural practice. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account. Stiles or gates at appropriate places will be required. Barbed-wire will not be used for the top line of wire.</i></p> <p>B) Historic Graveyards & Burial Grounds</p> <p>Suggested objectives</p> <ol style="list-style-type: none"> 1. <i>Provide and improve public access to graveyards.</i> 2. <i>Protect, preserve, enhance, conserve and maintain archaeological/historic graveyards and their settings and historic burial grounds (including those identified in the RPM) and those in the guardianship of the Council through improved access. Encourage and promote local involvement and community stewardship in the care, maintenance, management rehabilitation and conservation of these graveyards in accordance with legislation, best conservation and heritage principals and best practice guidelines. Maintain all burial grounds in the Council’s charge in good condition.</i> <p>C) Inland Waterways</p> <p>Note This is a recommended topic under the Heritage Act 1995 Sec 6(1). We submit that you should include a table of: <i>Existing or potential riverside and lakeside walks/cycle routes.</i></p> <p>Suggested Objectives:</p> <ol style="list-style-type: none"> 1. <i>In partnership with the NPWS, WI, Councils, community groups and other relevant stakeholders, identify, provide, preserve, protect, promote, encourage, develop, maintain, facilitate, increase and improve public access to the shoreline around lakes and to rivers, canals and riparian/waterway corridors.</i> 2. <i>Promote, develop and facilitate access for walking, cycling tracks and other compatible activities along inland waterways and in the vicinity of watercourses including rivers and canals in co-operation with landowners, WI, NPWS, Government Departments, community groups and other councils. Encourage the retention of</i>
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	<p><i>existing walkways along lakes and rivers.</i></p> <ol style="list-style-type: none"> 3. <i>Preserve and enhance an undisturbed buffer zone or riparian corridor by requiring the reservation of land adjoining or adjacent to canal and river banks, streams, lakes and other waterbodies to protect them and promote and facilitate the creation of waterside linear parks to link with existing parks and open spaces and to facilitate the provision of walking/cycling routes along canals and watercourses and to facilitate and encourage public access for non-noise generating recreational activities.</i> 4. <i>Recognising the importance of inland waterways, both navigable and unnavigable, work with State Agencies, landowners, local communities and other relevant groups/stakeholders to protect, manage, maintain, preserve, conserve, improve and enhance waterbodies and watercourses, rivers(named), river valleys, streams, lakes, springs and associated undeveloped riparian strips/zones, buffer zones distinctive linear sections of water corridors, canal and river banks, river valleys and riverine wetland areas from degradation and damage and the visual impact of dispersed and highly visible development that could adversely affect them by compromising their visual integrity, recreational, natural heritage, aesthetic, geological or landscape values and the natural characteristics and features and recognise and promote them as natural environmental assets, and key elements in the green infrastructure network and maintain them free from inappropriate development. Keep them in an open state and in a natural condition by discouraging culverting or realignment and in certain instances by uncovering existing culverts.</i> 5. <i>Protect and maintain the amenity and recreational value of walking and cycling routes by prohibiting the intrusion of development along these routes. *Seek to ensure that new development will not have a negative impact on established walking routes and public rights of way along inland waterways. It would be better if Seek to was omitted.</i> 6. <i>In areas adjacent to inland waterways, lakes, rivers, where planning permission is sought, the applicant must ensure that full public access to waterways is retained or conditions may be attached requiring retention of this access to facilitate creation or extension of walking/cycle routes.</i> 7. <i>Protect, enhance and improve existing public rights of way and, where possible, provide additional access to inland waterways including lake shores, riverbanks, through the acquisition of land for public rights of way and parking and lay-by facilities, through agreement with existing landowners*. *You should add: or by the use of compulsory powers</i> 8. <i>Normally only permit proposals for development associated with water sports adjacent to lakes where the proposed facilities are compatible with existing use of water including non-recreational uses, will not result in damage to features of archaeological heritage, can be satisfactorily integrated into the landscape, will not have an unacceptable impact on visual amenities and will not result in over intensification of use leading to excessive noise.</i> 9. <i>Recognise the importance of rivers and river corridors for walking and cycling, natural amenity and scenic values and promote their development for recreational purposes and tourism. Support and facilitate the development of Greenways and Trails along (name) rivers.</i> 10. <i>Riparian corridors shall be kept free from development along the side of each bank of the river for recreational requirements.</i> 11. <i>Promote, extend and facilitate the provision of increased access to lakeshores to extend public walking and cycling routes.</i> 12. <i>Maintain the amenity value of major lakes and immediate adjoining areas including skyline development on surrounding hill crests, within a landscape, recreational and</i>
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	<p><i>ecological context by restricting and regulating development that would prejudice use and enjoyment of these areas.</i></p> <p>D) Mass Rocks Suggested objective: <i>Preserve, protect and, where necessary, enhance mass rocks and holy wells.</i></p> <p>E) Wetlands Suggested objectives</p> <ol style="list-style-type: none"> 1. <i>In partnership with the NPWS, WI and other stakeholders provide and facilitate public access to wetlands and support and protect the recreational and amenity potential of wetlands and provide for an intrinsic network.</i> 2. <i>Protect, conserve, manage and enhance existing wetlands (including fens, and estuarine marshland) which are vital green infrastructure, from destruction, infilling, fragmentation, degradation and other inappropriate development and protect and conserve their quality, character and features by controlling adjacent development by use of buffer zones.</i> <p>F) Wicklow National Park Suggested objective: <i>Ensure that the character of the Wicklow National Park is protected, conserved and enhanced and prohibit any development which would impair its character.</i></p> <p>G) World Heritage Sites</p> <ul style="list-style-type: none"> ▪ Suggested objective: <i>Ensure that development proposals in designated WHS will be assessed having regard their contribution to their preservation and enhancement. Protect and preserve them from inappropriate development and maintain the Outstanding Universal Value of the tentative WHS of the Glendalough Monastic Settlement and engage with other national and international initiatives which promote special places of natural heritage.</i>
<p>Wicklow Planning Alliance (C17)</p>	<p>Built Heritage</p> <ul style="list-style-type: none"> • We need to better protect our heritage and use all the tools available. The La Touche Hotel is just one example of a protected structure that was wilfully neglected and there are many others in Wicklow Town and around the county which are deteriorating rapidly. The council has the power to intervene and this should be done. • Bray Town has a number of fine examples of Victorian buildings and streets. While a number of these are listed in the register of Protected Structures, it is necessary that the areas where they are located are viewed in a holistic approach. Currently Bray, unlike eight other towns in Wicklow, does not have any ACAs in place. As such it is our opinion that the Quinsboro Road, Florence Road and Eglinton Road, Galtrim Road, Wyndham Park, Adelaide Road, Novara Avenue, Sidmonton and Meath Road and Bray Seafront should all receive an ACA designation. • Bray needs urgent attention. Bray has much built heritage that has simply been ignored in previous plans and neglect when it comes to planning enforcement. If it was appreciated and minded Bray would be a major tourist centre. <p>Natural Heritage</p> <ul style="list-style-type: none"> • Not only should rights of ways be listed but also waymarked ways, looped walks, mass paths and routes to holy wells, mass rocks and penal mass stations, which should be identified, mapped, kept free of obstruction and protected. • Amongst other potential Rights of Way please list the route through the Luggala

	<p>Estate from “Pier Gates” to Lough Dan on the Sally Gap to Roundwood Road and the route from the main road in Glenealy to the woodland on Carrick Mountain along Ballymanus Lane.</p> <ul style="list-style-type: none"> • Please strengthen the awareness and protection of the Glen O’the Downs [SAC] Nature Reserve, the jewel in the crown of Wicklow nature. An objective should be included to monitor and manage the largely-forgotten western section of the Glen nature reserve and re-connect it to the Eastern section via a number of wildlife bridges over the N11 / M11 and underpass tunnels where suitable. Prioritise the Glen for awareness, protection, environmental monitoring, and restoration. Re-wild as a native riparian wooded (oak) wildlife corridor to the maximum extent possible. • Waterways, river systems and wetlands everywhere need urgent protection in order to address the Ecology Emergency. • Please identify, map & zone all Wicklow river corridors & wetlands for protection (Waterford County council’s last two County Development Plans provide a good example). Please state Wicklow policy to facilitate restoration of the natural connectivity, flow and condition of the rivers wherever reasonably possible, to include completing the removal of unnecessary obstacles / weirs and encouraging fencing / drinking solutions to keep livestock physically back from poaching the river bank, while also preventing overgrazing by livestock and wild animals and allowing re-wilding / native re-forestation. • Please state Wicklow policy to work closely with LAWPro, EPA, NPWS and IFI to support local communities, land-owners, River Trusts and Tidy Towns groups to protect rivers and re-connect the community to their local lifelines. • Please study the creation of a new zone type "Land reserved for Nature including Climate & Biodiversity Natural Solutions" and the zoning of Wicklow Rivers and a corridor 50m each side of each river. This could be piloted on selected rivers such as the Three Trout’s Stream and The Swan River in Bray. If successful it could be applied to the zoning of other Uplands as well as the Rivers/Wetlands. • What’s left of our trees and woodlands everywhere need urgent protection in order to address the Ecology Emergency. For example strengthen the awareness and protection of the ridge of Scotts Pine trees known as Harmon’s Brow / The Dancing Trees on the brow of Drummin Hill just South of Delgany Village <ul style="list-style-type: none"> ▪ Make more use of dark sky zones and quiet zones.
<p>Delgany Community Council (C19)</p>	<p>This submission relates to a wide range of issues, including heritage issues, relevant to Delgany. Therefore this submission is addressed in the main in Part 4.3.17 of this report. With regard to heritage matters specifically:</p> <ul style="list-style-type: none"> • All aspects of heritage (natural and built environment) which can be deemed to be of importance are worth retaining and protecting. All LAP heritage features as listed in Appendix B: LAP Heritage Features of the Greystones-Delgany and Kilcoole LAP 2013-2019 should be retained in all future CDP/LAPs. • The town of Bray also deserves particular attention. Important buildings such as St. Paul’s have been lost recently through inaction and lack of respect for architectural heritage. • Grants for restoration, fines if buildings are allowed to decay to a point where retention is deemed not viable. • The following heritage structures should also be considered for addition: Downhill Bronze-Age Hillfort, Coolagad Bronze-Age Hillfort, Bellevue Demesne, Toll-Road/ Norman Path, Woodlands Church.

	<ul style="list-style-type: none"> • The view of the trees at Drummin trees (Scots Pines) should be protected as they are a long-standing and unusual local landmark. They are located just south of Delgany village on the brow of Harmon’s Hill. The hill itself should also be protected as an outstanding view. • The woods behind Glen of the Downs and Kindlestown Woods should be protected. Coillte sold off about 4 acres recently, the woods provide a wonderful amenity for people living locally and we hope that what remains in public ownership can be left that way for future generations to enjoy. • The view from the front of Kindlestown Woods (towards the Great and Little Sugarloafs) should be preserved. • There is a particular need to ensure that any structures that are identified as in need of preservation/conservation are protected. Developers who apply for planning on such a site should be penalised if they allow a site to deteriorate to such an extent that it becomes impossible/unsafe to preserve it. The owner of such a site should have a responsibility to maintain it. • Please strengthen the awareness and protection of the Glen O’the Downs [SAC] Nature Reserve, the jewel in the crown of Wicklow nature. • Set policy to monitor and manage the largely-forgotten western section of the Glen nature reserve and re-connect it to the Eastern section via a number of wildlife bridges over the N11 / M11 and underpass tunnels where suitable • Please identify the complete Three Trout’s Stream River System, the ancient wooded lifeline which created and still flows through the Glen, as a County Wicklow (Climate and Biodiversity) nature reserve in itself, as well as an extension of the Glen O’the Downs SAC and a key corridor connecting the Natura 2000 sites of the Sugar Loaf, The Glen O’the Downs and the Wicklow Coastal Natura 2000 sites. It should be prioritised for awareness, protection, environmental monitoring, and restoration / re-wilding as a native riparian wooded (oak) wildlife corridor to the maximum extent possible. • Please identify, map & zone all Wicklow River Corridors & Wetlands for Protection (Waterford last 2 County Development Plans provide a good example). Please state Wicklow policy to facilitate restoration of the natural connectivity, flow and condition of the rivers wherever reasonably possible, to include completing the removal of unnecessary obstacles / weirs and encouraging fencing / drinking solutions to keep livestock physically back from poaching the river bank, while also preventing overgrazing by livestock and wild animals and allowing re-wilding / native re-forestation. • Please state Wicklow policy to work closely with LAWPro, EPA, NPWS and IFI to support local communities, land-owners, River Trusts and Tidy Towns groups to protect rivers and re-connect the community to their local lifelines. • Please study the creation of a new zone type "Land reserved for Nature including Climate & Biodiversity Natural Solutions" and the zoning of Wicklow Rivers and a corridor 50m each side of each river. This could be piloted on selected rivers such as the Three Trout’s Stream and The Swan River in Bray. If successful it could be applied to the zoning of other Uplands as well as the Rivers/Wetlands. • Please further study the option of purchasing (CPO) of these River Corridors for protection, restoration and re-wilding, and call on the Irish Government and other
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	<p>interested Corporate Stakeholders to provide a "Purchase for Rewilding" Fund, as the New Zealand Government have done for their bogs / wetlands.</p> <ul style="list-style-type: none"> • Please plan to work with Delgany and County Wicklow Stakeholders to appropriately commemorate the Millennium anniversary of the Battle of Delgany (1021 / 1022) and re-enact the events. Such a Heritage Festival could be extended to include the celebration of 1,500 years of Delgany Village and 5,000 years of settlement in the Glens and the Valley of the Three Trout Stream (including its Neolithic and Bronze Age Hillforts). • Make more use of dark sky zones and quiet zones. • Protect rivers, wetlands, trees, hedgerows and ecological networks. • consider sustainable agriculture and zone good quality soils on the edge of towns. • In the last development plan (2013) the eastern part of the Delgany-Kilcoole Mass Path was included as a listed right of way i.e. that section of the path from Kilcoole to the tarred road at Kilquade. However this Mass Path actually continues on from Kilquade to Delgany, crossing the Farrankelly Road dual carriageway (where signage steps and stiles were erected for it by NRA at the time of the road's construction) and continues on to Delgany via Drummin Lane and Blackberry Lane. This omission should be corrected in the next development plan.
<p>Bray Head Residents Association (C23)</p>	<p>This submission relates to a wide range of issues, including heritage issues, relevant to Bray specifically. Therefore this submission is addressed in Part 4.3.13 of this report.</p>

<p>Wicklow Uplands Council (C27)</p>	<ul style="list-style-type: none"> • WUC is an independent voluntary organisation which represents over 40 diverse member groups and individuals with an interest in the Wicklow Uplands region. Our organisation takes a partnership approach to sustainable development and promotes projects which bring value to those who live and work in the uplands as well as those who enjoy the area for recreational purposes. • Co Wicklow has rich and diverse built, natural and cultural heritage and this heritage must be protected. The Wicklow uplands are widely known for its iconic landscape. It is a living landscape which has been extensively farmed for generations. Wide areas of these farmed habitats are designated under Natura 2000 and also recognised as having high likelihood for High Nature Value (HNV). HNV farmland is extensively managed farmland that has a high biodiversity. These areas are important for the conservation of semi-natural habitats and the associated flora and fauna and also for providing environmental public goods and ecosystem services e.g. upland biodiversity, water quality, soil quality and resistance to flooding. Therefore it is essential that these areas are well managed and that viable communities are maintained in these areas. • Despite EU designations and the high likelihood of large areas of the Wicklow uplands as areas of HNV, traditional extensive hill farming is in decline. Farming sustains the biodiversity of the upland landscape and it vital in maintaining its HNV. Traditional hill sheep farming is also recognised as an important aspect of our cultural heritage. The decline in upland farming activities has seen an associated decline in the quality and condition of these valuable habitats. Coupled with this has been the rise in the extent and frequency of unregulated burning. This is in part due the current permissive season for burning of upland vegetation which is unduly restrictive and out of line with the UK season. Uncontrolled wildfires threaten the conservation status of Natura 2000 sites and pose a serious threat to forestry and public safety. The cost of tackling these wildfires is substantial. WUC promotes the use of controlled burning on a rotational basis as means to support agricultural productivity, to support biodiversity and as a pre-emptive measure to prevent wildfires taking hold in areas of heavy vegetation in drier summer months. The use of fire can create an emotive response but when carried correctly, it is an effective land management tool which supports upland biodiversity and agricultural productivity by creating a mosaic of vegetation type and structure.
<p>Jenny McCarthy (D2)</p>	<p>This submission relates to the ‘Old Schoolhouse’ on the Kilcoole Road; the submitter (property owner) is requesting that it be retained on the RPS.</p>
<p>Anna Deveney (D4)</p>	<p>This submission relates to the RPS entry regarding ‘pillar boxes’ in Bray and it suggests that the description of the entry is too vague and should be expanded to give clearer description of the location and information regarding the 9 such structures in Bray.</p>
<p>Fintan Clarke (D6)</p>	<p>This submission relates to the road to the lighthouse at Wicklow Head and the following points are raised:</p> <ul style="list-style-type: none"> • Irish Lights owns the access road from the public road to the lighthouse. The access is privately owned by Irish Lights subject to the right of way of the owners of the former Lightkeepers’ dwellings and local landowners. • It was constructed by Irish Lights. It is maintained by Irish Lights. • Irish Lights has always been aware of a certain number of the public using this access road as a place to walk to view the lighthouse and coastline. • Irish Lights has no problem with the practice of the public heretofore in using this access but the issue of how to address unauthorized vehicular access is under consideration in order to protect their facilities and in the interests of public safety generally. • Irish Lights requires 24-hour access to its facilities at Wicklow head lighthouse. • A recent website of Irish Lights indicated that:

	<p>Wicklow Head High (1) Accessible by road. Site open. Wicklow Head High (2) Accessible by road. Site open. Wicklow Head (Low) (2) Site and tower closed, but lighthouse can be viewed from above. This would indicate that the public had access right out to Wicklow Head but not to the lighthouse site situated there.</p> <ul style="list-style-type: none"> • This roadway won the 2012 “Best Natural Heritage Award” in the Wicklow Uplands Council “PURE MILE” Competition. • The area has been constantly monitored by people from the immediate locality who have regularly picked up and removed any stray litter from the roadway. • Wicklow Head is a renowned “Special Protection Area” having phenomenal views all along the coastline – sometimes extending as far as Wales. It is the most easterly point of the Irish Republic. Along this roadway one can see a marvellous heritage of common and rare flowering plants. Wildlife includes red kites, rabbits, foxes, green lizards while nesting kittiwakes, razorbills, gulls, cormorants and kestrels can be seen all around the high cliffs. • We have three lighthouses, one of which dates back to the late 1700s. We have here a rich, built heritage enjoyed by generations of Wicklow people. • Legal Test: a public right of way exists where it can be shown that there has been public use since time immemorial. Start and Finish: traditionally, a presumption that a public right of way exists also requires that the route starts in a public place and ends in a public place. There is one exception to this rule: where the destination is a place of natural beauty, which requires access. • Older residents from the locality do not have any recollection of this roadway ever having been permanently closed to the public; it is currently padlocked. • All of this scenic area is now being blocked off by the action of one individual who also claims ownership of the road. Is the present generation of Wicklow people to be denied access to an area that countless past generations have enjoyed? <p>Quite apart from the general public, emergency services such as lifeboat, mountain rescue, ambulances etc. will need to have unrestricted and immediate access to Wicklow Head. These people will not have time to go around scouting for a key when an emergency arises.</p>
<p>James Scott (D7)</p>	<p>Greenbelts: The plan should incorporate greenbelts around settlements to protect the rural nature of our surrounding and avoid having settlements that adjoin each other.</p> <p>Afforestation: Planting new woodland mitigates climate change and adds huge amenity value when done in close proximity to population centres. Greenfield sites should be offset with planting of additional woodland and the county should pursue afforestation in the green belt areas between villages when the opportunity presents itself. Every settlement should have a woodland where local people can go to experience the unmatched well-being benefits that come from human contact with this habitat. The county should have afforestation goals and be as specific in these goals as we are with housing development action plans.</p> <p>Coastal wetlands: We should continue to protect and even expand the coastal wetlands complex from Wicklow Town up to Kilcoole. There are a number of areas here where low-output agriculture is pursued in areas that were historically high quality wetlands. The county should have a strategy to re-flood and re-wild these areas as the opportunity to purchase land presents itself, in order to extend and protect the nationally important environment here.</p> <p>Water quality: A number of older wastewater treatment plants are discharging into our coastal streams which undoubtedly has an impact on fish stocks and coastal health. The development plan should contain strategies on how to reduce and eliminate wastewater discharge to our sensitive water bodies and also how to militate against</p>

	<p>future development which will impinge on water quality. We should have buffer requirements in our development plans which allow for native vegetation along streams to an appropriate distance. We should also be working to replace over the coming years bridges which obstruct the free flow of trout and salmon from the sea. Walkways: Our rural walkways are a priceless heritage from previous years and should be rigorously protected. We have only a very small handful of protected rights of way; we should have a policy of expanding this number. We should document the customary rights of way and class them according to their amenity value. Development should be discouraged and prevented within a certain distance of these ways. Future generations will thank us for protecting the heritage that has come down to us in the form of rural paths.</p>
Liz Tiernan (D8)	<ul style="list-style-type: none"> • Having declared a "biodiversity and climate change emergency" earlier this year, Wicklow County Council should be protecting its natural heritage as a priority now. We need to protect our existing natural heritage sites and take measures to extend this protection. Examples include the unnecessary cutting back of hedgerows and the cutting of mature trees which in many cases I have seen throughout the county are not necessary for health and safety and seem more to do with providing work/employment for people to carry out these jobs - this has to stop. • The 'Tourism & Recreation' section of the Issues Booklet begins with "Wicklow’s scenic unspoilt landscape and extensive woodlands" This is not how a keen eye views Wicklow. The landscape is dominated by extensive commercial monoculture conifer plantations and 'sheepwrecked' uplands and lots of us would like to see this start to change. Our old oak woodland in Glendalough is a gem that could be an inspiration for other parts. We need to take back land in Wicklow for native woodland for a multitude of reasons - to reduce erosion, increase carbon storage, increase biodiversity, for recreation and for our heritage.
Anne O’Leary (D11)	<p>Submission relates to Protected Structure, Ref No. 13-06 cottage at Main Street Kilcoole (submitter is owner of property). Request that Wicklow County Council removes the house from the list for the following reasons:</p> <ul style="list-style-type: none"> • Having no knowledge of our house being on this list, through no fault of our own, it has fallen into a state of very bad repair; • We have owned this cottage (Primrose Cottage) since 1993 and were never notified of the planner’s decision to add it to the list and only became aware of its presence on the Protected Structures list in January 2018 when we started discussions with our architect about the work we wanted to do. • On the advice of the conservation officers with Wicklow CoCo we have since applied and obtained full planning permission, planning register number 18/849, got various quotes, explored the restoration and have concluded that the costs of bringing it up to modern day standards of comfort are prohibitive and the resale value would be less than the build spend when compared with the costs of knocking and rebuilding on a like for like basis if planning allowed. • Despite our best efforts the roof slates are loose and rain is penetrating the building adding to an already established problem around rising damp and mould. • Owing to the ever increasing costs of restoration we find we are in a very difficult situation as the professional advice we have received is that the building is possibly not sound to begin with and these potential problems will only reveal themselves when restoration work will have already begun. We

	<p>have a limited budget and cannot get ourselves into this situation at this time in our lives.</p> <ul style="list-style-type: none"> • Having consulted with architects and builders it is clearly obvious that there are neither architectural nor social reasons why our house is included on the record. • We currently live next door to this cottage and our plan would be to sell our current house with a view to 'downsizing' to our cottage in the not so distant future, but only if we could bring it up to 21st century standards.
<p>Keith Scanlon (D12)</p>	<ul style="list-style-type: none"> • Please strengthen the awareness and protection of the Glen O' the Downs [SAC] Nature Reserve, the jewel in the crown of Wicklow nature. Set policy to monitor and manage the largely-forgotten western section of the Glen nature reserve and re-connect it to the eastern section via a number of wildlife bridges over the N11 / M11 and underpass tunnels where suitable. • Please identify, in the County Development Plan, the complete Three Trout's Stream River System as a County Wicklow (Climate and Biodiversity) nature reserve. It is, in effect, an extension of the Glen O' the Downs SAC and a key corridor connecting the Natura 2000 sites of the Sugar Loaf, The Glen O' the Downs and the Wicklow Coastal Natura 2000 sites. Please prioritise it for awareness, protection, environmental monitoring, and restoration / re-wilding as a native riparian wooded (oak) wildlife corridor to the maximum extent possible. • In Wicklow Branding & Communication (internal and external), please make proper central space, focus and respect for Wicklow's defining characteristics that have shaped all development - its Rivers, Wetlands, Uplands and Coasts / Marine area. The Earth is not flat, 2D, dry, boring and naked, and the Natural Wild Garden of Ireland certainly is not! This natural Wicklow mindset and identity appears very weak in previous County Development Plans and other Corporate Plans. Always take the opportunity to display Wicklow's Mountains / Uplands, Rivers & Marine area in the background whenever showing any geographic display / map, e.g. even administrative detail such as the 5 geographical Municipal District Areas that make up the WCC administrative area, etc. Please integrate this natural thinking and branding into all WCC communication, planning and discussion, perhaps including preparing a simple Wicklow 3D geographic map template for use by all Departments and Directors of Service. • In Heritage and Environment, please identify, map & zone all Wicklow River Corridors & Wetlands for Protection (Waterford last 2 County Development Plans provide a good example). Please state Wicklow policy to facilitate restoration of the natural connectivity, flow and condition of the rivers wherever reasonably possibly, to include completing the removal of unnecessary obstacles / weirs and encouraging fencing / drinking solutions to keep livestock physically back from poaching the river bank, while also preventing overgrazing by livestock and wild animals and allowing re-wilding / native re-forestation. • Please state Wicklow policy to work closely with LAWPro, EPA, NPWS and IFI to support local communities, land-owners, River Trusts and Tidy Towns groups to protect rivers and re-connect the community to their local lifelines. • Please study the creation of a new zone type "Land reserved for Nature including Climate & Biodiversity Natural Solutions" and the zoning of Wicklow Rivers and a corridor 50m each side of each river. This could be piloted on selected rivers such as the Three Trout's Stream and the Swan River in Bray. If successful it could be applied to the zoning of other Uplands as well as the Rivers/Wetlands. • Please further study the option of purchasing (CPO) of these River Corridors for protection, restoration and re-wilding, and call on the Irish Government and other interested Corporate Stakeholders to provide a "Purchase for Rewilding" Fund, as

	<p>the New Zealand and Danish Governments have done for their bogs / wetlands.</p> <ul style="list-style-type: none"> • Please state Wicklow policy to protect all remaining mature trees and established hedgerows (since they are essential in tackling the climate and biodiversity emergencies). Please plan how best to educate schools and all stakeholders about the value of trees and the place of trees in our native Celtic and pre-Celtic Culture including the Brehon Laws. • Strengthen the awareness and protection of the ridge of Scott’s Pine trees known as Harmon’s Brow / The Dancing Trees on the brow of Drummin Hill just south of Delgany Village • Please plan to work with Delgany and County Wicklow stakeholders to appropriately commemorate the Millennium anniversary of the Battle of Delgany (1021 / 1022) and re-enact the events. Such a Heritage Festival could be extended to include the celebration of 1,500 years of Delgany Village and 5,000 years of settlement in the Glens and the Valley of the Three Trout Stream (including its Neolithic and Bronze Age Hillforts) and a re-discovering / re-connection of our Brehon Laws with their progressive measures on protecting nature, protecting communities, diversity and inclusion. • Make more use of dark sky zones and quiet zones • Consider sustainable agriculture and zone good quality soils on the edge of towns.
<p>Eleanor O’Farrell (D13)</p>	<p>This raises the same heritage issues as D12 above.</p>
<p>Igor Cusack (D14)</p>	<p>The County Council should in future insist that private developers provide sufficient tree and bush planting, adequate non-paved gardens and allotment space to minimise the loss of biodiversity. In order to manage this, the Council should consider establishing an equivalent of a Parks Department to encourage a focus on the biodiversity of future housing estates.</p>
<p>Yasmin Fortune (D15)</p>	<ul style="list-style-type: none"> • Please prioritise our natural heritage by preserving our woodlands, wetlands and grasslands as wildlife habitat for our nature species - in particular our red and amber listed species. Please prioritise wildlife bridges so our wildlife can stay safe and healthy without being forced into traffic or into gardens when building roads and please consider tunnelling or other options such as sinking roads when roads must be built. The loss of this wildlife greatly affects the present and the future of our country: more than ever, at a time of endemic stress and anxiety experienced by our young people as a result of the great disconnect of the plugged-in information age, we need these green areas for human well-being as well as for the conservation of our incredible wild Wicklow. • Please prioritise the preservation of our geographical and aesthetic natural heritage. • Please prioritise the protection of the incredibly beautiful, ancient, and extremely special area of Glen of the Downs, Downhill Bronze-Age Hillfort, Coolagad Bronze-Age Hillfort, Bellevue Demesne, Toll-Road / Norman Path, Woodlands Church, Three Trout Stream and Delgany Historical Village. Please commemorate the 1022 Battle of Delgany and honour the importance of its location in the valley of the Glen of the Downs, and the strategic settlements of Ugaire King of Leinster on Downhill, and Citric King of Dublin on Coolagad. Please conduct extensive archaeological investigation into this special area. Please prioritise the open-to-the-air nature of the Three Trout’s stream and other streams and rivers in the county in order to protect the flourishing of biodiversity. • Please honour the historic importance of the remains of the Georgian gardens at Bellevue estate and the importance of Bellevue Demesne as wildlife habitat for red and amber listed species. • Please prioritise our built heritage by cherishing and encouraging public awareness

	<p>of our ancient archaeology and our more recent historical architecture. Please find a way to balance housing and development harmoniously with respect for and care of the beautiful structures of our ancestors.</p> <ul style="list-style-type: none"> • Please prioritise the preservation and raising awareness of our traditional farming methods and crafts, historical farm buildings and practices, and heritage farm-animal breeds including the Kerry Bog Pony whose numbers are most likely the last remaining Celtic Ponies of ancient times, documented in Ireland at the time of Newgrange. • Please prioritise access to nature and green aesthetic beauty for all County members and visitors.
Gabrielle Kirby (D16)	A greenway from Wicklow (The Murrough) to Greystones would be lovely and a nice tourist attraction, it would also bring more business to the shops into Wicklow Town.
Ann Scanlon (D17)	This raises the same heritage issues as D12 above.
Patricia Ryan (D18)	This raises the same heritage issues as D12 above.
Tina Roche (D19)	This raises the same heritage issues as D12 above.
Tessa Stewart (D26)	<ul style="list-style-type: none"> • Regarding the N11/M11 proposed development, it is important that we value our amazing heritage and prospects in this magnificent setting. The proposed routes would seriously damage the biodiversity of the area, resulting in habitat loss for Protected Species including the red-list barn-owl, yellowhammer, grey-wagtail and woodcock, a vast number of amber list birds and mammals including the red squirrel, the red deer, the pine marten, the red fox, the badger, the hedgehog, the long-eared owl and many others, and the destruction of Ancient Oak Woodland and the ancient Three Trout’s Stream; ancient sites of archaeological significance such as the 5000 year old Hillforts of Downhill and Coolagad and equally ancient toll-road, and the 1750s historical Georgian La Touche estate are at risk; The 7th Century monastic village at Delgany and the physical outline of the 12000 year old glacial valley - an untapped Culture and Heritage tourism asset are threatened. This area is important locally, nationally and globally. This is part of our world heritage. • When giving planning permission for roads and housing, prospects and heritage should be a priority. Otherwise we get suburban housing estates built right up to the edge of significant ancient castles, like with Kindlestown Castle which is completely surrounded by an estate in Greystones/Delgany, and no-one knows it is even there. It could be part of a nearby new hiking trail if the surroundings were not so dismal. We cannot market our ancient east if we treat it so badly. • Biodiversity in the water ways: The Swan River in Bray - it is currently functionally dead, filled with grey sludge. For the linked greenways to function there has to be life in them. As I understand it there may be outlets straight into the river from the pharmaceutical factories in Southern Cross, one man told me he worked there and the factory had an outlet straight into the river. Many people from Wheatfield complain about the condition of the stream as it flows through their estates, as at times it looks like milk. I have seen this myself. Also there are many of the old cottages up along the Boghall Rd that still have grey water outlets into a tributary of the Swan River. In addition another tributary has run off from the Bray Golf Club, which also reportedly has some toxic chemical run off. We need attention to this waterway, and if it is to be used as a planned greenway, it needs biodiversity stressed over public access and building new damaging paths. Perhaps a boardwalk might be a solution, but all dogs should be on a lead, as it is a very narrow area, and wildlife cannot escape easily. The heritage in the area is certainly outstanding, with Oldcourt Castle Tower being in good condition. However there is a Celtic cross base carved similar to the High Cross in Moone that is falling into the

	<p>Swan River, and needs to be rescued.</p> <ul style="list-style-type: none"> • Avenue down to Oldcourt House: Large old trees are part of our prospects and heritage, even when they are not a listed species. If there is a TPO then this should be honoured. I understand that Oldcourt House Avenue has been approved for an access road to a building site behind Charnwood. Some of these trees are protected, and most are magnificent. Many would need to be pulled down. This should not go ahead.
Noreen Keville (D28)	This raises the same heritage issues as D12 above.
Ann Teehan (D29)	This raises the same heritage issues as D12 above.
Isobel Connolly (D32)	This raises the same heritage issues as D12 above.
Cressida Knapp (D33)	<ul style="list-style-type: none"> • Submitter indicates she is resident of Donard spends a lot of time walking in the local woodland and mountain trails. She’s been delighted to see red squirrels, stoats, hares, hedgehogs, pine martins, frogs, swifts, and swallows. They have to survive in poor habitat conditions. She would like to see more deciduous woodland, which are better joined up with hedgerows and tree lines, so species can move about more freely and not get trapped in pockets. • Agricultural land should be made to be more heterogeneous with long grass borders, exposed soil in areas and more trees. • The water quality needs to be improved from agricultural runoff. • Brusselstown Ringfort is a beautiful site, but no trail to it exists.
Alison Ryan (D34)	This raises the same heritage issues as D12 above.
Sinead Wallace (D35)	This raises the same heritage issues as D12 above.
Nancy Quinn (D36)	<ul style="list-style-type: none"> • Regarding the beaches in Arklow, Wicklow County Council has a duty to the residents to restore the access to north and Seabank beaches which have been illegally blocked since 2016, by 2028 understand the population of our town will be in the region of 23,000. Is Arklow to become a seaside town without a beach? • The ancient coastal path which dates back centuries should be restored. This walkway extended from north quay, Arklow, Seabank, Johnstown North and ended at Ennereilly Beach. This could form a valuable amenity for tourists and local people alike. • Seabank beach access should be restored and approval for preservation status. This beautiful beach has already got NHA status, it contains many rare plants including ‘Horsetail’ in the 1988 Arklow town plan, the then town engineer Karl O Donovan stated that this gem of a beach should have to be preserved and enhanced.
Adam Calihman (D38)	<ul style="list-style-type: none"> • Design for biodiversity and no spraying of weeds. Ban sprays unless absolutely necessary. • Improved Nature Reserves - increased protections, allocations, clean up and restoration of forests, biodiversity, wild lands, wetlands, waterway
Shane Stokes (D40)	<ul style="list-style-type: none"> • Request to prioritise biodiversity and climate considerations in relation to the Wicklow County Development Plan. • Concerned at talk of building major roadways, which has been proven in other countries and areas to lead to an increase in traffic rather than a reduction of cars. Ireland is already falling behind its commitments in relation to climate change and facilitating more cars at the expense of nature will only exacerbate this problem. Would urge an improvement in public transport to be a priority rather than building more roads. • If the money planned for construction of new roads was instead put into subsidising, improving and expanding public transport, there would be less traffic, less pollution, less damage to Wicklow’s environment and much greater compliance with Ireland’s

	<p>carbon targets.</p> <ul style="list-style-type: none"> • A programme of tree/nature protection and planting would also help the latter requirement.
Deirdre Burke (D41)	<p>This is a very detailed submission that raises a wide range of heritage related issue. However, as all the issues raised relate specifically to heritage in Arklow, this submission is addressed in part 4.3.15 of this report.</p>
Rose Murray (D43)	<p>Preserve and create awareness of all natural and built heritage. Wicklow is so rich in this, it needs to be protected and honoured.</p>
Marie Demirsay (D44)	<ul style="list-style-type: none"> • More hedgerows for birds as our bird population is currently down by 40%. Their food and water sources are in decline in the Wicklow area and this needs to be addressed as a matter of priority. • We need substantial work in the area of river protection from issues such as nitrate run-off, pesticide run-off and quarry run-off. Clearing of rivers in conjunction with Inland Fisheries Board and Wicklow East River Trust. • Protection of all our oak and native Irish trees - all should have a protection order (TPO) • Proposed greenway should not be allowed to go ahead as the Delgany Greystones river walkway is the only connected biodiverse belt left and this should not be altered in any way and only enhanced as a protected wildlife belt • Introduce more wildlife and nature education for children in schools and encourage more school walks/trips in nature. • Green spaces/animal habitats should under no circumstances be further compromised and/or diminished as we have already lost so much as a result of over development in the Greystones and Wicklow area. • Pollinator host plants, no pesticides anywhere in Greystones.
Nicola Kenny (D45)	<ul style="list-style-type: none"> • This is a very detailed submission that raises a wide range of heritage related issue. However, as the majority of the issues raised relate specifically to heritage in Arklow, this submission is for the most part addressed in part 4.3.15 of this report. • The County Development Plan refers to a network of green spaces that help to conserve natural ecosystems & provide benefits to people. But the CDP does not indicate where these green and blue infrastructural elements are to be found. They should be drawn on & linked together.
Laili de Buitlear (D47)	<ul style="list-style-type: none"> • The County Development Plan should encourage the re-use of historical buildings such as the catholic Carmelite church that has just closed in Delgany. This could be a lovely concert hall and lecture venue for education of young and old. In these grounds is the walled garden with lovely trees and shrubs. This is the only green infrastructure in the village of Delgany along with the old burial ground – which is a heritage area since 2007. • The other important area in Delgany Village is Stylebawn House and lands which are up for sale. This house was for 30 years owned by John Gaisford St. Lawrence and the Howth family. This house was open to the village and public during the summer months every year and at certain bank holiday weekends. The gardens and trees are still standing; the house needs lots of repair and has planning permission for added living accommodation. This could be an open green area infrastructure so central to the village. This should not be let go to ruin and it should be taken over by Wicklow County Council. • Delgany Village, Blackberry Lane, Bellevue estate (now golf course) should be considered a 1st class protected heritage village and protected against new development.
Art O’Laoghaire (D48)	<ul style="list-style-type: none"> • Protect the natural landscape • Protect biodiversity • Explain and encourage re-wilding

	<ul style="list-style-type: none"> • Explain how the Ecology Emergency is separate from the Climate Emergency. • Implement a programme for the planting of trees in urban spaces so as to create shade and refuge in the public realm when the temperature gets too hot. • Require all residential developments to have allotments so that we can reduce the carbon footprint by growing what we eat rather than importing 83% of what we buy in the supermarket. Currently, Irish farmers do not produce what Irish consumers are buying in the supermarket. • Explain how and why Ireland is one of the most de-forested places in the world • Our ancestors were able to drink water straight from the river. We cannot do that today because of the artificial fertiliser, the animal and human waste, the industrial waste that we discharge into our rivers and sea. We need proactive planning enforcement.
Billy Timmins (D49)	<ul style="list-style-type: none"> • Information plaques on historical buildings or outlining historical events should be encouraged e.g. cottage where JM Synge gathered much of his material for "Shadow of a Glen". • Develop a series of "monuments" across the county to recognise the many literary figures associated with the county. • Recreate the WW1 War Memorial at Woodenbridge in towns and villages with the associated detail.
Disability Federation of Ireland (D51)	<ul style="list-style-type: none"> • While the crucial importance of maintaining and preserving heritage sites is fully acknowledged, conservation should not come at the expense of accessibility. • International and National heritage sites have proven that access to historical sites can be improved for people with disabilities and older people without destroying or compromising the heritage of the site. The Rock of Cashel in Co. Tipperary is one such site where ramps were used in places where large structural works weren't possible. • Wicklow County Council should approach the task of upgrading historical sites creatively and find imaginative solutions to improving accessibility for all. • Natural heritage should also be accessible to all. Wheelchair viewing platforms should be added where possible and signage should be accessible and interactive and audible. Blue ways, Greenways and Cliff Walks should have safe, accessible, level surfacing and accessible viewing areas. Adequate rest stops, help points and charging points should also be included.
Claire Mullarney (D58)	Propose that the full extent of Chapel Lane in Glenealy, from where it starts when it leaves the L1096 Glenealy/Ashford road, all the way up to the entrance to the public forest on Carrick Mountain be registered as a Public Right of Way. It has been used by generations, for decades, and is a hugely important health and well being resource for the community of Glenealy Village and the wider public.
Annette Vaucanson Kelly (D61)	This raises the same heritage issues as D12 above.
Craig Bishop (D62)	<ul style="list-style-type: none"> • The spectacular rugged landscape is what defines Wicklow. It is its unique selling point. The Green New Deal and other global initiatives are inspiring governments to take revolutionary steps to change the way we live. • The Garden of Ireland Project merges these two concepts and imagines most of the hinterland of Wicklow developed as one large green entity. Within this area innovations for a sustainable future for Ireland can be promoted and tested before being rolled out across the country. <i>(Infographic attached to submission)</i>
Justin Ivory (D63)	<ul style="list-style-type: none"> • Two decades ago myself and others via submissions etc were imploring the Council to build the principles of sustainability and Agenda 21 as signed up to by Ireland at the Rio Earth Summit into the CDP and LAPs. Those entreaties were ignored by Wicklow CoCo and in turn by national government and this was reflected across the

	<p>globe. In the face of the science and the clear facts of where Wicklow, Ireland and the world was heading 2 decades ago. Elected councillors and council officials chose to ignore that and instead took a short term, unsustainable approach. In my opinion this was criminally negligent.</p> <ul style="list-style-type: none"> • A long term (100 years) sustainable vision and view for Wicklow needs be adopted not just 2022 to 2027. A decision needs to be made what human population County Wicklow and its major centres can accommodate while not further compromising the natural environment and social structures of the county. You were asked to only allow for natural growth 2 decades ago but went well beyond that. • Wicklow cannot be all things to everybody and every species. It cannot support endless, infinite development and growth, act as an outdoor human recreational playground for an ever-expanding local population and visiting day-trippers from a growing Dublin population, and also try to capture even more tourist visitors. None of this is sustainable without damaging what makes this once 'Garden of Ireland' special - it's variety of wonderful landscapes and habitats and the wildlife and biodiversity contained therein. • Rewild large areas of Wicklow to help halt and reverse the loss of biodiversity. • Plant more native forests and apply CCF principles. • Pay farmers to farm for wildlife. • Create wildlife corridors connecting existing and new wildlife areas (SPAs, SACs, nature reserves etc.) • Restrict human recreational activities to designated areas and have areas which are undisturbed by human activity.
<p>Edel Corcoran (D65)</p>	<ul style="list-style-type: none"> • Please prioritise balanced, sustainable development planning in your upcoming plan, explicitly aligned with, and complying to UN SDGs, and Irish Government Policy on Regional Development, Climate and Environmental Protection, Gender Equality and Inclusion. • Please give much more weight to describing, protecting and improving Wicklow's unique Natural Heritage and unique Community Spirit of resilience, volunteering and empowered creativity. These 2 characteristics are Wicklow's key strengths, the basis of all our development and the basis of the Wicklow quality of life we will create for ourselves, our children and their children. • Please plan the steps towards a joined-up, sustainable service infrastructure for a Post-Fossil-Fuel 2030 period, e.g. parks and nature reserves, transport (not roads in isolation), water, energy, housing, residential zoning and services, etc. Please question any extrapolation and extension of current (legacy) policies. The Climate, Biodiversity and Environmental Emergency must trigger new improved thinking on all policies. Please do not invest in legacy fossil-fuel infrastructure but rather in renewable and sustainable infrastructure (and public education & engagement to support this). • Please define (immediately, in a basic way, which can be extended later) and measure current Wicklow (Community & Ecosystem) Wellbeing and consider what future planning / prediction can be done with such measures. • Please plan innovation pilots (with possible support from CIT Wicklow Campus and UCD Earth Institute) to find sustainable models for <ul style="list-style-type: none"> - business employee co-hosting / satellite centres, and, - community-supported, low-impact, sustainable housing in tune with nature stewardship, to include social and affordable and commercial.
<p>Sophia Meeres (D68)</p>	<ul style="list-style-type: none"> • The Irish government declared a Biodiversity and Climate Emergency in May 2019, as did County Wicklow. Wicklow County Council must ensure that the new CDP strives to adapt to climate change and strengthen biodiversity. Climate Resilience and Strengthening of Biodiversity should be umbrella themes in this new plan. Although

	<p>Climate change is named as a cross cutting theme in the CDP issues paper, the Biodiversity Crisis is ignored.</p> <ul style="list-style-type: none"> • Rather than viewing natural elements of the landscape as visual or green “heritage”, the landscape mosaic should be recognised as a network of natural infrastructures that help in the fight against climate change and its effects - by soaking up storm rainwater, preventing flooding, strengthening river banks and coastlines, cooling towns, storing carbon, purifying the air, removing pollution, strengthening soils etc. whilst providing food and shelter for wildlife. • If Wicklow’s development is to be planned in respect of its natural infrastructure, there must be better knowledge of it. Maps designating existing natural habitats, land cover and land use must be mandatory elements of the future CDP and all Local Area Plans. Wicklow’s Green and Blue Landscape Infrastructure (rivers, floodplains, riparian habitats, wetlands, woodlands, hedgerows etc) should be mapped, and described, along with the County’s vision for strengthening individual elements and connectivity between them. • Development should occur in respect to habitats identified on these maps. Ordinary habitats should be protected by default, and permission should be sought before removal of any mature habitat (be it hedgerow, woodland or wetland) as part of development. • The creation of greenways should be a priority, realised through the compulsory purchase of land if necessary.
Helen Howes (D78)	Ensure that all planning and decision-making processes prioritise the protection of our natural and built heritage. Provide resources that will preserve and promote our social heritage, and history (including our craftsmanship and skills).
Karen Kennedy (D83)	A planned greenway route linking Rathdrum to other areas e.g. Clara Vale/Avoca/Aughrim should feature in the future plans for Rathdrum.
Elizabeth Battye (D84)	Tree and pollinator friendly planting should be allocated an annual, ring-fenced, budget in all towns and villages in the county. The main thoroughfares and public realms should be prioritised for planting.
John & Bernadette Glynn (D85)	Propose that the route from the Glenealy Church to the Carrick Mountain and the public amenity area there needs to be registered as a Right of Way Part of this route is the L-10963 known as Chapel Lane (or Ballymanus Lane): the full extent of the public road is disputed however the entire route has been used by many generations to reach Carrick Mountain. There is massive support for this from the local community and further afield as evidenced by the petition with hundreds of names collected last year when access was threatened.
KRA Renewables (D95)	This raises the same heritage issues as D12 above.
Judy Osborne (D98)	<p><i>This is a substantial and comprehensive submission that addresses a very wide range of issues. The issues collated here are those that relate directly to built and natural heritage.</i></p> <p>Habitat Protection</p> <ul style="list-style-type: none"> ▪ This section needs to make much clearer the importance of protecting biodiversity and it is suggested that this section should be separate from Heritage and Landscape ▪ Recent EU judgments make it clear that habitat protection must include non designated sites as well as those designated. The development plan policies HL13 are not adequate and should be reworded to clarify the situation for prospective developers ▪ Policy HL4 ...to ensure that the council has sufficient information to show how proposals will affect designated areas or in the vicinity of a designated area - have not been adequate and recent research by An Taisce has shown that there has

	<p>been a failure to require Environmental Impact Statements.</p> <ul style="list-style-type: none"> ▪ A recent study commissioned by Monaghan County Council estimated the wetland habitat loss as being a loss of 1521 ha of wetland habitat throughout the county in 6 years. Do we know the situation in Wicklow? ▪ Dumping soil as agricultural infill, supported by Teagasc, appears to be a problem that has resulted in complaints to the European Commission. The widespread loss of wetlands, caused by the disposal of spoil materials from road building and large infrastructural projects, are frequently not quantified or identified as part of an EIA. It is recommended that waste deposition generated by any construction or infrastructural project needs to be fully integrated in to the EIA evaluation process, as stated in the 2001 EC guidance on EIA. ▪ Policy HL16. No county bio-diversity plan for Wicklow has been produced as promised. ▪ 6.1.13 Protection of Hedgerows and stone walls. Without any indication of this existing resource it is impossible to know whether this section has been successful in preventing unnecessary destruction. This needs to be monitored. Several counties have undertaken hedgerow surveys and this would be valuable in Wicklow too. Hedgerows form an important part of any ecological networks which are vital in the protection of biodiversity, as well as contributing to carbon sequestration. In keeping with the need to reduce our carbon footprint, the Council should discourage the destruction of hedgerows and their replacement by concrete block walls. There has been intense pressure on hedgerows in recent years. Many have been destroyed in order to provide better sightlines for development along rural roads. Pressure on hedgerows will also increase rapidly in the next decade as more farms are consolidated. Proposals to ameliorate this trend are therefore urgent in order to ensure that there are no further judgments from Europe criticizing Ireland’s failure to properly assess the impact of removing hedges and walls. Hedgerows may also form an important part of any ecological networks which are vital in the protection of biodiversity ▪ Demesne Planting/urban trees/Forestry/Trees need to be given appropriate protection. <p>Heritage and Landscape</p> <ul style="list-style-type: none"> ▪ Propose that Landscape Character Assessment (LCA) is a more appropriate and more flexible planning tool by which to assess proposals for new development. Such an analysis would take into account a range of different issues, including tranquillity zones which will be few enough in the county but therefore all the more valuable. ▪ All the issues raised in sections of this chapter would be organised in a more coherent way in a landscape character assessment that included recommendations. ▪ Policy HL2 has failed to result in the identification of vulnerable landscapes and in particular The Murrough in Wicklow town has been degraded to an unacceptable degree. ▪ The development plan failed to protect the heritage landscape of Arklow Rock ▪ There is considerable expertise in Ireland now for the preparation of Landscape character assessment and we propose that this be undertaken in conjunction with the County Development Plan. ▪ An Taisce propose that Wicklow County Council recognises the special role of its landscapes in terms of overall environmental quality, tourism, biodiversity, ecology and water quality. It also recognises inadequacies in its existing county landscape designations, including confusion of landscape character and quality / sensitivity.
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	<p>For this reason, it shall be a priority to carry out at appropriate scales separate assessments of the county regarding character and sensitivity in accordance with the Draft Guidelines issued by the Department of the Environment Heritage and Local Government (2001). The characterisation study will provide an important understanding of the landscape, differentiating types in order to appreciate as well as providing a sound basis for considering <i>in what ways</i> and <i>extent</i> each might undergo change by particular developments.</p> <ul style="list-style-type: none"> ▪ The assessment of sensitivity is quite distinct from this, providing an understanding of the value of various resources and resulting in categories of sensitivity that should be adapted to different kinds of development. Thus, the sensitivity of landscape in relation to such development kinds as rural house, wind farms and forestry will be considered separately as each kind presents its own unique opportunities and challenges. However, the foremost function of this assessment is to assist in deciding <i>whether</i> and <i>to what degree</i> certain landscape can accept the different kinds of development. This shall be realised by the production of development specific strategies that are based on landscape character and use the sensitivity assessment categorically regarding the acceptability of development (see as examples the landscape based strategies for county Waterford and county Roscommon) We propose that Wicklow County Council further recognises that landscape characterisation should be extended into urban areas, hamlets, villages and towns and can play an important role in planning for both urban renewal and extension (see section on Urban Extension and Design). ▪ LCA would assist in indicating suitable locations for many new developments particularly in the rural areas e.g. renewable energy, tourist sites, walking routes. ▪ This will be particularly useful in the new economic period which is likely to see considerably more rural development taking advantage of the renewable energy opportunities. ▪ Views and prospects would be covered by a Landscape Character Assessment <p>Heritage parks and gardens need to be identified and protected</p> <p>Rights Of Way</p> <ul style="list-style-type: none"> ▪ There are many rights of way that are not contested and these must be put back into the County Development Plan. An objective to preserve access to the coast, river banks and to public and private forestry should be included and the objectives of 6.1.17 should be retained to preserve the open character of commons land. ▪ The Planning and Development Act 2000 greatly facilitates the confirmation of existing rights of way. The rights of landowners to be kept advised at each stage of the procedures is clearly set-out and they should have nothing to fear. In fact the listing of rights of way is very much in their interest in that, if there is a clearly marked network of rights of way, it would be quite reasonable for them to refuse access to all other land. From initial enquires we have made from our members it appears that there a number access problems in the county as follows: Castleruddery, West Wicklow – access to fort site Glencree – Walk across upper part of valley – Collen’s land Curtlestown – Old Coach road Shillelagh – Graveyard at Balisland Old graveyard Near Lough Dan – Ballinrush Estate
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	<p>Hollywood – Old path south of village Church Mtn</p> <ul style="list-style-type: none"> ▪ While we are not contending, at this stage, these are all rights of way, they merit the attention of the Council as, in virtually all cases, they are traditional walking routes which could be registered by the Council as Rights of Way. The main purpose in compiling this list is to illustrate that all is not well on the access front in the county. In the 2004 Plan you make many references to walkways, trails etc which is commendable. However, it must be realised that most of these walkways go across private land can be closed by the landowner at any time without notice and for any reason or none. The fact that most of them are open is no guarantee for the future and a change in ownership can lead to a change of attitude. Another factor that could lead to a worsening of the situation is the stand-off between the IFA and the Government over payment to farmers for access. The IFA are making bellicose statements about closing off access in pursuance to their claim. ▪ The need for reasonable access to the countryside has been recognized as far back as 1997 by the then Dept of Sport (see appendix 1) and by the EU (see appendix 2). This denial of access has not only affected local people but is a real turn-off for visitors. ▪ The rapid suburbanisation of much of the county must inevitably result in the loss of traditional walking routes, old green roads and mass paths. Once these routes have been built-on they are lost forever. ▪ Councils in other counties have made progress on this issue as follows: <p>A. Rights of Way listed</p> <p>Dun Laoghaire/Rathdown – 28 rights of way (all rural) are listed and mapped in their Plan. While landowners have objected some to we are hopeful that, following a successful court case that the remaining objections can be dealt with.</p> <p>Signing posting has commenced. - 9.2.14 – Table 9.4.</p> <p>Clare - Rights of Way in Ennis and the Environs have been listed there is a commitment to list in the rest of the county – 3.1 – page 87.</p> <p>South Tipp – Some rights of way listed – Table 4.2 – page 36.</p> <p>B. Counties where listing is to be completed within two years: Kilkenny -7.3.5.2 – Action.</p> <p>Meath - 8.2.16.</p> <p>Fingal - page 158 - GBO 2. Mayo - O/TI PC 2.</p> <p>Carlow Draft – Public Rights of Way - page 74 – final pt.</p> <p>C. County who have provided for listing with no target date.</p> <p>South Dublin – 9.5.9.iv</p> <p>The task of listing would be greatly facilitated by the appointment of an Access Officer. This has been done in Donegal. Pending this appointment perhaps the Heritage Officer could start the ball rolling.</p>
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	<p>Applicable to Coastal Counties – There is a particular incentive to establish a Coastal Path on a permanent and legal basis by the ensuring that the path has the full status of a public right of way. It could, in time, form part of a national coastal path. This path would generate much needed tourist revenue. The Cornwall/Devon cliff path in England brings in annual revenue of 325M pounds sterling.</p> <p>Based on the provisions of the many county plans we submit that the following should be included on the Plan:</p> <ul style="list-style-type: none"> ▪ List existing public rights of way, paths, access points to rivers and waterways, lakes, mountains and other amenity areas, within one year of the adoption of the plan, but if examination of traditional walking routes for possible designation is not completed within this time, that an Interim Plan will be prepared. Detailed maps showing the actual routes will accompany the list and the appropriate signage will be put in place. The list will be included in the plan by way of Variation. ▪ Preserve, protect, promote enhance, improve and maintain, for the common good, existing rights of way. ▪ Prohibit development and keep free from obstruction existing rights of way, walking routes and amenity areas, and take legal action if necessary to prevent any attempt to close them off. ▪ Create new rights of way as required or extend/enhance existing rights of way either by agreement or by way of compulsory powers, in the interest of ensuring access to amenities. In particular, rights of way should be created to provide linkages from built up areas to the countryside. ▪ Look favourably upon planning applications that include proposals to improve the condition and appearance of existing rights of way. ▪ Prohibit development that would prejudice public access to existing rights of way, unless specific arrangements are made for suitable alternative linkages. <p>Policy TR10 promises to co-operate with representative groups to support the development of walking groups but no structure exists for this purpose.</p> <p>Other opportunities are neglected. For example the Avoca mines are not yet opened and an objective should be included to facilitate this development.</p> <ul style="list-style-type: none"> • We are pleased to see the designation of Bray Head with a Special Amenity Area Order however the objectives for the area of outstanding natural beauty and the coastal region in this section are very limited and have failed to provide appropriate protection to Wicklow Bay, one of the most stunning areas of outstanding beauty and natural habitat in the county which is now seriously degraded in the area closest to the town where its amenity is most badly needed.
<p>Cairn Homes (D101)</p>	<ul style="list-style-type: none"> ▪ Public amenities and investment in green infrastructure can greatly enhance the amenity and quality of life within towns. ▪ In Greystones, Wicklow County Council have developed the first phase of a greenway which will eventually connect Greystones and Delgany. Cairn Homes hope to deliver the second phase of this greenway as part of the proposed development at Farrankelly which is currently under consideration by An Bord Pleanala. The greenway is a fabulous amenity for Greystones, and something which could be replicated throughout the county. • Cairn Homes would encourage Wicklow to explore the potential for similar amenities in other towns such as Blessington where an opportunity exists to connect natural

	assets such as the Blessington Lakes and Glen Ding Woods. In Enniskerry there may be opportunities to provide connections with the Powerscourt Estate.
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Response of Chief Executive

(1) General

The CE welcomes these submissions and acknowledges that a lot of thought and work has gone into them. While all suggestions are valuable, a significant number of them are not issues that can be directly addressed via the County Development Plan which is a land use plan where the key role with respect to natural and built heritage is to provide:

- a clear articulation of the Council’s strategy and policy with respect to the protection of built and natural heritage of the County;
- identification of key heritage assets, a description of the type protection afforded to these and what these means in terms of their future use and development
- a framework (including development standards) within which projects or programmes (heritage related or otherwise) can be undertaken by the Council, other local or state agencies, community groups or private individuals.

The County Development Plan is not the Council’s operational or spending plan for the duration of its period; actions undertaken by the Council will be determined by annual delivery programmes and budgetary allocations.

Many of the heritage issues raised in submissions may be more effectively addressed through the remit of County Heritage Plan and the County Biodiversity Plan therefore these submissions will be brought to the attention of the County Heritage Forum and the new Climate Change and Biodiversity SPC. It is through the scope of these strategies and action plans that programmes, projects and relevant partnerships may be progressed.

The County Wicklow Heritage Plan is a five year strategy and action plan. The current plan is for the period 2017 to 2022. The implementation of the Plan is overseen by the Wicklow Heritage Forum and co-ordinated on a day to day basis by the Heritage Officer of Wicklow County Council. While the Wicklow Heritage Forum, Wicklow County Council and the Heritage Council are key partners in the delivery of the Plan , there is a significant role for the wider ‘heritage community’ in Wicklow which includes additional community groups, agencies, third level institutions and individuals. Successful implementation of the Plan is dependent on the continued active engagement, support and participation of this wider community in Wicklow.

The Heritage Forum is made up of the council, community, non-governmental organisation (NGO) and state sector representatives and is key to the delivery of the Heritage Plan. Members meet quarterly and make a huge commitment to co-ordinating and overseeing actions of the Plan. The Forum meetings provide a valuable opportunity for members to discuss issues, share knowledge, information and resources and build working relationships.

Wicklow County Council is committed to delivering the Wicklow Heritage Plan in partnership with others as resources permit. The Council will consider funding allocation for the delivery of the Plan in accordance with the annual budget. The Council will also support the delivery of the Plan through the work of its Heritage Officer and other professional staff. Each year a detailed work programme is drawn up from the actions in this Plan, which will be submitted to the Heritage Council and other funding bodies as appropriate. The commitment of other key partners to funding actions in the Plan will largely be dependent on their funding allocations and remits.

As the annual work programme is agreed, commitments will be sought from relevant partners, including other additional partners (as the need arises) for implementing key actions. There will be ongoing consultation with other relevant organisations regarding participation in proposed actions. The lead partner responsible for ensuring the delivery of actions will be highlighted as part of the agreed work schedule.

Chapter structure & topics and amended / new objectives for the County Development Plan: A number of submissions are made with respect to the structure and topics covered by the existing heritage chapter of the current County development Plan and requesting new or altered objectives. In general it is intended to maintain the current plan provisions in the new plan and enhance them where required. Submissions including suggestions for new topics and objectives or alternative wording will be considered in the drafting of the new plan. This report will not include a detailed line-by-line critique of all such suggestions.

Maps / data: The current County Development Plan and the Strategic Environmental Assessment / Appropriate Assessment accompanying same provide a wide range of maps and information about known heritage assets. It is intended that these will be maintained, updated and enhanced where possible in the new plan. In addition, it is intended that all plan maps for the new plan will be accessible on a more interactive online map viewer. It would not be feasible as part of this process, having regard to timeframes and resources, to survey, map and evaluate the significance of every possible asset / feature, such as suggested for the thousands of kilometres of hedgerows or stone walls in the County.

(2) Built Heritage

General

The architectural and archaeological heritage of a town, village or place contributes greatly to the distinctive character of each local area. The Council is committed to safeguarding this heritage so that future generations may also enjoy this inheritance. In this regard, the strategy for built heritage as set out in the current County Development Plan is as follows:

- *To ensure that the protection and conservation of the built heritage of Wicklow is an integral part of the sustainable development of the county and safeguard this valuable, and in many instances, non-renewable resource through proper management, sensitive enhancement and appropriate development;*
- *to safeguard archaeological sites, monuments, objects and their settings above and below ground and water listed in the Record of Monuments and Places (RMP), and any additional newly discovered archaeological remains,*
- *to identify archaeologically sensitive historic landscapes;*
- *to ensure the protection of the architectural heritage of Wicklow through the identification of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding of designed landscapes and historic gardens, and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the County; and*
- *to support the actions in the County Wicklow Heritage Plan, in order to enhance the understanding, appreciation and protection of Wicklow’s built heritage.*

The implementation of this strategy has a number of elements, with the key function of the County Development Plan being to sensitively manage changes that occur to this heritage and by ensuring that significant elements, features or sites are retained.

Elements of our archaeological and architectural heritage are protected through a variety of means, including but not limited to the implementation of the provisions of the European Convention on the

Protection of the Archaeological Heritage, the Convention for the Protection of the Architectural Heritage of Europe, the National Monument Acts and the Planning and Development Act 2000.

Record of Protected Structures (RPS)

A ‘protected structure’ is any structure or specified part of a structure, which is included in the RPS. The purpose of the RPS is to protect structures, or parts of structures, which form part of the architectural heritage and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. Every development plan shall include a record of protected structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such interest within its functional area.

The placing of a structure on the RPS seeks to ensure that the character and interest of the structure is maintained and any changes or alterations to it are carried out in such a way as to retain and enhance that character and interest. The inclusion of a structure in the RPS confers certain responsibilities upon the owner of the structure and requires that planning permission be sought for any changes or alterations to the structure. The definition of a ‘structure’ or ‘a specified part of a structure’ for the purpose of the RPS includes “the interior of the structure; the land lying within the curtilage of the structure; any other structures lying within the curtilage of that structure and their interiors; and all fixtures and features which form part of the interior or exterior of the structure”. From the date of notification of an intention to include a structure in the RPS, the owner has a duty to protect that structure from endangerment. The Council may, on receipt of a written request from the owner or occupier of a protected structure, issue a declaration under Section 57 of the Planning and Development Act 2000 (as amended), outlining certain works it considers would not materially affect the character and interest of the protected structure and which are, therefore, exempted from the requirement for planning permission. Any works that would materially affect the character and interest of a structure require planning permission. In general works to a protected structure should comply with the guidelines as set out in the Architectural Heritage Protection Guidelines from the Department.

The key to protecting such structures (or groups of structures) is to find ways to protect their physical integrity and maintain their viability. In this regard, there will be presumption in favour of the active use of heritage buildings, even if this means some modern interventions, rather than preserving them forever in the past, which can ultimately result in the structure being unusable and falling into dereliction.

The current County Development Plan provides the following objectives with regard to protected structures and it is intended that these will be retained and enhanced if necessary in the new plan:

- BH9** *To ensure the protection of all structures (or parts of structures) contained in the Record of Protected Structures.*
- BH10** *To positively consider proposals to improve, alter, extend or change the use of protected structures so as to render them viable for modern use, subject to consultation with suitably qualified Conservation Architects and / or other relevant experts, suitable design, materials and construction methods.*
- BH11** *All development works on or at the sites of protected structures, including any site works necessary, shall be carried out using best heritage practice for the protection and preservation of those aspects or features of the structures / site that render it worthy of protection.*

BH12 *To support the re-introduction of traditional features on protected structures where there is evidence that such features (e.g. window styles, finishes etc) previously existed.*

BH13 *To strongly resist the demolition of protected structures, unless it can be demonstrated that exceptional circumstances exist. In cases where demolition or partial demolition is permitted or where permission is given for the removal of feature(s), the proper recording of the building / feature will be required before works are undertaken and where possible the reuse of such features should be considered in any replacement buildings.*

BH14 *The Planning Authority shall consider the change of use of Protected Structures, provided that it can be shown that the structure, character, appearance and setting will not be adversely affected or where it can be shown it is necessary to have an economic use to enable its upkeep.*

In accordance with Section 58 of the Planning Act, the owners of protected structures are required to ensure the structure is not endangered. The Council is committed to ensuring the ongoing protection of structures / items on the RPS by utilising its powers under Section 59 and 60 of the Act to require owners take steps to prevent structures becoming endangered and / or to restore the character of the structure or any of its elements, if necessary.

With regard to some of the more specific structures / items raised:

Kilcoole schoolhouse: A submission was made during this consultation process requesting the removal of this structure from the RPS but the property owner has since contacted the Council to advise that they no longer wish to have the structure removed. This was one of a number of structures assessed by architectural heritage consultants commissioned by the Council in 2019. This assessment recommended that the structure remains on the RPS due to its social and cultural significance as the original school house for Kilcoole. It is therefore recommended it be retained on the RPS.

Bray post boxes: This suggestion regarding the post boxes is welcomed and it is recommended that the RPS be improved by inclusion of more information on all of the post boxes that are included in the existing RPS entry.

Georgian gardens at Bellevue Demesne: These gardens are not currently on the RPS. It is recommended that this complex of buildings and associated ground be further investigated for possible addition to the RPS. It would not be considered appropriate to consider the wider historical Bellevue estate for protection, given that a large portion of it has been redeveloped as Delgany golf club and for pockets of housing (particular on the western side).

The Carmelite Church in Delgany: This is a protected structure. The current County Development Plan explicitly supports the sensitive redevelopment of protected structures including changes of use, in particular through the following objectives:

BH10 *To positively consider proposals to improve, alter, extend or change the use of protected structures so as to render them viable for modern use, subject to consultation with suitably qualified Conservation Architects and / or other relevant experts, suitable design, materials and construction methods.*

BH14 *The Planning Authority shall consider the change of use of Protected Structures, provided that it can be shown that the structure, character, appearance and setting will not be adversely affected or where it can be shown it is necessary to have an economic use to enable its upkeep.*

It is intended that these or similar provisions be retained in the new plan. This church and the convent grounds have been purchased in the last year by a private owner, and it is understood that plans for the development the lands are currently being drawn up, principally for housing (as allowed by the zoning set out in the Greystones – Delgany Local Area Plan). Any such plans would be required to include proposals for the church (unless the current use is proposed to be retained). The LAP does not have a specific requirement for possible uses and any proposed use will be assessed on its merits.

With respect to the curtilage of the church, including any historic walled gardens, any development proposals would be required to be drawn up following archaeological and architectural heritage assessment and where features of historical importance are identified, the appropriate approach to their protection or re-development can be determined.

Stylebawn House: This is a protected structure. The Council has undertaken a number of actions over the last numbers of years to preserve the protection of this structure, particularly following a significant fire in 2016. The purchase of this property would be outside the scope of the County Development Plan.

Ref No. 13-06 Cottage at Main Street Kilcoole: It is recommended this property be evaluated to determine if there is any case for removal from the RPS.

Protection of built heritage in town / village centres, shop fronts, Architectural Conservation Areas

Structures or parts of structures, which form part of the architectural heritage of an area and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest in town / village centres including shop fronts and other heritage features may be protected via a number of means including by adding same to the Record of Protected Structures (where such high level of protection deemed warranted) or via the designation of the wider area as an **Architectural Conservation Area**, where the planning authority is of the opinion that such designation is necessary for the preservation of the character of the place, area, group of structures or townscape.

Delgany Village is protected via ACA designation.

Archaeology / ancient history

The National Monument Acts 1930-2004 are the primary legislative framework for the protection of archaeological heritage in Ireland. Through the definition of monuments, historic monuments, and national monuments a wide range of structures and features fall under the remit of these Acts.

The Record of Monuments and Places (RMP) was established under Section 12 of the National Monuments (Amendment) Act 1994 and structures, features, objects or sites listed in this Record are known as Recorded Monuments. The term Monument refers to any artificial or partly artificial building or structure, that has been carved, sculptured or worked upon or which appears to have been purposely put or arranged in position. It also includes any, or part of any prehistoric or ancient tomb, grave or burial deposit, or ritual, industrial or habitation site. Monuments that predate 1700 AD are automatically accorded the title Historic Monument. A ‘National Monument’ is defined in the National Monuments Acts (1930-2004) as a monument or the remains of a monument, the preservation of which is of national importance by reason of the historical, archaeological, traditional, artistic or architectural interest.

As well as extending protection to all known sites, now identified as Recorded Monuments, the National Monuments Acts 1930 – 2004 extends protection to all previously unknown archaeological

items and sites that are uncovered through ground disturbance or the accidental discovery of sites located underwater. Where necessary, the Minister with responsibility for Heritage will issue preservation orders to ensure protection is afforded to sites believed to be under threat.

The current County Development Plan protects national monuments and sites of archaeological significance through the following objectives and it is intended that these objectives will be retained and enhanced if necessary in the new plan.

- BH1** *No development in the vicinity of a feature included in the Record of Monuments & Places (RMP) will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.*
- BH2** *Any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance as identified in Schedule 10.01 & 10.02 and Map 10.01 & 10.02 of this plan) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the ‘preservation in situ’ of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a competent archaeologist.*
- BH3** *To protect previously unknown archaeological sites and features, including underwater sites, where they are discovered during development works.*

In addition, the ‘Development & Design’ Standards of the current County Development Plan require:

Development in the vicinity of archaeological sites shall accord with the requirements of the Framework and Principles for the Protection of Archaeological Heritage, DAHGI (1999) and shall be designed to have minimal impact on archaeological features. There is a presumption in favour of avoiding developmental impacts on archaeological heritage and of in-situ preservation of archaeological sites and monuments.

- *An Archaeological Impact Assessment and Method Statement will be required to support development proposals that have the potential to impact on archaeological features.*
- *A Conservation Plan may be required for development in the vicinity of a site or monument, to ensure the ongoing protection of the monument and its setting.*
- *A Visual Impact Assessment may be required for development proposals in the vicinity of upstanding remains.*

It is intended to maintain these provisions in the new plan and enhance them if required. In this regard, submission including suggestions for alternative wording will be considered.

Historic site management: The Council supports historic site protection and management, whether that be through the preparation of management plans by the site owners / custodians and by other means. The current County Development Plan explicitly mentions the Hillforts in West Wicklow in this regard, and this objective can be reviewed and enhanced if necessary in the new plan, for example to make more explicit mention of Glendalough and other significant sites.

With respect to Kindlestown castle mentioned in one submission, this castle is indeed surrounded by a very low density housing area (developed in the early 1990s), which although providing for generous space reserved around the castle and dwellings well set back, still diminishes the setting of the castle. Standards and requirements have improved since this time, and the Council is committed to protecting such features and their settings to the maximum extent possible.

A number of specific sites / items are mentioned in submissions as worthy of protection.

Downhill Hillfort – this is a recorded monument WI013-001

Coolagad Hillfort – the National Moments Service has determined that there is insufficient evidence at present to warrant inclusion of this as recorded moment

Toll-Road / Norman Path - this is not identified for protection by the National Moments Service. This will be brought to the attention of the NMS.

Woodlands Church – this is a recorded monument WI013-003

A request is made for archaeological investigation into the Three Trout’s River area. This would not be a matter for the County Development Plan.

Vernacular / traditional heritage

The current County Development Plan addresses the protection of vernacular heritage, including traditional farmsteads through the following objectives:

BH15 *To seek (through the development management process), the retention, conservation, appropriate repair and reuse of vernacular buildings and features such as milestones, stonewalls, traditional & historic shopfronts and pub fronts, thatched roofs and other historic elements. The demolition of vernacular buildings will be discouraged.*

BH17 *Where an item or a structure (or any feature of a structure) is considered to be of heritage merit (where not identified in the RPS), the Planning Authority reserves the right to refuse permission to remove or alter that structure / item, in the interests of the protection of the County’s architectural heritage.*

It is intended that these objectives will be retained and enhanced if necessary in the new plan.

(3) Natural Heritage

Natural heritage includes the variety of life, often referred to as biodiversity, its physical or geological foundation, and the landscapes which form the surrounding environment. Wicklow supports a good diversity of natural and semi natural habitats such as marine, coastal, wetland, woodland, lake, river and uplands that in turn support a wide range of associated wild plant and animal species. The conservation and management of the natural environment is viewed as a central element in the long-term economic and social development of the County. Protecting and enhancing biodiversity and landscapes is vital for the health, well-being and quality of life of communities today and will also be vitally important in the future in adapting to climate change.

The Council has an important role to play when it comes to promoting a reasonable balance between conservation measures and development needs, in order to avoid negative impacts upon the natural environment, mitigate the effects of harm where it cannot be avoided, and to promote the appropriate enhancement of the natural environment. Opportunities exist through the County Development Plan to support the creation and maintenance of a more resilient natural environment for the benefit of a range of ecosystem services, not least addressing the effects of climate change. The Council will continue to work closely with all Government Departments, environmental agencies and other bodies to collect data on the condition of natural assets to ensure that changes over time can be monitored and addressed.

The County Wicklow Heritage Plan and the County Wicklow Biodiversity Action Plan provide frameworks for a partnership approach with relevant statutory and non statutory agencies to addressing biodiversity issues. The Wicklow Climate Adaptation Strategy 2019 under theme 5 ‘Natural Resources and Cultural Infrastructure’ sets out an overall goal of fostering meaningful approaches to protecting natural and key cultural assets through an appreciation for the adaptive capacity of the

natural environment to absorb the impacts of climate change. It aims to ensure that full consideration is given to the need to protect the counties cultural, built and archaeological heritage.

The Council is committed to ensuring that the protection the natural environment and biodiversity remain key priorities in the new plan. The draft plan will undergo Strategic Environmental Assessment and Habitats Directive (Appropriate) Assessment in order to ensure that environmental considerations are fully integrated into the plan making process. In addition, the Council as required by statute and guidelines will continue to demand Environmental Impact Assessments and Habitats Directive Assessments for new development proposals where concerns regarding adverse impact on the environment and habitats arise.

Protected Sites / Nature Reserves

Natura 2000 sites: Natura 2000 site designation is the highest level of environmental protection afforded in the State, and the Council is keenly aware of its obligations under EU and national legislation in this regard. The County Development Plan includes a range of provision and objectives aimed at protecting all SACs and SPAs from inappropriate development.

The promotion of awareness of such sites, erection of interpretive signage etc would not be a matter for the County Development Plan, but the County Development Plan would support such programmes. The monitoring of the health of such sites would not be a matter for the County Development Plan, however the Council would support any projects or ongoing programmes by local or state agencies in this regard.

Coastal wetlands: The coastal wetlands in County Wicklow are protected at the highest level given their designation as EU Natura 2000 sites. The designation of same, and the definition of their boundaries, is not a matter for the County Development Plan. The management including policing of activities thereon is a matter for the NPWS but the Council also has a regulatory / enforcement role where possible unauthorised development is occurring. It would not be possible for the Council to pursue a programme of re-flooding and re-wilding areas that are not in its control; in addition, the Council does not have a funding stream to purchase such lands but given that the lands are activity monitored by the NPWS it is considered that their protection is already in hand.

Arklow Rock: Parts of Arklow Rock are a proposed NHA (which were published on a **non-statutory** basis in 1995, but have not since been statutorily proposed or designated) and benefit from limited protection in the form of

- Agri-environmental farm planning schemes such as Rural Environment Protection Scheme (REPS 3 and 4) and [Agri Environmental Options Scheme \(AEOS\)](#) continue to support the objective of maintaining and enhancing the conservation status of pNHAs. The farm plans operate for a period of 5 years. REPS 4 plans will continue to operate until 2014.
- Forest Service requirement for NPWS approval before they will pay afforestation grants on pNHA lands
- Recognition of the ecological value of pNHAs by Planning and Licencing Authorities.

There is however also a legally operating quarry within the designated area, which has been in situ since the 1880s and has been regulated via the provisions of the Planning Act (including quarry registration provisions) since 1964. The Council is conscious of this designation in its decision making with respect to this quarry.

Glen Of The Downs: The provisions of the County Development Plan would support measures to enhance this area, including measures to improve connectivity. However, it would be premature for

the plan to include as objectives specific projects such as a green bridges or tunnels across the N11 without any detailed study on the feasibility of same.

Nature Reserves: A ‘Nature Reserve’ is an area of importance to wildlife, which is protected under Ministerial order. Most are owned by the State and are therefore under state guardianship. There are six such reserves in Wicklow – Vale of Clara, Knocksink Wood, Glenealo valley, Glendalough, Deputy’s Pass and Glen of the Downs. Wicklow County Council would have no role in their management. Any concerns raised with regard to any of the nature reserves in County Wicklow should be brought to the attention of NPWS.

Three Trout’s River: It is suggested that the Three Trout’s river corridor be designated a ‘nature reserve’ in the County Development Plan, that it be retained in its natural condition and not developed as a ‘greenway’. A ‘Nature Reserve’ is protected under Ministerial order and therefore it would not be possible to so designate Three Trout’s via the County Development Plan. This river corridor is identified as a riverine green corridor in the current County Development Plan ‘Green Infrastructure’ strategy, a ‘green corridor’ (and indicative greenroute) in the Greystones – Delgany – Kilcoole LAP and is zoned in the LAP as ‘open space’ / ‘greenbelt’ which provide a certain amount of protection already; these zoning objectives link directly with the existing Glen Of the Downs SAC.

Greystones – Delgany – Kilcoole LAP objectives (set out below) are clear in that such greenroutes are a secondary aspiration with protection of biodiversity being the priority:

HER5 *To protect the biodiversity value and associated habitats of water bodies within the plan area in accordance with the objectives as set out in the Wicklow County Development Plan and Eastern River Basin District Management Plan. In considering proposals for development, regard shall be paid to the recommendations set out in Greystones-Delgany Local Biodiversity Area Study (2006). In particular, recommendations relating to the Three Trout’s Stream shall be implemented, as deemed appropriate, by the planning authority.*

TS12 *To develop the ‘greenroute’ network for pedestrian and/or cycling facilities. The proposed indicative ‘greenroute’ network is indicated on Map B. Greenroutes should be developed with a common scheme of signage and/or markings. Where feasible, proposals for development should provide for the development of these greenroutes. Proposals for the development of ‘greenroutes’ shall be subject to appropriate assessment requirements in accordance with the Habitats Directive. No development shall be permitted that would have adverse impacts (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites. While certain parts of the ‘greenroute’ network are likely to be implemented in the short term, certain parts are considered to be a more long term aspiration. Implementation of ‘greenroutes’ is subject to the available funding and further design and feasibility studies. Some sections may also be delivered as part of proposals for the development of zoned land.*

The objectives with regard to this corridor can certainly be reviewed in the next G-D-K LAP.

‘Non-designated’ sites of ecological value are explicitly addressed in Objective NH8 of the current County Development Plan and it is intended that this provision will be retained and enhance if necessary in the new plan:

NH8 *To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

Biodiversity

It is agreed that a renewed focus is required on protecting biodiversity and natural habitats. The current County Development Plan provides planning policy support for the National Biodiversity Action Plan (2017-2021) and the associated Wicklow Biodiversity Plan and Wicklow Heritage Plan, as well as a suite of planning policies and objectives regarding protection of the environment, habitats and protected areas / species that are implemented on an ongoing basis. It is intended that these provisions will be retained and enhanced where necessary in the new plan.

A new Strategic Policy Committee for Climate Change & Biodiversity has recently been established in Wicklow, and the submissions made in relation to these areas will be brought to its attention for consideration in their action / work programme for the coming years. The Wicklow Climate Adaptation Strategy 2019 under theme 5 ‘Natural Resources and Cultural Infrastructure’ sets out an overall goal of fostering meaningful approaches to protecting natural and key cultural assets through an appreciation for the adaptive capacity of the natural environment to absorb the impacts of climate change. The Council has set up a Climate Action Team and is working on the development of a Climate Mitigation Strategy in accordance with national guidance and advice from the Climate Action Regional Offices (CAROs).

With respect to the management of the countryside, and the impact of farming / forestry practices on biodiversity, this is complex area that many agencies or organisations play a role in, and one where the County Development Plan has limited function other than in supporting plans and programmes of other agencies tasked with engaging with farmers / landowners with respect to their practices and controlling new developments that require planning permission. A number of submissions raise the issue of controlled burning – this would not be matter for the County Development Plan.

It would not be possible for the Council to pursue a programme of native species planting or re-wilding areas that are not in its control; however the possibility of pursuing such an approach on Council owned property will be brought to the attention of the Climate & Biodiversity Action SPC to consider.

A number of submissions raised the issue of weed spraying / use of pesticides – this would not be matter for the County Development Plan.

Peatlands

The Council is conscious of the importance of peatlands for biodiversity and for carbon sequestration and the current County Development Plan addresses peatlands within the scope of wider biodiversity/natural heritage and climate action objectives. The majority of Peatland habitats in the County occur as upland blanket bog which is protected within the Wicklow Mountains SAC and SPA.

Woodlands, trees and hedgerows

Afforestation: It is a requirement of the current County Development Plan that new greenfield development sites are appropriately landscaped including tree planting (see Objective NH18 below). For the most part such sites would not be large enough to include the planting of a significant woodland or forest, particularly as there would be competing demands for the space particularly for essential recreational usage by residents. However, where opportunities arise in the zoning of land for the development of a larger ‘park’, significant new planting is and can be pursued e.g. new major development permitted at Farrankelly Greystones that will include a significant planted riverine park.

NH18 *To encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native, and appropriate local characteristic species, in all new developments.*

With respect to planting forests in ‘greenbelt’ areas between towns, the current County Development Plan supports such usage of land and it is intended that these existing provisions will be retained and enhanced if necessary in the new plan; however it would be beyond the remit of the plan to ‘require’ the afforestation of private farm lands:

FTY2 *To promote afforestation in co-operation with relevant agencies, including the Forest Service (Department of Agriculture, Food and the Marine) and forestry operators and to ensure that afforestation is undertaken in a manner that is consistent with the principle of ‘sustainable forest management’. The Council will only permit development that complies with the following:*

- *The development is compatible with the protection of the environment, and does not cause pollution or degradation of wildlife habitats, natural waters or areas of ecological importance;*
- *the development does not have a negative visual impact on the scenic quality of the countryside, and is of an appropriate nature and scale to the surrounding area;*
- *the development is not detrimental to archaeological or other historic/heritage features; and*
- *the Council will permit forestry development where it is considered that the roads infrastructure (in terms of design, width, surfacing etc.), which is to serve the development, can accommodate the proposed development. No development will be permitted that will result in damage to roads infrastructure or undue nuisance to other road users. The Council may apply a special financial levy to certain developments for works that are required to be undertaken to the road network.*

FTY3 *To promote the use of forests for appropriate recreation purposes and to facilitate the development of appropriate recreation facilities at suitable locations. The recreational use of forests will only be permitted where it can be demonstrated that the recreational use is compatible with the other forest objectives, functions and values of the forest, such as timber production, sensitive habitats and important archaeology. Developments will only be permitted that are acceptable in terms of other planning considerations, including the provision of acceptable infrastructure such as roads, car parking, water and sewerage infrastructure.*

FTY5 *To promote the use of native hardwood species using seed of native provenance where possible in afforestation schemes. The use of native species or a broadleaf / conifer mixture and age class diversity can enhance the visual impact and biodiversity of forests.*

FTY6 *To encourage the development of farm forestry as a means of promoting rural diversity and strengthening the rural economy.*

It is agreed that access to forests, especially in or near settlements would bring benefit to humans in terms of recreation, appreciation of biodiversity, watershed protection, prevention of soil erosion, and mitigation of climate change. Given the historical pattern of development however in the country it would be difficult to insert a new forest into most towns; in this regard it is considered more practical to devote resources to ensure existing forests are as accessible as possible to those in settlements. This will be examined as part of the ‘green infrastructure’ strategy.

The carrying out of tree planting schemes by the Council would be an operational matter for the Council and not a matter for the County Development Plan. The incentivising of rural landowners to plant trees would not be a matter for the County Development Plan. The development of a Tree Management Plan is a key action item under the Council’s Climate Adaptation Strategy.

With respect to afforestation goals or the type of species planted in new / existing forests, Planning Authorities have a consultative rather than consenting role regarding afforestation and therefore it would not be meaningful for Wicklow County Council to set afforestation targets for the county where it has no role in the implementation of such targets. In this regard, it is more appropriate to ensure that the Council plays a role in supporting the Department of Agriculture, Food and the Marine (DAFM) and others in implementing National targets and objectives such as those set out in *Forestry Programme for Ireland 2014-2020*. The key objectives of that plan include increasing on a permanent basis, Ireland's forest cover to capture carbon, produce wood and help mitigation.

Tree protection: The law around the felling of trees is governed by the Forestry Act, and the Local Authority has limited statutory role in this area. The Council would have no right to require an explicit consent of the Council to be granted for the felling of a tree if the action otherwise complied with the provisions and requirement of the Forestry Act.

Under Section 37 of the Forestry Act 1946, it is illegal to uproot any tree over ten years old or to cut down any tree of any age (including trees which form part of a hedgerow), unless a Felling Licence has been granted by the Forestry Service. Felling Landowners are required under the Forestry Act to give notice of intention to fell trees, following which prohibition orders are normally served. These remain in force pending the issue of a Limited Felling License, which can include environmental and replanting conditions. General Felling Licenses are normally granted to large estates where a management programme is in place, or in respect of lands to facilitate new planting, or for silvicultural thinnings. The requirement for a felling licence for the uprooting or cutting down of trees does not apply where:

- a) The tree in question is a hazel, apple, plum, damson, pear, or cherry tree grown for the value of its fruit or any ozier;
- b) The tree in question is less than 100 feet from a dwelling other than a wall or temporary structure;
- c) The tree in question is standing in a County or other Borough or an urban district (that is, within the boundaries of a town council, or city council area).

Other exceptions apply in the case of local authority road construction, road safety and electricity supply operations.

The Forestry Service consults with Wicklow County Council in the assessment of any such licence applications.

These statutory requirements are set in the 1946 Forestry Act and those wishing to fell a tree are legally obliged to comply with this Act, whether or not the provisions of this Act are set out in the County Development Plan.

Councils can make 'Tree Protection Orders' under Section 205 of the Planning Act where it appears to the planning authority that it is expedient, in the interests of amenity or the environment, to make provision for the preservation of any tree, trees, group of trees or woodlands, it may, for that purpose and for stated reasons, make an order with respect to any such tree, trees, group of trees or woodlands as may be specified in the order. An order under this section may—

- (a) prohibit (subject to any conditions or exemptions for which provision may be made by the order) the cutting down, topping, lopping or wilful destruction of trees, and
- (b) require the owner and occupier of the land affected by the order to enter into an agreement with the planning authority to ensure the proper management of any trees, group of trees or woodlands (including the replanting of trees), subject to the planning authority providing assistance, including financial assistance, towards such management as may be agreed.

Any specific trees or groups of trees that are suggested in submission can be assessed for possible TPO.

A number of trees / tree stands along the Oldcourt House Avenue and grounds are the subject of Tree Protection Orders. In the event that applications for development in the area are received, cognisance will have to be taken of these orders in the design of any new development and in the construction of any permitted works (it should be noted that no permission has as yet been sought or granted for any development on these lands).

Hedgerows: The managing of hedgerows by farmers / landowners would not be a matter for the County Development Plan - Teagasc (the agriculture and food development authority) as well as the Department of Agriculture, works directly with farmers on such matters. The current County Development Plan in its provision promotes and requires hedgerow retention in new developments wherever ever possible e.g.

NH12 *To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network in Wicklow.*

NH19 *To encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).*

Development and Design Standards

- *Greenfield developments shall be so laid out as to maximise retention and integration of natural features, such as mature trees, hedgerows, water courses etc into the site layout and which shall be adequately protected during construction phases in a manner agreed with the planning authority;*
- *Priority should be given to the preservation of existing trees and hedgerows along site boundaries;*
- *Detailed landscaping proposals will be required as part of any application, with particular attention to berming, landscaping and screening on greenfield sites proposed for development. The Planning Authority will require the maintenance, where possible, of hedgerows and traditional field boundary characteristic.*
- *Landscape design shall ensure that existing site features such as specimen trees, stands of mature trees, hedgerows, rock outcrops and water features are properly identified and retained, as appropriate and new planting or other landscaping should be appropriate to the character of the area and significant on-site natural features shall influence the layout of new development.*

It is recommended that these provisions be retained in the new plan and enhanced if necessary.

The Local Authority itself adheres to provisions regarding hedgerow cutting (unless a specific exemption is necessary to invoke e.g. where a traffic hazard may be arising), and engages closely with landowners to remind them of their obligations. The NPWS regularly publishes notices reminding the public regarding these regulations.

Water systems / rivers / wetlands

The current County Development Plan includes numerous objectives with regard to the protection of natural water systems and river corridors / riverine habitats. It is intended that these provisions will be retained and enhanced in the new plan where necessary e.g.

NH20 *To facilitate the implementation of the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and the EU Groundwater Directive to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality.*

NH21 *To resist development that would interfere with the natural water cycle to a degree that would interfere with the survival and stability of natural habitats.*

NH22 *To prevent development that would pollute water bodies and in particular, to regulate the installation of effluent disposal systems in the vicinity of water bodies that provide drinking water or development that would exacerbate existing underlying water contamination*

NH23 *To minimise alterations or interference with river / stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of generally 10m along watercourses should be provided (or other width, as determined by the Planning Authority) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. In all cases where works are being carried out, to have regard to Regional Fisheries Board “Requirements for the protection of fisheries habitat during the construction and development works at river sites”*

In this regard however the County Development Plan only has a certain remit which is generally the control of new development and providing planning policy support for the activities / plans / strategies of other bodies / agencies. The active ongoing management of water bodies, including pollution control, management of land uses near water courses, in-stream works to improve flow / passage of fish etc in Wicklow occurs via the implementation of the **Water Framework Directive** and **River Basin Management Plan**, which is actively delivered by the EPA, Department of Communications, Climate Action and Environment, and the Council’s water protection team.

The concern regarding possible pollution of the Swan River will be brought to the attention of the water protection unit of the Council.

The possibility of purchasing and re-wilding of river corridors would not be a matter for the County Development Plan, but would be an operational and budgetary matter for the Council.

With regard to ‘set backs’ or sensitive zones along watercourses, the option of expanding the current 10m zone (as set out in NH23) will be evaluated as part of the new plan development process. The suggestions made regarding Swan River in Bray and Three Trout’s in Delgany are more appropriately addressed through the LAPs for these settlements.

Wastewater: The management of the majority of wastewater treatment plants is now in the hands of Irish Water, which is activity pursuing a policy and programme of bringing all plants up to required standards in terms of quality of discharges. This programme is supported by the County Development Plan.

Responsibility for permitting and monitoring smaller plants / private effluent disposal systems falls with the Council; new plants are strictly controlled through the application of the Council’s policies and objectives with regard to such developments, by ensuring compliance with planning condition and EPA standards, and by the septic tank monitoring programme.

Bridges: Wicklow County Council has a dedicated bridge crew and bridge works generally are for the purpose of ensuring bridges are structurally sound and safe for use by pedestrian, cycling and vehicles. In the carrying out of repair and improvement works, the Council is however keenly aware of its obligation towards protecting biodiversity and fauna in particular, and this regard to the passage of fish and other aquatic species, the Council works closely with relevant expert bodies including Irish Fisheries to ensure no adverse impacts on biodiversity arise and where impacts cannot be avoided, suitable mitigation measures are employed; bat surveys, measures to minimise pollution during works and other such measures are normal practice. In addition, the Department of Transport is currently preparing new guidelines with respect to bridge maintenance, and it is expected that any new protocols will address issues such as biodiversity.

The current County Development Plan makes provision for protection of riverine habitats during the carrying out of works (NH23), and it is intended that this provision shall be maintained and enhanced if necessary in the new plan

Wetlands: The wetlands of County Wicklow have been mapped and identified through ecological survey work commissioned by the Council 2012-2014. This provides an important baseline of information on this habitat which informs the assessment of applications for development consent or other permits in or near wetlands. This baseline will be utilised in the future to monitor the extent and health of these habitats to ensure that current policies and objectives are providing sufficient protection

Zoning / mapping

Existing statutorily protected sites (Natura 2000 sites, NHAs, nature reserves etc) are generally not ‘zoned’ in the current County Development Plan (and LAPs that flow from it). In such plans, the lands are generally identified with their legal designation but in some cases, as designated as ‘conservation zones’.

Other non-designated natural sites, that are necessary to preserve for reasons of nature conservation, flood protection etc are generally zoned ‘open space’ and in more recent plans more particularly as ‘OS2’ where the objective is *‘To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.’*

It is intended that this OS2 zone will be utilised throughout the new County Development Plan and revised LAPs thereafter, and it is considered that this addresses the request for a new zone type for nature / biodiversity protection.

All of Wicklow’s river systems are mapped and identified in the current County Development Plan (in particular in the ‘Green Infrastructure (GI) Strategy’) and are identified as green assets for protection and enhancement. As the GI maps in the current County Development Plan contain a significant

amount of overlapping data making them hard to read and understand, it is intended to significantly improve these maps in the new plan, including providing a more interactive online map viewer.

Soil and geology

It is suggested that good quality soils be zoned on the edge of towns. It is not clear what exactly the intent of this request is; however it is not normal practice to ‘zone’ for soil types outside of or at the edge of towns – zoning is generally related to land use rather than some inherent natural characteristic of the land.

A number of state agencies, such as the Geological Survey of Ireland (GSI) and Teagasc provide detailed maps (and online map viewers) of soils types which the public can access.

(4) Landscape

Landscape Character Assessment (LCA): A LCA has been completed for the County during the course of a number of previous development plans and was considerably updated and enhanced in 2016 (Appendix 5). This assessment is used as a matter of course in the assessment of applications for development and it is the key determinant of the current County Wind Energy Strategy.

The current County Development Plan provides for the following development objectives with respect to landscape and it is intended that these would be maintained and enhanced if required in the new plan:

NH49 *All development proposals shall have regard to the County landscape classification hierarchy in particular the key landscape features and characteristics identified in the Wicklow Landscape Assessment (set in Volume 3 of this plan) and the ‘Key Development Considerations’ set out for each landscape area set out in Section 5 of the Wicklow Landscape Assessment*

NH50 *Any application for permission in the AONB which may have the potential to significantly adversely impact the landscape area shall be accompanied by a Landscape / Visual Impact Assessment, which shall include, inter alia, an evaluation of visibility and prominence of the proposed development in its immediate environs and in the wider landscape, a series of photos or photomontages of the site / development from clearly identified vantage points, an evaluation of impacts on any listed views / prospects and an assessment of vegetation / land cover type in the area (with particular regard to commercial forestry plantations which may be felled thus altering character / visibility). The Assessment shall demonstrate that landscape impacts have been anticipated and avoided to a level consistent with the sensitivity of the landscape and the nature of the designation.*

NH51 *To resist development that would significantly or unnecessarily alter the natural landscape and topography, including land infilling / reclamation projects or projects involving significant landscape remodelling, unless it can be demonstrated that the development would enhance the landscape and / or not give rise to adverse impacts*

The Murrough Coastal zone (which is raised in some submissions) is designated in the LCA as an ‘Area of Outstanding Natural Beauty’, which is the highest designation in the county. In conjunction with the Natura 2000 designation, this is one of the most protected areas in the County.

Green belts: A ‘greenbelt’ is generally an area of open lands around a city or settlement in which building is restricted. In the current County Development Plan, as with previous plans, the boundaries of settlement are clearly defined and controls regarding all forms of development are in place outside of settlements. These controlled areas are generally referred to in the plan as simply ‘rural areas’ but in effect they are the same as greenbelts. In this regard therefore it is not considered necessary to ‘re-designate’ them as such.

Views / prospects

Both the County Development Plan and LAPs include listed views and prospects which are intended to be retained in the new plan. Any suggestions for new listed views/ prospect will be considered in the crafting of the new plan.

With respect to the views from Delgany towards the Drummin trees, and from Kindlestown Hill towards the Sugarloaf Mountains mentioned in submissions, these are already protected views.

(5) Green Infrastructure / recreational use of natural resources

Many submissions noted the need for additional walking trails, cycling paths and greenways. Such infrastructure will not only improve the County’s recreational and heritage resources but will contribute to the creation of healthier communities and attractive places to live. The NPF acknowledges that *‘the maintenance of access to our landscapes and the creation of new accesses are dependent on maintaining good links with the agricultural sector’*. The NPF also notes that *‘the development of greenways, blueways and peatways offer a unique alternative means for tourists and visitors to access and enjoy rural Ireland’* and the *‘development of a strategic national network of these trails is a priority’*.

Wicklow County Council’s Municipal Districts, Community Cultural and Social Development Department and the Transportation and Roads Department are involved in the development of a number of greenways throughout the county, including the Blessington Greenway (estimated start date of construction is September 2020), Arklow-Shillelagh Greenway (currently at design land acquisition phase) and Kilmacanogue to Bray Cycleway (consultants recently appointed to progress).

Wicklow County Council’s Transportation and Roads Department are examining further schemes that are listed in the GDA Cycle Network Plan and will submit for NTA funding. These include;

- North Wicklow: Bray, Greystones, Kilcoole, Newtownmountkennedy;
- South Wicklow: Wicklow Town & Arklow;
- West Wicklow: Blessington & Baltinglass; and
- Rural Cycle Routes in Wicklow including the East Coast Trail Greenway in Wicklow and 18 other routes throughout the county.

Wicklow County Council is also working on a “Blueway” in conjunction with 2 other counties, Wexford and Waterford. This is an initiative of the Celtic Routes INTERREG project. A feasibility study has been carried out and currently funding options are being explored.

The current County Development Plan addresses green infrastructure in detail but in a strategic, county wide manner given that scale of plan making (Appendix 8 of the current plan). While maps are included in this Strategy, it is acknowledged that it is difficult at a county scale to show in meaningful way all GI assets and the connections between them, but this will be considered in the preparation of the new plan to determine if enhanced maps can be provided. More detailed provisions regarding GI are provided for in local plans.

Further investigation will take place into blue routes are part of the new plan preparation process. Previous work flagged inherent conflicts between biodiversity, habitats and water quality protection and additional human use of water and riverine resource for recreational purposes.

Objective T29 in the current plan supports the development of new and existing walking, cycling and driving routes / trails and ancillary facilities. It is intended that the new plan will include additional focus on walking routes, cycling routes, greenways and blueways where possible and include an objective to support the development of a strategic national network of trails.

The suggestion for various regional green routes is are noted such as Wicklow – Arklow (coast) and Laragh - Rathdrum - Avoca – Arklow (riverine), and these can be reviewed for possible inclusion in the new plan.

Greystones - Wicklow greenway: Wicklow County Council has applied to the Department of Transport Tourism and Sport for funding under the Carbon Tax Initiative to carry out a series of studies leading to route selection and design of this greenway. It is hoped that the funding applied for will help to progress the initial feasibility study, through options selection to design stage. The Council will then have to identify funding sources to take the project to the next stages which include environmental evaluation, land acquisition, and construction. The process will involve public consultation at various stages of the project. The proposed greenway project occurs within the context of large scale coastal erosion studies on the East Coast by Irish Rail and will be largely dependent on the outcome of this work.

There is an established desire line for walkers along this section of coastline along a variety of unmanaged and informal trails. The proposed greenway creates the opportunity to provide a more formal trail along this section of coastline that will facilitate a wider cohort of walkers and cyclists alike while mitigating the footprint of the existing informal trails onto a defined trail that is aligned to minimise and indeed reduce impacts on sensitive habitats. Ecological studies carried out to date have highlighted that challenges exist for creating a greenway over EU protected habitats and it is clear that additional scientific information and rigorous ecological assessment is required.

Swan River greenway: The Council is currently studying the feasibility of the development of a greenway along the Swan River in Bray, which is an objective of the Local Area Plan. This objective, along with all objectives of the plan, was subject to Strategic Environmental Assessment and Appropriate Assessment during that plan making process, and it was determined that the objectives could be delivered, without giving rise to significant adverse effects on the environment. This will be ensured through the implementation of in this project of the relevant objectives of the Bray MD LAP, in particular:

Bray MD Local Area Plan 2018 Objectives

- B1** *To ensure that the impact of new developments on biodiversity is minimised and to require measures for the protection and enhancement of biodiversity in all proposals for large developments.*
- B4** *To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network.*
- G12** *To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors,*

Natura 2000 sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites.

- GI3** *To minimise alterations or interference with river / stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of generally 10m along watercourses should be provided (or other width, as determined by the Planning Authority) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. In all cases where works are being carried out, to have regard to Regional Fisheries Board “Requirements for the protection of fisheries habitat during the construction and development works at river sites”. New river / watercourse road crossings and / or piping shall be strongly resisted except for reasons of overriding public health and safety.*
- GI4** *To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, where considered to be viable, safe and in line with sound arboricultural management, in the interest of amenity or the environmental, as set out in the Heritage Schedules of this plan.*
- GI5** *To promote the development of a series of major open spaces and recreational areas linked by green corridors where feasible (see Map GI1), in the Bray MD area as follows:*
- *along the south bank of River Dargle from Bray Harbour, as far as Rehills (SLO2) in agreement with affected landowners;;*
 - *on the former Bray golf course lands / Ravenswell Road, linked to harbour and north beach to the east and the People’s Park to the west;*
 - *From Bray Head, down to the Esplanade, and up through Bray Harbour, to the north beach;*
 - *On the Kilruddery estate as part of SLO 1 linking along the Swan River, through the OS to the west of Hollybrook Park; from the Bray SCR, through SLO 6 or SLO 9 onto the Boghall Road; continuing through new and proposed residential areas onto Herbert Road and onto the River Dargle; in particular, (a) any new development at or in the vicinity of Oldcourt House shall make provision for the continuation of the green corridor between Giltspur Brook and Rycroft; (b) any infill development along Herbert Road adjacent to the green corridor shall make provision for green link between Herbert Road and the Dargle corridor.*
 - *In the new development zone of Fassaroe west of the N11, linking river valleys to the north and south of the action area;*
 - *A linked area from Enniskerry GAA, through the open space in Action Area 2, connecting to Knocksink Wood / Glencullen River, through the Bogmeadow recreational area, and onto the Cookstown River.*

The exact route for these developments is not yet known so detailed ecological assessment for impacts on important ecological features, including general ecological impact assessment and specifically Appropriate Assessment, is best carried out when these routes are designed. The detailed design of these schemes will need to take into account the relevant ecological features in proximity to the proposed routes and the potential for impacts arising from the routes will need to be taken into account including both construction and operational phases.

The lack of designated routes to some heritage sites / features, such as Brusselstown Fort is noted, and the provisions of the County Development Plan (Objective BH4) would support the provision of such access routes if they can be delivered without adverse impacts on the archaeology of the area. It is considered that given the significant of this Hillfort and the number of recorded monuments

thereon, a detailed survey and study would be required before any interventions potentially increasing access could be supported.

With respect to access to the Avoca Mines, the custodian of this area is the Department of Communications, Climate Action and Environment (Exploration & Mining Division). It has undertaken a number of studies of the area and is actively engaged in numerous safety and environmental control projects over the last 10 years, which must be addressed before any plans to further open the Mines to the public can proceed.

Accessibility: Wicklow County Council strives to ensure that all of its properties are accessible to all. This is no doubt challenging when it comes to accessing historic sites or natural heritage such as beaches, river corridors or cliff walks where there may be difficult terrain to navigate and where a careful balance needs to be found between hard infrastructure and protecting the heritage asset. Where there are particular locations where those with disabilities have encountered problems, they should be brought to the attention of the Council and solutions can be investigated.

(6) Public Rights Of Way

It is agreed that rural walkways are a valuable resource. It should be noted that while many of these are public rights-of-way, such legal status does not need to be in effect to allow for such routes (e.g. some may be in situ due to a planning condition, some are with the consent of the landowner). The County Development Plan itself cannot designate or create new walkways, which can only be done by invoking separate process set out in Sections 206 and 207 of the Planning Act.

The County Development Plan can however list and thereafter protect *existing* PROWs. Unfortunately the tests and evidence that must be available to the Planning Authority to ensure such routes are legal PROWs for inclusion in the County Development Plan is extremely high, and has proven particularly challenging when efforts were made in previous plans to add new routes to the existing list. For example, at this time there is a live legal action against the inclusion of the coastal (Wicklow Town - Newcastle) PROW in the 2016 County Development Plan. However all efforts will be made to include additional existing PROWs in the new plan if possible. It should be noted that the inclusion (or non-inclusion) of a PROW in the County Development Plan does not in itself confer or deny the existence of a legal PROW.

Suggestions regarding new or enhanced objectives with regard to PROW, as well as suggestions for additional PROWs to be listed will be examined in detail in the crafting of the new plan.

With regard to issue raised with respect to the closing / blocking of existing PROWs or amenity routes any alleged unauthorised development brought to the attention of the Council will be investigated by the Planning Enforcement Department of Wicklow County Council; this is not a matter for the County Development Plan.

N/M11 improvements

A number of submissions raise concerns regarding the impacts of the N/M11 improvement project on built and natural heritage. This is addressed in Part 4.3.8 of this report.

Miscellaneous

- (a) Branding / awareness, signage, interpretative information, tours, events, education etc

These would not be matters for the County Development Plan, but would be more relevant for the Heritage Forum in its development and implementation of the County Heritage Plan, as well as tourism agencies such as Failte Ireland and Wicklow County Tourism, heritage agencies / bodies such as NPWS and An Taisce, as well as local organisations such as town teams, historical groups and chambers of commerce.

However the current plan would provide the planning policy support for projects in these regards and it is intended that these provisions will be retained and enhanced where necessary in the new plan. .

- (b) Dark sky zones: A dark zone or preserve is an area that restricts artificial light pollution. There is no provision in Irish law for the creation of such preserves at this time. The current County Development Plan does however include the following provisions in its Development & Design Standards and these can be enhanced if necessary in the new plan:

- *Applications for permission which include the provision of new street lighting or significant on site / on building lighting shall be accompanied by a certificate from a suitably qualified professional in the field confirming that all lighting has been so positioned and designed to eliminate or mitigate impacts on adjoining properties, particular residences (light trespass) or on the night (sky glow). Regard shall be taken of Guidance Notes for the Reduction of Light Pollution (Institute of Lighting Engineers, 2000).*
- *All external lighting attached to buildings shall be cowled and directed away from the public roads and adjacent dwellings.*
- *To preserve the character of the night time landscape, roads in rural areas should use the minimum amount of lighting necessary, restricted to critical intersections. Passive measures, such as cat's eyes and reflectorised markings, should be preferred as night time safety guides.*

- (c) Quiet Zones: Since the adoption of the current County Development Plan, new regulations have come into effect with regard to environmental noise (SI 549/2018), which provide for the designation of ‘quiet areas’ following study, consultation and approval by the Minister. These regulations will be considered in the crafting of the new plan to determine what role the County Development Plan may have in relation to same.

The current County Development Plan includes the following objectives with respect to noise and it is intended that these shall be reviewed and enhanced if necessary in the new plan:

- *WE12 To enforce, where applicable, the provisions of the Environmental Protection Agency (EPA) Acts 1992 and 2003, and EPA Noise Regulations 2006.*
- *WE13 To regulate and control activities likely to give rise to excessive noise (other than those activities which are regulated by the EPA).*
- *WE14 To require proposals for new developments with the potential to create excessive noise to prepare a construction and/or operation management plans to control such emissions.*
- *WE15 To require activities likely to give rise to excessive noise to install noise mitigation measures to undertake noise monitoring and to provide an annual monitoring audit.*

- (d) Allotments: The current CDP supports the provision of allotments and it is intended that this objective will be retained and enhanced if necessary in the new plan

CD45 To facilitate the development of allotments of an appropriate scale on lands which meet the following criteria:

- Lands situated within or immediately adjacent to the edge of towns/villages;
- lands that are easily accessible to the residents of a particular town or village;
- where an adequate water supply can be provided;
- where adequate road infrastructure and access exists/can be provided; and
- where adequate parking facilities can be provided.

The current County Development Plan does not generally promote the delivery of allotments as part of the public open space in new residential development – such lands are intended to be used by all residents of a new development and therefore it is not appropriate to reserve what would have to be large proportion of the open space for one group of users only.

Recommendations of Chief Executive

1. To update and enhance where necessary current policies and objectives with regard to built and natural heritage
2. To update the Record of Protected Structures
3. To review the structure of the current ‘heritage’ chapter and in particular, to divide the chapter into 3 components namely ‘Built Heritage’, ‘Biodiversity and Natural Heritage’ and outdoor recreation / access / public rights of way (the third section for integration into the ‘tourism and recreation’ chapter of the plan)
4. To enhance design standards with respect to landscaping and planting of public open space in new developments
5. To review existing watercourse set back objectives
6. To provide enhanced data and mapping system of heritage assets in the new plan
7. To update and enhance where necessary current policies and objectives with regard to Green Infrastructure
8. To review existing and consider suggested new PROWs for inclusion in the plan.

Part 4.3.11: Coastal Zone Management

Name	Issue Raised
Ashford Community and Heritage Centre (C1)	No development should be allowed on our coastlines unless it enhances nature such as dune restoration and carefully designed walks.
Wicklow Public Participation Network (C2)	More bins in sea areas to prevent rubbish landing in the sea
BirdWatch Ireland (C3)	Consideration should be given at county level to exploring opportunities where managed retreat might be facilitated at coastal sites. The Wicklow coastline is eroding and the Wicklow County Adaptation plan has identified repeated damage to certain parts of the coastline from extreme weather events.
Keep Ireland Open (C16)	<p>Objective CZM1</p> <p>We submit that this should be replaced by: <i>Prohibit inappropriate development where such development would significantly interfere with the recreational use of beaches or which could cause damage to, or degradation of, beaches, estuaries or sand dunes, protected/designated landscapes, amenity areas and their recreational and amenity values both for visitors and local people or where it might affect the character, quality and distinctiveness of seascapes. Protect, conserve, safeguard and preserve the character, visual, environmental and amenity values, quality and distinctiveness of coasts, landscapes and seascapes as valuable local amenities and as a tourism resource, enhance their visual and scenic qualities by protecting the skyline. Strictly control the nature and pattern of development and ensure that it is designed and landscaped to the highest standards and sited so as not to detract from the visual amenities. Development must accord with its surroundings in scale, density, height, massing, layout and must not have a detrimental impact on skylines or important views. Development shall be prohibited where development poses a significant or potential threat to coastal features and/or where the development is likely to result in altered patterns of erosion or deposition. Protect the structure and function of sand dunes and prohibit development that would damage their visual integrity.</i> Based on NPF National Policy Obj 41a, Donegal 7.1.3 P8 & 10.3 P9 & 10, Sligo 10.4.4 P DCZ 1 1st para, Fingal 9.5 Obj NH 60 & 67, Leitrim 3.3.3 para under Pol 18 2nd & 3rd pts, Galway County 9.9 NHB 8 c) & 10 1st & 3rd sentences, Kerry 5.1 T4, 6 Tourism Overall Obj T 62 & 10.16.1 NE59 & Clare 12.3.15.14a) & c). See also Meath 9.7.11 1st phrase.</p> <p>We submit that you should include additional Objectives:</p> <p>1 <i>Provide, support, actively promote, maintain, protect, improve and enhance access to the coast, beaches, seashore, coastal heritage and scenic landscapes in co-operation with landowners, relevant stakeholders and local groups and with statutory and relevant organisations for recreational activities including walking and cycling and examine the designation of traditional walking routes thereto as public rights of way. Where feasible, develop walkways/cycleways between the coast and green spaces in built-up areas.</i> Based on Wexford 13.7 CZM 26 1st sentence 1st phrase & 2nd sentence 1st phrase & 13.9 CZM31, Meath 9.7.11 OBJ9, DLR 4.1.2.9 3rd para last sentence and many other counties.</p> <p>2 <i>Work to protect beaches, within dunes and in other vulnerable areas manage and control car parking and vehicular movements.</i> Based on Meath 9.7.11 POL 23 and many other counties.</p>

	<p>Note Louth, Meath and many other counties have adopted Bye-laws. 3 See 10.3.7 NH 42</p>
James Scott (D7)	<p>We should continue to protect and even expand the coastal wetlands complex from Wicklow Town up to Kilcoole. There are a number of areas here where low-output agriculture is pursued in areas that were historically high quality wetlands. The county should have a strategy to re-flood and re-wild these areas as the opportunity to purchase land presents itself, in order to extend and protect the nationally important environment here.</p>
Nancy Quinn (D36)	<ul style="list-style-type: none"> • The policies in the current Development Plan do not protect our lovely coastline. • Particularly concerned about the damage being done to Brittas Bay Beach by over use, the dunes need to be reinstated and protected to ensure the rare flora and fauna that grow in abundance there. • Development of any kind should be restricted on our sensitive areas of coastline from Brittas Bay to Kilmichael. • Regarding the beaches in Arklow, Wicklow County Council has a duty to the residents to restore the access to north and Seabank beaches which have been illegally blocked since 2016, by 2028 I understand the population of our town will be in the region of 23,000. Is Arklow to become a seaside town without a beach? • The ancient coastal path which dates back centuries should be restored. This walkway extended from north quay, Arklow, Seabank, Johnstown North and ended at Ennereilly Beach. This could form a valuable amenity for tourists and local people alike. • Seabank beach access should be restored and approval for preservation status. This beautiful beach has already got NHA status, it contains many rare plants including ‘Horsetail’ in the 1988 Arklow town plan, the then town engineer Karl O Donovan stated that this gem of a beach should have to be preserved and enhanced. • North beach Arklow has been devastated by rock armour. I would ask WCC to replace this with proper wooden piling which would allow the sand to stay washed ashore.
Billy Timmins (D49)	<p>Identify access with signage and protect</p>
Richard Mulcahy & Stephen Tracey (D66)	<p>The submitters are landowners in the Park & Kilmurry townlands south of Arklow and believe that this coastal area is underutilised and that the coastal zone management plan can be improved to further promote tourism, recreation and the natural heritage of the locality.</p> <p>Refer in particular to Cell 12 of the current coastal zone management chapter. They would like to reference the current objective CZ12 which relates to this location and outline how they believe improvements to these objectives should be considered in the future CDP. While they believe strongly that this beautiful and valuable part of the county should be protected from unsustainable development, they also believe that the promotion of sustainable tourism should be encouraged as part of the plan. Note that the lands outlined in cell 12 are unique in that its east coast location has a catchment area of 1.9 million people within 100km of the area. Along with an excellent transport infrastructure from motorway to rail between Dublin and Wexford, the proposals are economically viable, socially responsible and environmentally friendly to both visitors and the existing community. It provides an opportunity to provide a sustainable tourism location of excellence in County Wicklow.</p> <p>Comment on Objective CZ12</p> <p>1. <i>To facilitate the enhancement of recreational amenities and facilities in the cell to cater for day visitors and long stay holiday makers to the extent that it is consistent with</i></p>

	<p><i>maintaining the capacity of the cell (including its beach and bathing water quality, sand dunes, car parks and road network) and in a manner that does not diminish its unique rural, scenic and recreational amenities.</i></p> <p>As noted in the current CDP, the area has limited tourist facilities. The promotion of new recreational activities should be encouraged and promoted as part of the new CDP. Water based activities such as angling, sea kayaking and surfing are high value, low impact activities that make the most of the coastal setting and can cater for the day visitors to the locality.</p> <p>The decline of the traditional farm due to slowing agricultural outputs should be off-set by encouraging farmers to diversify and use their lands for other activities. Promoting a new greenway along with a coastal walkway from Arklow Rock to Kilmichael Point should be explored and landowners encouraged to allow access to their lands in exchange for other tourist development infrastructure on their land subject to proper planning.</p> <p><i>2. Development that is detrimental to the quality or amenity of heritage features will not be permitted, including views and prospects, archaeological features, protected trees/structures.</i></p> <p>The World Tourism Organisation outlined the following goals for sustainable tourism:</p> <p>Physical Integrity: To maintain and enhance the quality of landscapes, both urban and rural, and avoid the physical and visual degradation of the environment.</p> <p>Biological Diversity: To support the conservation of natural areas, habitats, and wildlife, and minimize damage to them.</p> <p>Resources Efficiency: To minimise the use of scarce and non-renewable resources in the development and operation of tourism facilities and services.</p> <p>The promotion of sustainable tourism ensure that any proposed developments will not have a detriment impact on the quality or amenity features of the area.</p> <p><i>3. To strictly control the further proliferation of sea outfalls for effluent discharge and in particular to prohibit short sea outfalls. All effluent discharges should be in compliance with the EU Bathing Water Directive. Any development that compromises the Blue Flag status of the beach will not be permitted.</i></p> <p>Any new development in the locality should minimise the pollution of air, water and land and the generation of waste by tourism enterprises and visitors.</p> <p><i>4. To facilitate the development of appropriate outdoor and indoor recreation in the cell by permitting the use of its rural hinterland for environmentally sensitive and sustainable recreational purposes, where buildings and structures have only a minor impact on the landscape and where the completion of landscaping schemes would assimilate such developments into the countryside (e.g. golf, pitch and putt, amenity forestry, paint ball games, adventure fun parks).</i></p> <p>While the above activities are welcomed, believe that landowners should be encouraged to open their farms and land to educational courses covering farming, birdwatching, marine life, forestry, etc. As noted above, water based activities such as angling, sea kayaking and surfing make the most of the coastal setting and can cater for day visitors to the locality. All the above recreational activities are high value, low impact activities.</p>
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	<p>5. <i>To facilitate the development of new tourist accommodation subject to the following controls:</i></p> <p>a) <i>New tourist accommodation shall be restricted to the existing developed cluster at Clogga or to existing developed sites;</i></p> <p>b) <i>permission will only be considered for new accommodation where the development forms part of a well developed, integrated tourism and recreation development, which would add to the public amenity and enjoyment of the area and provides a significant public element (e.g. public car parking, playground / indoor playzone, swimming pool open to paying public etc);</i></p> <p>c) <i>the development of any further holiday homes shall be prohibited, other than a small scale element of which may be allowable in an integrated development that provides a range of accommodation types;</i></p> <p>d) <i>the development of any further static or touring caravan parks shall be prohibited;</i></p> <p>e) <i>automated gates will not be permitted on any development; and</i></p> <p>f) <i>new development shall have or be provided with high quality direct access to the main traffic routes;</i></p> <p>g) <i>development shall be of an exceptionally high quality design.</i></p> <p>The above proposals should be commended and due to the coastal location, innovative and sustainable tourist accommodation should be encouraged with a focus on renewable energy, water management, biodiversity and reducing and recycling waste. The rural design guidelines with a focus on vernacular architecture should be employed with farmyard style courtyard tourist accommodation promoted allowing for new accommodation in a clustered development.</p> <p>6. <i>To preserve existing access routes to the beach and to support and facilitate the development of additional car parking, proximate to existing access ways to the beach.</i></p> <p>Landowners should be encouraged to provide the above facilities in exchange for being allowed to develop other tourist related activities once they meet all proper planning and sustainable development standards.</p> <p>7. <i>To control and limit the development of permanent rural housing to that shown to be strictly necessary (in accordance with the County settlement and rural development strategies) and to require the highest standards of siting and design for any new dwelling and regard to environmental designations.</i></p> <p>This objective does not form part of their proposals for sustainable tourism development and so they have no comment on this matter.</p> <p>The proposals focus on tourism development centred around the local environment and physical resources in the locality ensuring sensitive development of this coastal area. Are asking that landowners be given the opportunity and encouragement to provide sustainable tourism development and activities subject to proper planning and sustainable development.</p>
<p>Michael Higgins (D88)</p>	<ul style="list-style-type: none"> • Brittas Bay beach is the only Blue Flag Beach in County Wicklow and should be looked after as it is a beautiful natural attraction and a huge amenity for the area. Currently there is a lot of erosion of the beach especially at the south entrance. Would it be possible to take some action in preventing the further erosion of the sand dunes? • With the increased population in County Wicklow and South County Dublin there is

	<p>a huge increase in the number of visitors to the area all year round. The area has very few amenities.</p> <ul style="list-style-type: none"> • More parking facilities should be provided for the beach particularly the north end of the beach should be looked at. This would stop people having to park on the road and thus creating hazards and causing traffic congestion at peak times. • The R750 is an extremely busy road particularly in the summer months. High volumes of traffic including buses, lorries and farm machinery make walking on this road particularly dangerous. On a recent road survey it was estimated there are approx 3,000 vehicles using this stretch of the road in the summer months per day. • The stretch between the North Beach entrance and the school/church/cafe and shop area of Ballynacarrig Village is a highly dangerous stretch of road. People trying to get to the shop and cafe walking from the various caravan parks and homes in the area are being put in immediate danger as there is no footpath available to walk on. Therefore there are numerous children, mothers pushing prams and elderly couples putting themselves in danger by walking on this very busy road to and from these facilities. The installation of a footpath is imperative to the safety of all users of this road, drivers included. This is a serious Health and Safety issue.
<p>Judy Osborne (D98)</p>	<p>As a member of the Wicklow Planning Alliance (WPA) have contributed to many pre-draft submissions to county development plans in 1998, 2003, 2007, and 2013. The plans that were adopted following these consultations have improved each time with the vision, goals and objectives better constructed, incorporating contemporary understanding of issues and government guidelines. Despite this most of the WPA proposals have been ignored and can see no analysis of the impact of the existing plan. The issues have not changed though the need to produce a plan that will reduce the carbon emissions and loss of biodiversity of the settlement strategy and all other goals becomes ever more urgent. Meaningful indicators which can be used to monitor the impact of the final plan become ever more important.</p> <p>COASTAL REGIONS: 6.1.18 and Appendix 1</p> <p>We are pleased to see the designation of Bray Head with a Special Amenity Area Order however the objectives for the area of outstanding natural beauty and the coastal region in this section are very limited and have failed to provide appropriate protection to Wicklow Bay, one of the most stunning areas of outstanding beauty and natural habitat in the county which is now seriously degraded in the area closest to the town where its amenity is most badly needed.</p>

Response of Chief Executive

Coastal Protection / Erosion

Coastal erosion is a natural process, and interventions to change or alter same can often result in adverse environmental impacts. Nevertheless, WCC and various agencies is engaged in the ongoing monitoring and surveying of the coastline in order to determine if action are warranted in particular location. In particular:

- The Irish Coastal Protection Strategy Study (ICPSS) is a national study that was commissioned by the OPW in 2003 with the objective of providing information to support decision making about how best to manage risks associated with coastal flooding and coastal erosion. The Study was completed in 2013 and provides strategic current scenario and future scenario (up to 2100) coastal flood hazard maps and strategic coastal erosion maps for the national coastline. This major study provides invaluable and essential information required to inform policy in this area,

particularly for local authorities in relation to the proper planning and development of coastal areas.

- Wicklow County Council is currently working closely with Irish Rail (with Arup Consulting Engineers) to update and enhance the data from the ICPSS for the Wicklow coastline, with a particular focus on, but not limited to, locations where the rail line is in close proximity to the coast; in this regard Brittas Bay and Arklow (north and south) are included in this study.

On completion of the Arup study, it will be clearer what, if any, interventions are needed along the Wicklow coastline and where projects are warranted, Wicklow County Council will progress same subject to funding being made available.

Protection and expansion of the coastal wetlands from Wicklow Town up to Kilcoole

The coastal wetlands in Co. Wicklow are protected at the highest level given their designation as EU Natura 2000 sites. The designation of same, and the definition of their boundaries, is not a matter for the County Development Plan. The management including policing of activities thereon is a matter for the NPWS. It would not be possible for the Council to pursue a programme of re-flooding and re-wilding areas that are not in its control; in addition, the Council does not have a funding stream to purchase such lands but given that the lands are activity monitored by the NPWS it is considered that their protection is already in hand.

The existing plan has a number of existing objectives in place to protect the coastal wetlands, such objectives will be reviewed and updated where necessary in the drafting of the new plan.

Brittas Bay Beach

As a land use plan the existing county plan has objectives in place to protect and enhance the dunes at Brittas Bay.

CZ9 – 3: *To protect, conserve and encourage the recovery of the beach-dune system at Brittas Bay. Development that results in the erosion of the beach-dune system will not be permitted. In this respect, the Council will particularly ensure protection against erosion caused by amenity and recreational use of the dunes. Regard will be paid to the ‘Wicklow County Council Brittas Bay Monitoring Project 2004’.*

The suggestions seeking measures to be put in place to improve and sustain the dunes and beaches of Brittas Bay are noted, however these would be more relevant to a coastal protection plan / programme, rather than the County Development Plan. The county plan fully supports such plans/programmes.

The tourism infrastructure and traffic concerns in the Brittas Bay area are acknowledged, including issues around car parking and pedestrian safety. The current car parks generally provide adequate capacity and it is only during extremes peaks in visitors during the summer month that capacity can be reached. The fact that the car parks are closed from October to April does however often give rise to on-street parking issues/ hazard and the possibility of the open period is being examined by the Municipal District. With respect to footpaths, the priority in the area has been those locations with permanent residents that need year round safe access to local schools, shops etc. The Council is committed to improve pedestrian and cyclist facilities in the area as funding allows.

The current County Development Plan notes these pressures and while it provides the policy support for appropriate infrastructure improvements, the carrying capacity of the natural environment is at all times the main priority and enhancing roads, car parks etc will undoubtedly result in even more

visitors and more potential damage to this vulnerable ecosystem. These objectives will however be reviewed in the crafting of the new plan.

Arklow beaches

While the suggestions regarding measures to improve and sustain the beaches of Arklow and its recreational facilities, including the development of sustainable tourism, are noted, these would be more relevant to a coastal protection plan / programme, rather than the County Development Plan. The current County Development Plan in its coastal zone objectives supports coastal management projects and works, and it is intended that these provisions will be retained and enhanced if necessary in the new plan.

With regard to access issues to the coastline / beaches in Arklow, any alleged unauthorised development including unauthorised closing of access is being and will continue to be investigated by the Planning Enforcement Department of Wicklow County Council; this is not a matter for the County Development Plan.

The restoration or development of new coastal routes in north Arklow would be a matter for further local study and funding, but would be supported by the provisions of the County Development Plan.

Issues raised with respect to the coastal protection measures in Arklow are noted; it is considered these would be more relevant to a coastal protection plan / programme, rather than the County Development Plan. The county plan fully supports such plans/programmes.

Arklow to Kilmichael (Cell 12)

The suggestions for improvement to the objectives for this cell are noted and will be considered in the crafting of the new plan. In general however it is considered that the existing provisions strike a suitable balance between protecting this valuable natural asset and allow for its development for tourism / recreation.

Signage and access

Objective CZ2-3 of the existing plan facilitates signage and access to the beaches at appropriate locations. Such objectives will be retained and enhanced if necessary in the new plan.

3. To facilitate the development of services and facilities for visitors such as suitable signage, footpath surfaces, notice and maps, while preserving the rugged and natural character of the area and its paths.

The delivery of such signage and access is a matter for the Municipal Districts for each coastal area.

Keep Ireland Open

Keep Ireland Open’s submission provides a lengthy and detailed submission on a significant number of the existing objectives and topics contained in the 2016-2022 County Development Plan. With regard to coastal zone management, the submission makes numerous alternative or additional wording suggestions for many of the objectives. This stage of the plan review process is more ‘Strategic’ in nature, and the development of specific objectives will follow once the overall strategy and key aims of the plan are agreed.

During the review of the detailed policies, objectives and development standards contained in the existing plan, it is intended that the new County Development Plan will update and strengthen these

existing objectives taking into consideration any new national policy and guidelines as well as the suggestions in this submission for new policies or existing policy amendments. In this regard it should be noted that particular care will need to be taken to ensure that policies and objectives are appropriate, rational, and reasonable, have a basis in Government policy and are legally sound.

With regard to the request for meaningful indicators which can be used to monitor the impact of the final plan it is noted that the County Development Plan is not an operational plan. Accordingly, the identification of indicators to monitor progress is difficult. However in accordance with the planning and Development Act 2000 (as amended), a two year review will be carried out. Section 15 (2) of the Planning and Development Act, 2000, states that ‘...a Planning Authority shall, not more than 2 years after the making of a Development Plan, give a report to the Members of the Authority on the progress achieved in securing the objectives’ of the Plan.

Recommendations of Chief Executive

1. To review and update / strengthen the objectives on coastal zone management in accordance with national, regional and local policy and strategies.

Part 4.3.12 Implementation

Name	Issue Raised	
Wicklow Planning Alliance (C17)	The Plan should include a commitment to monitor the efficacy of the plan and its outcomes and include the indicators that will be relied upon to deliver that monitoring. We suggest you adopt the Guidelines on SEA’s published by the Department of the Environment.	
Keith Scanlon (D12)	Include indicators that can facilitate monitoring that measures wellbeing / quality of life across social and environmental dimensions and aligned with UN SDGs.	
Tessa Stewart (D26)	Develop thorough measures of, and set targets for, Wicklow Biodiversity. This should include, as an early example, % land area under native continuous coverage forestry and protected from over-grazing (sheep and deer).	
Sinead Wallace (D35)	Include indicators that can facilitate monitoring that measures wellbeing / quality of life rather than solely on economic growth model.	
Keith Scanlon (D12)	A ‘pro-forma’ submission on a range of County Development Plan issues has been received from a number of people. Each individual issue is addressed under the relevant topic and in relation to Implementation the submission states: Include indicators that can facilitate monitoring that measures wellbeing / quality of life.	
Eleanor O’ Farrell (D13)		
Ann Scanlon (D17)		
Patricia Ryan (D18)		
Tina Roche (D19)		
Noreen Keville (D28)		
Ann Teehan (D29)		
Isobel Connolly (D32)		
Alison Ryan (D34)		
Annette Vaucanson Kelly (D61)		
KRA Visionary Project Partners (D95)		
Judy Osborne (D98)		Submissions made on previous county development plans resubmitted and it is acknowledged that each plan improves on the previous, however it is considered that the issued raised in previous submissions have not been taken on board. Meaningful indicators which can be used to monitor the impact of the final plan are become ever more important.

Response of Chief Executive

Wicklow County Council is fully committed to securing the implementation of objectives included in the Wicklow County Development Plan. The Council has a leadership role in order to progress and secure the plan objectives. It is the duty of the planning authority to take such steps within its powers as may be necessary for securing the objectives of the development plan. The successful implementation of the plan objectives will require an on - going collaboration and good-will approach with citizens, stakeholders, sectoral interests, and adjoining authorities.

This implementation will be achieved by:

- application of the objectives in the assessment of planning applications;
- investment in infrastructure underpinning the development objectives by private and public bodies, subject to the availability of funding;
- integrating the objectives of the plan with lower order plans such as Local Area Plans and action area plans;
- ongoing monitoring of the objectives of the plan and identifying any needs for adjustment of objectives over the plan lifetime and during future reviews.

There are a number of measures in place that will monitor the implementation of the County Development Plan:

- In line with the Planning and Development Act 2000 (as amended), under Section 15(2), a report for the Elected Members shall be prepared 2 years after the making of the development plan on the progress achieved in securing the objectives of the plan. In addition to this, in relation to the implementation of the Regional Spatial and Economic Strategy, under Section 25A of the Planning Act, Wicklow County Council is required, every 2 years, to prepare and submit a report to the Regional Assembly setting out progress made in supporting objectives, relevant to WCC, of the Regional Spatial and Economic Strategy for the Eastern and Midlands Region.
- The Office of the Planning Regulator (OPR) has a role that includes the assessment of all local authority and regional assembly forward planning programmes, including regional spatial and economic strategies; organisational review of the systems and procedures used by a Planning Authority, in the performance of any of their planning functions. The OPR operates an independent monitoring role, advising the Minister, Government and the Oireachtas on implementation of local authority statutory planning processes, using a new set of indicators to be developed to assist effective monitoring.
- It is intended that wellness, sustainability and quality of living will be at the core of the new County Development Plan. In particular, for the first time the County Development Plan will include a health and wellbeing ‘audit’, to ensure all of the provisions within the remit of a land use plan will contribute to community well-being and improved quality of life for all in Wicklow. This audit will determine the appropriate variables / parameters that contribute to well-being and how they may be monitored.
- Further to the requirements set out above, the Strategic Environmental Assessment (SEA) Directive requires that the significant environmental effects of the implementation of the development plan are monitored. The SEA will provide details of the measures that will be used in order to monitor the likely significant effects of implementing the plan, insofar as resources allows.

Recommendations of Chief Executive

1. To retain and enhance, where necessary, the policy for the implementation and monitoring of the objectives of the county plan.
2. To include policy to reflect the monitoring role of the Office of the Planning Regulator with regard to the implementation of the County Development Plan objectives
3. To include policy to monitor the implementation of the Regional Spatial and Economic Strategy objectives relevant to County Wicklow.
4. To include a ‘health and wellbeing’ audit, to ensure all of the provisions of the plan will contribute to improved quality of life for all in Wicklow.
5. To undertake the required Strategic Environmental Assessment (SEA) of the proposed new County Development Plan providing details of the measures to monitor the likely significant effects of implementing the plan.

Part 4.3.13 Bray

Name	Issue Raised
Anna Deveney (D4)	This submission relates to the Record of Protected Structures entry regarding ‘pillar boxes’ in Bray and suggests that the description of the record entry is too vague and should be expanded to give clearer description of the location and information regarding the 9 such structures in Bray.
Tessa Stewart (D26)	<p>Fassaroe: The development of Fassaroe should be carried out in a ‘joined up’ manner with regard to transport and education and links to neighbouring DLR new developments; concern expressed at the commencement of housing development in advance of the provision of new schools in Fassaroe itself, and the transport issue and problem this will create in the wider Bray area.</p> <p>It is suggested that a coordination body is required to facilitate joined up education and transport planning for areas such as Fassaroe, Bray, Shankill, Woodbrook, Shanganagh and Cherrywood.</p> <p>Natural heritage / environment: Concern is expressed regarding the water quality in the Swan River and possible polluted discharges to same.</p> <p>Trees along Oldcourt Avenue should be protected if not already the subject of the Tree Preservation Order and any existing TPO should be honoured especially given that the avenue is approved as the access route to new building site to the rear of Charnwood.</p> <p>The bareness of the new walls along the Dargle should be addressed by greening measures.</p> <p>Recreation / amenity: Plans for the green corridor along the Swan River should prioritise protection of biodiversity rather public access and the construction of damaging pathways.</p> <p>Built Heritage: The celtic cross base adjacent to Oldcourt Castle is at risk of falling into the stream and needs to be rescued.</p>
Billy Timmins (D49)	<p>Transport: Transport policy should seek to link the eastern and western sides of the N11.</p> <p>Recreation / amenity: A major sports complex should be a priority for the area.</p> <p>Education: Adequate land should be zoned for education and policy should not hinder or limit future expansion on existing adult or further education sites. The potential for increased usage of adult education sites should be recognised.</p>
Cosgrave Property Group (D96)	While Cosgrave Property Group is the owner of zoned development lands at Fassaroe, this submission relates to the ‘Core Strategy’, settlement hierarchy and population targets, which are addressed in Part 4.3.1 of this report rather than to any Bray or Fassaroe specific issues.
Bray Tidy Towns (C9)	<p>This submission relates to Architectural Conservation Areas and in particular requests the addition of ACAs for: Quinsboro Road, Florence Road and Eglinton Road; Galtrim/Wyndham/Adelaide/Novara/Sidmonton and Meath Road; and Bray Seafront. The intention of Bray Tidy Towns (BTT) submitting ACAs is to protect historical streetscapes and areas without bringing additional buildings onto the protected structures list.</p> <p>This submission is accompanied by detailed submission outlining the justification for such ACAs and ‘proposed ACA plans’ for each areas prepared by Bray Tidy Towns.</p> <p>Justification:</p> <p>ACA MORE FLEXIBLE THAN PROTECTED STRUCTURE</p> <p>The building guidelines for ACA’s relate to areas and streetscapes which are similar in character and although offering guidelines for the preservation of building exteriors do not, unlike guidelines affecting buildings with protected status, seek to influence the internal structures of buildings. An ACA status is arguably more user friendly than a Protected Structure status. See Section 3.2.3 of the AHPG.</p>

	<p>ONLY RELEVANT GUIDELINES NEED BE INCLUDED IN PLANNING POLICY As you are aware, “it is at the discretion of the planning authority to make the policies to protect these areas appropriate to the particular circumstances”. AHPG, Chapter 3 Section 3.2.10. Therefore controls can be put in place to suit specific areas.</p> <p>NOT ALL NOTABLE BUILDINGS ARE ON PROTECTED STRUCTURE LIST There is a belief that most of the houses requiring to be protected are on the Record of Protected Structures list: this is not the case. In the case of Quinsboro Road the signage problem at the unprotected Main Street end is pervasive and interferes with the character of the entire Quinsboro Road.</p> <p>OLD AND TROUBLESOME ISSUES SUCH AS SHOPFRONT NAMES AND SIGNAGE CAN BE GIVEN A FRAMEWORK ACA’s are bespoke and can deal with concepts such as minimizing visual impact, general standard of design, signage on shop-fronts, service cables, size of road signage and waste disposal bins. Architectural Heritage Protection Guidelines for Planning Authorities (AHPG) Chapter 3 Section 3.11.2 & Section 3.7.4. In we are of the opinion that the Quinsboro Road in particular would benefit from a signage policy.</p> <p>QUINSBORO ROAD We firmly believe that the adoption of planning policies through an ACA for the Quinsboro Road would at least halt some of the neglect currently endured by this most historical of Streets. The houses at the back of Nos. 1-11 Quinsboro Road are derelict and have been for quite some time.</p> <p>OTHER AREAS IN WICKLOW WITH ACA’S Currently Bray, unlike eight towns in Wicklow does not have any ACA’s in place although a previous plan stated the intention of looking for ACA status for two locations namely Sidmonton Park and King Edward Road. The nearest town in size to Bray on this list is Wicklow town, which has ACA’s for four separate areas including their Main Street. Other towns, which have ACA’s are: Tinahely, Blessington, Greystones, Delgany, Dunlavin, Rathdrum and Enniskerry.</p> <p>CONSOLIDATING ACA AREAS If the current format of having three ACA areas is not feasible it may be more appropriate to combine all three areas into one for the sake of cohesion as the houses in these areas were built either during the Victorian era which is 1837 – 1901 or the Edwardian era which is 1901 – 1910. The features requiring preservation in both cases would consist mainly of the cast iron railings, sash windows, brick-work, roof tiles and timber detail on front doors and surrounds. In some instances the front curtilages would require protection. See AHPG Sections 3.2.3,3.2.10 and 3.3.2 : https://www.chg.gov.ie/app/uploads/2015/07/Architectural-Heritage-Protection-Guidelines-2011.pdf</p> <p>Bray Tidy Towns is of the opinion that the ACA is a planning tool to be used by planners to enhance their influence on how historical areas develop. The recommended ‘building attributes’ detailed by BTT in the attached ACA proposals are only given as examples of items in areas requiring policies and guidelines, they are not meant as definitive recommendations in themselves.</p>
<p>Bray Head Residents</p>	<p>As a designated Special Area of Conservation of local, National and European importance protected under the EU Habitats Directive and a Special Amenity Area Order, the</p>

<p>Association (C23)</p>	<p>preservation and enhancement of Bray Head is of strategic importance to the development of County Wicklow and, as such, requires particular consideration in the drafting of the County Development Plan.</p> <p>The effective management and appropriate enhancement of the Bray Head area is a crucial building block in the development of Wicklow’s outdoor leisure amenities. In this context it is imperative that:</p> <p>a) Development and enhancement of the area is kept strictly in line with the requirements of the SAAO and that any unauthorised development is dealt with in a manner that adheres to SAAO requirements.</p> <p>b) Adequate resources are made available for the implementation of the Management Plan for the area. Resources are required to:</p> <ul style="list-style-type: none"> i. improvement and maintenance of existing footpaths and bridleways and the provision of suitable signage, footpath surfaces, notices and maps ii. development of a way-marked trail system and the creation of additional public footpaths and walkways with, where appropriate, increased accessibility for the mobility impaired iii. preservation of existing areas of heathland, maritime grassland and woodland areas iv. appropriate “rewilding” of the old par 3 golf course v. preservation and protection of the archaeological heritage of the area, particularly Raheencluig. <p>c) Plans for the enhancement of the area are integrated with town plans for Bray and Greystones and with plans for the development and enhancement of natural landscape and coastal amenities throughout the County.</p> <p>Issues arising from the RSES</p> <p>5. It is noted that the Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly identifies Bray as a Key Town (a large economically active service and/ or county town that provides employment for its surrounding area and with high-quality transport links and the capacity to act as growth drivers to complement Dublin and Regional Growth Centres). It is further noted that the Regional Policy Objectives RPO 4.26 and 4.27 are premised on a significant proportion of future urban development being accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth. BHRA considers that this future development, including meeting the requirement that 30% of all new homes be delivered within the existing built-up footprint of settlements, should be undertaken in a manner that protects and enhances the residential amenities of mature residential areas. RPO 4.37, supported by enhanced transport links envisaged in RPO 4.40, provides for the development of major schemes at the former Bray golf course and Bray harbour and the westward extension of the town, and BHRA notes that this will provide for the consolidation of the development of the town whilst protecting the residential amenities of existing housing development and estates.</p> <p>6. BHRA welcomes the emphasis on people based industrial activities as the primary local employment opportunity for Bray in RPO 4.38 (Support the development of Bray as a strategic employment location with a particular focus on attracting high value investment in ‘people’ based industries at accessible locations, in order to increase the number of local jobs).</p>
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	<p>7. BHRA welcomes the requirement of RPO 4.39 to promote the consolidation of the town centre with a focus on placemaking and the regeneration of strategic sites to provide for enhanced town centre functions and public realm, in order to increase Bray’s attractiveness as a place to live, work, visit and invest in. It is important that the deterioration of the commercial function of Bray town centre, and the erosion of the amenity functions of Bray seafront, are reversed in order to provide a vibrant focus for the people of the town. The damage to these functions has meant that the town has suffered from a diminution of a sense of place, and the economic activity of the population has become over-dependent on car transport (e.g. reliance on shopping areas and centres not easily accessible by public transport).</p> <p>8. In regard to RPO 4.41 (Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and ‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance), BHRA welcomes this, but is concerned to ensure that the provision of sustainable transport options, including cycleways, is undertaken in a manner that does not open up lands for development that would otherwise be unsuitable for development or conflict with overall sustainable development requirements. In particular, cycleways must be provided in a manner that cannot lead to the provision of vehicular access to lands not suitable or appropriate for development.</p> <p>Transportation and Infrastructure</p> <p>10. BHRA welcomes the emphasis placed in the Transportation and Issues paper on the provision of sustainable transportation in the forthcoming County Development Plan. In existing residential areas, where there is inadequate provision of road space to pedestrians, a higher priority should be given to these, and to cyclists. Re-engineering of roads in these areas should be based on a design approach which creates self-enforcing low speed environments in housing estates and settlements.</p> <p>11. The haphazard evolution of transport networks in existing developed areas, particularly mature residential areas, has created incentives for rat-running by car drivers that considerably damages residential amenities and significantly reduces road safety. This is frequently aggravated by new developments feeding into an existing deficient road network. BHRA requests that the Development Plan provide for a comprehensive traffic management review and plan for affected areas of the County, with specific provision for enhancing existing residential amenities and improved road safety in existing housing estates, as part of the overall objective of providing sustainable transport in Wicklow.</p>
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Response of Chief Executive

Strategic vision for Bray / RSES issues

The issues raised with respect to the RSES and its application to Bray are noted; the new plan will as required accord with the provisions of the new NPF and RSES, in particular in the new Core Strategy and settlement / growth provisions (for more detail please see the proposed Core Strategy set out in Part 2 of this report and Section 4.3.1). These provisions will then be applied at the local level in the preparation of the next LAP for Bray, which will address any sensitivities / conflicts that may exist in Bray in implementing new objectives for example around densification and better use of infill /

brownfield sites (including protecting mature residential areas as suggested in the submission from BHRA).

Built Heritage

This suggestion regarding the post boxes is welcomed and it is recommended that the Record of Protected Structures be improved by inclusion of more information on all of the post boxes that are included in the existing RPS entry.

With regard to heritage features at Oldcourt, these are protected under the National Monuments Act and / or the RPS, and there are obligations on the landowner to ensure that no damage is done to such structures / items. This is not a matter for the County Development Plan but it can be investigated by the Planning Authority.

ACAs: This proposal was recently considered (and rejected) by the executive and the members during the course of the adoption of the Bray MD Local Area Plan in 2018.

In this regard, the CE’s opinion on this proposal has not altered (it is not supported) and is as follows:

The quality of shop fronts within Bray Main Street and surrounding side streets is accepted as being relatively poor. It is agreed that ACAs can provide guidance with respect to visual and architectural treatments; however policies and objectives relating to ACAs will only apply to proposed developments and will not apply to the impacts caused by existing shop fronts and businesses.

Similarly the designation of an ACA would not resolve any perceived neglect and dereliction currently experienced on the Quinsborough Road. There are many protected structures in the Bray MD which are afforded protection yet are currently vacant and derelict and in need of development. The Council will utilise all of its power to encourage / induce the development of these sites e.g. by providing for a wider range of uses on some sites to ‘kick start’ development such as the application of the vacant sites levy etc. and encouraging development that will add vibrancy to the businesses in the central core of Bray.

While it is agreed that the ACA designation is not as onerous as the RPS designation and would allow property owners more flexibility with the interior of buildings it is considered that any buildings worth protecting have already been designated as a protected structure.

The planning authority is reluctant to consolidate ACAs as it is felt that this would discourage development in the Town Centre. It is considered that the town centres in the town are in need of regeneration; indeed the dimensions of many of the shops in Main Street are not suitable for modern retailing, and therefore the Council will support the redevelopment of sites and structures in the town centres which positively contributes not only to the heritage value, but also the commercial and residential vitality of the town centre. It is considered that the key to protecting such structures (or groups of structures) is to find ways to protect their physical integrity and maintain their viability. In this regard, there will be presumption in favour of the active use of heritage buildings, even if this means some modern interventions, rather than preserving them forever in the past, which can ultimately result in the structure being unusable and falling into dereliction. With this in mind each planning application will be assessed on an individual basis and considered on its own merits.

Natural heritage / environment

The concern regarding possible pollution of the Swan River will be brought to the attention of the water protection unit of the Council.

A number of trees / tree stands along the Oldcourt House Avenue and grounds are the subject of Tree Protection Orders. In the event that applications for development in the area are received, cognisance will have to be taken of these orders in the design of any new development and in the construction of any permitted works (it should be noted that no permission has as yet been sought or granted for any development on these lands).

With respect to the Dargle River walls, the flood scheme did not provide for explicit ‘greening’ or vegetation camouflaging measures for the walls, but rather it was expected that in time nature would take its course and recolonise infrastructure works. There is merit however in the suggestion and while there is no current project in train to install measures to assist re-vegetation, this is something that could be looked at in the future as a local biodiversity project, subject to funding.

The detailed submission with respect to Bray head is noted. The majority of the items raised relate to the actual management of Bray Head, the ongoing application of the management / restrictions afforded by the SAC status and the implementation of the Bray Head SAAO, which are not strictly matters for the County Development Plan. The current County Development Plan and the Bray MD LAP both provide the *policy support* for the ongoing protection and management of Natura 2000 sites and the implementation of the SAAO. The management and protection of Natura 2000 sites are matters for the landowners and the NPWS, with the Planning Authority’s role limited to permitting of development and pursuing unauthorised development, which are its legal obligations separate from the provisions of the County Development Plan. The delivery of projects / enhancements outlined in the SAAO would be matter for the SAAO implementation group and the landowners (which includes Wicklow County Council).

The allocating of resources to this group would not be a matter for the County Development Plan, but may be more appropriate for the Municipal District to consider in its annual budgetary process.

Recreation / amenity

The Council is currently studying the feasibility of the development of a greenway along the Swan River, which is an objective of the Local Area Plan. This objective, along with all objectives of the plan, was subject to Strategic Environmental Assessment and Appropriate Assessment during that plan making process, and it was determined that the objectives could be delivered, without given rise to significant adverse effects on the environment. This will be ensured through the implementation in this project of the relevant objectives of the LAP, in particular:

Bray MD Local Area Plan 2018 Objectives

- B1** *To ensure that the impact of new developments on biodiversity is minimised and to require measures for the protection and enhancement of biodiversity in all proposals for large developments.*

- B4** *To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network.*

- GI1** *New development and redevelopment proposals, where considered appropriate, are required to contribute towards the protection, management and enhancement of the existing green infrastructure assets and corridors of the local area in terms of the design, layout and landscaping of development proposals.*
- GI2** *To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, Natura 2000 sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites.*
- GI3** *To minimise alterations or interference with river / stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of generally 10m along watercourses should be provided (or other width, as determined by the Planning Authority) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. In all cases where works are being carried out, to have regard to Regional Fisheries Board “Requirements for the protection of fisheries habitat during the construction and development works at river sites”. New river / watercourse road crossings and / or piping shall be strongly resisted except for reasons of overriding public health and safety.*
- GI4** *To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, where considered to be viable, safe and in line with sound arboricultural management, in the interest of amenity or the environmental, as set out in the Heritage Schedules of this plan.*
- GI5** *To promote the development of a series of major open spaces and recreational areas linked by green corridors where feasible (see Map GI1), in the Bray MD area as follows:*
- *along the south bank of River Dargle from Bray Harbour, as far as Rehills (SLO2) in agreement with affected landowners;;*
 - *on the former Bray golf course lands / Ravenswell Road, linked to harbour and north beach to the east and the People’s Park to the west;*
 - *From Bray Head, down to the Esplanade, and up through Bray Harbour, to the north beach;*
 - *On the Kilruddery estate as part of SLO 1 linking along the Swan River, through the OS to the west of Hollybrook Park; from the Bray SCR, through SLO 6 or SLO 9 onto the Boghall Road; continuing through new and proposed residential areas onto Herbert Road and onto the River Dargle; in particular, (a) any new development at or in the vicinity of Oldcourt House shall make provision for the continuation of the green corridor between Giltspur Brook and Rycroft; (b) any infill development along Herbert Road adjacent to the green corridor shall make provision for green link between Herbert Road and the Dargle corridor.*
 - *In the new development zone of Fassaroe west of the N11, linking river valleys to the north and south of the action area;*
 - *A linked area from Enniskerry GAA, through the open space in Action Area 2, connecting to Knocksink Wood / Glencullen River, through the Bogmeadow recreational area, and onto the Cookstown River.*

The exact route for these developments is not yet known so detailed ecological assessment for impacts on important ecological features, including general ecological impact assessment and specifically Appropriate Assessment, is best carried out when these routes are designed. The detailed design of these schemes will need to take into account the

relevant ecological features in proximity to the proposed routes and the potential for impacts arising from the routes will need to be taken into account including both construction and operational phases.

With regard to the suggestion regarding a major sports complex in Bray, this is already an objective of the Local Area Plan and studies / investigation are already in train to determine how and where this can be best delivered and funded.

Education

The Bray Municipal District LAP zones land for education use, commensurate with the current and future population of the area, drawn up following consultation with the Department of Education and Skills, the elected members and the public. There are no provisions that would aim in any way hinder improvement or expansion of existing services.

Employment / Town Centre / Placemaking

The employment objectives for Bray as set out in the new County Development Plan and any revised Bray MD LAP will be consistent with the objectives of the NPF / NDP and Regional Spatial and Economic Strategy.

It is agreed that place making is an important factor in attracting new investment and job creation and this is particularly promoted and supported in the current County Development Plan. It is recommended that such support be retained and enhanced if necessary in the new plan. In addition, public realm strategies / plans / frameworks have been or are being prepared for a number of settlements in County and this is an ongoing process. The actual delivery of identified projects will be dependent on funding available and this therefore needs to be addressed through annual budgetary / capital works programmes and the URDF / RRDF funding programme.

Transport

It is agreed that east-west transport connectivity across the N11 is and will be an issue as more lands to the west of the N11 come forward for development. In light of this challenge, the NTA in conjunction with the TII and Wicklow County Council and DLR County Council, has already completed the Bray and Environs Transport Study and is now in the implementation stage of the recommendations and actions identified in the study.

Concern is raised in the submission from BHRA about the design of new cycleways and a concern expressed that the delivery of new cycleways may lead to the opening up of land that is not suitable or appropriate for development. In general the provision of cycleway would not ‘open’ land for development in itself, as ‘opening’ of previously undeveloped land would require a number of steps including the zoning of the land (and all of the assessment / decisions that go with that), the delivery of roads / vehicular access, the provision of piped infrastructure etc. The design of any new cycleway, including routes, will accord with best practice, including the National Cycle Manual published by the NTA.

It is agreed that it may be possible that some existing road space could be repurposed for cyclist and pedestrian usage and existing road layouts could be altered to create lower speed environments. The County Development Plan provides the policy support for such projects (e.g. Objective TR9: *‘To improve existing or provide new foot and cycleways on existing public roads, as funding allows’*). The actual delivery of same would be an operational and funding matter for the road authority / each MD.

Wicklow County Council in conjunction with the NTA, TII and DLR County Council has recently completed the ‘Bray and Environs Transport Study’ which clearly identifies the transport interventions that are required in Bray to ensure that the local roads and public transport networks are capable of accommodating any new traffic demands that arise.

Fassaroe

Wicklow County Council communicates regularly with the Department of Education and Skills to ensure that the Department is well aware of planned new growth areas, to appraise them regarding pre-planning discussion for larger scale new residential development (in particular those located or of such a scale that may present issues accessing existing schools), and to advise when such applications are lodged / granted.

Wicklow County Council in the drafting of Bray MD Local Area Plan, ensured that adequate lands were zoned for education use in Fassaroe, and that the phasing of the development was tied to the delivery of lands for education use including a primary and secondary school campus and a second primary school for later phases.

In addition, the existing County Development Plan requires for all larger scale developments:

CD5 *Where specified by the Planning Authority, new significant residential or mixed use development⁴ proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.*

This will be included and can be enhanced in the new CDP.

Furthermore, Wicklow County Council in conjunction with the NTA, TII and DLR County Council has recently completed the ‘Bray and Environs Transport Study’ which clearly identifies the transport interventions that will be required to accompany new housing development in Fassaroe, to ensure that the local roads and public transport networks are capable of accommodating any new traffic demands that arise.

On the basis of all of these actions, Wicklow County Council is confident that the development of Fassaroe can be managed and appropriately phased to ensure that the necessary infrastructure, including schools and public transport, will be delivered in tandem with the development of the major, and strategically important, new development zone.

Recommendations of Chief Executive

1. To review and improve the Record of Protected Structures
2. To maintain and strengthen if necessary natural heritage provisions of the plan, to ensure the ongoing protection of biodiversity and watercourses
3. To strengthen the Climate Action provisions of the Plan

⁴ This is determined to be any proposed development in: (a) settlement levels 1 to 4 of 150+ residential units, (b) settlement level 5 of 75+ residential units and (c) settlement level 6 of 30+ residential units.

4. To maintain and strengthen if necessary County Development Plan provisions regarding the phasing of new development with respect to social infrastructure audits and the delivery of schools in tandem with new housing.
5. To continue to ensure, through the designating of land for new housing development, that new residents will be within easy access of existing schools, or planned future schools.
6. To continue to prepare Local Transport Studies / Plans for all settlements intended for significant new development.

Part 4.3.14 Wicklow Town - Rathnew

Name	Issue Raised
Fintan Clarke (D6)	<p>This submission is with regard to Lighthouse Road. It relates to the permanent padlocking of a gateway on this stretch of roadway which goes from the public road to one of the most scenic areas of our county and which has been used without hindrance by past generations of our townspeople as many of my generation can testify. Friends of the Murrough, together with Wicklow Co Council secured a grant for the re-establishment of the Cliff Walk.</p>
Gabriella Kirby (D16)	<ul style="list-style-type: none"> ▪ A Mall something similar to Bridgewater in Arklow or Dundrum Shopping Centre. People are always looking for places to visit, especially in winter time when the weather is inclement. A Mall is the perfect place to go, it's warm, plenty of places to visit, coffee shops, retail outlets, etc. I think it would be a huge plus for Wicklow Town. ▪ Wicklow Town needs a cinema, whether in the Mall or separately. If you want to visit the cinema. It has to be Dublin, Arklow or Gorey at the moment. ▪ A Greenway from Wicklow (The Murrough) to Greystones would be lovely and a nice tourist attraction, it would also bring more business to the shops in the town. ▪ Make the Main Street a one way street.
Kathleen Snell (D20)	<ul style="list-style-type: none"> ▪ The development of Clermont Convent is upsetting some people. It was agreed to be made a full scale college with student accommodation and related shops nearby, also this would create local jobs. It has only been working at part capacity until the rest of the plan catches up. The idea of student accommodation, local shops and jobs should perhaps take priority. That is how Aldi got their planning permission as part of that? ▪ The businesses/ workshops along Charvey Lane, Saunders Lane, in the Murrough Enterprise Park and on South Quay and a college in Broomhall that need to be advertised better so people know they are there. ▪ People should be more aware of what is happening in their Community and Volunteer. ▪ About 2 plans ago there was a proposed zone 10 where there was to be a transport hub here in Rathnew behind the railway line from me-not where the houses are but the other side of the Old Arklow Road. It was to have a new station, buses like 02 ,133, Wexford bus and now 183 + all related shops that would service the same-but they said then it was on the long finger-I guess they were right, but the land was zoned at least 2 plans ago. The rest of the stuff is continuing as the plan I was talking about so maybe that is to happen eventually too. ▪ People living over shops may help the shop with rates but this would involve providing separate access for the resident.
Veronica O’Reilly (D27)	<p>Tourism suggestions to help the growth of Wicklow Town. Tourism would help the town become more vibrant. Some areas need attention.</p> <ul style="list-style-type: none"> ▪ South Quay - lights along the road beside the river. ▪ Use of Capt. Halpin's monument as a figure of interest to tourists by creating a designated area along the Murrough with an interpretative centre about him and other notable figures in the town. ▪ The new sign at the Black Castle is brilliant perhaps an interpretative centre could be ear marked for this area. ▪ A journey from the Jail to the harbour - like a walking tour to bring home the plight of the prisoners transported to Australia. ▪ A look at other ways the council could raise funds other than rates and parking. ▪ The rates and parking fees are necessary but maybe unsustainable in the long term. ▪ The town is often used for filming if this could be a possible add on to a tourist trail. ▪ More development on a Food Trail - or experience. ▪ Wicklow Town is the capital of the County - make this known. ▪ The Container Hotel is a unique concept and will help to make Wicklow more known.

<p>Billy Timmons (D49)</p>	<ul style="list-style-type: none"> ▪ The transport and road policy should ensure that the most attractive routes are the routes used and that there is visible and accessible parking. The harbour area has endless potential. The green space between both towns needs to be protected from development pressures
<p>Judy Osborne (D98)</p>	<ul style="list-style-type: none"> ▪ Wicklow town should be self-sustaining. ▪ Wicklow town should not be dormitory. ▪ Rathnew Village lacks an identifiable, i.e. it is relatively amorphous. A clear morphological vision is required in order to achieve integrity of urban form and fabric and allow for development and expansion at an appropriate scale and with appropriate building type / use. <p>There are a number of examples of bad urban design in the Wicklow area. For example:</p> <ul style="list-style-type: none"> ▪ The poorly integrated (though as yet incomplete) area around Broomhall where suburban housing interfaces with a school site and commercial / industrial blocks as well as the Wicklow Town Relief Road (Ashtown Lane). A poor understanding of the nature of these types of development in respect of their respective sites, roads, interrelationship (function, scale, access) and inadequate concern for the public realm have resulted in spatial awkwardness and disharmony (note the visual confusion, and clash of scale of this area as viewed adjacent to Rathnew Cemetery from the Tinakilly Hotel avenue). Moreover, this area could have proved an important buffer between an expanded Wicklow Town and Rathnew, rather than continuing amorphous sprawl. An appreciation of the overall morphology of Wicklow Town and Rathnew should have informed their respective expansion in principle, prompting the use of existing boundaries (e.g. hedgerows, streams, cemetery, roads) to structure expansion and the typologies involved in the different kinds of development concerned. ▪ Suburban housing backing and siding on to public roads creates a sense of hardness and denies the possibility of an enriched public realm. ▪ Close to Broomhall, are the lands around the Village Mill where industrial blocks are effectively ‘dropped into’ an area otherwise zoned for suburban residential development. The success of such land use mixing clearly necessitates a different response regarding building, plots, site, block and street / road, including a sensitively designed public realm. ▪ The recently completed bank building on Main Street, Wicklow, which: (a) ignores the original burgage pattern that is a legacy or Anglo-Norman towns; (b) obtrudes in profile with grossly excessive and inexpressive bulk as viewed from the Bridge and: (c) creates a strong horizontality in elevation across what was originally a few plots that is in severe contrast to the remainder of the streetscape. The inclusion of a form-based approach, including typo-morphological criteria, in the relevant development plan would have positively controlled such a proposal. ▪ The newly completed bank building, in terms of integration, is insensitive regarding its scale, massing and façade, and does not have the municipal or public use that might justify such difference. It ignores the burgage street structure of Wicklow Town, without any justification. <p>Access to open space is a major issue in all the main towns and most of the villages.</p> <p>A Green Strategy is required which provides much stronger controls to protect existing space in town centres and provide new space to encourage physical activity, both active sport and walking. The failure to do this has resulted in great damage to the Murrough in the Wicklow environs, which was a key amenity in the area.</p> <p>We are pleased to see the designation of Bray Head with a Special Amenity Area Order</p>

	however the objectives for the area of outstanding natural beauty and the coastal region in this section are very limited and have failed to provide appropriate protection to Wicklow Bay, one of the most stunning areas of outstanding beauty and natural habitat in the county which is now seriously degraded in the area closest to the town where its amenity is most badly needed.
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Response of Chief Executive

Wicklow Town - Rathnew strategic planning context

The detailed issues raised in the submissions in relation to Wicklow Town and Rathnew are welcomed, however it is important to note that the County Development Plan will deal with the strategic county level issues relevant to this settlement and the specific issues will be considered as part of the review process of the Local Area Plan (LAP) for Wicklow Town – Rathnew. This LAP process will commence once the new County Development Plan is adopted (c. 2021 / 2022).

The Regional Spatial and Economic Strategy (RSES) has identified Wicklow Town – Rathnew as a ‘Key Town’. A Key Town is defined as a large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. Significant growth (i.e. 30% or more than 2016 population) will be directed into the key towns.

Wicklow Town – Rathnew Development Plan 2013

This is the current local land use plan for the settlement. This plan addresses the majority of the issues raised above.

- The zoning and objectives for Wicklow town centre facilitates the development of a shopping Mall and a cinema, however the delivery of such uses is reliant on a private developer coming forward to propose such uses.
- With regard to making the main street into a one way street, many road improvement schemes / proposals have been considered over the years for Wicklow Town’s main street. Currently there are significant works underway to upgrade Fitzwilliam Square to enhance pedestrian and cyclist accessibility and movement in the area. This will include restricted vehicular access to one side of the square, the provision of cycle-lanes into the town centre, enhanced footpath and a one-way traffic system on Bridge Street. The Council is committed to continuing to work to improve the town centre public realm and user safety.
- Wicklow County Campus Centre of Excellence at Clermont, Rathnew is home to the Local Enterprise Office, the Wicklow Film Office, Teagasc and the Life Long Learning faculty run by Institute of Technology Carlow. Wicklow County Council aims to develop Wicklow County Campus as a Centre of Excellence in Enterprise, Education and Innovation in Co. Wicklow and to act as a catalyst for economic development in the county. There is a Wicklow County Campus Strategic Plan in place with objectives and actions in place to achieve the goals of the campus over a 5 year period. It is earmarked to be a full third level college campus with all associated uses; however this is a work in progress with new additions and developments that help to meet the overall vision.
- Albeit the County Development Plan and the Local Plan control and facilitate the advertisement of businesses at appropriate locations, subject to proper planning considerations, the actual marketing of local businesses is outside the remit of a land use plan. The Local Employment

Office (LEO), along with the Enterprise Department of Wicklow County Council, carries out a number of marketing initiatives with regard to employment in Wicklow.

- With regard to the potential of the Wicklow Quays, this is acknowledged in the current local plan and a Strategy has been included in the plan for the development of the Wicklow Port and Harbour. This strategy will be reviewed as part of the new local area plan process. In recognition of the importance and potential of this area, Wicklow County Council has made an application in 2020 for significant funding for a regeneration plan for this area under the URDF.
- With regard to the lack of a focus / centre in Rathnew village, this is acknowledged in the current local plan and a Strategy has been included in the plan for the development of Rathnew Village Centre. This strategy will be reviewed as part of the new local area plan process.

Transport Hub in Rathnew

As part of the drafting of the Wicklow Town – Rathnew Development Plan 2013, the existing ‘Action Area 10’ designation at Rathnew, which included a proposed transport interchange, was reviewed, and the Action Area / proposed transport interchange was omitted. The Wicklow Town – Rathnew Development Plan 2013, in line with the draft NTA Transport Strategy (it was in draft format at the time) focused on consolidating existing development and placed the focus back on the existing train station in Wicklow Town, hence the omission of the transport interchange.

Tourism

A number of suggestions are made regarding potential tourism projects / attractions that could be developed in the town. The content of these submissions are noted and welcomed. The new County Development Plan, as with previous plans, will acknowledge the importance of tourism and recreation and the positive contribution they make to the economic and social well-being of the County. The current County Development Plan and the Wicklow Town – Rathnew Town Development plan include chapters dedicated to tourism and recreation and it is intended to retain this in the new County Development Plan and review and enhance same in the next LAP for Wicklow Town – Rathnew.

The County Development Plan is a land use framework plan and includes objectives to deal with the land use matters pertaining to the planning and development of tourism and recreation – it is not the ‘Tourism Plan’ for the County. Issues for example raised in relation to walking tours, signage or traffic / parking management are outside the remit of the development plan.

The County Development Plan does not **deliver** new tourism or recreation projects or facilities – it is a land use plan that set the framework (location, design etc) for new developments and standards that would be applied when either the private market or state agencies wish to carry out development. The actual delivery of new facilities can be either by private developers or state agencies including the Council; the actual projects undertaken by the Council in this regard would be determined by operational and budgetary / funding considerations.

However, many of the issues raised are addressed in the **Wicklow Tourism Strategy & Marketing Plan 2018 – 2023**. This Tourism Plan sets out a vision of what can be achieved in Wicklow, identifies priorities, targets and detailed actions to ensure the County realises its tourism potential. The **Statement of Tourism Strategy 2017 – 2026** identifies a number of goals for tourism in Wicklow including the establishment of Wicklow as a year round destination, capture more overnight tourism, encourage the provision of alternative forms of accommodation, convert day visitors to staying visitors, integrate development of tourism infrastructure and assets and deliver sustainable

development. These goals reflect many of the issues raised in the submissions. All of these submissions will be brought to the attention of the ‘Implementation Groups’ that are now in operation to deliver on the actions of the Wicklow Tourism Strategy & Marketing Plan 2018 – 2023

Green Infrastructure / amenity routes

Green infrastructure and access to amenity routes are addressed in the Heritage section of this report (Section 4.3.10).

With regard to issue raised with respect to the closing / blocking of existing PROWs or amenity routes any alleged unauthorised development brought to the attention of the Council will be investigated by the Planning Enforcement Department of Wicklow County Council; this is not a matter for the County Development Plan.

Wicklow - Greystones greenway: Wicklow County Council has applied to the Department of Transport Tourism and Sport for funding under the Carbon Tax Initiative to carry out a series of studies leading to route selection and design of this greenway. It is hoped that the funding applied for will help to progress the initial feasibility study, through options selection to design stage. The Council will then have to identify funding sources to take the project to the next stages which include environmental evaluation, land acquisition, and construction. The process will involve public consultation at various stages of the project. The proposed greenway project occurs within the context of large scale coastal erosion studies on the East Coast by Irish Rail and will be largely dependent on the outcome of this work.

There is an established desire line for walkers along this section of coastline along a variety of unmanaged and informal trails. The proposed greenway creates the opportunity to provide a more formal trail along this section of coastline that will facilitate a wider cohort of walkers and cyclists alike while mitigating the footprint of the existing informal trails onto a defined trail that is aligned to minimise and indeed reduce impacts on sensitive habitats. Ecological studies carried out to date have highlighted that challenges exist for creating a greenway over EU protected habitats and it is clear that additional scientific information and rigorous ecological assessment is required.

Living over the Shop

Objective RT15 in the current development plan promotes the active use of above ground floor levels in principal shopping streets including living over the shop. This policy shall be continued in the draft plan and broadened or strengthened if considered necessary.

Urban Design

Issues around urban design are addressed in the Development and Design Standards section of this report (Section 4.3.28).

Recommendations of Chief Executive

1. To review all strategic objectives relevant to Wicklow Town – Rathnew in the County Development Plan and to update where necessary.
2. To review all objectives relevant to Clermont Campus in the County Development Plan and to update where necessary.
3. To maintain and strengthen if necessary natural heritage provisions of the plan, to ensure the ongoing protection of natural heritage and biodiversity

Part 4.3.15 Arklow

Name	Issue Raised
Residents of Beresford Terrace Arklow (C6)	<p>In the recent past two public rights of way were closed illegally, these closures have caused much anger and frustration in our town.</p> <ul style="list-style-type: none"> The route to Shelton Abbey from Ferrybank Arklow was closed illegally. This route has been a right of way since 1690, and was used by Arklow Residents until the gate was padlocked and shuttered some years ago. In 2016 the public right of way to North and Seabank Beaches was also illegally blocked; this was the only access to the seashore. <p>We would ask you to list the public rights of way throughout the County in the next Development Plan to ensure the rights of the citizens of our County are respected</p>
Nancy Quinn (D36)	<ul style="list-style-type: none"> The policies in the current Development Plan do not protect our lovely coastline. Particularly concerned about the damage being done to Brittas Bay Beach by over use, the dunes need to be reinstated and protected to ensure the rare flora and fauna that grow in abundance there. Development of any kind should be restricted on our sensitive areas of coastline from Brittas Bay to Kilmichael. Regarding the beaches in Arklow, Wicklow County Council has a duty to the residents to restore the access to north and Seabank beaches which have been illegally blocked since 2016, by 2028 understand the population of our town will be in the region of 23,000. Is Arklow to become a seaside town without a beach? The ancient coastal path which dates back centuries should be restored. This walkway extended from north quay, Arklow, Seabank, Johnstown North and ended at Ennereilly Beach. This could form a valuable amenity for tourists and local people alike. Seabank beach access should be restored and approval for preservation status. This beautiful beach has already got NHA status, it contains many rare plants including ‘Horsetail’ in the 1988 Arklow town plan, the then town engineer Karl O Donovan stated that this gem of a beach should have to be preserved and enhanced. North beach Arklow has been devastated by rock armour. I would ask WCC to replace this with proper wooden piling which would allow the sand to stay washed ashore.
Deirdre Burke (D41)	<p><i>This a very detailed submissions that clearly has had a lot of work and thought put into it, and therefore it is reproduced in full for the members rather than summarised:</i></p> <p>Natural heritage</p> <p>Arklow south beach: Reintroduce dune protection, which has been broken over the last few years which has worked and proven to be effective; Develop the grass area as a natural playground and plant trees along its border; Monitor activity around Roadstone, when and where they are placing boulders, paths and walkways along the coastline and onto beaches, obtain planning when needed for these activities, also monitor their runoff water and where it goes to?</p> <p>Sand dunes on Arklow golf links: All sand dunes have a protection status throughout Ireland and Europe, dunes which are on coastal links clubs must come under the same governance. The links is home to many species of wildlife, including the protected hare. Wild orchids grow here along with many wildflower species and bats, owls meadow pippit, redpolls, goldfinch, and hawks call this ever decreasing space their home.</p> <p>Ancient pine trees at Kynochs lodge should also have a preservation order placed on it, an important and biggest rookery in the town; also the land below leading out to the sea would benefit a protection status and could become a wildlife reserve, again boosting</p>

	<p>tourism.</p> <p>Brittas bay beach: Have an environmental protection order placed on it.</p> <p>Arklow Marsh: Arklow marsh should be a NHS (natural heritage site) as opposed to a pNHS “proposed”, it is home to a very rare cotton weed. Research done on the marsh to see exactly what wildlife live there. Look into enlarging Arklow marsh / natural flood relief. Once it has protection status, it can then be developed by professional conservationists to ensure the least amount of damage.</p> <p>Wildlife corridors: Urban forest could be considered here running from Servier (which could possibly fund such a project) right out to wooden bridge. Hundreds of trees have been felled along the railway line which is in turn along the path of the Avoca, more trees must be planted to create a natural flood defence, also the site behind Churchview could be a small urban forest and playpark with bike paths through it and natural play areas through it also, this again would in turn help greatly with the rivers of water which now end up at the bottom of the town with new estates and paved gardens popping up in the last 20 years. This piece of land is the last sump tank left between the top and bottom of Arklow. Encourage farmers in the area to maintain and improve their hedgerows, and encourage hedgerows where fences are, it’s not just good for wildlife but a bonus in the long run for the farmer. Districts all throughout the county could connect corridors and walkways which would bring a financial benefit and bring tourists.</p> <p>The Avoca River: Cleaning up the Avoca river of mine waste and sewage is now underway, at the bridge in Arklow, the island should be made larger which is part of the marsh and should be protected from any building activity, this is the most picturesque piece of land in the whole town and should be cherished as a home for the wildlife on the river.</p> <p>Small business will thrive once the treatment plant is done, and it is imperative that no large scale wall prevents the town from accessing it. The river will be the main attraction of our town and we must be able to enjoy and use it. Apart from activities like sailing and kayaking, bird watching and angling could give our town a huge financial boost. There are 15,000 members in Birdwatch Ireland alone and they travel the length of the country to spot and sight birds and fowl.</p> <p>Upper river management should be considered and an incentive to landowners to do their part where there is water through their land, clearing of scrub and waste during the quiet winter months could help greatly in the amount of debris running down and getting caught at the bridge. It has been proven that concrete structures and traps do a huge amount of damage and have the opposite effect.</p> <p>Discussions with property owners and fishermen about quayside development should take place with a seat for everyone at the table, making decisions in offices that have a huge effect on incomes should be a thing of the past, public information and participation is key to getting things right rather than cause confusion and tension. (as has been shown by flood relief plans)</p> <p>Urban hedgerows: The laws surrounding hedge cutting are from the 1st of March through to the 31st August. We see hills burning throughout the summer months and hedges being torn down. Wicklow County Council must themselves set an example and adhere to the law and must enforce it when broken. Sending reminders through social</p>
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	<p>media and local papers and radio stations to remind not just farmers but homeowners, football clubs golf links and courses, hotels that they must have their gardening done by these dates or fines will be issued. Try to prevent something before it happens not only preserves our wildlife but our air quality and our very important heritage.</p> <p>Balloons, Fireworks and Lanterns should be banned by Wicklow County Council. Every one of these are hazardous to wildlife, if not a county ban certainly a ban by civic offices and festivals. Wicklow coco has declared a climate crisis!</p> <p>Built Heritage</p> <p>The slipway: Arklow once the second largest ship builders in the country and the only remaining structure is the slipway. It could be used in the future again for boating activities.</p> <p>Tom’s house on Arklow golf links: Half of this was knocked by the golf club, and what’s left should be protected, this building has been associated with being the offices of the Parnell mines, regardless of that it is probably the last remaining vernacular stone building in the town and an important one.</p> <p>Stone walls throughout the town: The Navy bridge comes to mind. Excessive damage was done by IW and not repaired, fines should be imposed on bad labour practices, especially where heritage is concerned.</p> <p>All red stone buildings should be preserved and if possible become spaces for much needed groups i.e. men’s shed, art centres. The old railway unused building would be ideal for such a group.</p> <p>The coastguard houses are also have importance as part of our maritime heritage.</p> <p>Kynoch’s lodge is probably the most important piece of built heritage left standing and still in use.</p> <p>Old footpaths made from shingle should not be replaced with shoddy cement paths, (if there are any left).</p> <p>Rights of way: Rights of way must be preserved for future generations of the town, these are all well trodden paths by past generations and present, councils must ensure to preserve access to halt any practice of closure on these pathways.</p> <p>Mapping our town: All public land should be mapped for future planning. Land which has not been used should also be considered.</p> <p>Alps: The Alps site could have a CPO placed on as while it is still available, and turned into a natural eco village with shops, cafes art centre and theatre, using non invasive building. This would encourage business back to the town and bring in needed visitors to the town.</p> <p>Transport</p> <p>As a commuter town we have little or no public service, it is within the remit of the Council to lobby for more rail and bus services, which in turn takes people off roads,</p>
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	<p>which in turn leads to less congestion and better air quality.</p> <p>Upgrading of railway lines are needed badly, if every Council from Dublin to Wexford chipped in maybe IR would invest, until we have a proper public transport system it is useless building homes for people to sit in traffic for hours every day.</p> <p>To combat people leaving our town, we need to invest in the town itself to create a vibrant cultural area to live, this will not be achieved by culling trees and building walls, inclusion of nature and generation of business can go together, and enhance each other.</p> <p>A slip road which was part of the bypass onto the Vale Road must be implemented. The one bridge in the town simply cannot cope with the volume of traffic at the moment, and adding new homes which will all house two cars is only adding to the dismay; most of the day it can take up to 25-40 minutes to cross the bridge which is unacceptable.</p> <p>The port road to the M11 should be finalised and take heavy Roadstone trucks away from lower Main Street and the quay; these trucks cause a huge amount of damage to roads and dwellings along the routes they take. This has been promised and should be implemented.</p>
<p>Nicola Kenny (D45)</p>	<p><i>This a very detailed submissions that clearly has had a lot of work and thought put into it, and therefore it is reproduced in full for the members rather than summarised:</i></p> <p>Flood Risk</p> <ul style="list-style-type: none"> - A priority must be given to green infrastructure that respects nature. The County Development Plan should work with nature and not battle against it. - No development in flood risk areas should be permitted. - The whole of Arklow Bay requires review. The trend for rock armour has been a short term solution. A solution that works with the sea, not against it is required (i.e. breakwaters at sea). This in turn will help return our beaches to the once beautiful areas they were. - Discussions with property owners and fishermen about quayside development should take place. Public information and participation is vital to getting things right rather than cause confusion and tension (as has been shown by the recent proposed flood relief plans). Everyone should be considered a stakeholder, not just big companies. <p>Preservation of natural heritage.</p> <ul style="list-style-type: none"> - South beach, Arklow: Reintroduce dune protection, which has been broken over the last few years, which has worked and proven to be effective. Develop the grass area as a natural playground and plant trees along its border. - Arklow marsh should be a NHS (natural heritage site) as opposed to a PNHS (proposed). Research should be done on the marsh to see exactly what wildlife live there. - Look into enlarging Arklow marsh/natural flood relief. Once it has protection status, it can then be developed by professional conservationists to ensure the least amount of damage. - Cleaning up the Avoca River of mine waste and sewage is now underway. Small business will thrive once the treatment plant is constructed, and it is imperative that a large scale wall does not prevent the town from accessing the river. The river will be the main attraction of our town and we must be able to enjoy and use it. Apart from activities like sailing and kayaking, bird watching and angling could give our town a huge financial boost. - Upper river management should be considered and an incentive to landowners to do

	<p>their part where there is water through their land. Clearing of scrub and waste during the quiet winter months could help greatly in the amount of debris running down and getting caught at the Nineteen Arches. It has been proven that concrete structures and traps do a huge amount of damage and have the opposite effect.</p> <p>Green Infrastructure The County Development Plan refers to a network of green spaces that help to conserve natural ecosystems & provide benefits to people. But the CDP does not indicate where these green and blue infrastructural elements are to be found. They should be drawn on & linked together.</p> <p>Open Space/Recreation</p> <ul style="list-style-type: none"> - According to the CDP the delivery of new sports and other outdoor community facilities and spaces is dependent on adequate “open space” being reserved and developed. This will not happen if the council and developers continue to build on suitable “openspace”. - When a housing development is being planned it must include more open spaces and infrastructure to benefit our children’s future. <p>Preservation of built heritage</p> <ul style="list-style-type: none"> - The slipway in Arklow. This was once the second largest ship builders in the country. The only remaining structure of this is the slipway. It could be used in the future again for boating activities. - The coastguard houses are also have importance as part of our maritime heritage. <p>Rights of way protected Rights of way must be preserved for future generations of the town. These are all well trodden paths by past generations and present. The council must ensure to preserve access and halt any practice of closure on these pathways. This is vital especially around our coastal areas. The pathway at the caravan park/Porter’s Rock being the perfect example.</p> <p>Traffic &Transport</p> <ul style="list-style-type: none"> - As a commuter town we have little or no public service. It is within the remit of the council to lobby for more rail and bus services, which in turn takes people off roads. This leads to less congestion and better air quality. Not to mention better mental health for people as they’re not sitting in traffic for hours each day. - Upgrading of railway lines are needed badly. - A slip road which was part of the bypass onto the vale road must be implemented as soon as possible. The one bridge in the town simply cannot cope with the volume of traffic at the moment. With the proposed construction of Arklow’s waste water treatment plant this year along with the proposed development at Kilbride, it is imperative that this slip road is constructed as soon as possible. - The port road to the M11 should be finalised and take heavy Roadstone trucks away from lower main street and South Quay. Large Roadstone trucks & other haulage vehicles use the town centre road system creating danger, noise dust & vibrations
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	<p>which in turn causes structural damage to properties.</p> <ul style="list-style-type: none">- The town centre roads in Arklow serve neither existing industry nor population adequately.- Castlepark car park should be developed into a multi-story car park. The revenue from this could be used to fund local projects. <p>Economic Development & Employment</p> <p>A task force should be created to market Arklow. With the proposed new Data Centre due to commence construction in the near future Arklow can provide a very competitive offering to a variety of tech business in the greater Dublin area.</p> <p>Cultural/ Craft Centre</p> <ul style="list-style-type: none">- Arklow is in dire need of a Theatre/craft centre/rehearsal space for clubs.- Arklow has one of the longest running Musical Festivals in the country. Each year the Festival committee have to hire out space from schools and hotels. In the coming years it would be fantastic to provide a much needed Theatre for all the wonderful artists who travel countrywide to partake in the festival.- The Alps site could be purchased while it is still available. It could be used for cafes, art centre and theatre. This would encourage business back to the town and bring in much needed visitors. The theatre in particular would help other businesses in town. Restaurants, pubs and cafes for example would benefit from people attending the theatre.
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<p>Billy Timmins (D49)</p>	<p>Revitalisation of the old town centre is very important and any major derelict sites in the area should have a targeted policy. An access from the Vale road to M11 should be included</p>
<p>Sophia Meeres (D68)</p>	<p><i>This a very detailed submissions that clearly has had a lot of work and thought put into it, and therefore it is reproduced in full for the members rather than summarised:</i></p> <p>Arklow was consistently designated as a "large growth town" in past CDPs, despite its distance from Dublin, lack of local employment opportunity and essential infrastructure. The plan for Arklow seems to be to make it a "sleeper town" for Dublin. But dormitory towns do NOT correspond with either the principles of the RSES, or the NPF 2040.</p> <p>Arklow corresponds best with the description of a Self-Sustaining Town (<3% population growth) that must concentrate on improved quality of life. Located too far from Dublin, with unemployment at 20%+ (high), approx 20% commuting to Dublin for work (low), poor transport links and inadequate infrastructure (roads, waste and at risk of sea-level rise), the town could benefit from "catch-up" investment so as to boost the local economy, and in particular local tourism. Arklow is the right size. All new housing must be built within the existing footprint, rather than on green fields. STOP the sprawl of Arklow.</p> <p>If the RSES aim to better align residential location, population growth and employment, then settlements close to Dublin and other centres of employment should grow in population size, and density.</p> <p>Arklow should be designated as a self-sustaining town, and investments made to improve quality of life in the town. The public realm is badly in need of renovation, Main Street shops are failing and the town centre is partially derelict. Arklow has neither the road infrastructure or employment opportunities for large residential growth. New housing on the outskirts of town will simply consume farmland and worsen dreadful current circulation in the town.</p> <p>Arklow was allowed to sprawl without consideration for quality of life or technical issues to do with wastewater, storm water runoff, or transport. Raw sewage flows into the river, poorly controlled housing and drainage have exacerbated flood problems along the river and the whole seafront is at risk of flooding as the sea defences fail, and sea levels rise. Roadstone lorries traverse the town centre creating danger, noise, dust and vibrations. The central roads in Arklow are narrow and serve neither existing industry nor population adequately. There are no cycle lanes and occasionally no footpaths!</p> <p>Arklow’s service shortfalls include poor public transport - poor bus and train connections with other towns, inexistent local bus service, lack of bicycle lanes, lack of footpaths, lack of access to the countryside and beaches.</p> <p>Compact growth requires the filling in of urban gap sites, favouring of high-density residential blocks in derelict and brownfield sites over houses in green fields. Encourage residential occupation of failing the Main Streets. Create walkable towns, provide good public urban space, open space, parks, and gardens and provide access to the countryside. The Urban Areas of Wicklow’s larger towns must be reduced to encourage town centre densification and renewal. The ad-hoc construction of housing estates in fields on the edges of towns should no longer be possible. The CDP and LAP should lead development, not the developers!</p> <p>Produce an in-depth study of each town, and inventory of local constraints and</p>

	<p>opportunities.</p> <p>Protect natural and historical heritage, identify green-blue infrastructures and strengthen them.</p> <p>Encourage small scale local enterprise, local shops, and local produce. STOP building out of town, or edge of town shopping centres.</p> <p>Climate change, flooding and coastal zone management</p> <p>The planned construction of a Waste Water Treatment Plant, in a zone at risk from sea level rise, on the north shore of Arklow, seems extremely short-sighted.</p> <p>The natural coastal flood zone of Arklow bay has been denaturalised, incompleated rock-armour sea defences have proven to be a short-term solution that has worsened the long-term problem.</p> <p>Arklow’s sandy beaches have disappeared. Defences that work with the sea, not against it, are required all along the Wicklow coastline. In Arklow Bay, breakwaters located out to sea, plus sand nourishment, the removal of jetties and piers that affect long-shore drift and a barrier at the river mouth are all solutions described in the 1991 report by the Danish Hydrological Institute.</p> <p>Tourism & recreation</p> <p>The development of Arklow as a tourist hub will require the preservation of the historical “quaint” open character of the town’s Main Street, riverfront and harbour area. Access to a natural coastline with walks and views of the sea is an asset that has been partially lost, but Arklow’s beaches could be restored by the removal of the Roadstone jetties, and completion of the sea defences. The caravan park should be removed, and the lands renaturalised as a transition zone between land and sea. The Roadstone Quarry at Arklow Rock should be closed.</p> <p>Arklow lacks a good hotel, cafes and restaurants, all of which could be imagined as part of its town centre development.</p> <p>The potential of the river, the marsh and riverside walks into the countryside has yet to be realized as part of a green and blue infrastructural plan. The Avoca River Park (industrial zone) located on the floodplain of the river, and within the site of the historical Shelton Abbey, should be dismantled and restored - as part of a natural flood defence project. Shelton Abbey itself could be converted into a 5-star hotel! The Tailing Ponds on the riverside should be removed, and the flood plain restored. The sites of the Avoca mines should be rehabilitated so as to prevent the discharge of acid drainage into the Avoca. Riverside walks should be created between Avoca and the sea, as well as along the coastline from Wicklow to Arklow.</p> <p>Amenity Rights</p> <p>New public rights of way need to be created, along the seashore, shores and banks of major waterbodies. Riverside walks should be created between Avoca and the sea, as well as along the coastline from Wicklow to Arklow.</p> <p>All public land should be accessible via PROW.</p>
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	<p>Built Heritage</p> <p>Unless listed on the RPS, buildings of local, architectural and historical interest are unprotected, even if recorded in the Buildings of Ireland Inventory. The architectural interest and character of small Irish towns (such as Arklow) is embodied in an ensemble of buildings that may be modest but nevertheless constitute a valuable record that is gradually being lost. The removal / conversion of such traditional buildings should be more carefully controlled.</p> <p>Natural heritage</p> <p>The pNHAs provide NO legal status for these valuable habitats. The pNHA at Arklow Rock is being removed by quarrying activities; the pNHA designation seems completely useless as a protection. These habitats should be mapped and described as part of the GREEN AND BLUE INFRASTRUCTURE (GBI) survey.</p> <p>Ordinary habitats noted on the GBI maps should be protected by default, and permission should be sought before removal of any mature habitat (be it hedgerow, woodland or wetland etc) as part of development.</p>
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<p>Aisling Hudson (D71 & D73)</p>	<p><i>This a very detailed submissions that clearly has had a lot of work and thought put into it, and therefore it is reproduced in full for the members rather than summarised:</i></p> <p>Introduction</p> <p>Sustainability can mean different things within different ideologies. For the purpose of this submission, I will focus primarily on Arklow becoming an ecologically sustainable. This proposal lays out a version of Arklow, that can support its population and hinterland in a manner that does not overshoot its ecological carrier capacity. A region that lives within its ecological potential and aims to deliver eco neutral job opportunities to its residents.</p> <p>Furthermore, long term goals would be, to be an example for ecological revival for other regions locally and globally who are suffering ecologically, from the results of profit driven economic growth. In no way are any suggestions in this proposal deemed to be exact proposals and should be considered only as suggestions of how the area can be developed sustainably. The main reason for making this submission is that the public consultation has not been explained very clearly and Arklow’s place on the hierarchy has been dramatically changed. Also the tourism proposals on the original town plan we underdeveloped and this submission aims to fill that gap. This opportunity is welcomed by myself as when the original proposals were called for I did not have any academic knowledge, and although I did have the ideas, they would not have been applicable under the then ‘large-growth town’ label. I do not intend to undermine anybody else’s ideas of sustainable development or employment endeavours, but I feel I have something to contribute to public planning negotiations.</p> <p>This submission is broken into three parts. In order to fully understand the objectives of this proposal, I have included some theoretical references for sustainable development with an outline of relevant ideology around ecovillages, and eco-industry. This will lead into some explanation of social economics, essential knowledge for any understanding of sustainable development, demonstrating the inseparable links between the ecological capacity of a region, its economy and social health. The proposal will explain the political economics of sustainable developments and propose some suggestions for a subordinate political economy for the action areas, explaining why a different approach is necessary to promote sustainable livelihoods, and how it will benefit the hierarchy. There will be a focus on the development of the action plan areas, but only because of potential changes to key principles in the town plan strategy and are not meant to be planning or zoning application. They are intended to unpack some options that are in keeping with the RSES and NDP and SDGs, and some detailed suggestions to fill in gaps, in the current town plan, regarding the potential for a tourist industry in Arklow.</p> <p>Clean, green industries are also suggested, such as hemp production and bio-products. Expanding further on sustainable development and what that could mean for Arklow, economically, socially and ecologically, I will present suggestions for economic sustainability such as, research based marine and habitat ecology centre, and the research centred eco-villages. The industry can be clustered into three different but connected themes, eco-tourism, research and analysis, and hemp production including bioplastics and other bio- products, all ecologically beneficial. The final section and shorter part, sums up the relationship between this proposal and the regional, spatial and economic strategy (RSES), 2019-2031, and the Arklow area and environs, local area plan 2018-2024,</p>
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explaining what areas have been expanded on in order for the policy to be consistent hierarchically. There will be an outline of more detailed suggestions for the Arklow town plan, fleshing out the tourism, marine ecology, and educational and research opportunities and not covering the central aspects of the plan as the transition in this region will be too difficult for the scope of my understanding at this time. The arguments put forward in this proposal are all indicative of Arklow becoming a self-sustainable global centre for ecological, social and economic research. Overall, the focus will be on new development in the town, in keeping with the RSES and NDP and SDGs, and some detailed suggestions to fill in gaps in the current town plan regarding the potential for a tourist industry in Arklow. Clean green industries are also suggested such as hemp production and bio-products. Expanding further on sustainable development and what that could mean for Arklow, economically, socially and ecologically, I will present suggestions for economic sustainability, such as, research based marine and habitat ecology centre, research centred eco-villages.

Sustainable Development

Sustainability cannot be pre-planned too rigidly due to incomplete information. It is better to have a strategy in place that encourages fluidity and resilience as we deal with the externalities of the current paradigm. As more evidence presents, plans will need to be altered and therefore “sustainability is the long-term goal, that is, a more sustainable world” (Baker,S. 2016, p.9). A strong sustainability strategy aims to always seek more sustainable means of existence between humans and the natural world and ensuring the same or if possible, more opportunities to thrive are available for future generations.

Our knowledge and understanding of sustainable living and best practices policy are largely incomplete. Sustainability is complex and requires an open-ended approach, using the brightest of minds, working in hives, to propose and test various alternative ways of carrying out sustainable production and sustainable consumption (Baker, S. 2016, p.118). Essentials like food and energy provision, waste reduction and management, and recycling, need to be managed with justice on the side of ecology, and society and we measure this through economic means. Constant impact assessment is a process of establishing feedback systems using impact category indicators (ICI) and using the sustainable livelihoods approach (SLA) (Morse, S. 2010 p. 160-161). Results from all research can inform national and international environmental policy documents, linking all aspects of society together, micro to macro.

Elements of sustainable development have been successfully implemented elsewhere but because of lack of direction, the process has been slow and difficult. As there has been an ecological emergency declared, certain lifestyles need to be eradicated. Waste must be reduced drastically, and managed, to utilise as much energy as possible, from waste as it decomposes, in the safest, most technologically advanced way possible. This balance would be a fundamental aim of the research-based ecovillage. A more structured version, of a sustainable development model, has yet to be actualised in Ireland. Arklow’s future resource input, the national data centre, a transitional project, such as this, can be closely monitored, and used for research purposes to build a viable working model of sustainable transition which can inform processes at higher levels, up the hierarchy.

Sustainable living is difficult on a large scale, if not impossible, and without both structural guidance, funding, and local support and participation, the momentum can fade. The best results come from interaction between ground up, and top down

representation. Bundtland’s vision of sustainable development requires changes not just at the technological and institutional levels but also demands more fundamental social, economic and lifestyle changes (Baker, S. 2016, pp 59-60). There needs to be a multi-angled approach to a sustainability strategy. Research shows that inequality is not sustainable and creates unnecessary divisions and stress in society. Although a small percentage of people/groups/regions of the world benefit at the cost of the majority, this is not a sustainable mindset. On a finite planet we need to shift our mode of production completely. Ecological modernisation theory -Joseph Huber (2004), explores building a new relationship with industry. Industry needs (Baker, S. 2016, p.54). The Kuznet curve explains environmental degradation in relation to industrial development and how waste production increased with industrialisation and peaks when society emerges in a post-industrial environment. This proposal takes that further into a mind experiment where a reversal of environmental degradation begins to take place. Each area or town should have a strategy that shows, in a measurable way, strides towards this relationship being the norm. Structural guidance on the critical issues is necessary and should be fundamentally based on academic proposals using research from the local ecovillage. All data collected from the recovery process should be open source and available for the public to query and courses and innovation clinics should create an environment when researchers are working with residents of the ecovillage and the greater area to resolve ecological, social and economic hurdles using research methods.

Ecological Recovery and sustainability Recovery

On Land: There are also mechanisms outlined to counteract monocrop cultivation and other, even more, ecologically harmful industries within the Arklow region. Initiatives such as creating extensive “ecological arks” (Mary Reynolds), rewilding initiatives and permaculture plots will go towards reducing the ecological footprint of every resident in the area. Amendments to the current town plan include the provision of community gardens which incorporate the arts, wellbeing, without harming the environment reduction of food miles reduces the ecological footprint further.

River and Estuary: As the local wastewater treatment plant is completed, the river will no longer be used to manage sewage. As the river is regenerated, the process of recovery should be carefully and scientifically documented with the flood barrier design, and renewable energy projects, to be advised by top teams of professionals and those with ecological interests leading the way and not local industry or business. The process should be monitored in order to be reproduced anywhere. Best practices can be applied using international studies and would potentially attract attention from international sources of funding.

Arklow fishing: The local fishing grounds can once again cater for the local community. But research should be considered going forward. The national marine spatial plan should include Arklow as a centre for marine research with lab and training facilities, but also as a resource of a self-sustaining community. As fish stocks are recovering, fishing may be limited temporarily, local fishing companies can be compensated based on an average of previous year’s income. Their vessels can be upgraded as per requirements, with subsidies and grants available to allow for this transition.

Waste. Arklow, to be sustainable, cannot ignore its own waste. There must be provision for waste management in the sustainable development plan and the best way to

approach this is to maximise any benefits. One way to benefit from waste is to use the energy it creates. The other is to make the area as attractive as possible. Bio-energy from waste is developing with the use of organic matter being used by Energia at Huntstown in north Co. Dublin, (Sustainable Energy Authority of Ireland). Korea has a very interesting alternative using this energy to fuel their metropolitan cities. They have a specific method of covering the rubbish as it is dumped with soil and rewilding it. The waste management area is operating as a tourist park and bring in green income. The landfill is equipped so that the gas is siphoned off and used to power homes. The land is developed into a tourist park used for global research.

Sustainability

Ecological sustainability will depend on the economic strategy of Arklow and is an integral part of any recovery programme. A sustainability programme needs structural implementation. All over the region, more sustainable practices need to be adopted and enabled. The bio-plastics industry, supplying work to some residents, will supply all packaging for items currently using moulded plastic and products can be reused or recycled. It should not be a profit-oriented business, and this will avoid unnecessary energy being used to produce the products. More re-use and recycling efforts on a structural level are needed, with monitoring of resource use, waste production and energy production from designated eco villages. The aim of all strategies is to make waste reduction as attractive and as easy for end users as possible and to make the transition from ecological degradation in pursuit of human development to a sustainable means of living.

The Transition Movement

“The Transition movement. Originating in 2006 in the UK, (formerly called the Transition Town movement) seeks an integrated and community-based response to ecological and economic threats” (Poland et al. 2005).

The transition movement and its network functions at a global level, and helps transition teams enable transition projects by sharing research and ideas. The Irish branch formed in 2008 and has been meeting regularly and is active in communities that are embracing transition projects. They have experience with dealing with conflict within working groups and communities and have developed a suite of tools that are useful in resolving conflict and enabling further sustainable development. In the transition hubs, all kinds of communities and individuals share ideas using these tools. Arklow could have access to a wealth of experience by reaching out to other transition groups. Transition project, Brogwaun, in Wales, is a successful transition programme with similar characteristics of a potential Arklow initiative. Arklow could adapt the transition ethic to sustainable development.

The transition movement has been largely a roots-up movement, because of the lack of initiatives by government. They believe that local knowledge, skills culture should be built into sustainability planning. In the Arklow research-based ecovillage there could be an ongoing documentation of transition in action. “The movement projects that a transition to a low-carbon society is all but inevitable, requiring resilient communities and re-localizing the production of basic needs, while emphasizing opportunities for greater connectedness and celebration” (Chamberlin 2009; Hopkins 2008, 2011; Poland, Dooris,

and Haluza-DeLay 2011). Transition is a necessary process that the whole world will have to adapt to, so it is best to have empirically documented successes and failures in order to reduce the need for reactive governance and future crisis. In a purpose-built transition sector of an urban population the culture that would develop would be unique and would affect local culture, however this is what is necessary in order for the SDGs to have a chance of being achieved.

“cultural studies and cultural geographers emphasize how a distinctive culture of place emerges from the pragmatic and routinised interactions between engaged participants and social processes” (Poland et al. 2005).

Without engagement in the process the local community do not take up the responsibility of individual transition, which is necessary if patterns are to become habitus. The difference between most organic transition ventures is the lack of structural interference. Problems have arisen due to differences in individual needs or beliefs, causing communication conflict. I propose that Arklow’s transition project include a research-based eco village which incorporate structural elements to avoid issues that have caused problems in other developments. Home design, cluster layout and other functional decisions, should be decided based on best practice principles, rather than personal choice, democratic means or consensus. The Cloughjordan project, for example, ran into these difficulties, along with externalities of housing market collapse (Winston, N.2012 p.95-97). If the units are considered a social good, due to the research aspect, no tenants can own dwellings, and in another sense all residents have ownership. Other properties can adopt the principles, near the eco-village, and trade their property on the market as they wish, and residents of the research village can choose to transfer to another are whenever they wish. Foundation level feedback systems, monitoring community resource consumption, and waste production, as explained in the section outlining the research-based ecovillage project. This is purely for research purposes, and to simplify the advancement of the project. Other projects with less structural influence can join the research project, by contributing data, and leave it, at will. All empirical data will be welcome and useful in accurately predicting the consequences of social policy change, affecting sustainability, in the future. With enough data, accurate prediction regarding consumption needs and abilities can be made, reducing waste, poverty, hunger, environmental degradation, and all the other SDG’s, in a timely fashion, before the deadline of 2030.

“the movement projects that a transition to a low-carbon society is all but inevitable, requiring resilient communities and re-localizing the production of basic needs, while emphasizing opportunities for greater connectedness and celebration” (Chamberlin 2009; Hopkins 2008, 2011; Poland, Dooris, and Haluza-DeLay 2011).

A marine and habitat research centre, including labs, lecture theatre, board rooms. A place where specialists and academics can carry out research and a longitudinal study as the river and estuary becomes cleaner after the treatment plant is running. The marine centre can track the ecological recovery progress in a scientific environment and make recommendations on best practices, engaging with hierarchical agents from national, European and international level. The aim is to replenish fish stocks, flood risks, erosion prevention, habitat recovery and the sand dunes. Measuring the ongoing and changing carrier capacity of the area until such time as an abundant stock is available and fishing

practices are of the highest and safest standards. The development of this second harbour could facilitate the moving of bio- products along the east coast Social science research centre with teaching facilities. The eco village, with its unique research centred ethos, is an ideal environment to study many social science concepts and theories and apply them in a controlled set and setting. This can then inform policy right up the hierarchy. As explained under the ecovillage section, more detailed data analysis on lifestyle choices is possible when data is constantly collected in an organised way. Data analytics of information can be used for good or for evil, like all discoveries and technological advances. For this reason the data extracted from the eco village project will always be publicly available, open source, and training will be available on how to use the database to research any topic. The basic level of data sharing is automatically built into the agreements that encompass this eco-village, those being stated, energy consumption, water, energy created, waste and free services or goods associated with being a member of the community. Any data can be open source. The more data shared, the more accurate the predictions relating to community needs, the zeitgeist, drives, and overall health, and a measure of trust for the projects goals and outcomes will be evident in how much information is shared voluntarily by the community.

Research-based Ecovillage

As part of this proposal is a somewhat novel concept of a purpose build residential area, close to the data centre in action area three. This residential area would be designed as part of a longitudinal social scientific study of ecological sustainability. Findings from these residences can influence policy relating to environmental preservation. It would be expected that a lot can be learned about sustainable production and consumption, the building of social capital, sustainable livelihoods, and it can be used as a model for sustainable developments elsewhere as the based indicators are related to large-scale consumption, production and waste management issues.

This village will also be useful in developing strategies to reach the 2030 SDGs. It will help attract funding in conjunction with the universities in Ireland, raising the profile of Arklow as a provider of knowledge-based industry. It will provide a working model with real potential for transition to a sustainable version of reality, where equality, equity and lifelong learning are almost unavoidable. A place where it is easier to be eco-friendly, than not. This type of research project will not only be useful, but necessary if a sustainability model is ever to be establish. Connecting to the ecovillage network will allow the Arklow project to bypass a lot of collaboration hurdles (Dawson, J. 2006), and also connect Arklow on a global level with other like-minded hives around the planet.

Identifying the towns maximum sustainable yield (MSY) (Morse, S. 2010, p. 69), in terms of our fisheries, and the building up of fish stocks in local waters, or ability to provide locally produced food to reduce food miles, enabling local individuals and groups to contribute to the provision of self-sustainable food and energy source, and waste management, which have been identified as a key to sustainable development. Promoting sustainable development is about steering societal change at the interface between the three pillars of the social, the economic and the ecological dimensions (Baker, S. 2016, p.9). If change is to become habitual, it needs to occur on the macro and micro levels simultaneously in society. It should become part of “the civilising process” (Norbert Elias, 1939). The founding fathers of sociology all had strong views on the importance of social cohesion for societal health and wellbeing. Social norms provide strong guides for the masses. They

work better than legislation. Historically religion has been one of the strongest shapers of society, This is expressed in modern terms by “Normative principles [which] are moral rules that specify what is good or bad” - Principles of need, intergenerational equity, Intra-generational equity, common but differentiated responsibilities, justice, participation, gender [and all forms of] equality (Baker, S. 2016, pp 44-45). Many fears centre around control. Questions such as, who establishes these normative principles? As stated, historically religious groups established these norms. An example of which can be seen in social policy practices of the newly declared free state. These norms were not healthy for society and it is understandable why many fear similar situations being repeated. This submission argues that economic policies of liberalism and neo-liberalism, such as, financialisation, commodification of everything and everyone for profit, environmental degradation for profit, and austerity measures, create equally harmful normative principles, and encourage the throw-away society we know today. A more empirical evidence-based alternative means, for normative principle- setting strategy, would have better outcomes for society and the environment, and because we critically analyse the outcomes of such an approach, we do not risk getting trapped in situation of dominance, or structural violence. The trajectory of the project will alter, as more data are extracted from the indicators, as mentioned above. Influencing community resource usage, energy creation and waste management.

The Goals of the ecovillage are on the macro and micro-levels and centre around developing sustainable transition strategies. This will be achieved by constantly interacting and monitoring on the micro level for outcomes of policy change on the macro level. ICIs can be established to continuously monitor the outcomes of the latest sustainable production methods. The idea is to reduce over-production, over consumption and waste. As the project gets more successful at accurately predicting the needs of the community, within the boundaries of the carrier capability, the residents should experience micro level improvements in the quality of life. Automation and organisation of systems will reduce the work week of individuals, as will the lack of commuting time, by half. There should be no need to own a car within the eco-zones as routes on internal public transport should be regular and on time, serving all employers and should be free to users. This lowers the need for high wages, as does the provision of locally grown food some of it free, and homes heated with bio-energy. Ideally residents should be able to live comfortably on a universal income payment, and only work 20 hours a week, within the local community.

Micro-level goals

- To de-commodify residents by providing universal style benefits without burdening the environment or any specific demographic within the population.
- To change the experiences of individuals through open source, evidence-based measures that can be quantified and reproduced elsewhere.
- To create a scenario where the SDGs are possible and not just an ideological lip service.
- To enable maximum participation, the use of networks and partnerships in governance but to also ensure that fundamental aspects of ecological recovery are built into the culture of the eco-villages.

Network with transition towns, eco villages, permaculture groups, SDG working groups, national and international university programmes Allowing the community build on the shoulders of giants, rather than being isolated and dependant on structural sources of

knowledge.

Governance of sustainable development can be complicated because it involves participation by all levels of society. All forms of capital need to be recognised as valuable and utilised efficiently in an empirically monitored process. Morse (2010, p.164), incorporates De Haan’s capital pentagon theory (2000) in accounting for all forms of capital. In the research zone, developing methods of producing abundance in renewable capital resources across the pentagon is the key to sustainability. Social capital (Coleman, J. 1990, p. 300), for example, within communities, allows society to operate smoothly, in a more economically viable manner, increasing levels of trust. There are various ways of building and measuring social capital in communities, but it is accepted that for sustainable development, community involvement and a sense of responsibility, is essential for a successful self-sustainable project. There are different governance strategies considered effective, and this submission proposes a mixed-type governance. In keeping with the RSES a hierarchy method is welcomed. A new element below the town plan level will be proposed in relation to the later developed ‘research-based ecovillage project’ but above the town plan level the normal hierarchy is considered of national, European, and international bodies governing sustainability. Market governance will also be applied but not with the same intention as regular market governance. Market based tools such as taxes, subsidies, and offers will be used not for profit but to guide social behaviour towards healthier lifestyles, like the sugar tax now, but more closely based on scientific research and locally monitored reflexive governance (Baker, S. 2016, p.89).

Evidence-based, transition of path dependency is achievable. This proposal argues that neo-liberal policies are incompatible with sustainable livelihoods. Evidence already exists that alternative political economic models need to be explored. The central theme running through this submission is transition, based on measurable indicators, academic research and an open ended process, to reflect the open ended character of sustainable development, always aiming to increase sustainability and reduce entropy within and between ecological, social and economic systems. Research is the central theme of this sustainable development strategy. It proposes that Arklow becomes a centre for sustainable research development. The reason for this is, through the industrial development of Arklow, the estuary and habitat of the local environs have suffered dramatically, and a revival will be challenging but worth undertaking. There are also other challenges to consider having such an active estuary, with flooding being a main concern. The reviving of the areas mentioned deserves attention and when the rest of the proposal is considered, a research centred agenda for the town plan makes sense. No time can be wasted on undocumented trial and error efforts. Academic attention is critical from start to finish and the opportunity of having the national data centre on hand resolves some of the barriers to this project.

Attracting clean green tourism to Arklow

Residences for visiting academic researchers would encourage the interest of global research funds. It would be ideal to have accommodation onsite or within a short walking distance. Students could also use these facilities if undertaking a marine, or sustainable development module. These centres of research could become a hub for national and international universities to run Erasmus programmes or conferences, or, for longer post

	<p>graduate studies.</p> <p>Eco-tourism is a primary industry that many locals can tap into for income. The town should have at least one low cost accommodation facility, like a hostel, with a campsite, with eco- friendly facilities. Eco-tourism has the potential to capture and ever increasing ecologically aware cohort of tourists. More people are taking onboard warnings about their eco-footprints and the closer to home populations can be targeted.</p> <p>Educational Tourism can be transient, short term, and longer-term. Students, lecturers and researchers, NGOs, Corporate clients, and blue-chip companies would be attracted by the educational and research facilities and the research-centred ecovillage(s). Because the visitors are coming to study and experience environmental and ecological sustainability strategies, it could be assumed that they will be mindful of the environment. Generally, these tourists would have less of an impact on local ecology.</p> <p>Creative Tourism</p> <p>For visitors to the town, and townspeople alike, sustainable industry needs to be attractive and easy to participate in. The arts are an ideal way for individuals to connect with others, and their inner element, helping with depression, tragedy, recovery, and general wellbeing.</p> <p style="padding-left: 40px;">“the Transition movement embraces the opportunity to turn crisis into an opportunity to build more resilient, convivial, and vibrant local communities, declaring that “if it’s not fun, it’s not sustainable” (Hopkins 2008)”</p> <p>Arklow has an abundance of creative endeavours, particularly stage-oriented schools. For these schools, it is difficult to run performances or festivals because of the lack of appropriate communal space in the area. The town centre needs a facility for smaller shows along with a facility in one of the action areas which can hold larger performances, along with workshops or classes. One of the arts centres should also have communal spaces for artists to practice, and exhibit, and communal equipment for screen printing, photography, ceramics and so on. A market-place for selling artisan products and services, and local produce, would attract residents from the environs and further afield. A network of similar centres could be established to avoid carbon footprint. The industries in the town should aim to satisfy locals and environs on a regular basis and attract long term visitor from abroad. Facilities and opportunities within the research zones, and beyond, should be for people with all levels of physical ability, all genders, all ethnicities who wish to experience an eco-centred lifestyle.</p> <p>Green industry - Hemp based industry</p> <p>Hemp farming. The benefits of hemp farming are multiple. If mono crops are a necessity, and for large scale provision it is, hemp is the best option. Because of the root system of the hemp plant, drainage of land improves over time rather than the opposite. Another plus for hemp mono crop is that the uses for hemp are very broad and therefore provides more opportunity for local employment. Local employment reduces the environmental footprint of the town overall, adding to the sustainability outlook</p>
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	<p>Multiple industries based on hemp</p> <p>Medical grade CBD products, THC/CBD products. Topical, tinctures, pure essential, food supplements, beauty products, animal, and human use. Medium grade animal bedding, food and nutrient supplements. Industrial Grade Building materials, bio-plastics, land recovery.</p> <p>Hemp Employment</p> <p>Crop Production: Seed grower, cultivators and suppliers, production equipment, manufacturers and suppliers, Cultivation of certified products, Cultivation of raw materials for the nutraceutical market, Testing, validation, and quality control. Processing: Industrial manufacturing, Nutraceuticals, Food manufacturing, Cosmetic manufacturing. Supply/retail: Distribution, Logistics, e-commerce, retail outlets.</p> <p>Hemp harvesting and processing will require a purpose-built unit. To give an idea of the scale of land needed and facilities required for a general-purpose hemp processing plant I have included a brief case study of Hemp Inc. this company has been active in the cannabis market in California but have recently branched out into biomass. The facility has bi-coastal processing centres including the 85,000 square-foot multipurpose industrial hemp processing facility in Spring Hope, North Carolina, a state-of-the-art processing centre, in Medford, Oregon, and a 500-acre hemp growing Eco-Village in Golden Valley, Arizona. The 85,000 square foot facility sits on a 9-acre campus. It is environmentally sustainable. The material for hemp bioplastic is processed at the Company’s North Carolina facility, which is the largest of its kind, and has completed positive beta testing. The blend will be provided to multiple companies to help fill the growing demand for natural and hemp-based products for the bioplastics industry. According to Grand View Research, bioplastics are predicted to control five percent of the plastics market by 2020 and rise to 40 percent by 2030 (Hempinc.org)</p> <p>Bio-products from hemp: Hemp Bioplastics, Hempcrete, blocks, logs, (hemp and lime), insulation, medicine, food, clothes, paper, brown field recovery, eco mono-crop, paper, moulded plastic, textiles, body care products, animal feed, animal bedding, nutritional supplements, essential oils, animal medicine.</p> <p>Benefits of hemp bio-plastic industry</p> <ul style="list-style-type: none"> • Naturally Biodegradable and Recyclable-When hemp plastic is produced, it’s generally made using a biodegradable polymer that makes it into a plastic-like material we’re familiar with. • Highly Renewable-Being able to continuously reproduce material in an eco-friendly, renewable way is the only way we’ll be able to keep the planet’s resources sustainable. • Easy to Manufacture-One of the major benefits of traditional plastic is that it’s incredibly easy to manufacture in abundance. • Strong and Lightweight-We tend to find high-quality materials to not only be highly durable but also lightweight. • Non-Toxic-Even over the short-term chemicals from plastic break down and enter water. These harmful toxins can affect the endocrine, or hormone, system in our bodies, which can heavily disrupt the natural stasis of our body’s immune system. Hemp bio-plastic, is known to be 100% non-toxic.
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Summarising this proposal contextually, within the scope of the settlement hierarchy (RSES, p.13) principles, Arklow has great potential to be self-sustainable, incorporating growth only under strict observation by academic researchers. Serving residents, and those of its hinterland. If provision is to be sustainable ecologically, the maximum yield capability of the town must be identified. Reducing the carbon footprint of every individual should not cost the individual more money although a complete change of mindset and lifestyle is necessary. This change, or transition, should be enabled through structural changes that promote healthy lifestyles. The market is unlikely to accommodate any such initiative, due to lack of financial profit, and for this reason, hierarchical intervention is necessary. Transport within Arklow should be as clean as possible and be reliable. Transport out of Arklow could be made accessible by shuttles, to the motorway, from a central station. Nobody who works and lives in Arklow should need a car, and people who work in places that are not on a feasible public transport grid should be given assistance to have electric cars, with more charging points.

Balanced growth is key to sustainability. This approach would enable balance and sustainable growth of all future developments and simultaneously lighten the “ecological rucksack” (Morse, 2010, p.116) that industrialisation has created for us to reverse. This proposal allows progress to be evidence driven, accountable, open, inclusive and adaptable. It is viable economically, if initial investment can be secured. A project on this scale, with this potential should qualify for international funding from development agencies, if global agreements are worth making. If agreements are ever to become more than lip-service, if we are to survive ecological disaster, we need to use every second. Every day is another wasted, as the planet literally burns, in front of our eyes.

Healthy placemaking (RSES, p. 16) is a key section in the spatial strategy and this proposal promotes healthy living and lifestyle. It promotes healthy industry and exports, its core principle is ecological health. This, along with the use of market tools such as incentives, data collection and research, optimal health of production and consumption is likely to be achieved in record time. This is lowering entropy within production, consumption and waste systems.

Green infrastructures (RSES, p.17), are already in progress but can be extended to other locations of touristic interest, with eco-lodges placed along the routes. Tourists then have the option to walk around Ireland, safely with guided routes and accurate estimations of difficulty level, estimated average length it takes to the next lodge, and so on. This is successfully achieved right across the Bulgarian mountain ranges.

Climate action (RSES, p.8), is proposed on multiple levels. It aims to reverse ecological damage but it also aim to help the local bee population and other pollinators recover. The rewilded areas, and ecological arks will counteract and mono-crop cultivation in the area and will provide adequate habitat for species recovery and sanctuary. There would be an expectation that the bird population would also grow and diversify. This can be observed and guided by academic experts and professionals and enthusiasts and could also attract clean tourism. Reducing food miles, commuting, the need for personal vehicles, clean public transport, energy from waste, bio-energy and bio-fuel all go towards reducing the carbon footprint of the town

Economic opportunity in the region is expected to sustain the local residents and those of Arklow’s hinterland. New developments are expected to cater for the new residents

	<p>and attract knowledge based, clean, executive, blue-chip national and international interest, outside the scope of the RSES. Investment is possible from the private market and public sector, and investment from SDG initiatives, sustainable development research funding, and green tourism and development and production investors. All new initiatives should have a negligible environmental impact or a positive impact and the industries currently operating in the area that have a negative impact can contribute to the process by incorporating local green initiative into their annual corporate social responsibility portfolio.</p> <p>Strategic connectivity within the town and hinterland should be easily and cheaply accessible and free when possible. Marked routes by foot and bike along the coast and to hinterland towns and tourist destinations will not impact on the environment and shuttle services should connect the town to the national development plan, connecting Arklow to national, regional and international corridors, without the need for personal vehicles. To develop the second port to enable sea transportation and marine and rescue training facility. Applying this proposal to a revised local area plan for Arklow and environs, it can be said to have broadened chapter eight on Tourism potential, chapter eight, it has proposed several alternative clean and green production industries, expanding on chapter four, economic development and employment. Of the ‘kea areas’ in the LAP, this proposal focuses on the action plan areas chapter eleven, putting across a strong plan for sustainable development, focussing on altering Arklow’s trajectory from a large growth town, based on industrial development with a small tourist section, to being a leader in knowledge based industry, clean, green production and consumption and firmly driven by evidence based collaborative policy.</p> <p>This proposal has put forward a theoretical model of sustainable development for the revised Arklow town plan, which is consistent with policy of the RSES, the NDP and international best practices of sustainable development. Once established, structural expenses should reduce dramatically, and this reduction should occur in a relatively fast timescale due to the open source element of research and data collection. Corruption should be reduced as should the need for reactive governing, although reactive governance will be essential until adequate data are available to inform policy resulting inaccurate predictions of sustainable production and consumption. The central focus of clean and green employment and investment opportunities was expanded on and the potential of ecological recovery was presented with various proposals given consideration.</p>
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<p>Con Nyhan (D87)</p>	<ul style="list-style-type: none"> • Failure of proper EIA’s in the 2016-2022 Plan for County Development Plan, incorrect information from this Plan and the Arklow Town Plan was lifted from both these plans by Irish Water when drawing up a very flawed EIA contrary to EU law. Granting of planning permission for building in the flood plain of the Avoca River is also contrary to EU Law. Any further developments / building in the flood plain would be in contravention of EU Flood Directives • Flooding in Ferrybank areas of Arklow. The flawed EIA information that was lifted from Wicklow County Development Plan and Arklow Town Plan 2016- 2022 and this flawed information subsequently used for the Arklow Town Waste Treatment Plan. These flawed reports need to be revisited for the new County Development Plan 2023-2027. • Urgent Flood Relief Scheme for Arklow. No further building in the flood plain of Avoca River. • No further land based Wind Farms expansion in County Wicklow • No offshore Renewable Energy that will exacerbate flooding in the Arklow Town. The outfall pipe of 930 meters is insufficient distance out to sea. • Any Wind Turbines in Arklow Bank coupled with storm surges will increase the risk of flooding in Arklow. • Coastal Protection of the North Beach in Arklow. • The granting of planning permission be prohibited in the flood plain of the Avoca River. In contravention of the EU Floods Directive. Building in the flood plain of the Avoca River in contravention of EU Floods Directive. Urgent need for Flood Relief for Arklow. Coastal flood protection for North Beach Arklow. • Creation of New Town at the Kish adjacent the M11 Motorway, light rail linking old town to the New Town. • A New Bridge crossing of the Avoca River. • EIA’s for all developments adhering to all EU Directives. • Prohibition of the granting of permission, building in the flood plain of the Avoca River. • Coastal protection of the North Beach Arklow as far as Porters Rock. • Access through Arklow Holiday Homes to be reopened. • Access to Shelton Abbey from Ferrybank to be reopened on completion Flood Relief for Arklow. • Maintaining Biodiversity and Continuous Cover Forestry to offset Climate Change in Glenart, Kilcarra, Woodenbridge, Ballyarthur, Kilmagig, Kilbride & Shelton.
<p>Arklow Chamber of Commerce (C22)</p>	<p>(1) High level planning policy and context for Arklow</p> <p>Arklow has a vibrant and strong historic core with a relatively dense outer suburban area. The scale of residential expansion on the town since 2008 has been greatly curtailed with the lack of a sewage treatment plant but this is now resolved with construction scheduled to commence later this year. Already we have seen a strategic housing initiative started for the Kilbride Lands to the north of the town. There are a number of non-residential development projects scheduled for Arklow which will provide a balance:</p> <ul style="list-style-type: none"> - Arklow Primary Care Centre in the Main Street - Arklow Shipping New Offices - SSE Airtricity Windfarm Expansion - Echelon Data Centre at Avoca River Park - Arklow Courthouse redevelopment <p>These major developments are important along with the 100’s of smaller investments made every day by people in the town.</p> <p>(2) Development of the town centre</p> <p>In common with all other similar sized towns Arklow Town Centre suffers from a lack of active use and development. The current CDP places a large emphasis on preservation</p>

	<p>and development of retail within the Town Centre. The ‘Ireland 2040 Our Plan Draft National Planning Framework’ widens out the debate as to what should be expected of the town centres.</p> <p>We acknowledge retail is part of the mix but small scale residential development is just as important and the encouragement of residential, even at ground floor is logical and supportive of the existing retail. The recent changes to exempt development legislation for conversion from commercial to residential is welcomed and a step in the right direction.</p> <p>It is not realistic or financially viable to expect small infill town centre developments/ changes of use to compete with new suburban estates in terms of development standards, planning permission costs, RFI’s, expert reports, traffic studies, flood reports, levies, bonds, SUD’s, DAC’s etc.</p> <p>Submission: That the new CDP would give a presumption of planning for the repurposing of existing building stock and recognise the overall benefit of use versus vacancy and dereliction.</p> <p>(3) Planning Permission as a means of implementing development</p> <p>Planning policy separate from financial considerations is a blunt instrument to encourage development. Currently commercial buildings within the town core have a very low value and will be further lowered by the imposition of commercial rates on empty premises. As the Central Bank has indicated that its Mortgage Prudential Rules are not going to change then capital appreciation in house prices is limited and development will have to happen within the current price structure and that means the cost of delivery has to be decreased. Development simply cannot and will not happen if the figures are not right.</p> <p>This is recognised nationally by the generous tax breaks afforded by the ‘Living City Initiative’ available in Dublin and elsewhere. What is required is a ‘Living Town Initiative’.</p> <p>Submission: That the new CDP would recognise the very real costs associated with smaller Town Core Developments and operate policies to minimise Local Authority costs including an extension of the Development Contribution scheme Commercial rebate to non residential for smaller sites.</p> <p>(4) <u>Planning Permission</u></p> <p>The current system of ‘go’ / ‘no go’ planning is not always suitable as essentially all eggs are in the one basket for the owner. A more flexible approach in terms of temporary planning and limited duration planning (say 5/7 years) in conjunction of the above measures to allow more options and the actual effect of a particular development to be explored. This would be of benefit for change of use of smaller units where long term use might revert to the original function.</p> <p>Submission: That the new CDP would encourage use of temporary and planning permissions of limited duration where appropriate for smaller developments within the town core.</p>
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Arklow United Football Club (C25)	Arklow UFC expresses an interest in purchasing / leasing some suitable lands for second full size soccer pitch.
Arklow United Football Club C26	Second submission from the club with a slightly different request – that provision is made in the plan for an area to facilitate the club in providing a new pitch.

Response of Chief Executive

Clearly a lot of time and effort has gone into these very detailed submissions, which contains many excellent ideas and the CE welcomes such active participation from the public.

Unfortunately a number of the suggestions are not relevant to the County Development Plan, with many of them being related to the operations of the Council, the Council’s programme of works / capital programmes, development levies or budgetary matters, purchasing of land; many also relate to activities of other state agencies. The role of land use plan is to put in place a framework within which development can occur, but does not decide what works actually get done, by either private individual or public bodies. The delivery of objectives is determined by the initiation of private development or by the allocation of public funding which is a separate process to any land use plans. Development contributions and commercial rates are not matters for the County Development Plan nor is the disposing of land.

In addition, a significant number of the suggestions that *are* relevant to a development plan are Arklow specific and would therefore be relevant to the Arklow and Environs Local Area Plan (which was adopted in 2018), which is not under review through this process. Such submissions include zoning requests.

A number of the suggestions made are already included in either the County Development Plan or the current Arklow and Environs LAP and what is now required is an implementation programme and securing of necessary funding by the various departments of the Council / Arklow MD / other state agencies to secure delivery.

With regard to various points raised:

(1) Role of Arklow / settlement strategy

The issues raised with respect to the role of Arklow and the RSES and its application to Arklow are noted; the new plan will as required accord with the provisions of the new NPF and RSES, in particular in the new Core Strategy and settlement / growth provisions (for more detail please see the proposed Core Strategy set out in Part 2 of this report and Section 4.3.1). These provisions will then be applied at the local level in the preparation of the next LAP for Arklow.

(2) Development strategy within Arklow

This is addressed in the Arklow and Environs LAP, which is not under review as part of this process.

Upon adoption of the new County Development Plan, which will set out new development principles and growth priorities for the County in accordance with the provisions of the NPF and RSES, the Arklow LAP will be reviewed, and enhanced as required.

This will likely entail a review of the current development strategy within the town and will address the issues raised in submissions around mix of uses in the town centre, public realm improvement, compact growth, density, walking / cycling infrastructure, dereliction / brownfield redevelopment

(3) Transportation & movement

- The Local Authority works closely with the transport agencies, and lobbies them as suggested, for improved services in the County and in Arklow. In this regard, the Local Authority, with the support of the NTA, will be commissioning in 2020 a Local transport plan, which will endeavour to identify the issues and draw up solutions, including delivery and funding options, for improving transportation and movement throughout the town
- It is agreed that upgrading of the railway line is badly needed, the Local Authority will continue to work with the National Transport Authority and Irish rail to make this a reality
- It is agreed that a key mechanism to reduce commuting is to enhance the town itself, including the employment opportunities, so that more people can live and work in their home town
- Slip road from the M11 to the Vale Road: This is an objective in the existing County Development Plan and Arklow LAP and it is recommended that it is retained in the new County Development Plan. It should be noted that TII has previously indicated that it is not supportive of this objective and it is not part of its works programme for the N11.
- Port Road: This is an objective in the existing County Development Plan and Arklow LAP:
- Car Parking: The County Development Plan, being a strategic document, does not address local car parking needs. The current Arklow and Environs LAP already addresses the issue raised with respect to car parking in Arklow town centre:

VP4 *With regard to car parking to facilitate the following;*

- *to maintain existing and provide new car parking options as funding allows, in proximity to the Main Street and along ‘dark pink’ routes.*
- *to avail of opportunities to remove public on street car parking on the Main Street and at amenity areas, subject to due consideration of the commercial needs of Main Street, including loading parking.*
- *to require new development on the Main Street to incorporate pedestrian links, where feasible, to existing or new public car parks.*
- *deviations from the minimum car parking requirement (as set out the County Development Plan) shall be considered in the Main Street Strategy area as shown on Map 5.1 where a public car park is within 200m walking distance to the site. In such cases, only the needs of long-term users (e.g. employees and residents of the development) will have to be addressed by the developer.*

The delivery of new or enhanced car parking infrastructure and facilities would be an operational and budgetary matter for the Council.

(4) Healthy placemaking

It is intended that wellness, sustainability and quality of living will be at the core of the new County Development Plan. In particular, for the first time the County Development Plan will include a health and wellbeing ‘audit’, to ensure all of the provisions of the plan will contribute to improved quality of life for all in Wicklow.

(5) Climate Change

Climate change has been addressed directly in a number of Wicklow’s previous development plans; in particular the 2016 plan which includes a comprehensive overview of the climate change challenge,

the role of the County Development Plan in addressing same, a detailed ‘audit’ of the plan (similar in process to Strategic Environmental Assessment) to ensure that the plan contributed positively and actively to both mitigation and adaptation and gave rise and support to the inclusion of numerous policies and objectives in the plan in the areas of land use, transport, energy, building design and flood risk.

Goal 10 of the CDP 2016 related specifically to Climate Change;

“to 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.”

It is intended that the new plan will build on the previous plans and having regard to more recent State climate change policy and legislation (such as the National Mitigation Plan 2017, the National Adaptation Framework 2018 and the Climate Action Plan 2019) along with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), climate change will be very much to the fore of the new plan and will influence all aspects of the plan.

Climate change will be directly addressed with a specific climate change chapter and indirectly throughout the entire plan by integrating climate change mitigation and adaptation into the plan objectives.

The County Development Plan, as a land use framework, has only a certain remit with mitigation and adaptation to climate change, as not all sources and impacts are associated land use or development. Further to this the County Development Plan has no role in allocating funding or resources to carry out climate change actions / initiatives. Wicklow County Council and other government organisations have a number of climate change related strategies / plans that address many of the issues raised in the submissions received.

In directly addressing mitigation and adaptation to climate change, it is proposed that the new CDP will focus on the following issues in crafting the climate change action strategy of the CDP:

- Compact growth and crafting more sustainable settlement patterns
- Sustainable and low carbon transportation
- Enhancing public transport and access to same
- Flooding, surface / storm water management
- Natural resource management
- Renewable energy
- Low energy building design

(6) Flooding

- A number of submissions raised issues with respect to the need for, and the specifics and the design of the future Arklow Flood Relief Scheme. These would not be matters for the County Development Plan. The public’s input will be invited at various stages as this scheme develops.
- The County Development Plan does not address directly the design of any flood relief and flood protection schemes, rather it includes a strategic flood risk assessment, in order to ensure zoning and development objectives are consistent with the principles set out in the ‘Planning System and Flood Risk Management Guidelines’. Where the Local Authority, in conjunction with the OPW (which is the state body responsible for the implementation of the Floods Directive and is the lead State body for the coordination and implementation of Government policy on the management of flood risk in Ireland) identify a need for measures in any particularly river / river catchment to address flood risk, the most appropriate solution to same will be developed

- based on the requirements of the Flood Directive, taking into account of relevant Directives such as EIA Directive, Habitats Directive etc
- With respect to ‘upper river management’, there is value in this suggestion for dealing with downstream flood risk. However the management of upstream lands would be more appropriately addressed through an OPW lead upstream catchment policy at a national level rather than through the County Development Plan. With respect to the ‘nature based’ solutions suggested, the OPW in 2018 published 29 Flood Risk Management Plans to address flood risk in Ireland, such plans setting out the ‘whole of Government’ approach to managing flood risk and specifically including ‘Natural Water Retention Measures’ such as restoration of wetlands and woodlands.
 - With regard to the location of the new WWTP with respect to flood risk, the consent process for this plant entailed detailed flood risk assessment and mitigation measures which were considered acceptable by An Bord Pleanála.
 - With respect to the granting of permission for development in flood plains, such development is in fact permissible in accordance with the ‘Planning System and Flood Risk Management Guidelines’ if the provisions of the ‘justification test, set out in those guidelines is passed.

(7) Natural heritage

Coastal Protection / Erosion

Coastal erosion is a natural process, and interventions to change or alter same can often result in adverse environmental impacts. Nevertheless, WCC and various agencies is engaged in the ongoing monitoring and surveying of the coastline in order to determine if actions are warranted in particular locations. In particular:

- The Irish Coastal Protection Strategy Study (ICPSS) is a national study that was commissioned by the OPW in 2003 with the objective of providing information to support decision making about how best to manage risks associated with coastal flooding and coastal erosion. The Study was completed in 2013 and provides the strategic current scenario and the future scenario (up to 2100) coastal flood hazard maps and strategic coastal erosion maps for the national coastline. This major study provides invaluable and essential information required to inform policy in this area, particularly for local authorities in relation to the proper planning and development of coastal areas.
- Wicklow County Council is currently working closely with Irish Rail (with Arup, Engineering Consultants) to update and enhance the data from the ICPSS for the Wicklow coastline, with a particular focus on, but not limited to, locations where the rail line is in close proximity to the coast; in this regard Brittas Bay and Arklow (north and south) are included in this study.

On completion of the Arup study, it will be clearer what, if any, interventions are needed along the Wicklow coastline and where projects are warranted, Wicklow County Council will progress same subject to funding being made available.

Arklow’s coast

- While the suggestions regarding measures to improve and sustain the beaches of Arklow and its recreational facilities, are noted, these would be more relevant to a coastal protection plan / programme, rather than the County Development Plan. The current County Development Plan in its coastal zone objectives supports coastal management projects and works, and it is intended that these provisions will be retained and enhanced if necessary in the new plan.
- With regard to access issues to the coastline / beaches in Arklow, any alleged unauthorised development including unauthorised closing of access is being and will continue to be

investigated by the Planning Enforcement Department of Wicklow County Council; this is not a matter for the County Development Plan.

- The restoration or development of new coastal routes in north Arklow would be a matter for further local study and funding, but would be supported by the provisions of the County Development Plan.
- With respect to the activity of Roadstone, the operations of such quarries are bound by the condition of their planning permission and licences, and where there are any indications of non complaint activity occurring or development occurring without the required consent, the Council’s various enforcement divisions will investigate. This is not a matter for the County Development Plan.

Protected site and habitats

- Various sites and habitats types are protected under EU and national law. The enforcement of these provisions requires a number of actors and agencies to engage in active land management and enforcement, including but not limited to the landowner, National Parks and Wildlife Service and the Local Authority. The current County Development Plan provides the policy support for these actions and it is intended that these provisions will be retained and enhanced if necessary in the new plan.
- Irish law provides for various environmental protection zones, in particular SACs, SPA, and NHAs. Such designations are conferred by the state rather than the local authority and therefore it is not possible through the County Development Plan to designate new sites. Development Plans can however apply zoning and other designations to lands in order to manage their future activities and development. This is possibly the best tool that could be utilised to protect the additional areas suggested as worthy of such protection. With respect to the specific suggestion made regarding lands around Kynoch’s, these lands are zoned ‘open space’ where the objective is ‘*To protect and enhance existing and provide for recreational open space*’.
- With respect to the pNHA status of Arklow Marsh, the conferring of full NHA status is a matter for the state, rather than the County Development Plan. With regard to the possibility of studying the area, Wicklow County Council can commission such studies, should funding be made available for same.
- Brittas Bay is already a designated SPA and NHA
- While the comments regarding Arklow Rock’s pNHA designation are noted, the quarry at that location is operating within the remit of the permission granted to it; it should be noted the quarry pre-dates the pNHA designation.
- It is not correct to state that pNHAs or non-designated sites benefit from no protection whatsoever – the current County Development Plan includes the following objectives which it is intended to retain and enhance if necessary in the new plan:

NH5 *To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites⁵ in Wicklow.*

NH6 *Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

⁵ Along with cSACs, SPAs and pNHA these include Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).

NH8 *To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

- The suggestion regarding wildlife corridors is welcomed; the current County Development Plan and the Arklow LAP include various policies and objectives with regard to same and it is intended that these provisions will be maintained and enhanced in the new plan if necessary.
- The specific suggestions regarding an ‘urban forest’ in Arklow is interesting although it is unclear how this could be facilitated other than along the N/M11 corridor and the railway line corridor (much of which is already zoned ‘open space’) as most of the land in south Arklow is built up. Care would need to be taken to ensure any such action would not however interrupt vital train services. The open lands beside Churchview is the open space for this area, and there may therefore be conflict with recreational use were the land to be devoted to forestry. However again this is an interesting suggestion and as this is very much a local issue to Arklow, it is not a matter that can be addressed in the new County Development Plan, but certainly one that could be examined and assessed in the next review of the Arklow and Environs Local Area Plan. The managing of hedgerows by farmers/ landowner would not be a matter for the County Development Plan - Teagasc (the agriculture and food development authority) as well as the Department of Agriculture, works directly with farmers on such matters. The current County Development Plan in its provision promotes and requires hedgerow retention in new developments wherever ever possible.
- The Local Authority itself adheres to provisions regarding hedgerow cutting (unless a specific exemption is necessary to invoke e.g. where a traffic hazard may be arising), and engages closely with landowner to remind them of their obligations. The NPWS regularly publishes notices to remind the public regarding these regulations. With respect to the suggestion that Wicklow County Council should remind the non-farming public about the hedge cutting regulations, it should be borne in mind that these regulations only apply to ‘uncultivated’ lands and not to landscaped gardens.

Trees

The trees suggested as worthy of protection at Kynoch’s will be evaluated as part of the plan review process.

The Avoca River

Neither the County Development Plan nor the Arklow LAP are the prime strategy documents with respect to river / watercourse management and this would be more an issue for the River Basin Management Plans, and the OPW. . The current County Development Plan includes those objectives that are relevant to a land-use plan with respect to protection of rivers and their corridors and it is intended that these provisions will be retained and enhanced in the new plan if necessary.

The suggestions regarding monitoring of impacts arising from the construction of the new WWTP and Flood Relief Scheme are noted and will form part of the environmental monitoring programme required in the EIAs for these schemes.

(8) Built Heritage

The slipway in Arklow: This slipway is not a protected structure and as such does not benefit from protection due to its heritage status. It is not recommended at this time that such status be afforded

to this structure pending a complete survey of the harbour areas and the development of an overall plan to regenerate the area, which the Council would hope to commission in the short term.

“Tom’s cottage”: This structure is not a protected structure and as such does not benefit from protection due to heritage status. This structure was assessed during the course of the preparation of the 2018 Arklow and Environs LAP and it was recommended and accepted by the members that it not be added to the RPS. However, the current County Development Plan provides for the protection of such vernacular structures if necessary through the following objectives:

BH17 *Where an item or a structure (or any feature of a structure) is considered to be of heritage merit (where not identified in the RPS⁶), the Planning Authority reserves the right to refuse permission to remove or alter that structure / item, in the interests of the protection of the County’s architectural heritage.*

Dry stone walls in the town including on the Navie Bridge - These structures are not protected structures and as such do not benefit from protection due to heritage status. However, the current County Development Plan provides for the protection of such features through the following objectives:

BH15 *To seek (through the development management process), the retention, conservation, appropriate repair and reuse of vernacular buildings and features such as milestones, stonewalls, traditional & historic shop fronts and pub fronts, thatched roofs and other historic elements. The demolition of vernacular buildings will be discouraged.*

BH16 *Development proposals affecting vernacular buildings and structures will be required to submit a detailed, true measured survey, photographic records and written analysis as part of the planning application process.*

BH17 *Where an item or a structure (or any feature of a structure) is considered to be of heritage merit (where not identified in the RPS⁷), the Planning Authority reserves the right to refuse permission to remove or alter that structure / item, in the interests of the protection of the County’s architectural heritage.*

The coastguard houses: These structures are not protected structures and as such do not benefit from protection due to heritage status. It is not recommended at this time that such status be afforded to these structures unless a complete survey and assessment of same determined such protection suitable. If this is desired by the submitter, as an elected member of the Council, the CE can be directed to carry out such an assessment.

All red stone buildings: It is not clear exactly what is meant by this suggestion (possibly ‘red brick’ buildings). Where there are buildings of this nature that are worthy of protection they may already be on the RPS and may otherwise be already protected somewhat by Objectives B15-17 above. With regard to the use of such buildings, this is matter for the owners of same and the Local Authority could not force a change of use, even a use that may be needed in the town, without ownership of the building.

Kynoch’s lodge: This is already a protected structure

⁶ The National Inventory of Architectural Heritage can sometimes be utilised as a source of information with regard to the architectural value of any such items or structures.

⁷ The National Inventory of Architectural Heritage can sometimes be utilised as a source of information with regard to the architectural value of any such items or structures.

Old footpaths: It is not specified where exactly these footpaths are located, but often in the interests of public safety it is necessary to replace older paths with more modern material and construction.

It is not correct as suggested in one submission that buildings that are not ‘protected structures’ have no protection whatsoever; the current County Development Plan includes the following provisions which it is intended to retain in the new plan:

BH15 *To seek (through the development management process), the retention, conservation, appropriate repair and reuse of vernacular buildings and features such as milestones, stonewalls, traditional & historic shopfronts and pub fronts, thatched roofs and other historic elements. The demolition of vernacular buildings will be discouraged.*

BH17 *Where an item or a structure (or any feature of a structure) is considered to be of heritage merit (where not identified in the RPS⁸), the Planning Authority reserves the right to refuse permission to remove or alter that structure / item, in the interests of the protection of the County’s architectural heritage.*

(9) Rights of way

As part of the review of the County Development Plan, the plan provisions regarding public rights of way will be reviewed and updated to include new routes if sufficient information is available to determine the legal status of any routes as a public right of way. It should be noted however that the inclusion (or omissions) of a public right of way from the list in the County Development Plan does not infer or deny the legal existence of same.

With regard to issue raised with respect to the closing / blocking of existing PROWs or amenity routes any alleged unauthorised development brought to the attention of the Council will be investigated by the Planning Enforcement Department of Wicklow County Council; this is not a matter for the County Development Plan.

(10) Green / Blue Infrastructure

The current County Development Plan addresses green infrastructure (GI) in detail but in a strategic, county wide manner given that scale of plan making (Appendix 8 of the current plan). While maps are included in this Strategy, it is acknowledged that it is difficult at a county scale to show in any meaningful way all GI assets and the connections between them, but this will be considered in the preparation of the new plan to determine if enhanced maps can be provided.

More detailed provisions regarding GI are provided for in local plans, such as the Arklow LAP. This LAP includes a green infrastructure map detailing all of the GI elements in the settlement.

The suggestion for various regional green routes is noted, such as Wicklow – Arklow (coast) and Avoca – Arklow (riverine), and these can be reviewed for possible inclusion in the new plan.

Further investigation will take place into blue routes as part of the new plan preparation process. Previous work flagged inherent conflicts between biodiversity, habitats and water quality protection and additional human use of water and riverine resource for recreational purposes.

⁸ The National Inventory of Architectural Heritage can sometimes be utilised as a source of information with regard to the architectural value of any such items or structures.

(11) Open space and recreation

- The County Development Plan, and the local plans that flow from it, do not allow for the non recreational use of land zoned for ‘open space’; it may be that the submitter is concerned the development of land that *may* be suitable for future open space / sports use for housing / other non recreational use. However, if the lands in question are not zoned / designated for open space / sports use, there is no requirement to reserve them for such.
- Open space *is* required in all new housing developments at a rate of 10% of the site area; in addition, facilities for children play such as playgrounds are also required in larger developments. It is recommended that such provisions are retained in the new County Development Plan and enhanced where necessary.
- It is suggested that the local area plan should be amended to provide for community gardens. The LAP is not under review at this time and such a suggestion may be more appropriately made when it is new reviewed. However it should be noted that the current County Development Plan, and the local plans that flow from it, provides for the zoning of land for ‘open space’. Some of these lands are so zoned so as to provide for new playing pitches, sports grounds, parks etc, but additional lands are zoned ‘passive open space’ which are lands not intended for sport / park use particularly because they may be in the buffer zone along a Natura 2000 site, may be at risk of flooding, or may simply be not suitable for development. Such lands could be considered for the development of community gardens / allotments on the basis that they did not interfere with the role of the land as a flood plain, ecological buffer zone etc if applicable. In addition, the County Development Plan currently includes an objective in support of the development of lands for allotments, subject to a non onerous list of criteria including proximity to settlements, accessibility etc. It is intended to retain these provisions in the new County Development Plan and these can be enhanced if considered necessary. It however is not recommended that particular pieces of land be designated through the County Development Plan for this particular type of horticultural use alone.
- The zoning of land for sports use would be a matter for the Local Area Plan, which zoned c. 16ha for new sports uses in the town.

(12) Town Centre, Economic Development, Tourism

It is agreed that revitalisation of the old town centre is essential in Arklow - the current Arklow LAP promotes this as a key objective for the town and has a targeted policy to this effect including the following objectives:

- *To promote and encourage consolidation of and improvement to retailing and other town centre activities in the core area including the renovation and expansion of existing retail premises in the core retail area.*
- *Encourage the redevelopment and regeneration of vacant, underutilised and derelict sites including the conversion of non-retail premises in the core area to retail use.*
- *To protect features that contribute to the town’s overall appearance and heritage value.*
- *To encourage higher residential densities in the town centre / village centre zones and the concept of ‘living over the shop’.*
- *The redevelopment of lands within the town core area, particularly those sites with frontage onto the main streets and squares of the town, shall provide for a street fronting building of a high quality design or for a high quality urban space, including hard and soft landscaping, and appropriate street fixtures and furniture, in order to enhance and create a more attractive streetscape.*

VP1 *To maintain the Main Street in the short to medium term (until alternative orbital routes are developed) as the principal vehicular route through the town centre and to maintain the main*

vehicular routes to the waterfront area along the quays; to exploit any opportunities that arise to improve safety for both pedestrians and vehicles in the Town Centre and Waterfront area.

- VP2** To promote the pedestrian use of all ‘dark pink’ routes and avail of any opportunities to improve footpaths and pedestrian routes within in the Town Centre Strategy boundary and to the Waterfront zone, Wexford Road and Train Station along the main roads and key pedestrian routes.
- VP3** To facilitate the improvement of existing and the development of new linkages from the Main Street to car parks, amenity areas, the train station and the waterfront zone; in particular in the Town Centre Strategy area to require redevelopment proposals that have frontage on both Main Street and any ‘dark pink’ route to include new pedestrian routes through the site.
- VP4** With regard to car parking to facilitate the following;
- to maintain existing and provide new car parking options as funding allows, in proximity to the Main Street and along ‘dark pink’ routes.
 - to avail of opportunities to remove public on street car parking on the Main Street and at amenity areas, subject to due consideration of the commercial needs of Main Street, including loading parking.
 - to require new development on the Main Street to incorporate pedestrian links, where feasible, to existing or new public car parks.
 - deviations from the minimum car parking requirement (as set out the County Development Plan) shall be considered in the Main Street Strategy area as shown on Map 5.1 where a public car park is within 200m walking distance to the site. In such cases, only the needs of long-term users (e.g. employees and residents of the development) will have to be addressed by the developer.
- VP5** With regard to public transport to facilitate the following;
- the improvement of public transport user facilities including, shelters, covered bicycle parking, information points with maps, routes, timetables, real-time information and designated taxi ranks at / near the bus stops on Main Street and the train station;
 - the provision of new or enhance existing foot and cycleways to and from the public transport pick up locations, as funding allows;
 - a pedestrian link / bridge from the Train Station to the Wexford Road;
 - improved access to bus stops particularly crossing points for passengers.
- VP6** To protect and enhance the streetscape of Arklow Main Street through the appropriate control of alterations to existing buildings and the development of new structures; in particular building and roof lines and heights which diverge from the established form will require to be justified.
- VP7** To seek to improve the appearance of junctions and gateway areas into the Main Street, particularly the Main Street – Bridge Street junction.
- VP8** New or extended / refurbished units shall, at all times that the unit is not in active use, provide an attractive temporary display or professionally designed artwork affixed to the glass frontage. The temporary use of the space during such times for creative, cultural or community purposes will be encouraged; however, such change of use may require planning permission, and advice will be provided by the Council on a case by case basis in this regard.
- VP9** To support opportunities to create better linkages between the Main Street, the river, the north and south quay and the beaches, in particular access routes and views between the two.

- VP10** *To maintain the existing bandstand and ‘Sea Farers Memorial Garden’ and support other possibilities for the development of new urban spaces.*
- VP11** *To improve footpaths, lighting, seating and other street ‘furniture’ as funding allows, and require private development providing such features to meet the highest standards of design and siting in the town centre and waterfront zones.*
- VP12** *To facilitate appropriate infill development of vacant backland and private car parking areas along ‘dark pink’ routes in the Town Centre strategy area.*
- VP13** *To promote and facilitate the conversion of non-retail premises to retail/retail service use and in the ‘core retail area’ to strongly resist the conversion of existing retail/retail service premises to alternative, less active, uses that would diminish vibrancy and daytime activity.*
- VP14** *To seek to prepare an overall Main Street enhancement scheme to improve the street environment for all users, which may include widened footpaths, cycle facilities (where feasible), public realm improvements, and possibly accompanied by reduced speed limits.*

The NPF acknowledges the importance of towns and villages in terms of their economic, administrative and social functions and seeks to activate the potential for renewal and strengthen their role as places to live, work and visit. This includes encouraging new roles and functions for buildings, streets and sites within our towns and villages. The NPF requires a major new policy emphasis on renewing and developing existing settlements rather than continual expansion and sprawl. It targets a significant proportion of future development to occur on infill and brownfield sites within the built footprint of existing settlements. In accordance with national policy for compact growth, the core strategy will put in place measures to ensure a critical mass of people living and working in towns and villages that will in turn create vibrant settlements and support retail vitality.

NPO 16: *Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

The County’s settlements are the lifeblood of the County, meeting most of the employment, retail, cultural and social needs of all residents. Investment in settlements gives the highest return to society, as economies of scale can be achieved and the highest standards of environmental protection attained. Fundamental to the future success of settlements and their centres is the maintenance and enhancement of uses that bring people into the settlement to live, work, shop and interact. In particular, a healthy and vibrant retail sector is considered the key driving force behind the activity level in any settlement. A strong retail sector has the multiple benefits of drawing people into centres to interact with their community (thereby reducing social isolation), supporting local employment, and obviating the need for people to travel long distances for essential shopping needs, thereby reducing car dependency. It is accepted therefore that there is a presumption in favour of retail, commercial and cultural / community uses in the town centre; however the County Development Plan does also permit and promote residential use.

The following are objectives of the current County Development Plan in this regard and these will be reviewed and enhanced if necessary in the new plan:

- RT1** *To ensure the continued vibrancy and life of centres, to direct new development and investment into towns and villages in the first instance and to particularly prioritise actions that enhance*

business, retail, leisure, entertainment and cultural uses, as well as making town and villages centres an attractive place to live.

RT13 *To promote the revitalisation of vacant / derelict properties / shop units. Where no viable retail use can be sustained, alternative uses will be assessed on their own merits against the requirements of the proper planning and sustainable development of the areas within which they are located.*

RT15 *To promote the ‘active’ use of above ground floor levels, and in particular to promote the concept of ‘living over the shop’ in centres. Where a ‘living over the shop’ use is proposed, a relaxation in density, car parking and open space standards will be considered, where the development meets very high quality of design and accommodation.*

In addition, the ‘town centre’ zoning used for all county town centres have the following objective:

‘To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses, and urban streets, while delivering a quality urban environment which will enhance the quality of life of resident, visitor and workers alike. The zone will strengthen retail provision in accordance with the County Retail Strategy, emphasise town centre conservation, ensure priority for public transport where applicable, pedestrians and cyclists while minimising the impact of private car based traffic and enhance and develop the existing centre’s fabric.’

The suggestion regarding temporary or limited duration permissions and the reasons for the suggestion is noted; however such permission tends to be problematic and more costly as (a) the applicant would need to keep ‘renewing’ a permission if a temporary use is desired to be extended thus bringing ongoing planning costs and (b) significant resources would be required for the policing of such permissions to ensure temporary uses ceased as required. At this time this is not therefore supported as a viable mechanism of town centre revitalisation.

The current County Development Plan supports the development of (farmer’s) markets in accordance with the provisions of the ‘Retail Planning Guidelines’ (Objective RT35) and it is recommended that such support be retained and enhanced if necessary in the new County Development Plan.

The setting up of task force to market Arklow sites is not a matter for the County Development Plan. However there are already a number of bodies and agencies activity engaged in promoting and supporting employment in Arklow, including but not limited to Wicklow County Council and Local Enterprise Office, the IDA, Enterprise Ireland, the local Chamber of Commerce and the Town Team.

The various suggestion made to enhance tourism are noted and for the most part are accommodated and supported in the existing County Development Plan, the Arklow and Environs LAP and the various tourism strategies of County Tourism and Fáilte Ireland.

Suggestions regarding the closing of the Roadstone Quarry and jetties, the caravan park, the Avoca River Industrial Park and Shelton Abbey are contentious and would be outside the scope of any of these plans.

The detailed submission regarding sustainable economic development and tourism from **Aisling Hudson** is noted and the CE notes the amount of work and thought that must have gone into same. For the most part, it would seem that the ideas in this submission would be more relevant to the LECP, the County Climate Change strategy, County Tourism Strategy and the Arklow LAP rather than the County Development Plan. The development of an ecovillage, research centres, marine and habitat based industries, hemp and bioplastic industries and green tourism would all be supported by the

provisions of the current County Development Plan and Arklow Local Area Plan and it is intended that the supports for all sustainable and environmentally sound employment types and formats will be retained and enhanced if necessary in the new plan.

Suggestions regarding the fishing industry are noted and this along with other marine activities are being considered at this time in the development of the national Marine Planning Framework, and in the local area by the County Maritime Business Group. The current County Development Plan sets out clear policy supports for this industry, and it is intended that these provisions will be retained and enhanced if necessary in the new plan.

(13) Culture

The current County Development Plan, as well as the Arklow and Environs LAP, support the delivery of new and enhanced community / arts facilities and it is recommended that these objectives be retained and enhanced where necessary in the new County Development Plan. The delivery of new or enhanced cultural / arts infrastructure and facilities would be an operational and implementation matter for the various Council departments and state agencies active in this sector and in this regard the Council has a Wicklow County Arts Plan.

(14) Strategic Environmental Assessment

The new County Development Plan, as with previous county and local area plans, will be subject to Strategic Environmental Assessment and Appropriate Assessment. Questions are raised in one submission about the accuracy of previous Strategic Environmental Assessments, and in this regard it is refuted that these have been inadequate, and this is reflected in the acceptance of same by the prescribed environmental authorities, in particular the Environmental Protection Agency, the Department of Communication, Climate Action and Environment, and the Department of Culture, Heritage and Gaeltacht.

(15) Miscellaneous

Balloons, Fireworks and Lanterns

This would not be a matter for the County Development Plan

Public land / CPOs

The suggestion in this regard regarding mapping public land is not clear but the Local Authority keeps records (including maps) of all lands it owns. With regard to the Alps site, while there is merit in this suggestion, there is no funding stream available at this time for a project of this scale, but it something that the Arklow MD may wish to consider.

Waste management

The current County Development Plan addresses waste management, including waste-to-energy facilities, but this is more a matter for the Regional Waste Management Plan.

‘Transition movement’/ eco-villages / eco-research

The formation of an Arklow ‘transition’ team to support the move to more sustainable development would not be a matter for the County Development Plan. This may be a project that could be driven at a local level through the Municipal District office or the County Climate Change office.

One submission suggests ‘eco-villages’ as a model to test and research sustainability measures; the current County Development Plan would support such innovative forms of development, and research

methodologies / projects, subject to such being located appropriately on land designated for development, rather than on a greenfield remote rural sites (which often is the format put forward for eco-villages) as such locations are inherently unsustainable due to the separation from key services and car dependency. It is suggested this could be located in ‘Action Area 3’ (Kilbride), which is generally designated for residential, community and open space uses, and therefore there would be no zoning ‘impediment’ to its development as an eco-village. This land is in private ownership and the Local Authority would however not be able to ‘insist’ on such a format of development, unless it had ‘legal’ grounds to do so, which are not available at this time. As a general principle, lands should not be designated for restrictive forms of development.

The provisions of the current County Development Plan, and the Arklow LAP, would support the development of a marine and habitat research centre in Arklow and it is considered that the harbour / waterfront mixed use zone would be ideal for such usage.

Recommendations of Chief Executive

1. In the new Core Strategy, to ensure that new development is on the basis of sustainability principles and in particular to the availability of local employment and to sustainable modes of movement both within and between settlements.
2. To include a ‘health and wellbeing’ audit, to ensure all of the provisions of the plan will be contribute to improved quality of life for all in Wicklow.
3. To retain the following roads and transportation objectives in the new County Development Plan and to enhance where necessary:
 - Third interchange on the Arklow by-pass, linking the M11 to Vale Road
 - Arklow port access road
 - Second bridge in Arklow
 - To continue to work with and support the public transport providers and agencies to enhance public transport within and between Wicklow settlements, and in rural areas.
4. To retain existing foot and cycle way objectives in the new County Development Plan and to enhance as follows:
 - In accordance with any advice or updated strategies / requirements of the NTA
 - To include a new objective for a complete footpath from Rathdrum to Arklow, via The Meetings and Woodenbridge.
5. To continue to prepare Local Transport Studies / Plans for all settlements intended for significant new development.
6. To retain existing town centre and retail policies and objectives, and to enhance where necessary; in particular:
 - To continue to prioritisation of existing town centres as the commercial and retail heart of settlement and to appropriately manage ‘edge of centre’ and out of centre’ retail
 - To support local markets.
7. To retain and enhance if necessary existing policy support for tourism development in the County.
8. To retain and enhance if necessary existing policy support for Green Infrastructure and the enhancement and protection of the County’s rivers and river catchments.
9. To provide enhanced policy support and objectives in the new County Development Plan for community and social infrastructure such as:
 - community centres and arts venues
 - community gardens and allotments
 - education, including third level.

10. To retain and enhance if necessary existing objectives for Coastal Zone Management.
11. To include a new chapter specifically on Climate Change in the draft County Development Plan. The strategy and objectives of the chapter will have a focus on the land use and planning aspects of adaptation to and mitigation of climate change.

In the development of the new plan, particular regard will be taken of the need to align with national commitments on climate change mitigation and adaptation.

To support the implementation of the Wicklow County Council Climate Change Adaptation Strategy and upcoming Climate Change Mitigation Plan to support the land use aspects of the strategy and associated plans.

To integrate climate change mitigation and adaptation as guiding principles throughout the plan and in particular to address the areas of:

- Compact growth and crafting more sustainable settlement patterns
- Sustainable and low carbon transportation
- Enhancing public transport and access to same
- Flooding, surface / storm water management
- Natural resource management
- Renewable energy
- Low energy building design.

12. To review and improve the Record of Protected Structures and Tree Protection Orders.
13. To maintain and strengthen if necessary natural heritage provisions of the plan, to ensure the ongoing protection of biodiversity and watercourses
14. To carry out Strategic Environmental Assessment, Appropriate Assessment, Strategic Flood Risk Assessment and any other necessary assessments for the new plan as are required by statute and guidelines.

Part 4.3.16 Greystones – Delgany

Name	Issue Raised
Delgany Community Council (C19)	<p>Delgany Community Council (DCC) is an all volunteer group of residents and businesses who work together to promote business, tourism and community life in Delgany. The group works closely with Delgany Tidy Towns to develop projects, apply for funding and improve the locality.</p> <p>The main aims and objectives of the community council are as follows:</p> <ul style="list-style-type: none"> • To create a vision for Delgany that will result in a vibrant, active and sustainable community. • Encourage and work towards the maintenance and betterment of Delgany village and its environs • Preserve and protect the sites of historical interest in the Delgany area and environs • Act in a lobbying capacity so that the best interests of Delgany residents are heard. • Improve the quality of life for residents and visitors to the village and surrounding area. • Foster a sense of inclusion, belonging and participation amongst all the residents of Delgany. In the past year this has included a Christmas Carol Service, Spring Clean events and a community BBQ. <p>All residents of Delgany are welcome to join the DCC</p> <p>We have a history of engagement with the planning process, most recently with regard to the proposed N11/M11 road improvement scheme. We recognise the importance of engaging in this process as the County Development Plan sets out an overall strategy for the proper planning and sustainable development of County Wicklow.</p> <p>This submission has been prepared by a small subgroup of the council and was circulated to our entire committee for feedback in advance of submission. It is worth pointing out that the process is daunting to individuals who, while they may have very valid points to make, have little planning knowledge.</p> <p>(1) N11/M11</p> <p>We have huge concerns relating to some of the potential routes outlined as possibilities in the N11/M11 consultation process:</p> <p><i>Effect on Built and Natural Heritage:</i> Delgany is an Architectural Conservation Area (“ACA”) located in a landscape that has a distinctive character and features of natural beauty and interest. Two of the Off-line Corridor options are going to seriously damage that character and natural beauty.</p> <p><i>Effect on Biodiversity:</i> The Off-line Corridor Options will infringe in a deliberate way Article 10 of the Habitats Directive will destroy traditional field boundaries. These are important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.</p> <p>(2) Core Strategy</p> <p>We have noted that the current County Development Plan 2012-2019 had designated Bray, Wicklow, Rathnew, Greystones - Delgany, Greystones-Delgany, Newtownmountkennedy and Blessington as ‘growth towns’. The most recent National Planning Framework and Regional Spatial and Economic Strategy has now identified just Bray and Wicklow/Rathnew as growth towns. We want to ensure that any projected increase in population is focused on those towns. In our view the revised population</p>

	<p>growth target of 164,000 for County Wicklow should be reduced further if it is decided that Bray should get its figures for population growth from the Dublin metropolitan area.</p> <p>Bray is a large urban town with employment as well as reasonable transport links. Those transport links will be further enhanced if the Bus Connects plan is realised. Bray DART station has been identified as a bus hub.</p> <p>We assume that this means a review of zoning in the towns that have not yet been granted planning permissions. Delgany has experienced rapid growth in the last 2 years without an accompanying provision of community facilities and transport links. Delgany has been treated as part of the greater Greystones/Delgany area even though these places have distinct separate identities. We have the view that Delgany and Greystones should be considered separately in the Plan as they are totally different in terms of infrastructure and heritage. Delgany has expanded to a far greater extent than Greystones without the required additional facilities and services. We believe that the Greystones/Delgany area exceeds its ability to cope and that it should be prioritised in terms of provision of better public transport, additional local employment as well as additional community services. It is worth noting that the largest employer in the Greystones/Delgany area is probably the Department of Education through the 10 local schools.</p> <p>In terms of the RSES settlement hierarchy the most appropriate designation for Delgany is as a self sustaining town which is defined in the strategy as follows:</p> <p>“ii) Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.”</p> <p>Significant additional investment is needed to provide adequate public transport as well as employment and recreational opportunities for those who live locally. Improvements are being delivered on an ad hoc basis and seem to be planned primarily to serve the interests of developers. As an example, a section of the Delgany to Blacklion road is currently under construction as a development is taking place in the vicinity. That road improvement was first mentioned in a county development plan 30 years ago. When that section is completed it leaves a larger piece still without a timeline for completion.</p> <p>Delgany does not have any capacity for further growth as it has experienced significant expansion in recent years with no additional public transport, community facilities or employment opportunities. Any future large developments should have a special condition of a contribution towards the upkeep of the village of Delgany. This payment is collected by WCC and handed over to the local community in time.</p> <p>In order to ensure towns are self-sustaining we require: Local employment, excellent transport links, community facilities (sporting, cultural, heritage, amenity), local allotments, open spaces. Compact growth can be delivered in towns and villages by ensuring that any development takes place within the existing footprint in order to avoid semi urban sprawl which is both unsightly and difficult to service with public transport.</p>
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(3) Climate Change, Flooding and Coastal Zone Management

We welcome the recent adoption of a Climate Adaptation Strategy for County Wicklow as well as the establishment of a relevant Strategic Policy Committee.

We note the fact that the Council have appointed consultants to examine the feasibility of building the East Coast Wicklow to Greystones greenway. The Irish Rail coastal erosion study which has been commissioned as part of the feasibility study is timely and can also be used as groundwork to improve rail service.

The County Development plan can address climate change by:

- Encouraging compact development which can be more easily served by public transport
- Prioritising the development of public transport. Local link services will be needed to connect residents to public transport hub.
- Provision of Park and Ride facilities and a bus corridor on the N11
- Refusing to engage with proposals that encourage further car dependency by widening roads and increasing capacity for car based transport
- Provision of Local Link electric bus services to provide greater access to public transport hubs
- Continuing and expanding retrofitting of housing that is not adequately insulated.
- Considering carefully the environmental impact of any large scale developments that are planned for our county.
- Development along coastlines should be tightly controlled and related to provision of amenities and for tourism.
- Community energy projects should be promoted and supported in our county. There are initiatives in Co Leitrim which are worth exploring: [Sustainable Energy Communities \(SEC\) Programme](#)
- Increased number of recharging stations for electric cars.
- Flood risk areas can be managed by ensuring that any development in close proximity addresses potential impact on the floodplain. In some cases flood plains can be developed to a limited extent as walking routes
- Providing allotments to encourage Wicklow residents to grow and consume locally produced food. Further information available at this link:
- <https://lisafingleton.com/project/the-local-food-project/>
- New developments should be subject to a climate change impact audit. Developers should be encouraged to incorporate wild open space and measures conducive to wildlife (e.g. bat and swift boxes) as a matter of course.

(4) Housing

We welcome the emphasis on mixed housing developments that allow people to remain in an area and move to a larger/smaller property as their needs change. This natural mix of ages and stages creates livable communities and is an important contributing factor in placemaking.

Almost all groups will struggle to access decent affordable housing in our locality, whether to buy or to rent. Affordability is a huge concern in our area. Lack of affordability sees people moving towards Wexford and enduring lengthy and difficult

	<p>daily commutes.</p> <p>We recognise the need to increase density in order to maximise land use and create more compact sustainable communities. However this should take into account the neighbouring densities as well as height of buildings to ensure that the amenities enjoyed by existing properties are not damaged.</p> <p>High density is best suited to areas which have good public transport or substantial local employment opportunities, in our opinion, high density and further expansion on a medium to large scale should be confined to Bray and Wicklow.</p> <p>The Delgany area requires considerable additional infrastructural improvements and additional community facilities to catch up on the development that has taken place in the last 10 years and cannot accommodate further development at this point unless it is preceded by such facilities.</p> <p>There should be no increase to current housing density allocations in Delgany.</p> <p>Special types of housing needed locally: Those who need specific types of accommodation include the elderly, those with mental health difficulties, young adults leaving care at 18, and carers. Carers often struggle to access affordable housing and frequently find themselves in a precarious position. While they work fulltime as carers their work is unpaid and unrewarded and they cannot easily save for deposits. We would like to see the development of supported living hubs (ref McAuley place in Naas, Co Kildare https://mcauleyplace.ie/). This model is a welcome move away from the charitable provision of housing towards the creation of communities which allow vulnerable adults and artists to co-exist in a mutually beneficial environment. It also provides an arts and cultural hub for the local community. Certain types of properties lend themselves to such developments and we believe there is a great opportunity to create such a development when the Carmelite Convent site, in Delgany village, is developed.</p> <p>Affordable Housing: Examine creative ways to provide such housing. Companies and Approved Housing Bodies/Council could collaborate to fund and build affordable housing for rental or purchase by employees. This would allow companies to retain key staff and to build capacity.</p> <p>(5) Economic Development and Employment</p> <p>Economic development in North Wicklow has been limited. The vast majority of residents in Greystones/Delgany commute to the Dublin area for work. This is unsustainable and does not lead to the creation of strong communities. A recent report indicated that the I.D.A conducted only one visit to our county in the last year. We have a huge I.D.A. site in Greystones, it has been zoned for at least 20 years and has lain idle throughout that period. It needs to be developed to provide sustainable, local employment. Delgany is not suitable for new economic/retail development. The village is almost totally residential. Any attempt to change this would be detrimental to the heritage of the village.</p> <p>To improve Wicklow’s suitability as an employment base the Council should apply recognized best practice:</p>
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	<p>Social and educational climate: Council funded and supported affordable and social housing. Better community and leisure facilities. Better linkage with third level institutions. Government funded relevant retraining programmes for workers looking to transition.</p> <p>Development of the entrepreneurial ecosystem: Develop Facilities with supports for start-up businesses, remote working hubs that are serviced. Expand Local Enterprise centre, fund and support start up facilities with admin support Provide and incentivise co-working and remote working.</p> <p>Employer Retention: Develop processes and subsidies to attract and retain local employers</p> <p>Technical Infrastructure: Continue the expansion and development of high speed internet connectivity</p> <ul style="list-style-type: none"> • To maximize employment opportunities in Wicklow one needs to account for the current development in place along the N11 corridor. This spread out residential and light industrial development does not lend itself to the creation of a traditional high density employment zone such as a Central Business and Financial District. Instead Wicklow has the opportunity to develop what more modern cities such as Vancouver are doing which is to develop numerous “Alternative Business Districts” which are neatly integrated into or adjacent to residential centres. This approach works particularly well with information economy work and areas with high levels of education and internet connectivity. • This approach also would help mitigate the ongoing issues of congestion and dramatically improve societal decarbonisation by reducing the need for long commutes. • With the current planning focusing on City Centre Infilling it should not be necessary to do extensive new developments on brownfield sites since the goal of ABDs is tight integration into residential areas. Some ideal locations for Alternative Business Districts: Southern Cross between Bray and Greystones, Kilcoole, Wicklow Town, Ashford • If the locations are carefully chosen to fund development of ABDs these centres can also help to facilitate alternative employment opportunities for more rural communities while preventing increased commercial development within those communities • Ireland has a long history as an agricultural nation. There is no reason an information economy cannot work side by side with an agricultural economy in rural areas. Agriculture is undergoing cataclysmic changes over the next generation and if Ireland wishes to retain its farming and horticultural enterprises over the long term it will require cultural, governmental and industrial changes and planning well beyond the scope of this document. With that in mind, the Food industry is also suitable as craft and tourism. • Proper development to stimulate economic growth in Wicklow in general and rural area in particular is dependent on adequate public transport development and
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provisioning and the ability to access a suitably skilled workforce

(6) Town and Village Centres and Retail

- Areas of architectural heritage should be protected throughout the planning process, grants for restoration, public realm plans to ensure shop fronts are tasteful and in harmony in heritage towns.
- Vacant units: Incentivise new business to set up by reduced/free rates. Encourage “pop-up” shops, support prospective businesses to set up
- The appropriate scale of retail development varies in each location depending on the size of town/village, population base and proximity to other towns.
- Please examine the impact of paid/free parking on retail in our towns and villages. Provision of free parking at less busy times of the day may be an interesting solution.

(7) Tourism and Recreation

- Delgany: Develop a local Greenway (Delgany to the coast via Charlesland) which could connect to any future Greystones to Wicklow Greenway. DCC has been advocating for the development of a Three Trout’s Stream Delgany to Greystones Greenway.
- Our scenic landscape and heritage is the major attraction for tourism locally so it is obvious that any tourism development needs to happen in harmony with and without damage to the natural and built environment.
- There is a huge need for tourist accommodation in North Wicklow. At present the greater Dublin region is the financial beneficiary of our tourist attractions due to a lack of hotel accommodation in the North of the county.
- Develop and promote The Wicklow Way walking route. A lot of work has been done at local level to develop and promote walks such as The Delgany Heritage Walk and The Fairy Walk. Further information is available at this link: [Walks in Delgany](#)
- There are ongoing costs associated with the maintenance and signage of such walks and the financial support of the council through small grants, is very much appreciated.
- The development of a series of Greenways or coastal walking and cycling paths would be a great amenity and would build habits in terms of use of bikes, exercise. We welcome the development of the Blessington Greenway and would welcome a similar development on the East Coast. Greenways also provide the possibility for better physical connections, for example Delgany could be connected to the coast via Charlesland.
- Delgany was recently awarded a sum of €29,600, under the Town and Village renewal scheme, for the development of a Greenway Feasibility Plan and a Public Realm Urban Design Plan. Once the feasibility study has been concluded, further funding will be required in order to execute a plan for the village.
- In the last development plan (2013) the eastern part of the Delgany-Kilcoole Mass Path was included as a listed right of way i.e. that section of the path from Kilcoole to the tarred road at Kilquade. However this Mass Path actually continues on from Kilquade to Delgany, crossing the Farrankelly Road dual carriageway (where signage steps and stiles were erected for it by NRA at the time of the road's construction)

and continues on to Delgany via Drummin Lane and Blackberry Lane. This omission should be corrected in the next development plan.

(8) Heritage

- Under this heading we have included suggestions related to both the natural and the built heritage of our area. All aspects of heritage (natural and built environment) which can be deemed to be of importance are worth retaining and protecting.
- Delgany village has a very long history and it is hoped that the village centre can be improved and preserved in the short term. We have huge concerns at the devastating impact of some of the options under consideration as part of the N11/M11 road improvement scheme. Vast areas of environmental importance would suffer a devastating impact, communities which have thrived for many years would be split and the nature of Delgany village and surroundings forever changed. The orange, pink and cyan routes would be especially damaging to our village. We are including this extract from our submission as part of the consultation process on the N11/M11 scheme:

“Environmental Impact of the proposed N11/M11 routes

- *The scale of the offline options is scarcely comprehensible: embankments and cuttings in excess of 40m high/deep, with associated side slopes extending beyond the outside of the 200m corridors themselves. Such colossal earthworks will totally decimate the setting of Delgany village and eradicate the beautiful valley of the Three Trout Stream, as well as Drummin Hill. The proposed offline routes would slice a swathe through the top of Drummin Hill overlooking Delgany and Greystones. This would generate extreme noise pollution and such an impact is in direct contradiction to objectives outlined in the Delgany-Greystones & Kilcoole Local Area Plan*
- *(2013-2019) which discusses the need to reduce traffic and associated noise levels. The proposals would also be hugely visually intrusive, as well as destroying this much loved and well recognised local landmark of its iconic line of Scots Pines at the top of the hill known as the Soldier Trees. As well as the noise, air pollutants such as diesel particulates would drift down from the new main road to the homes and schools below. The offline corridors pose a serious threat to the stability and integrity of the ecological habitats of the area, in particular the Glen of the Downs SAC, the Three Trout Stream and the woodlands of Bellevue Demesne. The Preliminary Biodiversity Appraisal of the Three Trout Stream 2019 identified a number of BoCCI (Birds of Conservation Concern in Ireland) red listed bird species. There are also a large number of birds identified as medium conservation concern. The pink and orange offline options are contrary to a number of objectives of the Greystones-Delgany & Kilcoole LAP:*
- *Glen Road is zoned as a Green Belt (GB) area, the objective of which, as stated in the LAP, is: 6*
- *“To generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes”*
- *The areas immediately adjacent to the Three Trout Stream, both northern and southern banks, have been designated as Open Space zones, the purpose of which is:*

	<ul style="list-style-type: none"> - <i>“To preserve, provide for and improve public and private open space for recreational amenity and passive open space.”</i> - <i>The area to the immediate south of Glen Road, has been designated as a R2.5 zone, which allows for the development of low-density residential housing as follows:</i> - <i>“To provide for the development of sustainable residential communities up to a maximum density of 2.5 units per hectare and to preserve and protect residential amenity.”</i> - <i>Delgany Village is an ACA (Architectural Conservation Area), this special character could not be preserved with the offline options.</i> - <i>The LAP contains objectives for the preservation and protection of the view southwards at the Horse & Hound towards Drummin Hill.</i> - <i>Under Tree protection objectives, protected trees include Glen Road / Stylebawn, line of Scots Pine on the hill east of Drummin. Areas to the east of the Glen of the Downs are designated as medium or Medium to High with respect to Landscape Sensitivity. These areas coincide with the large forested areas which extend eastward from the SAC areas of the Glen of the Downs. These highly sensitive landscape areas constitute the contiguous areas of dense broad-leaf native woodland that constitutes the wider/peripheral Glen of the Downs woodland areas and natural habitats. Both the Pink and Orange proposed route options would devastate these sensitive landscape areas. With either of the pink or orange options the Glen of the Downs would be placed between two large carriageways, resulting in the severance of ecological exchange around boundaries of SAC. The existence of two separate carriageways (one through and a proposed additional one to the east of the SAC) would have the effect of creating an ecological island within the SAC. This would essentially disrupt the free movement of species, nutrients and pollinators between the SAC and the surrounding woodlands and hills. Such a scenario may rapidly and irreversibly compromise the ecological stability of the Glen of the Downs and the wider area.</i> - <i>Within the Bellevue Woodlands, there are NPWS - designated areas of Ancient and Long-Established woodland, representing some of the rarest native Irish woodlands and unique habitats in the country. This area is largely used for recreational and exercise purposes, with a WCC listed landscape viewpoint (“The Octagon”) and abundant walking routes. A significant negative effect on such habitats is almost inevitable given the scale of the proposed development. Furthermore at the southern end of the pink and orange options the proposed routes run through the area of land containing a known old illegal, and potentially contaminated, landfill which was purposely avoided and left in-situ in the redesign of Junction 11 prior to its construction to serve the Farrankelly dual carriageway.”</i> <ul style="list-style-type: none"> • All LAP heritage features as listed in Appendix B: LAP Heritage Features of the Greystones-Delgany and Kilcoole LAP 2013-2019 should be retained in all future CDP/LAPs. • Grants for restoration, fines if buildings are allowed to decay to a point where retention is deemed not viable. • The following heritage structures should also be considered for addition: <ul style="list-style-type: none"> ○ Downshill Bronze-Age Hillfort, Coolagad Bronze-Age Hillfort, Bellevue Demesne, Toll-Road/ Norman Path, Woodlands Church ○ The view of the trees at Drummin trees (Scots Pines) should be protected as
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	<p>they are a long-standing and unusual local landmark. They are located just south of Delgany village on the brow of Harmon’s Hill. The hill itself should also be protected as an outstanding view.</p> <ul style="list-style-type: none"> ○ The woods behind Glen of the Downs and Kindlestown Woods should be protected. Coillte sold off about 4 acres recently, the woods provide a wonderful amenity for people living locally and we hope that what remains in public ownership can be left that way for future generations to enjoy. ○ The view from the front of Kindlestown Woods (towards the Great and Little Sugarloafs) should be preserved. <ul style="list-style-type: none"> • There is a particular need to ensure that any structures that are identified as in need of preservation/conservation are protected. Developers who apply for planning on such a site should be penalised if they allow a site to deteriorate to such an extent that it becomes impossible/unsafe to preserve it. The owner of such a site should have a responsibility to maintain it. • Lower property tax for green buildings (a national issue but can be lobbied for at council level) • Please strengthen the awareness and protection of the Glen O’the Downs [SAC] Nature Reserve, the jewel in the crown of Wicklow nature. • Set policy to monitor and manage the largely-forgotten western section of the Glen nature reserve and re-connect it to the eastern section via a number of wildlife bridges over the N11 / M11 and underpass tunnels where suitable • Please identify the complete Three Trout’s Stream River System, the ancient wooded lifeline which created and still flows through the Glen, as a County Wicklow (Climate and Biodiversity) nature reserve in itself, as well as an extension of the Glen O’the Downs SAC and a key corridor connecting the Natura 2000 sites of the Sugar Loaf, The Glen O’the Downs and the Wicklow Coastal Natura 2000 sites. It should be prioritised for awareness, protection, environmental monitoring, and restoration / re-wilding as a native riparian wooded (oak) wildlife corridor to the maximum extent possible. • Please identify, map & zone all Wicklow River Corridors & Wetlands for Protection (Waterford last 2 County Development Plans provide a good example). Please state Wicklow policy to facilitate restoration of the natural connectivity, flow and condition of the rivers wherever reasonably possible, to include completing the removal of unnecessary obstacles / weirs and encouraging fencing / drinking solutions to keep livestock physically back from poaching the river bank, while also preventing overgrazing by livestock and wild animals and allowing re-wilding / native re-forestation • Please state Wicklow policy to work closely with LAWPro, EPA, NPWS and IFI to support local communities, land-owners, River Trusts and Tidy Towns groups to protect rivers and re-connect the community to their local lifelines. • Please study the creation of a new zone type "Land reserved for Nature including Climate & Biodiversity Natural Solutions" and the zoning of Wicklow Rivers and a corridor 50m each side of each river. This could be piloted on selected rivers such as the Three Trout’s Stream and The Swan river in Bray. If successful it could be applied to the zoning of other Uplands as well as the Rivers/Wetlands. • Please further study the option of purchasing (CPO) of these River Corridors for protection, restoration and re-wilding, and call on the Irish Government and other
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	<p>interested Corporate Stakeholders to provide a "Purchase for Rewilding" Fund, as the New Zealand Government have done for their bogs / wetlands.</p> <ul style="list-style-type: none"> • Please plan to work with Delgany and County Wicklow Stakeholders to appropriately commemorate the Millennium anniversary of the Battle of Delgany (1021 / 1022) and enact the events. Such a Heritage Festival could be extended to include the celebration of 1,500 years of Delgany Village and 5,000 years of settlement in the Glens and the Valley of the Three Trout Stream (including its Neolithic and Bronze Age Hillforts). • Make more use of dark sky zones and quiet zones • Protect rivers, wetlands, trees, hedgerows and ecological networks • Consider sustainable agriculture and zone good quality soils on the edge of towns <p>(9) Flood Management</p> <p>Please specify that Natural Flood Management Solutions (for Rivers and Streams) must always be tried as the first priority before hard engineering Flood Management solutions</p> <p>(10) Community Development</p> <ul style="list-style-type: none"> • Delgany has expanded with no additional provision in terms of community facilities. • Play space: There is no local play area and young families are obliged to drive to Greystones to avail of play facilities. There is a need for a large open, wild play area in which children and older people can play, walk and engage with nature. • Heritage/Culture/Arts centre: The area is rich in heritage and history yet we have no space in which to explore and preserve this heritage. There is a need for a heritage/community/cultural space to showcase the history of our area as well as displaying artefacts. As an example, there was a find of historical objects at Rathdown last year, the items found were never displayed locally and we assume that they have been archived only to be seen by researchers. • Additional Childcare spaces: The way in which audits of available childcare places are conducted needs to be reviewed, perhaps with oversight from or consultation with Wicklow County Childcare Committee. Stated distances of developments from existing developments need to be verified. At present an audit of childcare provision is triggered when a development has in excess of 75 housing units. There is a need to examine the impact of cumulative development on local provision as there are instances of multiple, phased developments which may be planned to circumvent the requirement for an audit of childcare provision. • There is no community childcare facility locally. Parents need to be able to access affordable, high quality childcare in order to facilitate their return to education or to the workforce. • A suitable premises for our local Family Resource centre: The Greystones Family Resource centre is in urgent need of appropriate accommodation. The current premises is too small and means that activities are curtailed while demand for their service increases. • All new developments should be landscaped with biodiversity and natural play spaces in mind. This is particularly important if density is to be increased and the concept of the private back garden eroded. We welcome the continued focus on permeability and connected developments which allow ease of access to pedestrians and cyclists.
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- We need additional provision for older adults as well as people with disabilities in order to provide secure and suitable accommodation. Supported living should be encouraged and incentivized-small bungalows or apartments with some onsite supports.
- Access to local amenities should also be provided for those who are older as well as those with disabilities. We do not have any wheelchair access to the sea. Public toilet facilities in Greystones are very limited. We believe that Greystones has long stretches of pathways by the sea, very conducive to wheelchair use. This facility would be greatly enhanced by the provision of a Changing Places toilet facility locally.
- Residential and daycare facilities for those with dementia are very limited and are not secure due to insufficient funding. This needs to be addressed.
- There is a delay in the provision of educational facilities with decisions being delayed until the situation has reached crisis point. There is a need to ensure that sites zoned for education are passed to the Department of Education as early as possible so as to avoid unnecessary delays.
- Some parents are experiencing difficulty in accessing early years provision due to huge demand locally
- Due to huge rental costs most Wicklow based students who attend college in Dublin will opt to remain living at home. Their commutes are lengthy, bus and dart connections need to improve as a matter of priority.
- We need to make provision for young people who are not attending school. In some cases an alternative provision might be made. DDLETB provides an alternative learning programme, similar is needed locally.
- In Delgany on the Carmelite Convent site. There is an excellent opportunity to develop a suite of community facilities like a heritage centre, open play space and equipped playspace.
- At the site of the old bandhall in Delgany - plenty of scope to develop a green space that is sympathetic to its natural setting. Its proximity to local schools would mean it could be used as a resource for teaching and learning about biodiversity.
- A river walk with local access could be developed as part of any development at the Stylebawn site in Delgany, it would enhance amenities for locals as well as being a welcome addition to any development which might take place at the site.
- Identify available land in areas with a good population base, require developers to set aside an area of land as part of any planning application in the vicinity.

Transportation and Infrastructure

- As population has increased we have seen a worsening of public transport options in the Delgany/Greystones area. When DART services to Bray improved, this happened at the expense of the service to Greystones, all at a time of ever increasing demand.
- Provide a local loop bus service, this could be done on Chapel Road in Delgany. The road between Delgany and Blacklion is adjacent to 5 schools with a school-going population of about 3,000 pupils. A local service has been proposed in the Bus Connects plan but it may be a low priority for that system which is very focused on provision of arterial routes to the city.
- Safe cycle routes need to be provided to encourage cycling. A cycle project officer in

	<p>the Council would be a welcome addition.</p> <ul style="list-style-type: none"> • Park and Ride on N11 with bus lanes and a shuttle to connect rapid bus service on the N11 with the DART station • Park and Ride on N11, interchange at Loughlinstown as against the Bus Connects proposal to provide same at Bray DART station. How can the traffic delays in Bray town centre be solved? • We need connections to the Luas • Commission an audit of walking and cycling routes to local schools. Identify and document safe routes with appropriate crossing points if needed. Allocate resources to local schools to develop safe routes to schools. Refer to NTA, provide bike shelters and cycling lessons in schools in conjunction with the Local Sports Partnership • When schools are on holiday there is a significant reduction in traffic • There are areas in Delgany where adjacent development has made connection to a public foul sewer possible. Unfortunately the fees charged by Irish Water are prohibitive. The council should examine some sort of subsidy to make connection possible and to minimise the possibility of polluting a water course. There is sufficient capacity in the system to allow such connections. While this is no longer the remit of the council, planning applications could include conditions to facilitate such connections. • It is worth noting that if the orange/pink routes (N11/M11 SCHEME) go ahead there is a high likelihood that the hydrology and aquifer will be impacted so people in the area who rely on well water will be affected by this proposed development. <p>(11) Environmental Assessments</p> <ul style="list-style-type: none"> • A scheme to identify and protect river systems, wetlands and boglands • A census to take account of biodiversity with specific focus on ecosystems, rare and protected species. An audit of development schemes post construction to confirm whether environmental impacts/requirements outlined in the planning application have been adhered to. • This topic needs careful consideration, if building is allowed in close proximity to an existing floodplain there are implications. We need holistic assessment. • The independence of the process through which Environmental impact statements, architectural and archaeological assessments are conducted needs to be ensured. Such assessments are commissioned by developers, sometimes in response to a planning office request. They are paid for by developers on whom the agencies who conduct the assessments rely for further business. We need to be sure that such assessments are always conducted without favour, fear or bias. Perhaps this can be done through some form of independent sampling and oversight.
<p>East Coast Regional Drugs and Alcohol Task Force (C29)</p>	<ul style="list-style-type: none"> • The East Coast Regional Drugs and Alcohol Task Force looks for and supports the provision of a community facility within the Greystones MD Area large enough to accommodate our services and other groups providing a range of 'care in the community' services to vulnerable members of this community who need it. This facility will need to be affordable, accessible and suitable for a range of directly provided services. • This Task Force is attempting to expand and deliver services in the Greystones Municipal Area in direct response to requests made and needs already identified and being further researched. We are attempting to provide direct services to individuals, families and communities affected by drugs including alcohol across

	<p>the region. We have found bases in both Arklow and Wicklow town at rents and venues which are affordable, accessible and suitable to do this work. Our services link directly with others, including but not exclusively homeless services and mental health services. Ideally, a facility which could accommodate these and other service also would be very useful to the users of such services.</p> <ul style="list-style-type: none"> • However, we can find no specific premises in the Greystones Municipal area where we can do similar work which are similarly affordable and accessible. As Greystones town has the second highest population in Wicklow (per Census 2016) and with its continuous and large scale housing developments at this time, it is vital that we establish a presence and service in or around this particular town. Previous contact with Wicklow County Council (WCC) and the Town Secretary has yielded no results and we have been told that no plans are in place to change this at any stage in the near future. We are prepared to provide services which are free and confidential to this community for those directly and indirectly affected by drug (including alcohol) misuse. We urgently need WCC to help priorities and source suitable facilities for such services in this region. • From consultation with other providers (e.g. Family Resource Centres, Homeless Service providers and not-for-profit counselling providers) a need for a dedicated space for a range of 'helping services' for those affected adversely by issues beyond their control and services willing to provide care in the community is a must. From our perspective, services which could be provided NOW could include: Information education and advocacy support; Rehabilitation and aftercare support; Support for family members affected by another's drug/alcohol use; Counselling and other relevant therapeutic services. • We urgently ask that you consider carefully the provision of such services in all Municipal Area and particularly large towns like Greystones with a range of these and other 'care in the community' services possibly sited under one roof to assist all ages and needs. A multi- purpose community centre accommodating a range of resource providers in close proximity to each other would enhance the socio-economic benefits of this large town, Greystones, and its rapidly expanding population size.
<p>Karen Cowen (D3)</p>	<p>There should be a proper bike path on Greystones main street. Church lane, Greystones should be a one way street with proper pedestrian path and bike path for the full road. We walk or cycle to school and a fatality is very likely. Cars drive fast, lots of traffic, if children can cycle to school safely there will be many fewer cars on the road and healthier children.</p>
<p>Keith Scanlon (D12)</p>	<ul style="list-style-type: none"> • Expresses full support for the submissions of Wicklow Planning Alliance and Delgany Community Council • Please strengthen the awareness and protection of the Glen O'the Downs [SAC] Nature Reserve, the jewel in the crown of Wicklow nature. • Set policy to monitor and manage the largely-forgotten western section of the Glen nature reserve and re-connect it to the Eastern section via a number of wildlife bridges over the N11 / M11 and underpass tunnels where suitable. • Please identify, in the County Development Plan, the complete Three Trout's Stream River System as a County Wicklow (Climate and Biodiversity) nature reserve. It is, in effect, an extension of the Glen O'the Downs SAC and a key corridor connecting the Natura 2000 sites of the Sugar Loaf, The Glen O'the Downs and the Wicklow Coastal Natura 2000 sites. Please prioritise it for awareness, protection, environmental monitoring, and restoration / re-wilding as a native riparian wooded (oak) wildlife corridor to the maximum extent possible • Please study the creation of a new zone type "Land reserved for Nature including Climate & Biodiversity Natural Solutions" and the zoning of Wicklow Rivers and a

	<p>corridor 50m each side of each river. This could be piloted on selected rivers such as the Three Trout’s Stream and The Swan River in Bray. If successful it could be applied to the zoning of other Uplands as well as the Rivers/Wetlands.</p> <ul style="list-style-type: none"> • Please state Wicklow policy to protect all remaining mature trees and established hedgerows (since they are essential in tackling the climate and biodiversity emergencies). Please plan how best to educate Schools and all Stakeholders about the value of trees and the place of trees in our native Celtic and pre-Celtic Culture including the Brehon Laws. • Strengthen the awareness and protection of the ridge of Scotts Pine trees known as Harmon's Brow / The Dancing Trees on the brow of Drummin Hill just South of Delgany Village • Please plan to work with Delgany and County Wicklow Stakeholders to appropriately commemorate the Millennium anniversary of the Battle of Delgany (1021 / 1022) and re-enact the events. Such a Heritage Festival could be extended to include the celebration of 1,500 years of Delgany Village and 5.000 years of settlement in the Glens and the Valley of the Three Trout Stream (including its Neolithic and Bronze Age Hillforts) and a re-discovering / re-connection of our Brehon Laws with their progressive measures on protecting nature, protecting communities, diversity and inclusion. • Flood Management: Please specify that Natural Flood Management Solutions (for Rivers and Streams) must always be tried as the first priority before hard engineering Flood Management solutions.
Igor Cusack (D14)	<p>The rapid development of Greystones, and other towns down as far as Arklow, has not been matched by adequate provision of infrastructure. There is an urgent need to improve rail and bus services to reduce the need for commuting by car to Dublin. A more frequent Dart service is essential and more and longer trains to and from the commuting areas in the south of County Wicklow. Twin rail tracks are needed where possible and the extension of the Luas to Bray. This would be an expensive programme but might be less so than the proposed N11/M11 improvements. Land should only be zoned for housing where adequate public transport is available.</p>
Yasmin Fortune (D15)	<ul style="list-style-type: none"> • Please prioritise the protection of the incredibly beautiful, ancient, and extremely special area of Glen of the Downs, Downhill Bronze-Age Hillfort, Coolagad Bronze-Age Hillfort, Bellevue Demesne, Toll-Road/ Norman Path, Woodlands Church, Three Trout Stream and Delgany Historical Village. Please commemorate the 1022 Battle of Delgany and honour the importance of its location in the valley of the Glen of the Downs, and the strategic settlements of Ugaire King of Leinster on Downhill, and Citric King of Dublin on Coolagad. • Please conduct extensive archaeological investigation into this special area. Please prioritise the open-to-the-air nature of the Three Trout’s stream and other streams and rivers in the county in order to protect the flourishing of biodiversity. • Please honour the historic importance of the remains of the Georgian gardens at Bellevue estate and the importance of Bellevue Demesne as wildlife habitat for red and amber listed species.
Tricia Cusack (D23)	<ul style="list-style-type: none"> • I live in Greystones and after attending the public consultation evening there on 13 November 2019 and seeing that this town is slated for growth, I have to say that this is worrying on several counts. There seems to be very little local control over what is becoming a chaotically 'planned' area where growth means an agglomeration of estates with identikit houses and fairly barren green areas to compensate for a lack of decent gardens. The current plan of Greystones shows a shocking lack of public green space (and golf courses do not constitute public space). • Transport issues: Cars block and choke Church Road several times a day; traffic and air pollution needs to be taken seriously.

	<ul style="list-style-type: none"> • Greystones has a dog faeces problem - most people try to clean up their pet's mess but there are so many dogs it only takes a small proportion of antisocial owners to ensure the promenade and the cliff walk towards Bray - and already the new path over the coastal park! - are permanently soiled. • Solutions? <ul style="list-style-type: none"> ○ Proper planning for a healthy and pleasant town to include more public green and biodiverse space with trees and bushes not just lawn; more imaginative estate design - look at garden suburbs such as Moor Pool in Birmingham. ○ Car-free days? Difficult but should be considered. ○ Council should ensure serious consideration given to having DART extended? ○ Re dog faeces problem, in short term dog wardens, as a deterrent; long-term look at other European solutions, including DNA records. • I would like to raise one last issue. The council seems to have a policy of replacing any broken street lights with white (daylight) LED lighting. This has been proved to disrupt sleep rhythms of humans and to disturb wildlife. If the council wants a healthy population and a green environment, not only should this policy be modified but existing white LEDs should be replaced.
<p>Tessa Stewart (D26)</p>	<ul style="list-style-type: none"> • Supports the submission made by the Wicklow Planning Alliance and Delgany Community Council and from the Green Party. • Regarding the N11/M11 proposed development, it is important that we value our amazing heritage and prospects in this magnificent setting. The proposed routes would seriously damage the biodiversity of the area, resulting in habitat loss for Protected Species including the red-list barn-owl, yellowhammer, grey-wagtail and woodcock, a vast number of amber list birds and mammals including the red squirrel, the red deer, the pine marten, the red fox, the badger, the hedgehog, the long-eared owl and many others, and the destruction of Ancient Oak Woodland and the ancient Three Trout’s Stream; ancient sites of archaeological significance such as the 5000 year old Hillforts of Downshill and Coolagad and equally ancient toll-road, and the 1750s historical Georgian La Touche estate are at risk; The 7th Century monastic village at Delgany and the physical outline of the 12000 year old glacial valley - an untapped Culture and Heritage tourism asset are threatened. This area is important locally, nationally and globally! This is part of our world heritage. • Otherwise we get suburban housing estates built right up to the edge of significant ancient castles, like with Kindlestown Castle which is completely surrounded by an estate in Greystones/Delgany, and no-one knows it is even there. It could be part of a nearby new hiking trail if the surroundings were not so dismal. We cannot market our ancient east if we treat it so badly. • Strengthen the awareness and protection of the Glen O’the Downs Nature Reserve, the jewel in the crown of Wicklow nature. Set policy to re-connect the largely-forgotten western section of the Glen nature reserve and re-connect it to the eastern section via a number of green bridges. Please identify the complete Three Trout’s Stream River System – the ancient lifeline which created and still flows through the Glen - as a County Wicklow (Climate and Biodiversity) nature reserve and prioritise it for awareness, protection, environmental monitoring, and restoration / re-wilding wherever possible.
<p>Marie Demirsay</p>	<ul style="list-style-type: none"> • The IDA site: Preserved for forestry and wildlife as we need to protect and maintain

(D44)	<p>the current inhabitants on this important site especially as we have very limited spaces in the Greystones area to do so.</p> <ul style="list-style-type: none"> • Proposed Greenway should not be allowed to go ahead as the Delgany Greystones river walkway is the only connected biodiverse belt left and this should not be altered in any way and only enhanced as a protected wildlife belt. • Recycle plastic bins on beach at south beach, cove, harbour, diving board area. • Green spaces/animal habitats should under no circumstances be further compromised and/or diminished as we have already lost so much as a result of over development in the Greystones and Wicklow area. • Pollinator host plants, no pesticides anywhere in Greystones. • Bike depot outside Cafe Gray should be moved and delivery vans should have 7 mins time frame. • The Glen of the Downs is a protected Nature Reserve and should not be altered or infringed on in any way to expand the dual carriage way - alternative ways to deal with the traffic must be found; it has been compromised enough already in the past.
Laili de Buitlear (D47)	<ul style="list-style-type: none"> • The County Development Plan should encourage the re-use of historical buildings such as the catholic Carmelite church that has just closed in Delgany. This could be a lovely concert hall and lecture venue for education of young and old. In these grounds is the walled garden with lovely trees and shrubs. This is the only green infrastructure in the village of Delgany along with the old burial ground – which is a heritage area since 2007. • The other important area in Delgany Village is Stylebawn House and lands which are up for sale. This house was for 30 years owned by John Gaisford St. Lawrence and the Howth family. This house was open to the village and public during the summer months every year and at certain bank holiday weekends. The gardens and trees are still standing; the house needs lots of repair and has planning permission for added living accommodation. This could be an open green area infrastructure so central to the village. This should not be let go to ruin and it should be taken over by Wicklow County Council. • Delgany Village, Blackberry Lane, Belleview estate (now golf course) should be considered a 1st class protected heritage village and protected against new development.
Billy Timmins (D49)	<p>Greystones/Delgany - Green spaces, including sporting facilities, should be protected from development pressures. Signage, demarking the various areas, needs to be enhanced. The provision of a “viewing point” with limited parking north of the Grove cemetery, off the R761, should be considered.</p>
Michael Hayden (D56)	<p>The Greystones Family Resource Centre was founded in 2002 to offer help and advice across a range of issues that affect individuals and families in the communities of Greystones, Delgany, Kilcoole and Newtownmountkennedy. We support everyone, regardless of their socio-economic situation, particularly those who may not have a voice. We work to limit disadvantage and social exclusion. We work with a wide range of stakeholders right across the county, including the PPN, CYPSC, Wicklow Sports Partnership, Music Generation, Community Gardai, Residents’ Associations, Tusla, East Coast Taskforce, the HSE, local schools and community groups. The GFRC has been involved for several years in the work to bring the Jigsaw Youth Mental Health service to Wicklow.</p> <p>The GFRC offers a range of supports to the community:</p> <ul style="list-style-type: none"> - Play therapy is provided at a low cost for 3-18 year olds. It works to help children safely work through their emotions and improve behavioural issues and relationships. - Low Cost Counselling for children, teens and adults. Counselling is valuable as an aid to personal growth. It is of particular relevance in times of crisis or transition and can also be a help in problem solving.

	<ul style="list-style-type: none"> - Domestic Violence: The GFRC works in partnership with the Bray Women’s Refuge. Our community based domestic violence service, part-funded by the Department of Justice works with women, men and children who are victims of domestic violence by providing support in the following areas: - Rainbows Programme: This is funded by Tusla and facilitated by GFRC volunteers, supporting children affected by bereavement or parental separation. We are supported in this work by St Laurence’s National School, who provide space for the programme. - Community Education: We work with the KWETB and volunteer tutors to deliver community education to those living in our catchment area - Community Groups: We support a number of community groups and organisations - Community Events: We support the local community in the organisation of a range of events throughout the year. These provide an opportunity for people to come together in a relaxed setting - Summer Project & Holiday Activities: We run a summer project and holiday activities for local children <ul style="list-style-type: none"> • The Greystones Family Resource Centre offers a strong community based infrastructure for delivering programmes and engaging with the local community to provide services and initiatives that meet local needs. The GFRC offers expertise, community knowledge and a safe space for anyone who wants advice, support or onward referral. • The County Development Plan (CDP) should identify the infrastructure needed for specific population sizes as in the previous plan. • For example, a town the size of Greystones, the second largest in the county (Census 2016) should have a Multi-purpose Community Resource Centre, which has not been delivered in the life of the previous plan. A strategy should be put in place to ensure that the infrastructure is delivered rather than simply listed. This is even more urgent, with the continuing expansion of the population in the greater Greystones district since 2016. • We would like to see a large multi use community/resource centre that is for the primary use of the community. This centre could be used to house a number of community groups (FRC, men’s sheds, youth groups, other community groups) and used to host agencies and organisations from outside the Greystones area, resulting range of services and supports to the community. • The centre could also utilised as a space for all ages and needs within the community to gather throughout the day for toddler groups, community groups, courses, after-schools, youth cafes and so much more. Similar spaces have been established in areas such as Bluebell where the Bluebell Community and Youth centre and the F2 Centre in Fatima which both offer fantastic spaces and opportunities for the whole community. • We are working to our limits in the space we have here in Burnaby Court and the spaces we can rent for larger activities. • However, we have no room to expand and grow alongside the growing community. Before long, the community will develop issues that we could help address if we had the space and the capacity. A dedicated community space could not only be used and run by the FRC but also shared with other community groups, organisations and stakeholders within the wider community. It is important that the community services and supports, like those we offer grow and develop alongside the community and its needs. At the moment, the population of Greystones is growing at a much faster rate and we would like to see issues being addressed early rather than waiting for problems to occur.
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	<ul style="list-style-type: none"> • It is important to us that any community space in Greystones is open and accessible to all community members. That there are facilities included which support anyone with limited mobility, that have young children, is on good transport routes etc. Therefore, a community/resource centre in Greystones should be able to offer ground floor access, private/quiet areas for counselling or play therapy, a space where people can wait for their children who might be attending our services, a large multi use space such as a hall that can be used for larger groups, office space, storage space, open space where members of the community can come and socialise and share a coffee/tea with each other and the workers, space that the young people of the community can have ownership of and that is for their sole use, outdoor space (grass area, allotments, workshed space), parking and the facilities to offer a wide range of varied opportunities to the community. • If we were able to bring a number of groups and organisations in the community together then we could really foster a space that is open and welcoming, that supports people in the community from womb to tomb and where we are all working together towards common goals. • There is an onus on the County Development Plan to ensure that land use is strategically managed in such a way that it promotes equity across social groups in terms of access to community infrastructure and services. This includes equality proofing planning, housing, infrastructure and economic development. All socio-economic development in the county should be guided by community development principles. • Communities need to find more and new ways of developing social outlets which bring people together and reduce isolation. This means developing and maintaining local facilities and services as much as possible. These spaces must be accessible to all hence transport and affordability must be factored into development. • The plan should include a focus on the use of primary and secondary school buildings for community use, particularly since many families in localities have fundraised and paid for their development/upkeep. • The plan should incorporate policies which fully support the ongoing improvement in the provision of Community Facilities, Education, Childcare, Arts and Culture and facilitates and complements the implementation of the forthcoming Local Economic and Community Plan. • The cultural and natural heritage of the county must take priority over short term economic gain. Community facilities should be integrated with environmental and cultural amenities to provide a more strategic and cohesive approach to community development in the county. • The county development plan can support accessible arts in the community by continuing support for and increasing resources to the voluntary and community sector for art and culture initiatives. • The County Development Plan should continue to include high level goals to ensure the provision of adequate community and social infrastructure as well as providing open space for recreation, environmental and civic benefits. The Greystones Family Resource Centre and multi-use community space should be considered a core part of support infrastructure in the county and should be provided with adequate space and resources to contribute to continued sustainability and community development in the county.
<p>Sarah Mac Artain (D72)</p>	<ul style="list-style-type: none"> • Greystones is currently seeing a massive growth in population and with the development of new housing. What are being missed at the moment are open and accessible community spaces, spaces that are run for the community, by the community. Such spaces should be available to all, and be particularly welcoming to those at risk of disadvantage or social isolation. Currently there are a small number

	<p>of rooms that are used by the community however these spaces are small or privately owned/run and come with rental costs. This means that there is no one, multi-functional space that provides wraparound support for the community. The Community Facilities Hierarchy model in the 2016-2011 County Development Plan for Wicklow states that given the population of 18,140 (2016 census), a Community and Family Resource Centre facility is considered necessary in the Greystones area.</p> <ul style="list-style-type: none"> • We would like to see a large multi use community/resource centre that is for the primary use of the community. This centre could be used to house a number of community groups (FRC, men’s sheds, youth groups, other community groups) and used to support agencies and organisations from outside the Greystones area bringing a wider range of services and supports to the community. • The centre could also utilised as a space for the community to gather throughout the day for toddler groups, community groups, courses, after-schools, youth cafes and so much more. Similar spaces have been established in areas such as Bluebell where the Bluebell Community and Youth centre and the F2 Centre in Fatima which both offer fantastic spaces and opportunities for the whole community. • Currently Greystones FRC is situated in a small bungalow in Burnaby Court. Here, our work is restricted by the limitations of the building. There is no space to host groups or anything where there are more than 8 people in attendance. • The house does not offer the privacy that some of our more sensitive work requires. We are looking for a new home, one which would allow us to expand our work, offer more opportunities to the community which include employment, education, community development groups and courses We would also be able to expand supports for individuals, family support, counselling, youth mental health services (space for Jigsaw to offer their services from) and play therapy. • We are working to our limits in the small space we have in the house and the spaces we can rent for larger activities. • However, we have no room to expand and grow alongside the growing community. Before long, the community will develop issues that we could help address if we had more space and more capacity. A dedicated community space could not only be used and run by the FRC but also shared with other community groups, organisations and stakeholders within the immediate and wider community. It is important that the community services and supports, like those we offer grow and develop alongside the community and its needs. At the moment, the population of Greystones is growing at a much faster rate than the provision of community supports. • We would like to see issues being addressed early rather than waiting for problems to occur. • It is important to us that any community space in Greystones is open and accessible to all community members. Facilities should support anyone with limited mobility or those with young children. • A community space must be on good transport routes and have adequate parking • Therefore, a community/resource centre in Greystones should be able to offer <ul style="list-style-type: none"> ○ ground floor access ○ private/quiet areas for counselling or play therapy ○ a space where people can wait for their children who might be attending our services ○ a large multi use space such as a hall that can be used for larger groups ○ office space ○ storage space ○ open space where members of the community can come and socialise ○ space that the young people of the community can have ownership of
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	<ul style="list-style-type: none"> ○ outdoor space (grass area, allotments, workshed space) ○ parking • If we were able to bring a number of groups and organisations in the community together then we could really foster a space that is open and welcoming, that supports people in the community from womb to tomb and where we are all working together towards common goals. • Please see the Bluebell CDP website https://bluebellcdp.ie/ or the case study of Fatima Groups United FRC (the F” Centre) in ‘Sustainable, Inclusive and Empowered Communities’ the new 5 year government strategy supporting the community and voluntary sector for examples of what could be achieved in Greystones.
<p>Ciara King (D79)</p>	<ul style="list-style-type: none"> • In the Greystones area it seems that huge amounts of housing developments have been granted planning and have been built/are coming on stream in the last number of years without any of associated infrastructure being considered properly. The roads have not been improved or widened, none of the public transport has been increased. This is impacting negatively on the area – traffic has increased hugely, the condition of the roads around these new developments are terrible, school places are impacted – these are all areas that can and should be planned for in advance of building new developments. There should be a strong focus on sustainability – looking at designated cycle paths/ways, good footpaths. • There is a vital need to reduce reliance on car-based travel and to ensure more sustainable patterns of travel, transportation and development. • The Council should work with the NTA and national government to ensure that the public transport is upgraded and increased before new housing developments commence. More park and ride facilities, increased service from Greystones Dart station, more carriages on the Wexford train, better bus services.
<p>Anita Tuesley - Wicklow Planning Network (D89)</p>	<ul style="list-style-type: none"> • Greystones-Delgany is not a large economically active town that provides employment for surrounding areas. It does not have high-quality transport links. The Dart needs expansion and we need a variety of different Bus services and a transport strategy that gets people out of their cars on the N11 and onto public transport. Greystones- Delgany is not therefore a “Key Town” as defined in the National Strategy. • Greystones- Delgany is not a “Self-Sustaining Growth Town” as defined in the National Strategy. It does not have good transport links or capacity to become more self-sustaining. • Greystones- Delgany has very high levels of population growth but a weak employment base. It is reliant on other areas for employment. • We do not think Greystones- Delgany has the capacity to sustain more housing growth because its employment base and public transport infrastructure is very weak. See the submission we made on the proposals for the N11M11 upgrade.
<p>Cairn Homes (D101)</p>	<ul style="list-style-type: none"> • Cairn Homes have delivered circa 250 new homes over a 3 year period in Greystones, Co Wicklow, and have sought planning permission for an additional 780 new homes over two sites also in Greystones. In addition, Cairn Homes own additional land in Greystones, Blessington and Enniskerry with capacity to deliver c.1,200 new homes over the lifetime of the new County Development Plan. Cairn is committed to working with Wicklow County Council in the delivery of these much-needed new homes together with the associated infrastructure necessary to deliver new communities with improved and high-quality amenities. • Cairn are conscious that a large proportion of the Greystones working population travel outside the town for employment. Given its location and good public transport links to Dublin, a significant number of people commute to the capital on a daily basis. Whilst it is located within the boundary of the Metropolitan Area as defined by the RSES, Cairn feel that there is potential for it to meet the needs of

	<p>residents through the provision of a wider range of services and employment opportunities within the town. In addition to the significant number of new homes that Cairn can deliver in Co Wicklow, they also own 6.6 Ha of employment zoned land in Charlesland, Greystones. This land has the potential to deliver significant employment opportunities for new and existing communities in the wider Greystones area. Cairn have estimated these lands could accommodate c. 1,500 jobs in Greystones.</p> <ul style="list-style-type: none"> • In this regard it should be noted that Cairn have applied for planning permission for a 1,356sqm Community Enterprise Centre and 1,376 sqm Office building as part of a SHD application to An Bord Pleanála which is currently under consideration. If granted planning permission, the proposal has the potential to create a valuable resource for small local start -up companies and industries which we anticipate will stimulate much larger employment opportunities for the wider community. Such developments, together investment and improvements to both the N11 and Dart will further enhance Greystones and create an attractive place not only to live but to work also which would represent a much more sustainable community and efficient use of public infrastructure. • Greystones therefore meets the definition of "<i>Self-Sustaining Growth Towns</i>". • In line with the above set out hierarchy, Cairn believe that Greystones should be promoted for population growth. Greystones, given its location along the Dart Line, proximity to Dublin and availability of services should be targeted for population growth in line with the policies of the National Planning Framework and RSES. The NPF encourages the concentration of development along public transport corridors, particularly rail corridors, and the consolidation of development within the metropolitan area. • Proposed upgrades to the N11 from Junction 4 to Junction 14 have recently been placed on public display and it is understood this project will likely progress, subject to planning, during the lifetime of the next development plan. These proposed upgrade works are welcome and will address the significant traffic delays experienced along the N11 particularly at peak times. However, there is also a requirement to improve public transport connections within Wicklow to help encourage more sustainable modes of transport. • While Greystones benefits from its location along the Dart line, the rail line remains a single line into Greystones which limits capacity on the line. Cairn is aware that the upgrading of the rail line has long been an objective of both CIE and Wicklow County Council. We trust Wicklow will continue to pursue the upgrading of the train line with a view to increasing capacity for Greystones and other towns in Wicklow located along this vital rail corridor. The park and ride facility at Greystones is also at capacity and we would suggest that consideration should be given to enhancing the park and ride facilities in Greystones. • Interconnectivity between different forms of public transport, and modal choice is essential in encouraging more sustainable modes of transport. Wicklow generally is underserved by bus services. Greystones is served by two bus routes; 84A which runs approx. once an hour and 84X and express service which runs at peak times to Dublin. A more frequent service which connects which Greystones and Bray rail stations would greatly improve connectivity in Greystones. All the towns would greatly benefit from improved bus services within the towns and to connect to other nearby large towns. We are aware public transport is outside the remit of Wicklow County Council but would encourage the Council to work with TII to improve services to these towns. • Public amenities and investment in green infrastructure can greatly enhance the amenity and quality of life within towns. In Greystones, Wicklow County Council
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	<p>have developed the first phase of a greenway which will eventually connect Greystones and Delgany. Cairn hope to deliver the second phase of this greenway as part of the proposed development at Farrankelly which is currently under consideration by An Bord Pleanala. The greenway is a fabulous amenity for Greystones, and something which could be replicated throughout the county.</p> <ul style="list-style-type: none"> • For the most part Cairn is focused on the delivery of new homes. However, in both Greystones and Blessington, Cairn own land which is currently designated for commercial and employment uses. Cairn recognises the importance and benefit of facilitating employment opportunities in close proximity to new residential developments and have included approx. 2,600sqm at Charlesland, Greystones as part of the live planning application. • The nature of the Irish economy has changed dramatically in recent years and will likely continue to evolve over the lifetime of the new development plan. There has been a move away from industrial and manufacturing uses which required large units, towards a service economy based in open plan offices. Office based uses have a much higher jobs yield per sqm of commercial floorspace than industrial or manufacturing uses. This may reduce the requirement for the quantum commercial or industrial zoned land, particularly in peripheral locations. As mentioned above Cairn own 6.6ha of commercially zoned land at Charlesland, Greystones. As part of the current planning application, Cairn undertook research into the changing needs of industries and potential employment generated per sqm. This highlighted a potential need for Wicklow County Council to review the economic policies contained within the development plan to ensure they support the move towards office-based employment and are sufficiently flexible to accommodate a rapidly changing economy. • For example, in Greystones there is an objective to accommodate 660 jobs on the 6.6ha of commercial zoned land owned by Cairn. Based on a plot ratio of 0.5, it is estimated the site would yield approx. 33,000sqm of commercial floorspace. This equates to an employment density of 50sqm per employee. This density would normally be associated with manufacturing and warehouse uses. In contrast office based uses generally require 12 - 30sqm per employee, based on Home & Communities Agency (2015) Employment Density Guide. In Greystones, we estimated the 6.6ha of commercially zoned land would accommodate circa 1,500 jobs between both office and warehouse based uses. This yield far exceeds the employment target for the site in the current development plan. • Consideration should be given to the requirements of different industries; the types of employment and the number of jobs Wicklow can reasonably support in the development of these policies. Policies and zonings may need to be reviewed to ensure targets and yields are realistic.
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Response of Chief Executive

Clearly a lot of time and effort has gone into these very detailed submissions, which contains many excellent ideas and the CE welcomes such active participation from the public.

Unfortunately a number of the suggestions are not relevant to the County Development Plan, with many of them being related to the operations of the Council, the Council’s programme of works / capital programmes, development levies or budgetary matters, purchasing of land; many also relate to activities of other state agencies. The role of land use plan is to put in place a framework within which development can occur, but does not decide what works actually get done, by either private individual or public bodies. The delivery of objectives is determined by the initiation of private development or by the allocation of public funding which is a separate process to any land use plans. Development

contributions and commercial rates are not matters for the County Development Plan nor is the disposing of land.

In addition, a significant number of the suggestions that *are* relevant to a development plan are Greystones - Delgany specific and would therefore be more relevant to the Greystones – Delgany - Kilcoole Local Area Plan, which is not under review through this process.

A number of the suggestions made are already included in either the County Development Plan or the current Greystones – Delgany - Kilcoole Local Area Plan and what is now required is an implementation programme and securing of necessary funding by the various departments of the Council / Greystones MD / other state agencies to secure delivery.

With regard to various points raised:

(1) Role of Greystones – Delgany / settlement strategy

The issues raised with respect to the role of Greystones – Delgany, and the RSES and its application to Greystones - Delgany are noted; the new plan will as required accord with the provisions of the new NPF and RSES, in particular in the new Core Strategy and settlement / growth provisions (for more detail please see the proposed Core Strategy set out in Part 2 of this report and Section 4.3.1). These provisions will then be applied at the local level in the preparation of the next LAP for Greystones – Delgany.

(2) Development strategy within Greystones – Delgany / zoning

This is addressed in the Greystones – Delgany LAP, which is not under review as part of this process.

Upon adoption of the new County Development Plan, which will set out new development principles and growth priorities for the County in accordance with the provisions of the NPF and RSES, the Greystones – Delgany LAP will be reviewed, and altered / enhanced as required.

This will likely entail a review of the current development strategy within the town and will address the issues raised submissions around the quantum and location of zoned land, compact growth, density, mix of uses in the town centre, public realm improvement, walking / cycling infrastructure, dereliction / brownfield redevelopment.

With regard to ‘distinct identity’ of Delgany and the suggestion that Delgany be considered separately to Greystones in development plans, Delgany has been historically associated with Greystones in a planning policy perspective for some time, and the two settlements are strongly linked both physically and in terms of shared services (water services, roads, schools, telecoms, higher order shops, etc) and communities. In light of this long standing connection, the ‘settlement’ of ‘Greystones’ as identified in the Regional Spatial and Economic Strategy as a settlement in the metropolitan area, is considered to include both Delgany and all other areas located within the boundary of the Greystones - Delgany Local Area Plan (such as Killincarrig, Blacklion and Charlesland). It is not clear from the submission if what is being sought is a separate local plan for Delgany, and / or its ‘separation’ from the wider settlement of Greystones in terms of population targets, planning policy etc. It is considered that Delgany has much better prospects for improvements in services being identified as part of a larger settlement, as national and regional investment priorities flow directly from the development hierarchy and priorities set out in the NPF and RSES. Furthermore, the existing LAP clearly recognises the entity of Delgany as a distinct part of the wider settlement and includes numerous Delgany specific policies and objectives. It is considered therefore that Delgany is adequately served by existing designation and development objectives.

It would appear that the key concern in this regard relates to the amount of housing development that has already occurred and future housing that would be allowed for through the zoning provisions of the current LAP surrounding Delgany, and the impact that may have on the services and character of the area. This issue can be examined and addressed in the next LAP, which will be drawn up in line with a range of principles as set out in the NPF, RSES and the new County Development Plan.

(3) Housing

Please see Part 4.3.3 of this report where this topic is addressed in more detail.

The appropriate mix and density of housing optimal for various locations in the Greystones-Delgany area will be addressed in the next LAP for the settlement.

The current County Development Plan includes policy and development standards that inform the design, layout and height of new buildings. These policies and standards will be reviewed to ensure their compliance with new policy particularly the Specific Planning Policy Requirements (SPPRs) of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) and Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018).

The design and layout of new residential development should relate successfully to the structure and character of the settlement. Each site presents its own challenges and opportunities. The design response for each housing development should be informed by the site’s characteristics. The Plan shall expand on the housing design objectives contained in the current plan (HD2, HD3) and include objectives requiring a tailored design approach which is responsive to local context and the submission of a design statement with applications for residential schemes which shall outline the design rationale.

The Plan shall include a policy to require that the design and layout of new residential development achieves highly permeable, well connected streets in accordance with best practice as set out in the Design Manual Urban Roads and Streets (DTTS & DECLG 2013).

The new County Development Plan will include a new Housing Strategy as per the requirements of Section 94 of the Planning and Development Act, 2000 (as amended). The purpose of the strategy is to ensure that provision is made for the housing needs of the existing and future population of the plan area.

The Strategy shall include an estimate of the amount of social and affordable housing required during the plan period and shall provide that as a general policy a specified percentage (not exceeding 10%) of the land zoned in the development plan for residential use, or for a mixture of residential and other uses, shall be reserved for those in need of social housing in the area.

While the County Development Plan is not directly responsible for the delivery of affordable homes there are a number of things it can do to create the right environment for the delivery of affordable homes, removing development bottlenecks and enabling a continuous supply of housing. These include:

- Providing a robust development framework and core strategy;
- Zoning land for development that is serviced and in appropriate locations which gives a greater degree of certainty to developers and infrastructure providers;
- Providing a clear and articulate longer term development strategy that facilitates the coordinated and efficient provision of enabling infrastructure;

- Including policy to support active land management;
- Providing for higher densities that ensures more efficient use of land and enabling more units coming to the market;
- Providing flexibility in terms of design particularly in urban cores to enable more cost-efficient construction and variety of homes;
- Including policy which encourages infill development and the densification of existing built up areas.

(4) Transportation & movement

- The Local Authority works closely with the transport agencies, and lobbies them, for improved services in the County and in Greystones – Delgany. In this regard, the Local Authority, with the support of the NTA, will be commissioning in 2020 a Local Transport Study, which will endeavour to identify the issues and draw up solutions, including delivery and funding options, for improving transportation and movement throughout the town.
- The Local Authority is committed to delivering essential new / improved road, footpath and cycleway schemes, particularly those that are identified as priority schemes within local plans. However, the funding available for such infrastructure is not unlimited and is often dependent on both development levies accruing from new developments in the area and / or the delivery of certain elements of projects by developers. The Delgany to Blacklion road improvement is one such example, where a source of funding to complete the entire scheme from end to end has never been available, and therefore improvements have occurred in sections as funding or new development allows. The next LAP for Greystones – Delgany will include a more detailed ‘implementation plan’ for the infrastructure improvements identified as essential in the plan, which will make it clearer to the public and other interested parties when and how various schemes will be delivered.
- It is agreed that a key mechanism to reduce car use and commuting is to enhance the town itself, make it more compact and more accessible to existing / planned public transport and to enhance the employment opportunities, so that more people can live and work in their home town.
- It is agreed that upgrading of the railway line is badly needed, the Local Authority will continue to work with the National Transport Authority and Irish Rail to make this a reality
- N/M11 Improvement Scheme: The scheme has been identified in Project Ireland 2040 as one of the 20 priority National Roads to be progressed in order to enable the continued economic development of the state. The scheme has also been identified in relevant regional and local planning policy, including the current County Development Plan. The exact nature, scale, extent and location of the improvements are the subject of a separate project process and therefore it is not appropriate via this report to set out any assessment of any issues raised in these submissions.

Cycling and Walking

There are a number of objectives in the current County Development Plan with respect to walking and cycling paths / lanes (TR9 to TR13), and it is recommended that same be retained in the new plan and strengthened where necessary i.e.

The Council is committed in its annual roads delivery programme to improve footpaths and cycling paths / lanes. The delivery of footpaths and cycling paths / lanes is an operational matter and is dependent on the allocation of funding through the annual budgetary process or allocations from other agencies, such as the NTA.

Significant work is ongoing on the provision of walking and cycling facilities. The recent IPB dividend funding was spent improving footpaths throughout the county. This is in addition to NTA funding for

footpaths and cycleways. In relation to schools, the NTA have a designated ‘permeability’ fund. This is aimed at creating safe routes to schools and removing barriers such as walls and gates blocking direct access to schools. Several projects have been completed under this programme and others are currently being progressed.

(5) Economic Development

It is agreed that there is a deficit in employment opportunities in Greystones - Delgany, which has the lowest ‘jobs ratio’⁹ of all of the larger settlements in the County, leading to high commuting levels out of the town. The Council is committed, through its various roles, to supporting the development of new or expanded employment developments in the town. The County Development Plan and the LAP as spatial, land-use frameworks provide the planning policy support for all forms of economic development at appropriate locations and includes the zoning or significant land for new employment development. The land-use objectives of the plan aim to support the strategies of the Local Economic and Community Plan (LECP) and the Local Enterprise Office, all of which have a wider remit than the County Development Plan in the area of economic development.

The County Development Plan through the core strategy and a range of detailed objectives will play an important role in creating the right environment for new economic development and making the county attractive to investors. The locations considered most suitable for economic development will be identified, providing a greater degree of certainty for developers and employers in terms of investment.

While the Planning Act does not require the core strategy to address economic development explicitly, this is considered an essential element of the overall development strategy for the County. The core strategy in the current development plan includes an ‘*Economic Development Hierarchy*’ and a broad assessment of the County’s employment requirements up to 2028. This will be reviewed and updated as part of the preparation of the Draft Plan.

The core strategy and development plan objectives for economic development and employment will be informed by the *NPF* and the *RSES*. Relevant National Policy Objectives (NPOs) and Regional Policy Objectives (RPOs) include:

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

RPO 6.2: *Support local authorities to ensure their LECPs and city and county development plans are sufficiently agile to account for unexpected opportunities, to accommodate valid propositions for enterprise development that may emerge and for which there are strong locational drivers that do not apply to the same extent elsewhere.*

⁹ This is the ratio of the number of jobs in the settlement to the number of residents of the settlement in the labour force.

The RSES identifies key towns on the settlement hierarchy below Dublin and the regional centres. These are defined as large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. Bray and Wicklow-Rathnew are identified as Key Towns in the RSES settlement hierarchy. Significant population and employment growth will be directed into the key towns. The remaining towns have capacity for continued commensurate growth to become more self-sustaining and to attract high quality employment at strategic accessible locations. The RSES also identifies the IDA lands in Greystones as a strategic development site with potential to strengthen the economic base in North Wicklow.

It is accepted that employment growth has not been commensurate with population growth in Greystones - Delgany. This will be addressed as part of the County Development Plan by suitably managing the population growth of the town to that commensurate with the services, including employment available and placing emphasis of growing employment and services. The RSES acknowledges that *'in general, there is a challenge of satisfying the developmental needs of Dublin so that it can continue to fulfil its role as an international and national driver and economic entity in its own right, while at the same time addressing the economic potential of the rest of the areas in the Region'*. In order to address this, the RSES proposes orderly growth of the region and placemaking to facilitate the development of resilience and competitiveness of the economic base.

A suggestion is made that the IDA lands be preserved for forestry and wildlife. However, these lands are for the most part open cultivated farm lands with some valuable potentially habitats such a protected tree stands along the eastern boundary and some existing hedgerows; and have been long zoned for major employment development. Any development on these lands will be subject to the environmental / heritage protection provisions of the County Development Plan and the Greystones - Delgany – Kilcoole LAP, such as County Development Plan Objectives NH8 (below):

NH8 *To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

NH19 *To encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).*

(6) Climate Change (please see also part 4.3.2 of this report)

Climate change has been addressed directly in a number of Wicklow’s previous development plans; in particular the 2016 plan which includes a comprehensive overview of the climate change challenge, the role of the County Development Plan in addressing same, a detailed ‘audit’ of the plan (similar in process to Strategic Environmental Assessment) to ensure that the plan contributed positively and actively to both mitigation and adaptation and gave rise and support to the inclusion of numerous policies and objectives in the plan in the areas of land use, transport, energy, building design and flood risk.

Goal 10 of the CDP 2016 related specifically to Climate Change;

"to 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."

It is intended that the new plan will build on the previous plans and having regard to more recent State climate change policy and legislation (such as the National Mitigation Plan 2017, the National Adaptation Framework 2018 and the Climate Action Plan 2019) along with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), climate change will be very much to the fore of the new plan and will influence – all aspects of the plan.

Climate change will be directly addressed with a specific climate change chapter and indirectly throughout the entire plan by integrating climate change mitigation and adaptation into the plan objectives.

The County Development Plan, as a land use framework, has only a certain remit with mitigation and adaptation to climate change, as not all sources and impacts are associated land use or development. Further to this the County Development Plan has no role in allocating funding or resources to carry out climate change actions / initiatives. Wicklow County Council and other government organisations have a number of climate change related strategies / plans that address many of the issues raised in the submissions received.

In directly addressing mitigation and adaptation to climate change, it is proposed that the new CDP will focus on the following issue in crafting the climate change action strategy of the CDP:

- Compact growth and crafting more sustainable settlement patterns
- Sustainable and low carbon transportation
- Enhancing public transport and access to same
- Flooding, surface / storm water management
- Natural resource management
- Renewable energy
- Low energy building design

(7) Flooding

- The County Development Plan does not address directly the design of any flood relief and flood protection schemes, rather it includes a strategic flood risk assessment, in order to ensure zoning and development objectives are consistent with the principles set out in the ‘Planning System and Flood Risk Management Guidelines’. Where the Local Authority, in conjunction with the OPW (which is the state body responsible for the implementation of the Floods Directive and is lead State body for the coordination and implementation of Government policy on the management of *flood risk in Ireland*) *identify a need for measures in any particularly river / river catchment to address flood risk, the most appropriate solution to same will be developed based on the requirements of the Flood Directive, taking into account of relevant Directives such as EIA Directive, Habitats Directive etc*
- *With respect to the ‘nature based’ solutions suggested, the OPW in 2018 published 29 Flood Risk Management Plans to address flood risk in Ireland, such plans setting out the ‘whole of Government’ approach to managing flood risk and specifically including ‘Natural Water Retention Measures’ such as restoration of wetlands and woodlands.*

- (8) Natural heritage** (Please also see Part 4.3.10 of this report where this topic is addressed in more detail)

Protected Sites / Nature Reserves

Natura 2000 sites: Natura 2000 site designation is the highest level of environmental protection afforded in the State, and the Council is keenly aware of its obligations under EU and national legislation in this regard. The County Development Plan includes a range of provision and objectives aimed at protecting all SACs and SPAs from inappropriate development. The designation of same, and the definition of their boundaries, is not a matter for the County Development Plan. The management including policing of activities thereon is a matter for the NPWS but the Council also has a regulatory / enforcement role where possible unauthorised development is occurring.

The promotion of awareness of such sites, erection of interpretive signage etc would not be a matter for the County Development Plan, but the County Development Plan would support such programmes. The monitoring of the health of such sites would not be a matter for the County Development Plan, however the Council would support any projects or ongoing programmes by local or state agencies in this regard.

Glen Of The Downs SAC: The provisions of the County Development Plan would support measures to enhance this area, including measures to improve connectivity. However, it would be premature for the plan to include as objectives specific projects such as a green bridges or tunnels across the N11 without any detailed study on the feasibility of same.

Three Trout’s River: It is suggested in some submissions that the Three Trout’s river corridor be designated a ‘nature reserve’ in the County Development Plan, that it be retained in its natural condition and not developed as a ‘greenway’. Conversely a number of submissions also seek the development of the corridor as an amenity route (see section below on ‘greenroutes’). A ‘Nature Reserve’ is protected under Ministerial order and therefore it would not be possible to so designate Three Trout’s via the County Development Plan. This river corridor is identified as a riverine green corridor in the current County Development Plan ‘Green Infrastructure’ strategy, a ‘green corridor’ (and indicative greenroute) in the Greystones – Delgany – Kilcoole LAP and is zoned in the LAP as ‘open space’ / ‘greenbelt’ which provide a certain amount of protection already; these zoning objectives link of directly with the existing Glen Of the Downs SAC.

Greystones – Delgany – Kilcoole LAP objectives (set out below) are clear in that such greenroutes are a secondary aspiration with protection of biodiversity being the priority:

HER5 *To protect the biodiversity value and associated habitats of water bodies within the plan area in accordance with the objectives as set out in the Wicklow County Development Plan and Eastern River Basin District Management Plan. In considering proposals for development, regard shall be paid to the recommendations set out in Greystones-Delgany Local Biodiversity Area Study (2006). In particular, recommendations relating to the Three Trout’s Stream shall be implemented, as deemed appropriate, by the planning authority.*

TS12 *To develop the ‘greenroute’ network for pedestrian and/or cycling facilities. The proposed indicative ‘greenroute’ network is indicated on Map B. Greenroutes should be developed with a common scheme of signage and/or markings. Where feasible, proposals for development should provide for the development of these greenroutes. Proposals for the development of ‘greenroutes’ shall be subject to appropriate assessment requirements in accordance with the Habitats Directive. No development shall be permitted that would have adverse impacts (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites.*

While certain parts of the ‘greenroute’ network are likely to be implemented in the short term, certain parts are considered to be a more long term aspiration. Implementation of ‘greenroutes’ is subject to the available funding and further design and feasibility studies. Some sections may also be delivered as part of proposals for the development of zoned land.

The objectives with regard to this corridor can certainly be reviewed in the next G-D-K LAP.

‘Non-designated’ sites of ecological value are explicitly addressed in Objective NH8 of the current County Development Plan and it is intended that this provision will be retained and enhanced if necessary in the new plan:

NH8 *To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

Coastal Protection / Erosion

Coastal erosion is a natural process, and interventions to change or alter same can often result in adverse environmental impacts. Nevertheless, WCC and various agencies is engaged in the ongoing monitoring and surveying of the coastline in order to determine if actions are warranted in particular locations. In particular:

- The Irish Coastal Protection Strategy Study (ICPSS) is a national study that was commissioned by the OPW in 2003 with the objective of providing information to support decision making about how best to manage risks associated with coastal flooding and coastal erosion. The Study was completed in 2013 and provides strategic current scenario and future scenario (up to 2100) coastal flood hazard maps and strategic coastal erosion maps for the national coastline. This major study provides invaluable and essential information required to inform policy in this area, particularly for local authorities in relation to the proper planning and development of coastal areas.
- Wicklow County Council is currently working closely with Irish Rail (with Arup, Consulting Engineers) to update and enhance the data from the ICPSS for the Wicklow coastline, with a particular focus on, but not limited to, locations where the rail line is in close proximity to the coast; in this regard Greystones - Delgany (north and south) are included in this study.

On completion of the Arup study, it will be clearer what, if any, interventions are needed along the Wicklow coastline and where projects are warranted, Wicklow County Council will progress same subject to funding being made available.

Development along the coastline

Development in the coastal part of Greystones - Delgany is managed through the provisions of the current County Development Plan and the G-D Local Area Plan. In particular, the current County Development Plan includes a chapter of Coastal Zone Management, which it is intended to maintain and enhance if necessary in the new plan. The area between Bray Head and Kilcoole is identified as three distinct coastal ‘cells’ in the current strategy, where different objectives apply given the environmental characteristics of each areas and its ability to accommodate change / development.

Views / prospects

Both the County Development Plan and LAPs include listed views and protected which are intended to be retained in the new plan. Any suggestions for new listed views/ prospect will be considered in the crafting of the new plan.

With respect to the views from Delgany towards the Drummin trees, and from Kindlestown Hill towards the Sugarloaf Mountains mentioned in submissions, these are already protected views.

The development of viewing points, such as suggested for north Greystones, would be an operational and funding matter for the Council rather than the County Development Plan. However it is noted that any such viewing point would be located on the south facing slope of Bray head, which is itself a highly scenic area and indeed the view towards this area from Greystones is protected.

Zoning / mapping

Existing statutorily protected sites (Natura 2000 sites, NHAs, nature reserves etc) are generally not ‘zoned’ in the current County Development Plan (and LAPs that flow from it). In such plans, the lands are generally identified with their legal designation but in some cases, as designated as ‘conservation zones’.

Other non-designated natural sites, that are necessary to preserve for reasons of nature conservation, flood protection etc are generally zoned ‘open space’ and in more recent plans more particularly as ‘OS2’ where the objective is *‘To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.’*

It is intended that this OS2 zone will be utilised throughout the new County Development Plan and revised LAPs thereafter, and it is considered that this addresses the request for a new zone type for nature / biodiversity protection.

All of Wicklow’s river systems are mapped and identified in the current County Development Plan (in particular in the ‘Green Infrastructure Strategy’) and are identified as green assets for protection and enhancement. As the GI maps in the current County Development Plan contain a significant amount of overlapping data making them hard to read and understand, it is intended to significantly improve these maps in the new plan, including providing a more interactive online map viewer.

A survey of a number of Wicklow’s wetlands was carried out in 2012 which it is intended to continue this to cover more of this habitat. The information gathered to date has been valuable in the assessment of applications for development consent or other permits in or near wetlands. This baseline will be possible to utilise in the future to monitor the extent and health of these habitats to ensure that current policies and objectives are providing sufficient protection.

It is suggested that good quality soils be zoned on the edge of towns. It is not clear what exactly the intent of this request is; however it is not normal practice to ‘zone’ for soil types outside of or at the edge of towns – zoning is generally related to land use rather than some inherent natural characteristic of the land. A number of state agencies, such as the Geological Survey of Ireland (GSI) and Teagasc provide detailed maps (and online map viewers) of soils types which the public can access.

Water systems / rivers / wetlands

The current County Development Plan includes numerous objectives (NH20 to NH23) with regard to the protection of natural water systems and river corridors / riverine habitats. It is intended that these provisions will be retained and enhanced in the new plan where necessary.

In this regard however the County Development Plan only has a certain remit which is generally the control of new development and providing planning policy support for the activities / plans / strategies of other bodies / agencies. The active ongoing management of water bodies, including pollution control, management of land uses near water courses, in-stream works to improve flow / passage of fish etc in Wicklow occurs via the implementation of the **Water Framework Directive** and **River Basin Management Plan**, which is actively delivered by the EPA, Department of Communications, Climate Action and Environment, and the Council’s water protection team.

Hedgerows: The managing of hedgerows by farmers / landowners is not be a matter for the County Development Plan - Teagasc (the agriculture and food development authority) as well as the Department of Agriculture, works directly with farmers on such matters. The current County Development Plan in its provision promotes and requires hedgerow retention in new developments wherever ever possible (objectives NH12, NH19 and the Development Design Standards). It is recommended that these provisions be retained in the new plan and enhanced if necessary.

The Local Authority itself adheres to provisions regarding hedgerow cutting (unless a specific exemption is necessary to invoke e.g. where a traffic hazard may be arising), and engages closely with landowners to remind them of their obligations. The NPWS regularly publishes notices reminding the public regarding these regulations.

Tree protection

Please see Part 4.3.10 of this report where this topic is addressed in detail.

Any specific trees or groups of trees that are suggested in submission can be assessed for possible TPO.

(9) Built Heritage (Please see Part 4.3.10 of this report where this topic is addressed in detail)

The architectural and archaeological heritage of a town, village or place contributes greatly to the distinctive character of each local area. The Council is committed to safeguarding this heritage so that future generations may also enjoy this inheritance. It is intended that the existing strategy will be retained and enhanced if necessary in the new plan.

Record of Protected Structures / ACAs (Please see Part 4.3.10 of this report where this topic is addressed in detail)

Stylebawn House: This is a protected structure. The Council has undertaken a number of actions over the last numbers of years to preserve the protection of this structure, particularly following a significant fire in 2016. The purchase of this property would be outside the scope of the County Development Plan.

Georgian gardens at Bellevue Demesne: These gardens are not currently on the RPS. It is recommended that this complex of buildings and associated ground be further investigated for possible addition to the RPS. It would not be considered appropriate to consider the wider historical Bellevue estate for protection, given that a large portion of it has been redeveloped as Delgany golf club and for pockets of housing (particular on the western side).

Structures or parts of structures, which form part of the architectural heritage of an area and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest in town / village centres including shop fronts and other heritage features may be protected via a number of means including by adding same to the Record of Protected Structures (where such high level of protection deemed warranted) or via the designation of the wider area as an **Architectural Conservation Area**, where the planning authority is of the opinion that such designation is necessary for the preservation of the character of the place, area, group of structures or townscape.

Delgany Village is protected via ACA designation.

Archaeology / ancient history (Please see Part 4.3.10 of this report where this topic is addressed in detail)

With respect to Kindlestown castle mentioned in one submission, this castle is indeed surrounded by a very low density housing area (developed in the early 1990s), which although providing for generous space reserved around the castle and dwellings well set back, still diminishes the setting of the castle. Standards and requirements have improved since this time, and the Council is committed to protecting such features and their settings to the maximum extent possible.

A number of specific sites / items are mentioned in submissions as worthy of protection.

Downhill Hillfort – this is a recorded monument WI013-001

Coolagad Hillfort – the National Moments Service has determined that there is insufficient evidence at present to warrant inclusion of this as recorded moment

Toll-Road / Norman Path - this is not identified for protection by the National Moments Service. This will be brought to the attention of the NMS.

Woodlands Church – this is a recorded monument WI013-003

A request is made for archaeological investigation into the Three Trout’s River area. This would not be a matter for the County Development Plan.

(10) Green / Blue Infrastructure

The current County Development Plan address green infrastructure in detail but in a strategic, county wide manner given that scale of plan making (Appendix 8 of the current plan). While maps are included in this Strategy, it is acknowledged that it is difficult at a county scale to show in meaningful way all GI assets and the connections between them, but this will be considered in the preparation of the new plan to determine if enhanced maps can be provided.

Objective T29 in the current plan supports the development of new and existing walking, cycling and driving routes / trails and ancillary facilities. It is intended that the new plan will include additional focus on walking routes, cycling routes, greenways and blueways where possible and include an objective to support the development of a strategic national network of trails.

More detailed provisions regarding GI are provided for in local plans, such as the Greystones – Delgany - Kilcoole LAP. This LAP includes a heritage map detailing GI elements in the settlement. The route along Three Trout’s down to the coast is already shown as a possible greenroute in the LAP.

Greystones - Wicklow greenway: Wicklow County Council has applied to the Department of Transport Tourism and Sport for funding under the Carbon Tax Initiative to carry out a series of studies leading to route selection and design of this greenway. It is hoped that the funding applied for will help to progress the initial feasibility study, through options selection to design stage. The Council

will then have to identify funding sources to take the project to the next stages which include environmental evaluation, land acquisition, and construction. The process will involve public consultation at various stages of the project. The proposed greenway project occurs within the context of large scale coastal erosion studies on the East Coast by Irish Rail and will be largely dependent on the outcome of this work.

There is an established desire line for walkers along this section of coastline along a variety of unmanaged and informal trails. The proposed greenway creates the opportunity to provide a more formal trail along this section of coastline that will facilitate a wider cohort of walkers and cyclists alike while mitigating the footprint of the existing informal trails onto a defined trail that is aligned to minimise and indeed reduce impacts on sensitive habitats. Ecological studies carried out to date have highlighted that challenges exist for creating a greenway over EU protected habitats and it is clear that additional scientific information and rigorous ecological assessment is required.

(11) Community Development

Community and social infrastructure is recognised as a fundamental element in creating resilient, sustainable and healthy communities. The County Development Plan will include objectives to support the delivery of community facilities and social infrastructure and will ensure that adequate land is identified in settlements for community facilities. As per Section 8.2 of the current plan the County Development Plan facilitates the delivery of community infrastructure through:

- *‘The reservation of land for the development of new or enhanced social and community infrastructure in County and local development plans;*
- *Managing the expansion of residential development commensurate with the community infrastructure available;*
- *Requiring the delivery of new community infrastructure as part of development proposals; and*
- *Co-operating with other services providers in the delivery of new infrastructure’.*

The delivery of community facilities / buildings including community centres, family resource centres, drugs / alcohol addiction support services, men’s sheds, youth clubs etc is outside the remit of the County Development Plan. This may be more appropriately addressed in the County’s *Local Economic and Community Plan (LECP) 2016 – 2022*, which supports and promotes community development and contains goals, objectives and for the delivery of the community development, as well as the plans of the Health Service Executive.

The current county development plan includes a community facilities hierarchy model. This is *‘a list of social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal’.* The development plan provides that:

CD5 *Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.*

It is considered necessary to continue this policy in the new development plan to facilitate the delivery of community and social infrastructure aligned with new residential development.

It is intended that wellness, sustainability and quality of living will be at the core of the new County Development Plan. In particular, for the first time the County Development Plan will include a health and wellbeing ‘audit’, to ensure all of the provisions of the plan will contribute to improved quality of life for all in Wicklow. This assessment is intended to include an evaluation of recreational and community facilities needs, which can then be utilised at a local level in the drafting of the next round of Local Area Plans.

Children’s Play Areas

The lack of a playground in Delgany is noted. Wicklow County Council’s Play Policy informs the facilitation and delivery of play facilities / playgrounds in the County. The current development plan includes the following policies:

CD26 *To facilitate opportunities for play and support the implementation of the Wicklow County Council Play Policy and its objectives, including the collection of development levies.*

CD27 *In all new residential development in excess of 50 units, where considered necessary by the Planning Authority, the developer shall provide, in the residential public open space area, a dedicated children’s play area, of a type and with such features to be determined following consultation with Community, Cultural & Social Development Office of Wicklow County Council. The location of any such proposal shall be situated within a centrally located area capable of being passively supervised by surrounding developments.*

CD28 *All new estates, streets, open spaces/parks and community facilities shall be designed with the needs and safety of children as a priority.*

These objectives will be reviewed and strengthened where necessary in the new plan.

Childcare

Childcare facilities are integral to economic and social wellbeing. Wicklow County Childcare Committee was formed in 2001 and is funded by the Department of Children and Youth Affairs to improve the quality and quantity of childcare in Co. Wicklow. In 2001, the DoEHLG published Childcare Facilities: Guidelines for Planning Authorities, which require the provision of 20 childcare places for every new 75 housing units. The current development plan includes the following policies with regard to childcare:

CD22 *To facilitate the provision of childcare in a manner which is compatible with land-use and transportation policies and adheres to the principles of sustainable development.*

CD23 *To facilitate the provision of a network of childcare facilities that reflects the distribution of the residential population in the County, in order to minimise travel distance and maximise opportunities for disadvantaged communities.*

CD24 *Where considered necessary by the Planning Authority, to require the provision of childcare facilities in all residential developments comprising 75 houses or more (including local authority and social housing schemes). In accordance with Department of Environment, Heritage & Local Government guidelines, childcare places shall be provided at a ratio of 20 places per 75 residential units, having regard to cumulative effects of permitted development, (unless it can be demonstrated that having regard to the existing geographic distribution of childcare facilities and the emerging demographic profile of the area that this level of childcare*

facilities is not required). Without substantial cause, it is the policy of the Planning Authority not to allow a change of use of these premises within five years.

These policies will be reviewed and strengthened where necessary in the new plan. Apart from ensuring that adequate land is available for childcare facilities and implementing the childcare guidelines, it is not within the remit of the County Development Plan to influence the cost of childcare.

Culture / Arts

The current County Development Plan, as well as the Greystones-Delgany-Kilcoole LAP, supports the delivery of new and enhanced community / arts facilities and it is recommended that these objectives be retained and enhanced where necessary in the new County Development Plan. The delivery of new or enhanced cultural / arts infrastructure and facilities would be an operational and implementation matter for the various Council departments and state agencies active in this sector and in this regard the Council has a Wicklow County Arts Plan.

Education

The Department of Education and Skills (DES) is responsible for the delivery of educational facilities and services. Through the County Development Plan and local area plans, the Council must ensure that adequate serviced or serviceable land is available to meet current and future requirements. Specific sites may be reserved in local plans. However, it is considered important that education and related uses should be favourably considered within a variety of land-use zoning categories, thereby ensuring sufficient flexibility to accommodate future needs. The RSES notes that schools need to be located along sustainable transport corridors (i.e. walking, cycling, public transport). The current plan includes the following policies:

CD6 *To facilitate the provision of schools by zoning suitable lands in local plans capable of meeting the demands of the projected populations. Prior to the identification of lands for primary and secondary school provision the Planning Authority shall consult with the Forward Planning and Site Acquisition and Management sections of the Department of Education.*

CD7 *Where lands are zoned for educational use, to facilitate the development of facilities that provide for linkages between schools types. For example, particular encouragement will be given to primary and secondary school campuses, the linking of pre-school services with primary schools and the linking of secondary schools with vocational training facilities.*

RPO 9.21 in the RSES states that ‘where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations’. It is considered that a new objective should be included in the development plan to give effect to RPO 9.21.

The Council will continue to work with the DES with regard to the provision of schools. The community use of school buildings is a matter to be agreed between the schools / Department of Education and Skills and the local community.

Open Space

The current development plan recognises that the delivery of new sports and other outdoor community facilities and spaces is dependent on adequate ‘open space’ being reserved and developed. The plan distinguishes between the different types of open space including residential

open space (open space provided as part of housing developments), active open space, passive open space and allotments. The current plan includes the following open space objectives:

CD42 *Through the local plan process to designate suitable open space in all settlements, commensurate with its needs and existing facilities, in accordance with the provisions of the Wicklow County Council Play, Sport & Recreation and Active Open Space policies.*

CD43 *To require open space to be provided in tandem with new residential development (in accordance with the standards set out in the Development & Design Standards Appendix)*

CD31 *All new neighbourhood parks or active open space zones shall include a ‘mixed use games area’ (MUGA) of an appropriate size and nature to be determined in, pre-consultation with the Community, Cultural & Social Development Office of Wicklow County Council.*

The Development and Design Standards (Appendix 1 of the current CDP) sets out the minimum standards for open space.

‘In accordance with the Planning Authority’s Active Open Space Policy, active open space shall be required as a rate of 2.4ha per 1,000 population divided into:

- *1.6ha outdoor play space (pitches, courts, sports grounds)*
- *0.6ha casual play spaces (parks)*
- *0.2ha equipped play space (playgrounds and MUGAs)*

Normally, public AOS in accordance with this standard will be zoned through the local plan process and individual development will be required to either deliver some or all of the space required (through an action area agreement) or via development levies. However, where such provision has not been made in a local plan, any application or Action Area Plan which would result in a resident population of 1,000 or more, compliance with this standard will be required’.

The Development and Design standards also include detail on the location, siting and design of open space facilities. These standards apply to the whole county.

The RSES requires Local Authorities to follow the following *Guiding Principles* in planning for recreation and open space:

- *Facilitate a sufficient supply of good quality sports and recreation facilities, including networks for walking, cycling and other activities and shall maximise the multiple use of such facilities by encouraging the co-location of services between sports providers, schools, colleges and other community facilities.*
- *Support play policies to address the play and recreation needs of children and young people and ensure the integration of play provision and child-friendly neighbourhoods.*
- *Provide for the development of dedicated youth spaces in key urban areas and the development of multi-function spaces in smaller communities / rural areas.*

RPO 9.17: *To support local authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region.*

The policies and design standards for open space will be reviewed and strengthened where possible. The emphasis on the quality of open space areas should be strengthened. The delivery of open space facilities including parks and playgrounds is dependent on financial resources.

Lands designated / zone for open space uses, including active open space (AOS) are generally protected from development other than that associated with its recreational / sporting use. Such zoned lands could generally only be developed for other uses were a decision made via the Local Area

Plan process, to alter the zoning. Open space requirements in Greystones-Delgany will be reviewed as part of the review of the Greystones-Delgany-Kilcoole LAP.

Allotments / community gardens

The current County Development Plan includes an objective in support of the development of lands for allotments, subject to a non onerous list of criteria including proximity to settlements, accessibility etc. It is intended to retain these provisions in the new County Development Plan and these can be enhanced if considered necessary.

It is however not recommended that particular pieces of land be designated through the County Development Plan for this particular type of horticultural use alone, as it is considered that further study would need to be carried out in advance of such designation in order to ensure the optimal sites are identified. In addition, the current County Development Plan, and the local plans that flow from it, provides for the zoning of land for ‘open space’. Some of these lands are so zoned so as to provide for new playing pitches, sports grounds, parks etc, but additional lands are zoned ‘passive open space’ which are lands not intended for sport / park use particularly because they may be in the buffer zone along a Natura 2000 site, may be at risk of flooding, or may simply be not suitable for development. Such lands could be considered for the development of community gardens / allotments on the basis that they did not interfere with the role of the land as a flood plain, ecological buffer zone etc if applicable.

More detailed assessment of the need for this form of open space can be undertaken in the preparation of the next LAP for Greystones - Delgany.

Accessibility

The challenges accessing some community facilities, amenities and open spaces, such as beaches, for those with mobility issues, are noted. The Council is conscious of the principles of ‘Universal design’ which is defined in the Disability Act 2005 as:

‘the design and composition of an environment so that it may be accessed, understood and used to the greatest practicable extent, in the most independent and natural manner possible, in the widest possible range of situations and without the need for adaptation, modification, assistive devices or specialised solutions, by persons of any age or size or having any particular physical, sensory, mental health or intellectual ability or disability’.

It is intended that the new County Development Plan will be ‘proofed’ to ensure to the greatest possible extent, these principles are reflected in its objectives.

The delivery of physical improvements, such as beach / coastal access paths, or accessible toilets / changing rooms, would be an operational and budgetary matter, best considered by the Greystones MD.

Delgany Carmelite Church

This is a protected structure. The current County Development Plan explicitly supports the sensitive redevelopment of protected structures including changes of use, in particular through the following objectives:

BH10 *To positively consider proposals to improve, alter, extend or change the use of protected structures so as to render them viable for modern use, subject to consultation with suitably*

qualified Conservation Architects and / or other relevant experts, suitable design, materials and construction methods.

BH14 *The Planning Authority shall consider the change of use of Protected Structures, provided that it can be shown that the structure, character, appearance and setting will not be adversely affected or where it can be shown it is necessary to have an economic use to enable its upkeep.*

It is intended that these or similar provisions be retained in the new plan.

This church and the convent grounds have been purchased in the last year by a private owner, and it is understood that plans for the development the lands are currently being drawn up, principally for housing (as allowed by the zoning set out in the Greystones – Delgany Local Area Plan). Any such plans would be required to include proposals for the church (unless the current use is proposed to be retained). The LAP does not have a specific requirement for possible uses and any proposed use will be assessed on its merits. However, Objective CD5 (detailed above) will be applicable, and where a deficiency in social / community facilities needed to support the development is identified, the developer may be required rectify same, and may consider the church / convent grounds for this purpose.

Old Bandhall Site

These lands are owned by Wicklow County Council and are zoned partly ‘RE’ (existing residential) and partly ‘OS’ (open space). Any potential use for community use or otherwise, would be an operational and funding matter for the Council.

(12) Public Rights Of Way

It is agreed that rural walkways are a valuable resource. It should be noted that while many of these are public rights-of-way, such legal status does not need to be in effect to allow for such routes (e.g. some may be in situ due to a planning condition, some are with the consent of the landowner). The County Development Plan itself cannot designate or create new walkways, which can only be done by invoking separate process set out in Sections 206 and 207 of the Planning Act.

The County Development Plan can however list and thereafter protect *existing* PROWs. Unfortunately the tests and evidence that must be available to the Planning Authority to ensure such routes are legal PROWs for inclusion in the County Development Plan is extremely high, and has proven particularly challenging when efforts were made in previous plans to add new routes to the existing list. For example, at this time there is a live legal action against the inclusion of the coastal (Wicklow Town - Newcastle) PROW in the 2016 County Development Plan. However all efforts will made to include additional existing PROWs in the new plan if possible. It should be noted that the inclusion (or non-inclusion) of a PROW in the County Development Plan does not in itself confer or deny the existence of a legal PROW.

Suggestions regarding new or enhanced objectives with regard to PROW, as well as suggestions for additional PROWs to be listed, such as the Drummin mass path, will be examined in detail in the crafting of the new plan.

(13) Town Centre, retail

The County’s settlements are the lifeblood of the County, meeting most of the employment, retail, cultural and social needs of all residents. Investment in settlements gives the highest return to society,

as economies of scale can be achieved and the highest standards of environmental protection attained. Fundamental to the future success of settlements and their centres is the maintenance and enhancement of uses that bring people into the settlement to live, work, shop and interact.

The current County Development Plan provides the planning policy support for the physical enhancement of town / village centres and the promotion / maintenance of active uses; the Council in its wider function supports town centres through a range of initiatives and projects such as the support of town teams, public realm improvements, supports for businesses through the LEO etc. Issues around financial incentives, grants, levies and parking charges are not matters for the County Development Plan.

A healthy and vibrant retail sector is considered the key driving force behind the activity level in any settlement. The following are objectives of the current County Development Plan in this regard and these will be reviewed and enhanced if necessary in the new plan:

- RT1** *To ensure the continued vibrancy and life of centres, to direct new development and investment into towns and villages in the first instance and to particularly prioritise actions that enhance business, retail, leisure, entertainment and cultural uses, as well as making town and villages centres an attractive place to live.*
- RT13** *To promote the revitalisation of vacant / derelict properties / shop units. Where no viable retail use can be sustained, alternative uses will be assessed on their own merits against the requirements of the proper planning and sustainable development of the areas within which they are located.*
- RT15** *To promote the ‘active’ use of above ground floor levels, and in particular to promote the concept of ‘living over the shop’ in centres. Where a ‘living over the shop’ use is proposed, a relaxation in density, car parking and open space standards will be considered, where the development meets very high quality of design and accommodation.*

In addition, the ‘town centre’ zoning used for all county town centres have the following objective:

‘To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses, and urban streets, while delivering a quality urban environment which will enhance the quality of life of resident, visitor and workers alike. The zone will strengthen retail provision in accordance with the County Retail Strategy, emphasise town centre conservation, ensure priority for public transport where applicable, pedestrians and cyclists while minimising the impact of private car based traffic and enhance and develop the existing centre’s fabric.’

(14) Tourism

The various suggestion made to enhance tourism are noted and for the most part are accommodated and supported in the existing County Development Plan, the Greystones – Delgany - Kilcoole LAP and the various tourism strategies of County Tourism and Failte Ireland.

(15) Strategic Environmental Assessment / Environmental Impact Assessment

The Council is committed to ensuring that the protection the natural environment and biodiversity remain key priorities in the new plan. The draft plan will undergo Strategic Environmental Assessment and Habitats Directive (Appropriate) Assessment in order to ensure that environmental considerations are fully integrated into the plan making process. In addition, the Council as required by statute and guidelines will continue to demand Environmental Impact Assessments and Habitats Directive

Assessments for new development proposals where concerns regarding adverse impact on the environment and habitats arise.

(16) Miscellaneous

Development levies: The Planning Act allow the Planning Authority to include conditions in a grant of a planning permission requiring the payment of a contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority and that is provided, or that it is intended will be provided, by or on behalf of a local authority. This does not provide for the payment of levies for the general upkeep of any area.

Branding / awareness, signage, interpretative information, tours, events, education etc.

This issue is addressed in Part 4.3.10 Heritage.

Dark sky zones

This issue is addressed in Part 4.3.10 Heritage.

Quiet Zones:

This issue is addressed in Part 4.3.10 Heritage.

Public foul sewer connection fees: The County Plan facilitates such connections however any issues around fees for connection are a matter for Irish Water.

Dog fouling / waste management / traffic management: These are not matters for the County Development Plan but rather are operation matters for the Council or for other agencies such as An Garda Síochána.

Recommendations of Chief Executive

1. In the new Core Strategy, to ensure that the new development strategy for Greystones- Delgany is based on the principles and requirements of the National Planning Framework and Regional Spatial and Economic Strategy, and in particular is framed around sound sustainability principles including the availability of local employment, service infrastructure (including community facilities and capacity) and sustainable modes of movement both within and between settlements.
2. To include a ‘health and wellbeing’ audit, to ensure all of the provisions of the plan will be contribute to improved quality of life for all in Wicklow.
3. With respect to housing
 - Prepare a new housing strategy to inform housing policy in the County Development Plan.
 - Review and update as necessary residential density provisions / standards in accordance with NPF / RSES and Ministerial guidelines
 - To review and update objectives to ensure a mix of house types and sizes in new residential and mixed-use schemes to cater for the varying household needs in the County.
 - Expand on the housing design objectives contained in the current plan (HD2, HD3) and include objectives requiring a tailored design approach for new residential development which is responsive to local context and the submission of a design statement with planning applications which shall outline the design rationale.
4. To retain and enhance where necessary objectives for improved public transport and sustainable modes of transport; to continue to prepare Local Transport Studies / Plans for all settlements intended for significant new development.
5. To retain and enhance where necessary objectives relating to economic development

6. To include a new chapter specifically on Climate Change in the draft County Development Plan. The strategy and objectives of the chapter will have a focus on the land use and planning aspects of adaptation to and mitigation of climate change.

In the development of the new plan, particular regard will be taken of the need to align with national commitments on climate change mitigation and adaptation.

To support the implementation of the Wicklow County Council Climate Change Adaptation Strategy and to support the land use aspects of the strategy.

To integrate climate change mitigation and adaptation as guiding principles throughout the plan and in particular to address the areas of:

- Compact growth and crafting more sustainable settlement patterns
- Sustainable and low carbon transportation
- Enhancing public transport and access to same
- Flooding, surface / storm water management
- Natural resource management
- Renewable energy
- Low energy building design

7. To maintain and strengthen if necessary natural heritage provisions of the plan, to ensure in particular the ongoing protection of biodiversity; to enhance information provided in the development plan regarding natural heritage assets.
8. To retain and enhance if necessary existing policy support for Green Infrastructure and the enhancement and protection of the County’s rivers and river catchments.
9. To maintain and strengthen as necessary built heritage provisions of the plan, and to review / update the RPS.
10. To provide enhanced policy support and objectives in the new County Development Plan for community and social infrastructure such as (but not limited to):
 - community centres and arts venues
 - community gardens and allotments
 - education, including third level
 - facilities and supports for the elderly
11. To include a policy to require, where practicable, new development to incorporate the principles of universal design in accordance with the *National Disability Authority Centre for Excellence in Design Universal Design Guidelines for Homes in Ireland (2015)*.
12. To review and expand if possible the current list of PROWs in the County Development Plan.
13. To retain existing town centre and retail policies and objectives, and to enhance where necessary; in particular to continue to prioritisation of existing town centres as the commercial and retail heart of settlement and to appropriately manage ‘edge of centre’ and out of centre’ retail
14. To retain and enhance if necessary existing policy support for tourism development in the County
15. To retain and enhance if necessary existing objectives for Coastal Zone Management.
16. To carry out Strategic Environmental Assessment, Appropriate Assessment, Strategic Flood Risk Assessment and any other necessary assessments for the new plan as are required by statute and guidelines.

Part 4.3.17 Blessington

Name	Issue Raised
Community Pool for West Wicklow (C12)	<ul style="list-style-type: none"> ▪ The Community Facilities Hierarchy (Section 8.2 of the CDP) indicates that a swimming pool is a necessary part of the infrastructure for a level two settlement with a population range between 7,000 and 15,000. Blessington has a population of 5,500. Taking into account the surrounding villages, Blessington would meet the criteria for a swimming pool. ▪ The submissions sets out a detailed justification for a swimming pool having regard to benefits associated with education, sport, health, local economy and safety. ▪ The people of West Wicklow have been campaigning for a pool for over 50 years. ▪ Water Safety Ireland carries our lifesaving training on Blessington Lakes during the summer and has indicated that a community pool in the area would enable them to carry out lifesaving training during the winter months. ▪ There is a lot of public support for a pool. Approximately 49 letters of support have been submitted as part of the submission. ▪ Recommend the inclusion of a swimming pool in West Wicklow in the new development plan.
Blessington Allotments Campaign (C15)	<ul style="list-style-type: none"> ▪ Legislation for allotments passed in 1926, Acquisition of Land (Allotments) Act, 1926. ▪ Local Government Act 2001 and the Planning and Development Act 2010 cover the provisions of allotments. ▪ Blessington Allotments campaign started in May 2018. ▪ Over 40 members of the Blessington community have registered their interest with the Blessington Allotment campaign. ▪ Allotments are good for people, families, the environment, pollinators and the climate. ▪ The submissions details the many benefits to having allotments including community benefits, mental and physical health, social inclusiveness, climate change, biodiversity, food poverty, food sustainability, diet and nutrition, All Ireland Pollinator Plan. ▪ The fee for allotments should be affordable and provision should be made for those on limited incomes. ▪ The location of allotments should be close to the town centre. ▪ Expansion opportunity in the future should be accounted for. ▪ Details on the design and management of allotments are provided. ▪ Allotments should be provided in every community in County Wicklow. ▪ Chapter 8 should be updated to provide for the following. The Council should adopt a strategy for allotments and an official policy for allotments. The Council should acknowledge the many benefits of allotments and should encourage local communities to make use of allotments. The Council should celebrate the next European Day of Sustainable Communities by increasing the number of allotments in the County.
Blessington Town Team (C18)	<p>Blessington Town Team was set up in accordance with ‘A Framework for Town Centre Renewal’. There are three key pillars: community, private and public. The main body of the submission is a Health Check of Blessington prepared by Future Analytics.</p> <p>This report provides information on the performance of Blessington across a</p>

	<p>variety of indicators, as well as an assessment of strengths, constraints, opportunities and threats. It is intended that the data will inform and support the future community and socio economic planning and development of the town with a view to enhancing the prosperity and vitality of the centre and improving the quality of life for the local community and those working in and visiting Blessington. The appearance of the town, the public realm, the quality and range of services and amenities have a direct impact on the economic performance of the town and the health and wellbeing of residents.</p> <p>The assessment addresses issues in relation to accessibility, community infrastructure, urban realm, natural environment and the economy.</p> <p>Some of the key issues identified in the Health Check include:</p> <ul style="list-style-type: none"> ▪ Improve the urban realm; ▪ Remove the car parking from Market Square and turn it into a public plaza; ▪ Address vehicular and pedestrian circulation with particular emphasis on prioritising pedestrians and creating a safe and accessible pedestrian environment; ▪ Removing obstacles to permeability; ▪ Develop a parking management strategy which provides for the removal of parking on Market Square and rationalisation and realignment of on-street parking on Main Street; ▪ Complete the inner relief road to remove through traffic and heavy vehicles from Main Street; ▪ Provide cycling infrastructure (cycle lanes and bicycle parking); ▪ Prepare a signage strategy; ▪ Prepare a strategy for the coordinated design of shopfronts and fascias; ▪ Undergrounding of cables and protection of the trees along Main Street; ▪ Provide spaces for outdoor seating and eating on the street to improve vibrancy; ▪ Capitalise on the potential afforded by the greenway and provide facilities for tourists; ▪ Consider providing a farmer’s market in the Square; ▪ Repurpose vacant units; ▪ Protect and enhance the natural environment; ▪ Improve the approach routes to the town; ▪ Provide a large public park and a MUGA, ▪ Encourage greater evening and night-time activities, ▪ Improve links with heritage and enhance sense of place.
<p>Blessington and District Forum (C28)</p>	<ul style="list-style-type: none"> ▪ Population growth should ensure to take into account the location on the periphery of County Kildare and the possibilities of development within County Kildare adding to Blessington population growth. ▪ Currently housing development in Blessington has not been matched by adequate infrastructure and services. This must be addressed, to ensure Blessington isn’t over populated, under serviced and turned into another Dublin commuter belt settlement. ▪ Blessington & District Forum is in favour of housing being developed in the local area, but it must be ensured that all housing developments are carried out in a sustainable manner and only built in parallel with community facilities. This has not been the case in the past. ▪ Kildare Co. Co. grant planning permission for large scale housing on the periphery of the town, yet Blessington and more specifically the Municipal

	<p>District of Baltinglass then need to provide the services and facilities for these new residents whilst receiving none of the benefits, this must be addressed soon.</p> <ul style="list-style-type: none"> ▪ All estates should be built to a higher standard taking into account energy and resource consumption. Estates should be provided with well designed public open spaces, properly planned inner roads and ample off street parking. ▪ Blessington is close to Dublin, and therefore offers good supply chains for businesses to benefit from, yet doesn’t see the same economic development as other towns in the proximity of Dublin. The reasons for this need to be determined and then addressed. ▪ Encourage the provision of pedestrian areas and open spaces in town centres, such an example would be the pedestrianisation of the market square in Blessington as opposed to its current status as a car park. ▪ Completion of Blessington E-Greenway around lakes and provision of support facilities. ▪ Develop and enhance the public realm in Blessington by improving street furniture, improving the parking conditions, the concealment of overhead cabling to underground and deliver a public park. ▪ Expansion of tourist accommodation facilities in the area. ▪ Development of Culture and Heritage Activities. ▪ Development of Viking TV Series links within West Wicklow, potentially film sites and driving routes, similar to what has been done in NI with Game of Thrones. ▪ Develop a walkway from Blessington into and through Glen Ding Woods, existing right of ways should be protected. ▪ Ensure sufficient lands in appropriate locations are zoned to cater for social and community needs. Promote the shared use of educational and community facilities, to maximize the sustainable use of such infrastructure and promote community cohesion. ▪ Planning to participate in a multiagency approach to deliver adequate services in West Wicklow. ▪ Blessington is served by the N81 and serious consideration and pressure needs to be applied to TII for a much improved and safer road network for the residents of West Wicklow. ▪ Housing is being planned, but no road network improvements are planned, the N81 and Blessington town are at times bottle necks and this is only going to get worse as housing is delivered without adequate improvements to the road network. ▪ Improved bus services are required, along with edge of town developed park and ride facilities, to ensure towns like Blessington are not cluttered with commuter parking. ▪ The inner relief road in Blessington should be completed. ▪ At times Blessington is a town choked by traffic. ▪ The secondary school in Blessington is already over capacity and yet no firm plans are in place to deliver a much needed extension or new build. ▪ Consideration should be made to make all towns, including Blessington to become more self sustaining by delivering on high speed broadband and encouraging working from home or from within community run enterprise hubs. ▪ The existing Blessington LAP contained a lot of excellent suggestions on town development but unfortunately little if any have been delivered upon,
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	<p>and in some cases the opposite has occurred to what was deemed the best plan for our town.</p> <ul style="list-style-type: none"> ▪ Blessington has huge opportunities into the future to be a destination town as opposed to a town people pass through. ▪ The County Development Plan and future LAP must proactively ensure Blessington becomes a destination town. It has an enviable location, on the edge of the Blessington Lakes, beside the Wicklow Mountains, within short distances of Dublin and Kildare and a rich local heritage that should be explored. All of these characteristics should be maximized to build the Blessington brand.
Edel Byrne (D25)	<ul style="list-style-type: none"> ▪ Provision of sports and recreation facilities for the town of Blessington with regard to a community multi-use sports facility incorporating a running track, community swimming pool and all ancillary facilities.
Billy Timmons (D49)	<ul style="list-style-type: none"> ▪ A parkland and walk linking the new greenway and town centre to Glen Ding should be identified. ▪ There should be adequate zoning for sporting and community facilities including a swimming pool and soccer pitches. ▪ An area action plan for the north/east of the town should be included. ▪ Proposals for the N81, including the bypass and a Luas stop should be identified.
Cairn Homes (D101)	<ul style="list-style-type: none"> ▪ Request that Blessington is identified as a self-sustaining town. ▪ Development of the town has been constrained by the absence of wastewater facilities. ▪ With planning permission now in place for an upgrade to the treatment plant there is significant opportunity for new development. ▪ Cairn’s landholding in Blessington Demesne equates to approximate 64ha and is covered by a range of zonings including residential, employment, amenity, community and education and agriculture. ▪ Given the mix of uses that can be delivered on Cairn lands there is potential to develop a self-sustaining community. ▪ Blessington should be promoted for population growth. ▪ Blessington should be actively encouraged to address current pent up housing demand that has accrued from the lack of residential development over the past c. 10 – 15 years. The impact of this is evident in the population growth in the town. Between 2011 and 2016 the population of Blessington only increased by c.740 based on Census figures. The current population target in the existing development plan is 6,540 by 2022 and 7,500 by 2028. ▪ Request that the upgrade of the treatment plant is prioritised to ensure that housing can be delivered. ▪ The town would benefit from improved bus services within the town and between the town and neighbouring large towns.

Response of Chief Executive

The submissions received make some very valuable points in relation to Blessington’s potential and the opportunities for improvement. Many of these issues are local issues including the provision of community facilities, open space, public realm improvements and better permeability. Blessington has a Local Area Plan which is due to be reviewed following the adoption of the County Development Plan. The County Development Plan will provide the strategic context for the Local Area Plan and will therefore address primarily strategic matters relating to Blessington such as its position on the

settlement hierarchy, the population target and strategic / regional infrastructure issues. Matters pertaining to the public realm, community infrastructure are considered to be local specific matters which fall under the remit of the local area plan and the annual budgetary process.

Settlement Hierarchy

This report includes a proposed draft Core Strategy. More detail on this is provided in Section 4.3.2.

Settlements that have a population of 1,500 or over (Census 2016) have been assessed in accordance with the RSES asset based approach. The assessment has been carried out for Blessington and it is considered to come under the definition of ‘self-sustaining town’; employment growth has not been commensurate with population growth in Blessington and therefore the town comes within the typology for ‘self-sustaining’ towns. In accordance with Section 4.7 of the RSES, self-sustaining towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. The level of growth identified for Blessington will be commensurate with its place on the settlement hierarchy, its ability to develop sustainably taking into account the need for employment growth and the availability of community facilities.

Town Centre

The NPF acknowledges the importance of towns and villages in terms of their economic, administrative and social functions and seeks to activate the potential for renewal and strengthen their role as places to live, work and visit. This includes encouraging new roles and functions for buildings, streets and sites. The NPF requires a major new policy emphasis on renewing and developing existing settlements rather than continual expansion and sprawl. It targets a significant proportion of future development to occur on infill and brownfield sites within the built footprint of existing settlements.

The following national policy objectives are relevant for Blessington:

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

NPO 16: *Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

NPO 18a: *To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.*

The RSES recognises the importance of placemaking and urban renewal. Relevant regional policy objectives include:

RPO 6.12: *Local authorities shall include objectives in development plans and local area plans supporting emphasis on placemaking for town centres, for example through inclusion of a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans.*

RPO 6.13: *Local authorities shall support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces for example with cost effective, temporary uses that build on the longer-term vision for space.*

These national and regional policies will be reflected in the new County Development Plan and will inform the review of the Blessington Local Area Plan.

The review of the development plan will include a stronger focus on town and village centres, recognising the potential for renewal and placemaking. Heritage plays an important role in defining the character and appeal of Blessington and is recognised as an important element in placemaking. The future local area plan will include more detailed objectives in relation to placemaking, town and village improvement, parking strategies, potential pedestrianisation and public realm enhancement. The Health Check carried out for the town will inform the preparation of the Local Area Plan and has already informed the Council’s application for RRDF funding which was made in February 2020.

Community Facilities

The provision of community facilities including community centres, multi-use sports and recreation facilities etc is outside the remit of the County Development Plan. This is more appropriately addressed in the County’s *Local Economic and Community Plan (LECP) 2016 – 2022* which supports and promotes community development and contains goals and objectives for the delivery of the community development.

The current county development plan includes a community facilities hierarchy model. This is ‘*a list of social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal*’. The development plan provides that ‘*where a new significant residential or mixed used development is proposed, the Planning Authority may require certain social and community facilities to be provided as part of the proposed development and/or may require a special financial contribution to be made to contribute to the development of such facilities*’.

CD5 *Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.*

It is considered necessary to continue this policy in the new development plan to facilitate the delivery of community and social infrastructure aligned with new residential development.

The Planning Authority acknowledges the very strong case that has been made for a new community swimming pool in Blessington and the Council is committed to working with the community on this project. Unfortunately Wicklow County Council’s 2019 application for funding for a detailed feasibility

study for this project under the ‘Large Scale Sports & Infrastructure Fund’ from the Department of Transport, Tourism and Sport was unsuccessful.

While the actual delivery of such infrastructure is outside the remit of the development plan, the plan will include objectives to support and facilitate the development of community facilities and social infrastructure. This could be addressed in more detail in the review of the Local Area Plan which can make sure that adequate land is zoned for such facilities.

The multi-use of new community buildings is required by the current development plan.

CD32 *New community buildings / facilities shall be designed to facilitate a wide range of uses including active uses (e.g. basketball, badminton, gymnastics / dance, martial arts etc), meeting / club use and the operation of youth clubs and youth services.*

This policy should be retained and strengthened if necessary. It is considered that a review of the policy should consider amending the wording to require that any such building is universally accessible.

The Department of Education and Science is responsible for the delivery of educational facilities and services. Through the County Development Plan and local area plans, the Council must ensure that adequate serviced or serviceable land is available to meet current and future requirements. The Planning Authority has been working with the Department of Education and Skills to identify appropriate school sites in Blessington and will continue to assist the Department in this regard.

Open Space & Allotments

The current development plan recognises that the delivery of new sports and other outdoor community facilities and spaces is dependent on adequate ‘open space’ being reserved and developed. The plan distinguishes between the different types of open space including residential open space (open space provided as part of housing developments), active open space, passive open space and allotments. The current plan includes the following open space objectives:

CD42 *Through the local plan process to designate suitable open space in all settlements, commensurate with its needs and existing facilities, in accordance with the provisions of the Wicklow County Council Play, Sport & Recreation and Active Open Space policies.*

CD43 *To require open space to be provided in tandem with new residential development (in accordance with the standards set out in the Development & Design Standards Appendix)*

CD31 *All new neighbourhood parks or active open space zones shall include a ‘mixed use games area’ (MUGA) of an appropriate size and nature to be determined in, pre-consultation with the Community, Cultural & Social Development Office of Wicklow County Council.*

The Development and Design Standards (Appendix 1 of the current CDP) sets out the minimum standards for open space.

In terms of allotments the current plan includes an objective to facilitate allotments. This policy will be retained and strengthened if necessary.

Objective D45 states *‘To facilitate the development of allotments of an appropriate scale on lands which meet the following criteria:*

- *Lands situated within or immediately adjacent to the edge of towns/villages;*

- *lands that are easily accessible to the residents of a particular town or village;*
- *where an adequate water supply can be provided;*
- *where adequate road infrastructure and access exists/can be provided; and*
- *where adequate parking facilities can be provided’.*

The identification of specific sites for allotments would be an issue for the Local Area Plan.

Walking Trails / Links and Blessington Greenway

Construction on the Blessington E-Greenway is expected to start in September. The project received €5 million funding under the National and Regional Greenway Fund. The trail will cover approximately 42km and will have E bikes as a major attraction with charging points along the route. The current plan (Objective T3) requires that tourism and recreation related developments locate in existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable. Objective T4 ensures that tourist development will only be permitted in rural areas where the product or activity is dependent on its location and will not adversely affect the environmental quality and amenity of the area. These policies are considered sufficiently agile to facilitate and support a tourism development associated with the Greenway while protecting the environment, heritage and natural amenities of the area. It is intended to continue these policies in the new plan and strengthen where necessary.

Objective T29 in the current plan supports the development of new and existing walking, cycling and driving routes / trails and ancillary facilities. It is intended that the new plan will include additional focus on walking routes, cycling routes, greenways and blueways where possible and include an objective to support the development of a strategic national network of trails.

Quality of Housing Developments

In addition to Government guidelines relating to Sustainable Urban Housing and Apartment developments, the County Development Plan includes Development and Design Standards to ensure that new development is designed to a high standard. These include standards for the layout of the scheme, the provision of open space and the design of houses and apartments. These standards will be reviewed and strengthened where necessary.

Wastewater infrastructure

Irish Water has indicated that the upgrade to the wastewater treatment plant in Blessington will be complete by 2022.

Sustainable Transport

The provision of new and improved sustainable transport option is recognised as a challenge for the whole county including Blessington and West Wicklow. The Local Authority works closely with the transport agencies for improved services in the County and in Blessington. Transport objectives must be consistent with national transport strategies and with the RSES. A Ministerial Direction on the EMRA RSES removed an objective to extend the LUAS to Blessington. An objective in the county development plan to provide LUAS to Blessington would therefore be inconsistent with the RSES. The Council will however continue to work with the NTA and support improved bus services in Blessington.

The County Development Plan will also include a strong emphasis on and improving walking and cycling infrastructure.

N81

The need for the upgrading of the N81 is acknowledged in the existing county plan with the necessary land use objectives in place (TR17 – TR23) however the delivery of such projects is a matter for Transport Infrastructure Ireland. These objectives will be reviewed and strengthened where necessary.

Blessington Inner Relief Road

The County Development Plan and the Blessington Local Area Plan 2013 (*Objective S7 - To facilitate the completion of the Inner Relief Road*) facilitate the development and completion of the inner relief road in Blessington. Wicklow County Council and Kildare County Council (part of the route passes through Kildare) are working closely on a programme to deliver this road and have already commenced the design process and are in the process of investigating delivery and funding options.

Recommendations of Chief Executive

1. To identify Blessington as a self-sustaining town in the core strategy and encourage a level of growth that allows the town develop in a sustainable manner.
2. To improve town centre placemaking, renewal and regeneration objectives having regard to national and regional policy and provide a strong policy framework for the review of the Blessington LAP.
3. To provide enhanced policy support and objectives in the new County Development Plan for community and social infrastructure including education, sport and recreation centres and allotments.
4. To provide a strong emphasis on sustainable travel and enhance walking and cycling infrastructure. This should be expanded upon in the Blessington LAP.
5. To review and strengthen the Development and Design Standards for residential development.

Part 4.3.18 Newtownmountkennedy

Name	Issue Raised
Newtownmountkennedy Community Forum (C11)	<ul style="list-style-type: none"> ▪ Newtownmountkennedy has been designated as a growth town. The community of Newtownmountkennedy will still refer to it as a village and work hard to maintain a village like community. ▪ Despite growing rapidly, the settlement is not self-sustaining in that it relies on other areas for employment opportunities, services, and facilities. ▪ It is considered that once an area has been designated for large growth in the CDP all development levies received from that area should be ringfenced to be spent within the area. Until the required services, infrastructures and community facilities required to meet the needs of the residents are provided the development levies should remain ringfenced to be spent within that area. ▪ There is more zoned land to be developed in Newtownmountkennedy but there is insufficient infrastructure and facilities to cater for the residents. ▪ The lands zoned currently will more than reach the population targets in the old CDP we would like to see these reduced until a plan for services, facilities and infrastructures is in place. ▪ New residents are joining clubs and groups outside of the area because the existing clubs in Newtownmountkennedy don’t have the facilities or capacity to cater for them. ▪ There is no youth club, scouts den, soccer club, library or play facilities for older children. ▪ There is a high percentage of young families after moving to the area and limited resources to cater for them locally. This is not supportive of an inclusive / engaged community. Despite this planning continues to be granted and no plan is in place to provide for these new residents. ▪ It is important for a phasing scheme to be implemented in the CDP so that development must be phased in line with community facilities, infrastructures and services. The Government are pushing for higher densities then they must support building amenities and transport infrastructures in line with development. Commitments from central government regarding infrastructures and services and in particular public transport should be tied into phasing sequences of large developments. ▪ It is requested that priority is given to greenway / cycleways and walking routes to reduce car journeys and promote a healthier lifestyle in Wicklow. The feeder second level school is located in Kilcoole, a short distance away but no safe path or cycle route for children from Newtownmountkennedy to access the school. ▪ There is no public transport to link Newtownmountkennedy to Kilcoole. ▪ All children from Newtownmountkennedy travel to and from school by school bus or car. As part of the new CDP we would like to see all education zoned land have greenway access routes through neighbouring zoned lands. This should be outlined in the zoning. ▪ Too many small retail units were built on the Main Street of Newtownmountkennedy only suitable for a take away or small café. These lay vacant for years. There is a shortage of alternative sized units. There is a thriving craft industry in and around Newtownmountkennedy that could be promoted as the town’s niche. ▪ In light of the new policies pushing for higher housing densities it is considered important to protect existing outdoor recreational amenities.

	<p>There are Coillte forests located centrally in Newtownmountkennedy and at walking distance in Kilmurry and Callow Hill. These woods provide a valued natural resource for the residents of Newtownmountkennedy where open space is limited and we would like to see these amenities protected.</p> <ul style="list-style-type: none"> ▪ As a growth town Newtownmountkennedy is badly in need of a large sports campus within walking distance of the town. ▪ In Newtownmountkennedy there are some centrally based community facilities such as playing pitch and community centre. It is thought that for accessibility and safety this is the best model to follow. There are various sports and age groups crossing paths at the community centre and it is felt that this provides a great opportunity for social interaction. Where possible community facilities should be clustered together and located as centrally as possible. ▪ Newtownmountkennedy requires a large land parcel zoned for sport and recreation to cater for a multi-use sports facility to meet the needs of all new residents. ▪ In Newtownmountkennedy there is a large development with small crèches located throughout. These smaller crèches are not viable for childcare providers and the community would like to see larger scale crèches contained in new developments going forward that are viable for childcare providers. ▪ There should be an over-all long-term plan for recreational facilities and open space carried out with input from the local groups and residents for all areas. All community needs both current and future should be identified and possible locations earmarked for facilities. All future development community contributions and a percentage of LPT should be ring fenced for these facilities. This way a community will have a clear plan to work to and can apply for match funding and work with the council to build their future.
Aoife Gregg (D24)	<ul style="list-style-type: none"> ▪ Highlight the need for better planning in Newtownmountkennedy. ▪ The area has a lot of potential for retail with the massive growth in housing. ▪ The Main Street needs to be looked at urgently. It is used for park and ride and often cars are parked on double yellow lines or blocking the path for wheelchairs and strollers. ▪ Another food supermarket is needed also to sustain the growth and flow of neighbouring villages to the Main Street.
Billy Timmons (D49)	<ul style="list-style-type: none"> ▪ Linkages to the eastern side of the M11 should be enhanced. ▪ The southern side of the town on the old N11 needs to have an increased link to the core.
Paul Stanton (D52)	<ul style="list-style-type: none"> ▪ Mr. Stanton owns approximately 31 hectares of land at Ballinahinch Lower, Newtownmountkennedy that are zoned for integrated tourism/ leisure/ recreational complex in the Wicklow County Development Plan 2016-2022 (see map No. 07.03 of the existing County Plan). ▪ The significant increase in population clearly indicates the growing importance of Newtownmountkennedy and therefore suggests that there is a need to re-consider the hierarchy of Newtownmountkennedy in the overall urban structure. ▪ Given the growth of Newtownmountkennedy in recent years, it is considered that Newtownmountkennedy should be designated as a Self-Sustaining Growth Town in the new County Development Plan. ▪ The current County Plan states that based on the existing zoning of lands that Newtownmountkennedy is at a deficit of zoned lands for residential development. In this context it is respectfully submitted that these lands be

	<p>considered for re-zoning for residential development in the making of the Draft County Plan.</p> <ul style="list-style-type: none"> ▪ It is submitted that the County Plan carefully consider the population projections of the county and in particular Newtownmountkennedy and designate the settlement hierarchy accordingly. ▪ The subject lands in Newtownmountkennedy have been previously granted planning permission in 2003 for an integrated tourism and leisure recreational complex comprising of a snow leisure centre, health and leisure academy, education centre, hotel with 184 no. bedrooms, 23 apartments, ancillary restaurants, bars, functions rooms and 18 hole golf course. Works commenced on this development and an extension of duration was granted by Wicklow County Council in 2010 for a further 5 years based on substantial works already carried out on the site. Development levies in excess of €1m were also paid to the County Council in respect of this development. ▪ The subject lands at Newtownmountkennedy are therefore brownfield lands and should be utilised for future development in accordance with the objectives of the NPF and the RSES which encourage the regeneration of brownfield lands throughout the country. The NPF states that <i>"the target is for at least 40% of all new housing to be delivered within the existing build – up areas of cities, towns and villages on infill and / or brownfield sites"</i>. ▪ As such it is considered that there is an opportunity to meet both the existing and future housing needs of the area on the subject lands, in accordance with the sustainable development objectives of the NPF and the RSES in the preparation of the new County Plan.
Colum O’Broin (D67)	<ul style="list-style-type: none"> ▪ Ever since the first Strategic Planning Guidelines for the GDA in 1999, Newtownmountkennedy has had a superior status to other towns in the county and this was restated in the two subsequent Regional Planning Guidelines for the GDA and similarly in the Retail Planning Guidelines. There was logic initially in this designation, given Newtownmountkennedy’s excellent connectivity and public transport and available land to consolidate what is a relatively spread out settlement. ▪ In the meantime Newtownmountkennedy has attracted a high level of commercial infrastructure (large supermarket, shopping development, Hotel/Conference centre) that can serve a much greater population than currently exists in Newtown. I would thus request that Newtownmountkennedy be given the higher of the available designations in the RSES of Self-Sustaining Growth Town. ▪ Given the attributes that initially drove Newtown’s previous designation in the previous three Planning Guidelines and the commercial infrastructure already developed based on that designation it is requested that the target population remain at least at its current level of 6000.

Response of the Chief Executive

Population Growth

The NPF requires that local authorities apply a tailored approach to the growth of towns and villages. This is set out in NPOs 7 and 9 (please refer to Section 4.3.1 Vision and Core Strategy for more detail).

The NPF Implementation Roadmap sets out County Population Projections to 2031. The population projection for County Wicklow for 2031 is 164,000. This is significantly below the target in the current development plan – 176,000 in 2028. Accordingly this requires a change in the population growth strategy for all of the settlements including Newtownmountkennedy. The new targets are addressed in the draft Core Strategy which forms part of this report.

Settlement Hierarchy

The new draft Plan will include a new settlement hierarchy which will comply with the regional settlement hierarchy.

Relevant Regional Policy Objectives:

RPO 4.1: *In preparing core strategies for development plans, local authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.*

The regional settlement hierarchy identifies two types of settlement that sit below key towns on the hierarchy. These are ‘Self-Sustaining Growth Towns’ or ‘Self Sustaining Towns’. Self-Sustaining Growth Towns are settlements with a moderate level of jobs and services include sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining. Self-Sustaining Towns include towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.

In determining a settlement hierarchy for the County, the RSES advocates the use of an evidence-led asset based approach. The asset base compiles information across 25 different indicators which considers not just historic population growth, but a wider number of relevant factors to build an overall profile of settlements, in terms of their scale and functions, human capital and placemaking assets, enterprise eco-system, connectivity and environmental and infrastructure capacity. The asset base assessment is used to identify which settlements in Wicklow have the greatest capacity and potential for growth, while ensuring that future growth is sustainably managed. This assessment has been carried out for Newtownmountkennedy and it has been determined that the settlement comes within the definition of a ‘self-sustaining town’. In accordance with Section 4.7 of the RSES, self sustaining towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. Newtownmountkennedy has experienced significant population growth and is in need of catch-up services and community facilities.

Alignment between Population / Housing growth and provision of Services, Infrastructure and Facilities

The RSES recognises that one of the key challenges facing the Region is the need for better alignment between population growth, location of residential development and employment to create healthy and attractive places. This is a challenge currently facing Newtownmountkennedy.

It is accepted that the recent rate of housing development has outpaced the capacity of existing services, and the Council is endeavouring to utilise all means open to it to enhance infrastructure including:

- Working closely with housing developers to ensure community facilities, open spaces etc that are part of those developments as delivered in a timely manner;
- Working with landowners and the community to deliver improved sports and play facilities;
- Liaising with the Department of Education and Skills regarding new school provision;
- Seeking funding, and supporting the community in seeking funding from various schemes such as the Town & Village Renewal Scheme, LEADER and the Rural Regeneration and Development Fund, for town and community enhancement programmes;
- Working with and lobbying the transport agencies for improved public transport services and funding for accessibility improvement schemes.

As set out above, in light of the catch-up that is required in facilities in Newtownmountkennedy, the approach to future development in Newtownmountkennedy as set out in the proposed Core Strategy will be to moderate housing growth and focus on improving infrastructure and services during the plan period.

Where further housing development is proposed, the current county development plan objective CD5 will be applied:

CD5 *Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.*

It is intended that this objective will be maintained and enhanced if necessary in the new plan.

Town Centre

The NPF acknowledges the importance of towns and villages in terms of their economic, administrative and social functions and seeks to activate the potential for renewal and strengthen their role as places to live, work and visit. This includes encouraging new roles and functions for buildings, streets and sites within our towns and villages. The draft County Development Plan will include a town plan for Newtownmountkennedy and this will include objectives for the town centre including detailed objectives in relation to placemaking, town and village improvement, parking strategies and public realm enhancement.

The CE recognises that a strong retail sector is a key element in the vitality and vibrancy of the County’s towns and villages. Apart from creating employment, the retail sector plays a significant role in attracting people to towns and villages thereby contributing to overall economic vitality. The new draft Plan and draft Newtownmountkennedy Town Plan will provide a clear framework for retail development and include objectives for the town centre and retail development. However, it should be noted that, apart from putting the right policies in place to facilitate retail development, the development plan including the town plan are not responsible for finding uses for particular units.

The comments in relation to an overconcentration of small sized retail units in the town centre are noted. The current plan includes an objective (RT20) to give positive consideration to the re-configuration of existing retail provision to accommodate the demands of modern retailing.

Community Facilities and Recreational Amenities

Community and social infrastructure is recognised as a fundamental element in creating resilient, sustainable and healthy communities. While the actual delivery of such infrastructure is outside the remit of the development plan, the County Development Plan will include objectives to support the delivery of community facilities and social infrastructure in Newtownmountkennedy and will ensure that adequate land is identified in the local plan for community facilities.

The Planning Authority agrees with the submission that community facilities should be suitably located within the development limits of the relevant settlement and should be easily accessible for all sections of the community. It is considered that the development plan would benefit from such an objective. The multi-use of new community buildings is required by the current development plan.

CD32 *New community buildings / facilities shall be designed to facilitate a wide range of uses including active uses (e.g. basketball, badminton, gymnastics / dance, martial arts etc), meeting / club use and the operation of youth clubs and youth services.*

This policy should be retained and strengthened if necessary.

The County Development Plan is not the Council’s operational or spending plan. Annual delivery programmes and budgetary allocations determine the delivery of community facilities and open space. It is noted that the Council has applied for funding for placemaking measures including the provision of community facilities under the 2020 call for Rural Regeneration and Development Fund.

In terms of health and overall well-being the importance of being able to access recreational amenities is recognised. In line with this, the Planning Authority recognises the importance of ensuring that existing forests are as accessible as possible especially to those living in nearby settlements. This will be examined as part of the ‘green infrastructure’ strategy.

Development Levies

The comments in relation to the use of development contributions are noted. This is not within the remit of the County Development Plan. The basis for determining the calculation and allocation of development contributions is addressed in the Development Contribution Scheme, prepared in accordance with Section 48 of the Planning and Development Act 2000 (as amended), which is reviewed every few years. The current scheme for Wicklow came into effect in October 2015 and is in place until 2022 or until a new scheme replaces it.

Childcare Facilities

The concerns in relation to the size of childcare units are noted and will be brought to the attention of the Wicklow County Childcare Committee. Wicklow County Childcare Committee was formed in 2001 and is funded by the Department of Children and Youth Affairs to improve the quality and quantity of childcare in Co. Wicklow. The Committee will be consulted as part of the review of the policies relating to childcare (C22 to C24).

Walking and Cycling Infrastructure

The comments in relation to the need for better walking and cycling infrastructure in Newtownmountkennedy and between Newtownmountkennedy and Kilcoole are noted. There are a number of objectives in the current County Development Plan with respect to walking and cycling

paths / lanes and it is recommended that same be retained in the new plan and strengthened where necessary.

The Council is committed in its annual roads delivery programme to improve footpaths and cycling paths / lanes. The delivery of such infrastructure is dependent on the allocation of funding through the annual budgetary process or allocations from other agencies, such as the NTA. Significant work is ongoing on the provision of walking and cycling facilities. The recent IPB dividend funding was spent improving footpaths throughout the county. This is in addition to NTA funding for footpaths and cycleways. In relation to schools, the NTA have a designated ‘permeability’ fund. This is aimed at creating safe routes to schools and removing barriers such as walls and gates blocking direct access to schools. Several projects have been completed under this programme and others are currently being progressed.

It is agreed that enhanced connectivity from the south of the town and Garden Village to the town centre is necessary, and the Council again will utilise resources available to it to improve walking and cycling infrastructure in particular from these locations.

Land at Ballinahinch Lower

As stated in the public notice and pursuant to Section 11 (2) of the Planning and Development Act, 2000 (as amended), requests or proposals for zoning of a particular parcel of land for any purpose shall not be considered at this stage of the development plan process.

Recommendations of the Chief Executive

1. Identify Newtownmountkennedy as a self-sustaining town in the new Draft County Development Plan 2021-2027.
2. Prepare a new town plan for Newtownmountkennedy to be included in the draft County Development Plan.
3. Include objectives to support proposals for regeneration, rejuvenation of vacant and derelict sites, town centre renewal and public realm enhancement. In accordance with *RPO 6.12*, include objectives on placemaking in Newtownmountkennedy.
4. Identify objectives for the town centre particularly with regard to town centre improvements and the development of retail.
5. Include an objective in the Newtownmountkennedy plan requiring that community facilities are appropriately located in the town and are easily accessible for all sections of the community.
6. To provide enhanced policy support and objectives in the new County Development Plan for community and social infrastructure including education, sport and recreation centres.
7. To provide a strong emphasis on sustainable travel and enhance walking and cycling infrastructure. This should be expanded upon in the Newtownmountkennedy local town plan.
8. To investigate the feasibility of providing a pedestrian and cycle link between Newtownmountkennedy and Colaiste Chraobh Abhann secondary school in Kilcoole.
9. As part of the green infrastructure strategy, to assess the feasibility of providing access to the Coillte forests located centrally in Newtownmountkennedy and at walking distance in Kilmurry and Callow Hill.

Part 4.3.19 Ashford

Name	Issue Raised
Ashford Development Association Ltd (C1)	<p>The Ashford Development Associated Ltd (ADAL) was established for the primary purpose of participating in the then 2004 - 2010 Development Plan. The ADAL registered as a Charity and a Limited Company in early 2007 and has continued to serve the community of Ashford to this date. ADAL have built and run the Ashford Community and Heritage Centre which is at the heart of the Community. ADAL partner with the Wicklow County Council in many different circumstances and have built a good relationship over time with the Council.</p> <p>ADAL are back to their foundations, giving a full picture of what are the needs and wishes for the future as a community. ADAL will try to answer the questions and cover what has gone well and what has gone not so well over the intervening years.</p> <p>What is the best designation for Ashford?</p> <p>The best designation for Ashford is Village. It is appreciated that the time for this is long past, so we accept that we are designated as a Small Growth Town although the “feeling” of the community is as a Village. It must be pointed out that where there has been growth elsewhere, Ashford has reduced in size between the censuses from 1449 to 1425 population. It is believed that this has continued to the present in 2019 until the new Ballinahinch Wood Estate comes online (to be discussed separately). There can be several causes that can be proposed for this change with the following observations.</p> <ul style="list-style-type: none"> ▪ Lack of housing in the area - at no time has there been a lack of available housing ▪ Poor transportation infrastructure - there is very poor transportation in the area ▪ Lack of children’s schools and crèches - this is a large problem ▪ Lack of work in the area - there is little or no work in or around Ashford ▪ Crime and antisocial behaviour - not in Ashford. ▪ Cost of Living - Same as all of south-east, cheaper than Dublin. ▪ Rental accommodation - little or none. ▪ Air, Water, Pollution - not an issue. ▪ Non-expanding, ageing population - this is the most likely scenario. <p>It is noted from these observations that the people of Ashford wish to remain a Village. People do not come here to commute to Dublin but remain as they always have. People get old, children move away. This is a future worry and there should be an effort made to regenerate the population, but making a Dublin Commuter Belt settlement is not the answer. This has already begun and steps need to be taken to absorb what has been done. There is a need to prevent further continuation of this policy as there is and will not be any infrastructure to support this kind of growth.</p> <p>What Towns and Villages should be promoted for population growth?</p> <p>As we have said above, Ashford should be promoted for small or moderate growth of young families, working from home. Artists, Crafts, Teachers, Professionals. Ashford has no transport to Dublin and no work opportunity within Ashford.</p> <p>Do you think your town has the capacity to sustain more housing growth? if so, why?</p>

	<p>The RSA has declared they have no plans to upgrade the M11 in the near or within the next period of the development plan and it cannot support more development. Ashford is too far from the Rail Service in Wicklow and the trains are infrequent and do not run regular in peak hours. The schools are overfilled at present and any new families will arrive without places in schools. The current new 169 residents will not have spaces in the current available two primary schools.</p> <p>When the current residents took the Ballinahinch Estate to An Bord Pleanála, their inspector wrote a devastating vision of the future and recommended that permission was denied to the 169 houses. An Bord Pleanála chose to ignore the Inspector’s recommendation. Please read this comprehensive inspector’s report and think carefully before any new housing in Ashford is planned, zoned or expected. Remember that this Inspector Report reflects the situation before 169 new houses were introduced.</p> <p>Do you think that the level of housing development in your town has been matched by adequate infrastructure and services?</p> <p>There are no new schools in the area, nor any planned. There are 0 spaces in the current schools. How many school places can we assume are needed by the 169 houses? There are no crèche spaces. With the 169 houses there is a new crèche for 40 children. How many extra spaces will be needed? There is no change in transport, planned, expected or imagined.</p> <p>We did a small survey of the car parking in the village of Ashford. These spaces are shared by both the staff and the patrons of the businesses. Three pubs, national school and churches have their own private parking.</p> <p>Cafe / Charity Shop/ 2 Retail Units/ Estate Agent/ Garda Station/ Post Office - 13 spaces (there are more staff that cover most of these spaces) Post Office / Residence / Play School / Ashford Community Centre / Church / School - 13 spaces Play Park - 12 spaces Bottle Bank / GAA - 5 spaces Chemist / Centra and 3 retail units - 20 spaces Martsworth Carpets - 5 Private spaces Take Away - 6 spaces Butcher / Solicitors - 6 spaces</p> <p>We are beginning to see the ABP Inspector’s vision becoming a reality and seeing a great increase in time to enter the parking in front of the chemist (see the ABP Inspector Report).</p> <p>What are the service shortfalls in your area?</p> <p>Transport, schools, crèches, parking, work (of course).</p> <p>How should we deliver compact growth in each of the County’s towns and villages?</p> <p>This is the first opinion question that is strategy vs. facts. We believe that growth must be looked at as a County as a whole. Some places need growth, some do not. All have some growth need as people age. We need to really step back and say “Wicklow is Wonderful!” why do we all feel that it is so wonderful. It is these</p>
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	<p>perspectives that need to be understood. For example, Ashford which we know well and is only one piece of the puzzle. We would probably be very similar to Aughrim in many respects.</p> <p>We are a good proportion of old families that have been here for 100’s of years, some 20-50 years, some newcomers. All are proud to be a small village (town) that has simple shops, Avoca, Mount Usher Gardens, Ashford Film Studio, the home of the River Vartry, Bel Air Hotel, Hunter’s Hotel, a real treat for tourists and a fine example of the “Garden of Ireland”.</p> <p>Our difficulties are not being targeted as a Dormitory Community for Dublin and radically change what we are and what we can offer. We are an ageing community and we always need good people who are resident here, not traveling, to join the community and take up the houses that become available. New estates are possible but of the size of 10-30 big quality houses. Can we meet these aspirations for the likes of Ashford and Aughrim?</p> <p>Each community should have the growth in accordance to their nature.</p> <p>What types of houses are required to meet housing demand?</p> <p>This is a question better suited to each individual area, as one solution cannot fit all. We will answer this in respect to Ashford and similar places like Aughrim and Rathdrum.</p> <p>Ashford, which has been designated as a Small Growth Town, is one of the few places that has had a reduction in population. That clearly shows that there is no “burning” need for new housing. This is especially clear with 169 houses coming available early 2020. Ashford has also the reputation of a beautiful Village, the home of Mount Usher Gardens, a fine example of what Wicklow has to offer. To keep this image it is necessary to make some restrictions on what can or will be built. Building should be restricted to 2 storey housing with a maximum height of 9.4 meters. No expansion, retention or relaxation should be made to this.</p> <p>This has been the case for Ashford until the “rogue” estate, Mt. Usher View, decided to take it upon themselves to build three story buildings without permission and then seek retention from the Wicklow County Council. This continues to be an eyesore and a monument to bad planning in the centre of Ashford. We need to prevent this from happening again and protect against urban sprawl. There are probably other lessons to be learned in this bad example.</p> <p>The character of Ashford should be declared in the Plan, renewed, enforced and maintained. We are the home to many fine buildings and pubs with two story dormer style housing. Whereas some planners may see this as “old style Ireland”, something to be ashamed of, we do not agree. A “cityscape” as recommended to Mt. Usher View by the Wicklow County Council Planners, is not in character in Ashford, is not what most of the community want. This is the best example of “urban sprawl” and what not to do, that speaks for maintaining the status quo of Ashford.</p> <p>Is the rural housing policy working effectively to facilitate genuine rural housing needs while protecting the landscape from inappropriate urban generated development?</p>
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The straight answer from Ashford is NO. We have two examples in Ashford where the opposite is true, Mt. Usher View and Ballinahinch Wood. Mt. Usher View is an unmitigated disaster. Ballinahinch Wood, although nicely implemented, faces the commuting challenge on the M11 and the infrastructure collision as described by the An Bord Pleanála Inspector Report. This requires a full read to understand the consequences, yet to be felt, of placing urban development in a rural setting.

What measures are required to make our towns and villages more vibrant and attractive as places to live in, work in, shop and visit?

We need to all understand the assets and what each different place has to offer. One plan fits all is not the solution. An active Tidy Towns does much to promote getting the best visually out of what we have. In Ashford we compete with Aughrim year on year, catching up slowly. What this gives us is a goal and it really serves to pull ourselves up and do the best of what we can with what we have.

We do not want to continue to harp on Mt. Usher View, but mistakes like this in the planning process really set back a community from achieving this goal. We have a PPN network which should cover this, but does not, as the PPN does not address planning issues. The Ashford Development Association, set up for the purpose of giving the Wicklow County Council a window into the thoughts of the community of Ashford, has never been invited by the planners to a meeting. When we have requested one, but have been told that they must remain impartial.

We believe that an open regular dialogue should be maintained with groups like ourselves which exist throughout Wicklow. The County Plan should be a live ongoing document which lives from regular contact with communities throughout its term. Communities should not be surprised by planning in their area and the Planning system should not be publish notice, objection, appeal, ending in An Bord Pleanála. Planning should be the warm acceptance of everyone’s needs and working together for a better future.

What scale of retail development is appropriate for Wicklow’s towns and villages?

This of course, depends on the town or village, the space available and the economics of the situation. Ashford for example, has a privately owned, old cattle mart in the centre of the village.

There has been talk of building a Californian style market and shops which would have a very unique draw to the village. This development could include underground parking which would eliminate some of the parking congestion currently a problem in Ashford. This would be a suitable development other than there is a request for high rise apartments in a special designated green zone overlooking Mount Usher Gardens. This zone should not be revoked but the planning department, the neighbours and the Ashford Community should find a way to make this development go forward. It is challenges like this where we need to commit to a new way of working.

How should tourism be developed throughout the County Wicklow without compromising our valuable resources including our scenic landscapes and rich heritage?

This is the top question as this would resolve all others or greatly enhance the road to recovery on most. We really need a “think tank” taking each site around the

County and focusing on what more can be done. We have Avoca’s best spots centred in Wicklow. We have the Ashford Studio and Mount Usher Gardens in Ashford. We have Waterfalls and Avoca in Powerscourt. There are many other sites, less known and more in need of promotion.

There is also the work of establishing cross compatibility of sites. In Ashford an attractive package can be imagined of a breakfast at Chester Beatty, a guided tour of the Ashford Studios in the late morning, lunch at Mount Usher Gardens and an afternoon at Mount Usher and spending the dinner and night at Hunters Hotel. We have thought of this, but have not as yet organised it. Some incentive might push us forward or even the interest and cooperation of the Wicklow County Council. We all need to be more proactive.

What aspects of Wicklow’s Heritage do you consider should be protected?

From the aspect of Ashford, most physical heritage has been added to the record. The missing element is not the physical stuff but the stories. The people of Wicklow have within their families are the stories of the past which have a rich heritage woven in real people. There are photographs held in cupboards and boxes that deteriorate with time. There needs to be a concentrated effort by the Heritage groups to capture these stories and copy these photographs before our ageing population disappears with these. Again incentives would help. Even an offer of a duplication service with the proviso that the original or the copy would be retained with publishing rights included.

How can the County Development Plan encourage the reuse of historical buildings that have fallen into disuse?

We have the Garda Station in Ashford that is promised to be re-furbished and turned into a new station for the traffic corps. The traffic corps could be encouraged to continue and complete the project as earlier initiatives have fallen away.

Are there any other assets such as views, trees, or natural areas that should be afforded protection as part of the County Development Plan?

This is a sore point for us. The entrance to Ashford from the south was lined with large mature trees of great beauty. Prior to applying for planning, developers have a habit of arriving early on Saturday morning and cutting down trees to the ground. This happened at the entrance to Ashford and at Ballinahinch Woods. Before anyone can stop them, the trees are gone. By the time a complaint can be raised with the Council, on Saturday morning, the illegal act is complete. How can we put into the plan that if anyone does this, permission will be refused on this basis only and any new application will be conditional on restoring or replacing the trees with mature ones.

The River Vartry flows though the whole area of Ashford connecting the 2000 Natura site of the Wicklow Mountains to the 2000 Natura site of the Broadlough. It forms a corridor of green surrounding the river that is a natural thoroughfare of wildlife to and from the two protected sites. The River Vartry is an EU protected Salmonid River affording it protection for the species. Even though this sounds great, it is not truly protected without the full attention of the Wicklow County Council. Currently for example, there is a Retention Application with An Bord Pleanála that suggested a surface water sewer in the conditions of the retention grant. This is an environmental issue not suitable for the retention process.

The River Vartry is a vital part of the ecosystem formed by the two 2000 Natura sites. An effort should be announced in the new Plan to protect and propose that the Vartry become a 2000 Natura site or at least a SPA or SAC like Devil’s Glen. Much of this is in the hands of landowners but with our help we can encourage and have a good possibility of agreement of the landowners who wish to do the best for the river.

Are there adequate community facilities in your area? If not, what additional facilities are needed?

We have a working, successful, Community Hall but it is limited to 60 people which just suits our needs for the moment. If the Community grows, this will run into difficulties. Bigger halls are hard to come by and we do not see any large spaces coming available.

We have a lovely park that people come from all around to visit on a regular basis. Other parks of this quality would be very welcome but this one is an essential part of the village across from the Garda Station and next to the new to be built regional traffic corps in the old Garda Station.

Are the educational needs of our population being met? What additional facilities are needed and where?

Ashford has been shouting for years that the two schools are full and have no room for expansion. Again there is additional land zoned for educational use next to the Nun’s Cross School and the National School in the village. These are zoned but locked in the same situation as above. Unless they are built on, the land will not be given nor unlocked.

Where do you think new open space facilities should be provided?

The park in Ashford is a great success for residents far and wide, mostly from Wicklow County. What that says is that if you build something designed well and maintained well, it becomes very popular. The worries of social misbehaviour did not materialise and it has remained undamaged and unlettered. We are fortunate to have a lovely small stream that flows through the park and that too has remained pristine. We are fortunate in that the park is across from the Garda Station and will be next to the Traffic Corp refurbishment of the old Garda Station is quintessential to its success. Right in the centre of the Village, across from the Community Hall, makes it a poor place for anti-social behaviour, which can be an issue with other places. When we look back, it was not understood that this was really the only safe place in Ashford for the park and its integrated stream. It is places like this, which form a backbone to communities drawing in potential new residents, with young families, into the Village with the thought “Wouldn’t it be nice to live in Ashford?” All of Ashford are proud of what we have and everyone jointly looks after it. This is the positive example of Open Space.

We would like to imagine that the ugly uncompleted estate, Mt. Usher View, would turn into a beautiful green space at the other end of town, but that is not a very likely outcome of the long term fight to correct the planning problems. Most towns could benefit from an open space such as ours and each contributes to the overall, appeal of the town.

Are the open space requirements set out in the County Development Plan

	<p>adequate for new development?</p> <p>Sometimes the open spaces are overwhelmed by the larger developments. If you look at the example of the Ballinahinch Woods, the open spaces are not obvious and the overall impression is of a very large amount of houses. This is not broken up by bits of green here and there. The semi-detached nature of the housing, does not afford a view of nature but built up residents, more suitable for Greystones than Ashford. The Open Space requirements should be expanded in rural settings and encouragement be made for detached houses on larger plots, surrounded by grass, more sustainable and suitable for areas like Ashford.</p> <p>What methodology should be used to deliver active open space and recreational facilities?</p> <p>Areas of green should be combined where possible. In Ashford we have Bramble Glade as an example of an estate which combines open space and housing in a simple way. The residents feel that they are surrounded by nature not looking out on each other.</p> <p>How would you like Ashford to develop in the future?</p> <p>We would define this as organically. We already have had more expansion than we can absorb as far as new housing. All the zoned land should be limited in scope and size. Those zoned Strategic Land Reserve should be retained as SLR. Potential developers should be encouraged to make houses of greater size, detached in substantial plots rather than squeezing many small houses in a small space. The profit made would be similar but we would not have the issues with lack of transport and infrastructure. This may require changing the houses per hectare thresholds or the amount of housing that is required in Ashford.</p> <p>We would like to see more spaces available in schools and crèches to accommodate the existing new residents of Ashford.</p> <p>What do you think are the main issues facing Ashford?</p> <p>We would like to resolve the situation with Mt. Usher View and find a solution that can mitigate the awful look of the estate. This includes a resolution to the current objection for the Surface Water Sewer proposed for the estate.</p> <p>We have no available parking in the centre of the village. This is an urgent situation to be resolved. We have line painting on the roads that needs renewing. We have signage issues with the very severe bump at the entrance to the village. Visitors often do not see this and wheels take air.</p> <p>The most important issue is the Ashford Weir which was destroyed in 2016 by the flood. There is an initiative to replace with a fish-friendly waterscape in the future. Wicklow County Council has kindly put aside funds to clean up the space but this is just a minor fix. What is needed is a full fledged project to do the following:</p> <ul style="list-style-type: none"> - Get the approval of all stakeholders setting up design parameters - Have an Architectural Design Competition to design a suitable landscape or fish ladder. - Construct a “catch-all” silt and dirt trap for protecting the river downstream - Protect and bury the foul sewer pipe that runs across the river by the bridge - Remove some remnants of the old weir and grade parts of the river. - Build the new waterscape during the summer when works are allowed.
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	<p>The cost of this will be upwards to €100,000 and will not be done without the commitment of the Wicklow County Council. This is both an environmental issue and one of an aesthetic issue for the community. Wisely the Council would be able to find a grant structure suitable as a joint project between Ashford and Co. Wicklow.</p> <p>A commitment to working with Ashford on the Weir project would be helpful. Parking can only be address in the greater scheme of renewal of the town centre. Putting a curb on development in the area is a sensitive issue but saying “Until”... would be honest and forthright as the situation of more housing and no transport is not resolvable in the life of the Plan</p> <p>How can the town centre be regenerated and the range of services enhanced?</p> <p>There is a project in the works that could do much for the centre but has its difficulties with height of housing and building in a green belt. We need a creative solution by all the stakeholders working together with the Wicklow County Council. This would be a unique way of working together but could solve many problems of parking, regeneration, and making a natural “California” type rural solution. Very appealing but needing real creative people to work together and find a good solution. The people are there, but we need leadership from the Wicklow County Council.</p> <p>This project could be of great benefit to the community and perhaps there is a solution for many problems. The proposal includes a large underground parking as well as retail shops and perhaps a hotel. If the housing were limited to two story housing and very low density, the land which is green belt could be used for a Constructed Wetland and reed pond, affording a very attractive and useful feature to Ashford. We could divert all the surface water that is currently causing a concern and being dumped into the River Vartry at Mount Usher Gardens into these filtration ponds and wetland serving many purposes. This would host pollinators, be a surface water solution for Ashford, and be an example of forward thinking, green, and right at the heart of the Village. We would be so proud of our place, hosting such a good solution. We would believe this all possible with your Leadership.</p> <p>Has the town been able to absorb recent development or are there any problems arising?</p> <p>The problems are just to come. No one will be able to get to the chemist. There will be more stopped traffic waiting on the street to get into the 20 spaces shared by staff and all the other businesses. There will be more and more double parking on the street and along the curb. The double yellow lines will be crossed. The town centre cannot accommodate the 300 new cars in the village from Ballinahinch Wood. Only 20 - 30 houses are filled and we are seeing the problem accelerate, including the traffic to Dublin is worse. Traffic at 8:00 am was seen at the junction for Abwood on the M11. We cannot ignore this issue any longer.</p> <p>The school issue will soon be evident as the new houses fill up. We suspect to have to host some town meeting on the subject of schools and crèches pretty soon.</p>
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Konrad and Katherine Jay (D53)

Map of Mount Usher Gardens



As the owners of Mount Usher we wish to secure the long term protection of these internationally renowned Gardens, and the overall aim of this submission is to respectfully request the Planning Authority to include the following policy objectives in the revised Local Area Plan for Ashford 2020.

- a) To include suitable objectives to achieve the protection of this unique recreational, environmental, and botanical asset and amenity from in appropriate development along its boundaries.
- b) To include suitable objectives to protect the River Vartry, the Killiskey River, and all other streams and watercourses within the area from the ever increasing threats of abstraction and impoundment and to protect them from the very acute threats posed by noxious and polluting effects from agriculture, forestry, commercial activity, and housing.

The submission goes on to give details on the description and background to Mount Usher Gardens.

It is intended to continue to maintain and develop the gardens. The areas immediately affect the boundaries of the gardens are as follows:

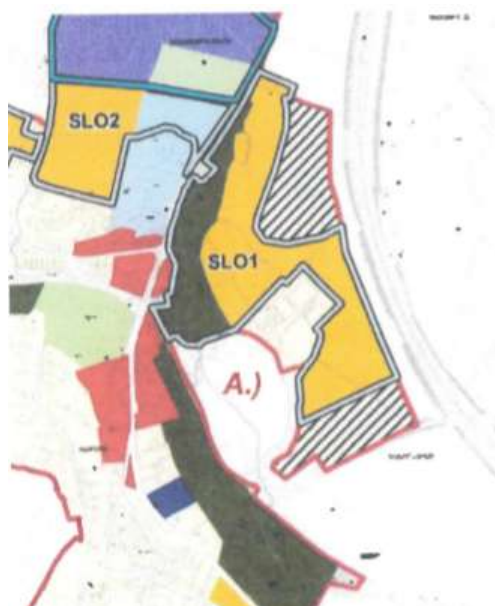
Old Ashford Mart (Marked A on map above)

There should be enhanced protection for the amenities of Mount Usher with the following objectives included:

- a) include a specific recognition that all the boundaries of the gardens be protected into the future.
- b) reinstate the 2008 objective to provide a ten meter buffer zone between all development on the Mart site, including parking, and the southern boundary of Mount Usher Gardens.
- c) all development to the rear of the Mart site along its northern boundary be

two storey only (first floor above ground).

Inchanappa Demesne /Mill Road (Marked D on map above)



This is an important area within the village of Ashford and the following objectives should be reinstated:

- a) To reinstate the lands referred to above, and indicated A on the map above, into the LAP and zoned as ‘Open Space’ as per the 2008 area plan, in order for them to be integrated naturally into the lands adjacent to SLO 1 which are already zoned as such.
- b) That’s the waterways, streams, and ponds running through these lands be maintained in accordance with best environmental practice and in keeping with the current plan under the heading of heritage objectives.
- c) That the Mill Road, the woodland, and boundary wall that runs between Ashford village and the back gates of Inchanappa opposite the private gates of Mount Usher be referred to specifically in the revised plan and protected, and that a plan regarding the future responsibility for their maintenance and protection be put in place.

River Vartry

In order to protect the river, the following objectives are proposed to be included in the plan:

- a) To ensure that the River Vartry, and the Killiskey River be specifically protected from all excessive and damaging abstraction and impoundment going forward.
- b) To ensure that any development in the area takes full consideration of the impacts it will have on the health of the rivers and watercourses in the area and mitigates these in an acceptable and ecologically sustainable manner.
- c) To ensure the avoidance of pollution to the river and watercourses by ensuring that stringent and effective attenuation and disposal of all waste water and surface water is insisted upon in all further developments.

	<p>Precedent The mixed use development of Mount Usher Court is a bad precedent with its ‘bunker architecture’.</p>
<p>Scoil na Coroine Mhuire, Ashford (D94)</p>	<p>Scoil na Coroine Mhuire would like to take this opportunity to respond to the points raised in the issues paper regarding the future development of Ashford, in particular the need to create sustainable communities with adequate educational facilities for the expected growth in young families in the village.</p> <p>Already Scoil na Coroine Mhuire is under considerable pressure to meet demand and discussions are on-going with the Department of Education with proposals for additional temporary accommodation. While these are important to cope with our immediate needs we do also need a more permanent solution to provide the best, most efficient environment for the children and staff and anticipate a new purpose built school using the land adjacent to our current site for the necessary expansion.</p> <p>This is recognised in the current Local Area Plan for Ashford: 1.6 Social and Community Development In order to meet the needs of the existing and future residents of Ashford and its hinterland, there is a need to enhance community facilities in the town. In particular, this plan must make provisions for the growth of existing schools and sports / recreational facilities and also to provide for more indoor community space... Table 1.3 ... Education/Community Primary Education SLO2 Lands at Inchanappa South</p> <p>The Board of Management are happy for this objective to remain in the new plan currently being prepared.</p>

Response of Chief Executive

Small Growth Town designation

Ashford is designated as a Level 5 ‘Small Growth Town’ in the ‘Urban’ settlements in the current County Development Plan. The current Town Plan for Ashford reflects this designation with its population allocation, zonings and objectives. In line with the objectives of the new NPF and the new RSES, a revised Core Strategy and settlement hierarchy has been drafted for Wicklow (See Part 2 of this report). Given Ashford’s population, existing services and employment functions, Ashford is proposed to be designated as a Level 5 ‘Rural’ ‘Small Town Type 1’ with an appropriate growth strategy commensurate with this tier in the hierarchy and the carrying capacity of the town. This revised population allocation is significantly lower than the current population allocation. The zonings and objectives of the new Ashford Plan will reflect this revised designation and allocation.

Village status

Many of the residents of the Level 4, 5 and 6 settlements in the new settlement hierarchy consider their settlement a ‘village’. It is accepted that some see Ashford as more of the village, but this is likely to be more of an emotional connection to a particular past (or future) vision of the place, rather than a reflection of current demographic or planning policy definitions. While the current and proposed Core Strategy of the County Development Plan has Ashford designated a ‘Town’, this is purely a settlement typology for the purposes of complying with the RSES and for the crafting of the land use plan. Given Ashford’s current population, services and employment function it would not be appropriate to

designate it as a ‘village’ in the CDP settlement hierarchy, as it does not fulfill the criteria as set out in the RSES to be designated a ‘village’.

Service shortfalls

The RSES recognises that one of the key challenges facing the Region is the need for better alignment between population growth, location of residential development and employment to create healthy and attractive places. This is a challenge currently facing Ashford.

It is accepted that the recent rate of housing development has outpaced the capacity of some existing services and employment opportunities, and the Council will utilise all means open to it to both enhance infrastructure and promote and facilitate the development of new or expansion of existing employment in the area. In light of the catch-up that is required in such facilities in Ashford the approach to future development in Ashford as set out in the proposed Core Strategy will be to moderate housing growth and focus on improving employment, infrastructure and services during the plan period.

With respect to parking infrastructure and town centre accessibility, while any new development that is proposed is required to provide adequate parking, in line with the parking standards set out in the County Development Plan, the Council is committed through its annual delivery programme to improving town centre roads, footpath, cycleways and car parking in order to improve accessibility and safety for all.

It is noted that it is considered that there are shortfalls of crèches. In this regard, any new residential developments of 75+ units are required to provide a crèche. There are also a number of other separate crèches/ childcare facilities in the village.

The need for a larger hall is noted and the need for additional parks like the one at Inchanappa is noted. There are proposals from the community to extend the existing walkway in the park at Inchanappa further west towards the old Garda Station. The plan facilitates the provision of such facilities.

The Department of Education and Skills (DES) is responsible for the delivery of educational facilities and services. Through the County Development Plan and local plans, the Council must ensure that adequate serviced or serviceable land is available to meet current and future requirements. The current plan for Ashford has zoned two sites adjacent to the two existing national schools to facilitate the extension of these schools. These sites, along with the need for additional school capacity, will be reviewed in the drafting of the new plan for Ashford and where additional land for education is required, the plan can facilitate this.

Where further housing development is proposed, the current county development plan objective CD5 will be applied:

CD5 *Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.*

It is intended that this objective will be maintained and enhanced if necessary in the new plan.

Housing demand / types / design

While it is suggested that larger, less dense, detached housing formats are what is needed in Ashford, no evidence in support of same is provided and indeed there is already a good amount of such housing formats in the settlement. The current County Development Plan requires new development to include a mix of housing types and sizes, to accommodate the needs of the widest range of people in society and it is intended that this provision will be continued in the new plan.

In addition, there is a requirement through the NPF and Ministerial guidelines that better use be made of scarce serviced land resource, and therefore higher densities will be expected in all appropriate locations.

The housing demands and needs for the County will be assessed and evaluated through the new Housing Strategy accompanying the new County Development Plan.

(Please see also Part 4.3.3 of this report)

The suggestion that a height restriction of 2 stories and 9.4m should be in place for any development in Ashford is noted. However, in accordance with Ministerial planning requirements, blanket numerical limitations on building height shall not be provided in developments plans. In addition, the introduction of a specific height restriction is not considered necessary as each site is different with any proposal for development considered on its own merits. Given the sloping topography of Ashford Village, different heights may be more suitable to some sites than others.

Character of Ashford

It is acknowledged that there is a strong architectural character in Ashford with many examples of older traditional well-designed buildings that contribute to the character of the settlement. There are a number of protected structures in the village that all lend themselves to enhancing the character of the area. Any new development on the main street, or in view from the main street is required to have regard to the design and appearance of the surrounding structures and then through the development management process the design of any new development is assessed. Modern design is generally always welcome and the visual impact will be assessed through the development management process. The design of the traditional and new buildings in the village will be assessed as part of the new plan making process and if deemed necessary, set design criteria to protect /enhance the traditional architectural design heritage may be included in the plan.

Mount Usher Court - It is noted that one submission considers the design of this to be ‘bunker architecture’ and considers it to be a poor precedent for the village. Appreciation of different design can be a very personal issue. Generally the plan is open to all types of design and through the development management process, where public submissions can be also made on the design of the proposal, the design can be assessed with its impact on the surrounding buildings/ areas.

Mount Usher View - It is noted that one submission from a group considers the design of this to be not in keeping with the character of the village and the 3 storey height is too high for the village, and therefore it is considered it to be a poor precedent for the village. It is important to note that this development was not originally built in accordance with the planning permission granted. Wicklow County Council initiated enforcement action and the outcome of this action has led to a number of planning applications for retention. The Council is of the opinion that the development as constructed and for which retention permission is being sought, subject to the alterations to the design required by the grant of permission, is generally acceptable in design and layout. It is accepted that it is of a more contemporary design than the original proposal, however as stated above appreciation of

design is a subjective issue and the plan welcomes contemporary design, and the design and its impact is assessed through the development management process.

Open Space Standards

Please refer to Part 4.3.9 of this report (Community and Open Space) which deals with the open space requirements in detail.

Tourism / heritage / amenity of Ashford

The proposed tourist package to promote the village is noted however neither the County Development Plan nor the Ashford plan has a role in promoting the tourist attractions in Ashford.

It is noted that the old stories of Wicklow’s past needs to be recorded, however this is not within the remit of the CDP to record historical stories. The CDP only protects physical structures and sites. The Heritage Office and the Archive Section of WCC have had a number and continue to have different initiatives that record the old stories relevant to Wicklow.

With respect to Mount Usher Gardens, it is acknowledged that the gardens are an important tourism amenity and green area in Ashford. All proposed zonings and uses adjacent to the gardens will be carefully considered in the drafting of the new plan, and if deemed necessary, set design criteria and/or buffer areas may be included in the plan.

With regard to the cutting down of trees, please refer to Part 4.3.10 (Heritage) of this report, which gives a detailed response in relation to the requirements for the felling of trees.

Vartry River & Weir

The current County Development Plan provides for a wide range of policies and objectives aimed at enhancing and protecting rivers and water bodies, including the River Vartry and smaller water courses that feed into it. These provisions aim to complement and work side by side with the implementation of the Water Framework Directive, the River Basin Management Plan and the work of various environmental agencies such as the EPA, NPWS and Inlands Fisheries. The County Development Plan cannot designate the River Vartry as a ‘Natura 2000’ site, as this is a specific EU designation under the Habitats Directive, but it does benefit from various protections without this designation. The current river protection objectives of the County Development Plan are intended to be retained and enhanced where necessary in the new plan.

There is a proposal from a community group in the village to address the damage to / loss of the weir, however there are no specific design details drawn up as of yet. Wicklow Municipal District is not directly involved in this proposal however this MD has contributed financially. The County Development Plan provisions would facilitate and support actions to rectify the damage to the weir.

Public transport

It is noted that there is a lack of public transport in Ashford, however for a lower tier settlement it is actually well served with the 133 Bus Eireann bus providing a regular service between Dublin City and Wicklow Town as well as the Rural Link providing a daily link towards Glendalough. The CDP and the Ashford plan fully allows for and supports the enhancement of public transport in the area, however WCC is not the provider of the public transport service, this is a matter for the transport agencies, particularly the NTA.

Site specific submissions

Mart site: The suggestions regarding the possible development at the former Mart site is noted; no application has been received by the Local Authority in relation to this site. The site is zoned to facilitate mixed use and retail and the design will be considered through the development management process. This site and its zoning will be reviewed as part of the new plan making process.

Inchanappa Demesne / Mill Road: The current designation and objectives for his area will be examined in the drafting of the new plan and will be reviewed and updated where deemed necessary.

Ashford Old Garda Station: It is noted that there may be plans in place to reopen the old Garda Station as a base for the Traffic Corps. The provisions of the current County Development Plan would certainly support bringing a vacant building like this back into use.

Recommendations of Chief Executive

1. Review the existing objectives of the Ashford Town Plan in accordance with national and regional policy and to update where necessary in the drafting of a new plan.
2. Prepare a new plan for Ashford that reflects its proposed revised position in the settlement hierarchy from ‘urban’ to ‘rural’ and its reduced population allocation as detailed in the draft Core Strategy.
3. Consult with the Department of Education with regard to existing and proposed educational requirements for Ashford.
4. Provide a stronger focus for architectural heritage and tourism assets in the Ashford Plan. Ensure that the objectives contained in the Plan give adequate protection to architectural heritage and the environment and ensure that the very resource which tourism depends upon is not damaged by inappropriate development.

Part 4.3.20: Baltinglass

Name	Issue Raised
Baltinglass & District Forum (C10)	<ul style="list-style-type: none"> • Changes in the infrastructure of the town make it apparent that the town should concentrate on tourism and on the natural points of historic and scenic attraction and this approach might stand a better chance of achieving progress towards a viable community. • The unlikelihood of attracting major industry is recognised. • One priority need is an increase in housing and support for the community. • The opening of the primary health care facility will benefit the community at large. • Requirement for improved transport in the area. The very limited transport facilities work against the government policy for reduction in greenhouse gases in that the major part of the population is totally dependent on private cars. • Need greater access to Historic Sites. Properly managed the Neolithic ring forts would generate huge interest for visitors both domestic and from abroad. • Development of the town centre with improved parking, seating, pedestrian facilities and a more central park and an accessible river walk available to visitors and residents. This would require land purchase before the town is totally surrounded by developed farmland or housing with the resultant increase in land values. • The bridge is a bottleneck and is an inadequate route for two-way traffic. • CCTV or other methods of policing public areas to counteract the rise of anti-social behaviour and petty crime. • Community centre is needed in Baltinglass to facilitate the various sporting groups. The inclusion of a stage would encourage involvement in amateur dramatics and music events.
Billy Timmons (D49)	<ul style="list-style-type: none"> • Baltinglass should be upgraded to a Level 4 town to assist in developing it as a hub for south west Wicklow. • A new link to the R747 and N81 upgrade should be included as objectives. • Town centre zoning should include the entire town and not prohibit commercial development. • Equally change of use from commercial to residential should be permitted. • It makes no sense to have a widespread national policy of encouraging people back into town centres while at the same time refusing change of use planning applications. • Access to the Cistercian Abbey ruin should be enhanced. • Include objective to provide a footbridge immediately north of the bridge. • Reference should be made to the Hillfort complex in the area and a site for a potential interpretative centre should be outlined. • Zoning on higher lands should be residential and not industrial/employment. • A pilot painting/mural scheme should be examined along the lines of Waterford City, Kiltimagh, Co Mayo and Clonakilty, Co Cork.
Simon Murphy (D60)	<ul style="list-style-type: none"> • Baltinglass Town Centre and parts of Parkmore Estate in Baltinglass Town are flood risk areas which was identified many years ago. Baltinglass Town Centre and the lands along the River Slaney bank from Eldon Bridge to the north through Parkmore Estate and to Holdenstown Bridge need to be included in the proposed SFRA, to be correctly assessed and to reduce the quantity of lands adjacent to Baltinglass Town Centre which could be

	<p>excluded from development by the future Baltinglass Town development plan.</p> <ul style="list-style-type: none"> • Baltinglass Town is a designated Heritage Town surrounded by the highest density of historical sites of any town in the country. Baltinglass Abbey is the mother house of Jerpoint Abbey. As you drive from Dublin along the N81, there is not one mention of Baltinglass Town as a tourism destination.
<p>William Quinn (D64)</p>	<ul style="list-style-type: none"> • Quinn’s of Baltinglass, a business that is agricultural in nature, would like the Council to clarify in future development plans where businesses like Quinn’s should be appropriately located. • This is so that Quinn’s can plan for future land holdings, for example where Quinn’s could move to, develop out or relocate to with clear unambiguous guidance and advice and understanding from the council. • Under the current development plan and planning guidelines this type of business does not fall into one of the established and traditional land use zonings. • Quinn’s as a business want to expand, grow and invest locally. • Quinn’s Agri store sells all sorts of items that farmers require on a daily basis including the following: animal feed, fertilizer, sprays, seed, farming hardware, animal health, fuel, general hardware, gardening inputs, paint, DIY, pet and equine feed and homewares. Our primary customer base is farmers/small landholders and their families. • Quinn’s sites are typically more than 5 acres in size and therefore require a significant land take (the Baltinglass branch is in excess of 10 acres). This is a similar setup to what other competitors of ours in the industry sell – the likes of Glanbia, Cooney Furlong, Red Mills, Grennans, Liffey Mills, etc • For short periods during harvest season we may need to open 24 hours 7 days a week due to grain intake (all weather related). • Question as to whether a Quinn’s branch would be classified as retail, industrial, manufacturing, retail warehousing, farm shop, agriculture. • It is considered that the best approach for Quinn’s is to leapfrog to a greenfield site outside the town limits. • The nature of the business means they have exceptional circumstances. • Request that the plan gives more clarity in terms of where they could relocate to. • Example of out of town site at Clough lower, Baltinglass provided as an example of a site where Quinn’s could relocate to. • Inadequate energy infrastructure serving Baltinglass and West Wicklow. • Request for CDP to include objective to get natural gas to serve West Wicklow. Quinn’s is a huge use of energy and would benefit from natural gas. • In order to attract more large scale businesses in manufacturing and industry in the future it is strongly encouraged to include an objective for natural gas availability in West Wicklow/Baltinglass.

Response of Chief Executive

Settlement Hierarchy

Baltinglass is the second largest town in West Wicklow and plays an important role in servicing a wide rural hinterland. It is considered important that Baltinglass continues to function as a hub for economic, administrative and social functions and new development should focus on consolidating

the town and strengthening its character and vibrancy. The proposed draft Core Strategy included in this report identifies Baltinglass as a self-sustaining town. In accordance with Section 4.7 of the Regional Spatial and Economic Strategy, self-sustaining towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. This is considered an appropriate development strategy for Baltinglass.

Housing

The core strategy will set out the population growth target for Baltinglass. This will inform the amount of land that is required for new housing and land will be zoned accordingly. While the County Development Plan is not directly responsible for the delivery of housing there are a number of things it can do to create the right environment for the delivery of affordable housing including:

- Providing a robust development framework and core strategy;
- Zoning land for development that is serviced and in appropriate locations which gives a greater degree of certainty to developers and infrastructure providers;
- Providing a clear and articulate longer term development strategy that facilitates the coordinated and efficient provision of enabling infrastructure;
- Including policy to support active land management;
- Providing for higher densities that ensures more efficient use of land and enabling more units coming to the market;
- Providing flexibility in terms of design particularly in urban cores to enable more cost-efficient construction and variety of homes;
- Including policy which encourages infill development and the densification of existing built up areas.

Heritage and Tourism Potential

Baltinglass town’s historic origin and rich heritage are a significant element of the town’s appeal and it is considered that this should be strengthened in the new plan. The area’s rich heritage is a significant asset and should be managed in a sustainable manner. There are opportunities to capitalise on the heritage assets and grow tourism in a manner that respects and protects the intrinsic character of the area. The new plan, subject to environmental assessment, may include additional objectives to harness untapped tourism potential. However, it should be noted that the town plan is a land use plan and not a tourism plan. As such the provision of an interpretative centre and promotion of tourism are outside the remit of the development plan. Creating access to historic sites is also not an issue that can be addressed in the development plan. This would be a matter for the landowner and the Office of Public Works.

The current Baltinglass Town Plan which forms part of the current county development plan includes the following objectives:

BALT2 *To facilitate and support the development of the tourism industry in Baltinglass and maximise the town’s location as a gateway between the tourism assets within Co. Wicklow and the west, including Co. Kildare.*

BALT4 *To improve, as funding allows, the principal access routes and junctions linking Baltinglass town centre to surrounding tourist attractions and strategic transport corridors.*

These objectives will be reviewed and strengthened where necessary in the new plan. .

Town Centre

The National Planning Framework acknowledges the importance of towns and villages in terms of their economic, administrative and social functions and seeks to activate the potential for renewal and strengthen their role as places to live, work and visit. This includes encouraging new roles and functions for buildings, streets and sites. The NPF requires a major new policy emphasis on renewing and developing existing settlements rather than continual expansion and sprawl. It targets a significant proportion of future development to occur on infill and brownfield sites within the built footprint of existing settlements.

The following national policy objectives are relevant for Baltinglass:

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

NPO 16: *Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

NPO 18a: *To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.*

The RSES recognises the importance of placemaking and urban renewal. Relevant regional policy objectives include:

RPO 6.12: *Local authorities shall include objectives in development plans and local area plans supporting emphasis on placemaking for town centres, for example through inclusion of a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans.*

RPO 6.13: *Local authorities shall support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces for example with cost effective, temporary uses that build on the longer-term vision for space.*

These national and regional policies will be reflected in the new County Development Plan and will inform the review of the Baltinglass Town Plan. The review will include a stronger focus on the town centre, recognising the potential for renewal and placemaking. Heritage plays an important role in defining the character and appeal of Baltinglass and is recognised as an important element in placemaking. The Council were successful in their bid for RRDF funding for Baltinglass in 2019. The approved scheme includes restoration of the Courthouse and re-use as a new library and heritage space, conversion of the old Library into a Digihub for use by local entrepreneurs/home workers, restoration of the Courthouse courtyard for use as an event space by the local community, traffic management and traffic safety improvements.

A pilot painting / mural scheme is not considered to come within the remit of the development plan. However the Plan will include objectives for public realm improvements and such an activity could be considered as public realm improvement.

Change of use from Commercial to Residential in Retail Core

It should be noted that new exemptions under the Planning and Development Act as amended provide for a change of use from commercial to residential without the need of a grant of planning permission subject to certain conditions being fulfilled and procedures followed.

However there is a concern that conversion of a significant number of town centre properties from commercial to residential use could adversely impact on the vibrancy of town centres and the range of services and goods that may be on offer locally. Therefore the current County Development Plan includes the following objective:

RT14 *To control the provision of non retail uses at ground floor level in the principal shopping streets of centres, in order to protect the retail viability of centres and to maintain the visual character of streets. This objective aims to prevent the proliferation of ‘dead frontages’ on key streets. In particular, active use of corner sites, particularly within larger centres, is considered pivotal in creating a sense of vibrancy.*

It is accepted that this objective may limit the development potential of vacant or underutilised units particularly in areas where there is not a strong demand for retail. However, it is important that the development plan affords adequate protection to the town centre and retail core in order to ensure its viability as a town centre. The policy and the retail core of Baltinglass will be reviewed and amended if necessary.

Community Facilities

The provision of community facilities including community centres is outside the remit of the County Development Plan. This is more appropriately addressed in the County’s *Local Economic and Community Plan (LECP) 2016 – 2022* which supports and promotes community development and contains goals and objectives for the delivery of community development.

The current county development plan includes a community facilities hierarchy model. This is ‘*a list of social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal*’. The development plan provides that ‘*where a new significant residential or mixed used development is proposed, the Planning Authority may require certain social and community facilities to be provided as part of the proposed development and/or may require a special financial contribution to be made to contribute to the development of such facilities*’.

CD5 *Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.*

It is considered necessary to continue this policy in the new development plan to facilitate the delivery of community and social infrastructure aligned with new residential development.

Furthermore, as part of the review of the Baltinglass Town Plan, the Planning Authority will assess and ensure that adequate land is zoned for community facilities.

Agri-Stores

Agri-stores involve predominantly the sale of products. Such a use is therefore considered to be retail. The zoning objectives and retail policy in the Baltinglass Plan will be reviewed to give greater clarity to agri-stores and where such uses are best located.

Zoning

The submission to request that zoning on higher lands should be residential and not industrial/employment is noted and will be taken into account in the review of the Baltinglass Town Plan.

Healthcare

The County Council notes that the new primary health care centre in Baltinglass is due to open in 2020.

Transport and Public Safety

The concerns in relation to public safety on the N81, the R747 and generally in the town centre are acknowledged. It is accepted that the situation on the bridge in the town centre is a hazard for pedestrians and cyclists. An objective in the current plan to build a new road has not been realised.

BALT6 *To provide for a new road linking the R747 and the N81 south of the town.*

The current town plan also includes an objective to provide a new pedestrian link between the N81 and the R747 as follows:

BALT7 *To provide for new pedestrian linkages connecting the east and west of the town from the N81 south of Edward Street through SLO 1 and Action Area 2 onto the R747.*

The Planning Authority in consultation with the TII will review these objectives and consider options to improve public safety in the town centre and include objectives accordingly.

The Planning Authority accepts that improved public transport is needed in order to ensure the sustainable development of the County. However, the coordination and provision of public transport is a matter for the NTA and the public transport providers such as Bus Eireann. The current County Development Plan includes an objective (TR7) to promote improved public transport facilities.

TR7 *To promote the delivery of improved and new bus services both in and out of the County but also within the County by:*

- *facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);*
- *requiring the developers of large-scale new employment and residential developments in the designated metropolitan and large growth towns in the County that are distant (more*

than 2km) from train / LUAS stations to fund / provide feeder bus services for an initial period of at least 3 years; promoting the growth of designated settlements to a critical mass to make bus services viable and more likely to continue;

- *to work with Bus Eireann and the NTA to improve services in south and west Wicklow.*

The Council will continue to work with the NTA and support improved bus services in Baltinglass. The objectives relating to public transport will be reviewed and strengthened where necessary.

Flooding

The strategic flood risk assessment for Baltinglass will be reviewed as part of the CDP review having regard to any new data that has become available.

Energy Infrastructure

The new development plan will include objectives to support and facilitate works to enhance and improve energy infrastructure, however the provision of energy infrastructure is outside the remit of the county development plan.

Recommendations of Chief Executive

1. Review the Baltinglass Town Plan in accordance with national and regional policy and amend accordingly.
2. Review the boundary of the retail core in Baltinglass and amend if necessary.
3. Review the zoning objectives in the Baltinglass Plan and provide greater clarity in terms of locating agri-stores and/ or facilitating extensions to agri-stores.
4. Provide a stronger focus for heritage and tourism in the Baltinglass Plan. Ensure that the objectives contained in the Plan give adequate protection to heritage and the environment and ensure that the very resource which tourism depends upon is not depleted by inappropriate development.
5. Identify objectives in consultation with the TII to improve traffic safety and permeability in Baltinglass particularly at the bridge.
6. Prepare a new Strategic Flood Risk Assessment for Baltinglass having regard to any new data that has become available.

Part 4.3.21 Carnew

Name	Issue Raised
Fergus Kinsella (D10)	<ul style="list-style-type: none"> ▪ Request to install a footpath at the bottom of Mill Lane on the Ferns Road in Carnew as this forms part of a popular local circular loop / Slí na Slainte. There is a wide grass verge on both sides of the road. ▪ The existing footpath descending the lane adjacent to the Mulroney is in a poor state of repair. ▪ This would greatly enhance the walking routes for locals and visitors alike and is much needed.

Response of Chief Executive

The importance of providing footpaths is acknowledged in terms of public safety, public health and the general benefits in terms of climate change. The Current County Development Plan includes a town plan for Carnew and this will be reviewed as part of the County Development Plan. The town plan acknowledges the need to improve footpaths serving the town and includes the following objective:

CAR8 *To improve / provide new footpaths, cycleways and traffic calming on existing roads where required and to require the provision of new link roads, footpaths and cycleways as specified in this plan within identified ‘Action Areas’ and ‘Specific Local Objective’ sites.*

It is proposed to retain this objective in the new plan.

Chapter 9 in the current County Development Plan also includes objectives relating to the improvement of public footpaths:

TR9 *To improve existing or provide new foot and cycleways on existing public roads, as funding allows.*

The Council is committed in its annual roads delivery programme to improve footpaths and cycling paths / lanes. The delivery of footpaths and cycling paths / lanes is an operational matter and is dependent on the allocation of funding through the annual budgetary process or allocations from other agencies, such as the NTA.

Recommendations of Chief Executive

1. Retain and enhance objective CAR8 in the Carnew Town Plan.

Part 4.3.22: Dunlavin

Name	Issue Raised
Dunlavin District Forum (C14)	<ul style="list-style-type: none"> • The Town Plan refers to Dunlavin as an 18th Century Town – Dunlavin is a 17th Century planned estate town. • The feasibility of retaining the services we currently have and development of more is queried. During the current Development Plan four commercial premises have closed – there has been no increase in the number of commercial premises. The community are now without services they previously had. • Lack of water supply is consistently cited as a reason not to provide planning permission for housing during the term of the current Development Plan. Then in 2019 permission for housing was granted without any upgrade to a water supply. • The community are seeking clarity on this issue and would like to see a clear, transparent reference to water supply in the next Development Plan for Dunlavin. • In relation to Population Growth there are concerns about the level planned for in the current Development Plan. The Forum takes issue with the rate of growth included in the plan – 169% for Dunlavin. This is completely at odds with the rates for other towns in Level 5 – Aughrim at 33%, Tinahely at 37% and Baltinglass at 44% for example. The Forum are not against growth but are questioning the rate of growth and expansion. • History and public observation tells us that the rate of housing and population growth is rarely matched by the growth of services and infrastructure. It is almost always a game of “catch-up”. The Forum do not want to see this happening in Dunlavin. • The education places, healthcare services, public services, commercial premises and community facilities needed for such a population growth would be hugely significant and there are significant concerns that they would not arrive when needed. • Dunlavin & District Forum have recently established Hive@W91 – a new, innovative co-working space within the village. This has not been easy and has come with very significant financial commitments. Unfortunately, despite exploring numerous avenues, the Forum have been completely unable to secure any support through Wicklow County Council, government grant aid. It is requested that in the next Development Plan there is a recognition of the enormous efforts being made within communities to sustain themselves, it must be remembered that all this work is voluntary, that finances are a constant struggle and that support from outside is needed – be that in the form of professional advice from those with expertise in given areas or financial support to sustain projects in their infancy. There is also an added benefit in that we have used a commercial unit that was vacant breathing new life into the street also. It is considered that at the very least the rates on the venture could be considered for a different approach. • In conjunction with objective DUN2 which supports and encourages development in the town centre, it is requested that provision is made for adequate parking in the next Development Plan – this is essential to the success of commercial premises. • DUN3 in the current Plan states <i>‘To facilitate and support the development of the tourism industry in Dunlavin and maximise the town’s location as a</i>

	<p><i>gateway between the tourism assets within Co. Wicklow and Co. Kildare’.</i> There needs to be a more strategic and focused approach taken on this than heretofore. Previously a brochure was produced in relation to a West Wicklow Heritage Trail – there were no brochures in Dunlavin – there was no consultation with community groups or business interests in Dunlavin on what might be included in the trail. In our opinion there has been little or no marketing of the project and there is no signposting etc.</p> <ul style="list-style-type: none"> • The Forum was granted financial support under the Town & Village Scheme last year for the Historical Trail in Dunlavin. The Forum have sought guidance and advice on support for this or if there is a large overarching plan that the Forum should be feeding into but have been unable to find answers to this. It is considered that a cohesive, structured plan for the support and development of the tourism industry needs to be established. • DUN4 in the current Plan states <i>‘To promote the development of the undeveloped zoned employment lands at Dunlavin Lower in the following manner: - Access to and within these lands shall be subject to an initial overall design proposal and shall facilitate a through access road in accordance with objective DUN8 as set out in Section 5.7 of this plan’.</i> It needs to be borne in mind that the planned for Railway Walk as included in the Development Plan (DUN6) intersects with the lands in question. The establishment of both the walkway and a new access road will require a detailed plan and provision needs to be made for same in the next Development Plan. • DUN9 in the current Plan states <i>‘To provide a continuous footpath from the town centre to the GAA club grounds along Sparrow Road and to restrict parking along this road in close proximity to the church grounds’.</i> An issue that is constantly reported to Dunlavin & District Forum is the speed at which vehicles travel on this road – it is understand that speed limits review has taken place and look forward to hearing the outcome of same. Before any money is invested in the work noted in DUN9 it would be important to investigate if any measures need to be taken in relation to speed limits on that road. An improved footpath increases pedestrian traffic and with the current speed concern this, would not be best practice. • Dunlavin & District Forum were very pleased to see the recent work in Dunlavin Council Yard – following engagement with the Local Municipal District it was agreed to carry out some work to improve the appearance of the entrance. This work is very much welcomed. It is requested, however, that consideration be given to planting in future work carried out. In line with objective DUN 11, which requires the planting of indigenous species, the Forum would like to see indigenous plant and tree species being used. This was also commented on in the recent Tidy Towns Adjudication Report. • DUN12 states <i>‘The Council shall seek to protect and enhance, where opportunities arise, the former Great Southern and Western Railway line and its related structures i.e. bridges, mounds, cuttings, old platforms and station buildings and facilitate the use of the former railway line in accordance with the provisions of objectives DUN10 and AA1 of this plan’.</i> It needs to be borne in mind that the planned for Railway Walk as included in the Development Plan (DUN6) intersects with the lands in question. The establishment of both the walkway and a new access road will require a detailed plan and provision needs to be made for same in the next Development Plan. • The unique granite kerbstones are an important element in the
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	<p>Architectural Conservation Area. The Forum has had a lengthy discussion with the Council on the protection of the unique granite kerbstones in the village. They were removed during work to the footpaths and following intervention by Dunlavin & District Forum which resulted in conversation with the local Municipal District the kerbstones were reinstated. Dunlavin Tidy Towns and Dunlavin Arts Festival were also involved in these discussions. The Forum are very thankful for the engagement with the local municipal district and the community voice was very respected in the process. However, it is requested that reference to the granite kerbstones be included in some form in the next Development Plan so that we can avoid a similar issue in the future.</p> <ul style="list-style-type: none"> • It is requested that the granite kerbstones be included in the protected structures section of the plan. • It is noted that one water hydrant is included in the Record of Protected Structures. It is requested to include the other three hydrants (Dunlavin Green, Stephen Street and corner of Church Road).
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Response of Chief Executive

This submission is welcomed and provides valuable input into the review of the County Development Plan and the Dunlavin Town Plan in particular.

Historical References

The error in relation to Dunlavin’s date of origin is noted and will be corrected in the new Plan.

Population Growth

The NPF Implementation Roadmap sets out County Population Projections to 2031. The population projection for County Wicklow for 2031 is 164,000. The population growth target for the county as set out in the current County Development Plan (2016 – 2022) is 176,000 in 2028. Accordingly this will require a change in our population growth strategy going forward. This is set out in the new Core Strategy forming part of this report and alterations to the growth strategy for some settlements including Dunlavin are proposed.

The NPF requires that local authorities apply a tailored approach to the growth of towns and villages. This is set out in NPOs 7 and 9 (Please refer to Section 4.3.1 Vision and Core Strategy for more detail). In accordance with NPO 9, Dunlavin cannot be identified for significant growth (i.e. 30% or more above 2016 population levels) as it is not identified for significant growth in the RSES (i.e. it is not a key town).

Services

The concerns and challenges regarding retaining services and facilities in small towns like Dunlavin are noted. The aim of the development plan is to put in place a planning framework that support the continued operation of business, retail and other local services and the facilitate the development of new services at the best locations. Unfortunately an amenable land use regulatory environment is only one of many factors that may influence whether certain businesses and services can continue to operate and develop.

The Council is committed to continue the delivery of all services that are in its remit.

It is an objective of the current County Development Plan that any new significant housing development be accompanied by a ‘social infrastructure audit’ to ensure that community and social services in place or planned will have the capacity to serve new residents. It is intended that this provision will be retained and enhanced if necessary in the new plan.

Water Supply

The water supply in Dunlavin is from a well / spring. This supply has been deficient for many years and not adequate to accommodate any new significant development. Irish Water has undertaken improvement works at this source and treatment plant which has allowed for enhanced capacity, sufficient to allow the granting of permission for 40 houses in 2018. It is estimated that there may be capacity for up to another 100 additional dwelling units at this time, but this will be kept under review. The Council will continue to work with Irish Water to enhance water services in the area.

Co-Working Space

The development of the co-working space is a significant achievement for the Dunlavin District Forum and demonstrates the community’s enterprising and innovative spirit. Such a development will strengthen the town’s economic resilience and vitality. Financial support is not within the remit of the development plan. However, the Local Enterprise Office (LEO) provides support and services to help start, grow and develop small businesses in Co. Wicklow.

Tourism, Heritage & Walkways

As part of the review of the plan, it is proposed to strengthen the section on tourism and include additional objectives to harness the tourism potential of the area. However, the County Development Plan and the Dunlavin Town Plan are not in themselves ‘tourism plans’ and the concerns regarding overarching tourism strategy, support for tourism groups etc would be more matters for tourism bodies such as County Wicklow tourism, and Failte Ireland.

The Planning Authority commends the work of the Dunlavin District Forum in securing funding for the Historical Trail in Dunlavin. The new plan will make reference to this trail.

The review of the plan will consider how to integrate Objectives DUN 6 (Railway Walk), DUN 8 (new link road) and DUN 4 (development of the employment lands) to ensure that no conflict arises.

DUN 11, which requires the planting of indigenous plants and trees, will be retained in the new plan. The Municipal District will be notified of the need to plant indigenous species when carrying out landscaping work.

With regard to the protection of the granite kerbstones it is considered appropriate to acknowledge the contribution of these features to the ACA and make reference to them in the Town Plan. The kerbstones will also be assessed to determine if they warrant inclusion in the List of Protected Structures.

With regard to the water hydrants, the Planning Authority will consider whether these should be included in the List of Protected Structures.

Car parking

The current County Development Plan requires the delivery of new parking in tandem with new development where a need is identified. However, issues around existing on street / town centre

parking, the layout and regulation of same etc would not be matters for the County Development Plan, and may be more appropriately dealt at a local level by the Municipal District team via a town centre transport and accessibility plan.

Speed Limits

The consideration of speed limits is not within the remit of the County Development Plan. However, it is noted that the construction of any new footpath would be subject to best practice in terms of public safety.

Recommendations of Chief Executive

1. Identify a new population target for Dunlavin in the core strategy and amend the zoning plan in the Town Plan accordingly and in accordance with the objectives of the NPF and the RSES for the Eastern and Midlands Region.
2. Review the Dunlavin Town Plan and consider the following improvements:
 - a. Correct the error in relation to the town’s origin.
 - b. Strengthen the section on tourism and include additional objectives to support and harness the development of tourism having regard to the town’s wealth of heritage.
 - c. Make reference to the Dunlavin Historical Trail.
 - d. Review objectives Dun 6 (Railway Walk), Dun 8 (new link road) and Dun 4 (development of the employment lands) and amend if necessary to ensure that no conflict arises that would interfere with the Railway Walk.
 - e. Retain Objective Dun 11 which requires the planting of indigenous plants and trees.
3. Consult Irish Water and include an update in the town plan on the water supply serving Dunlavin.
4. Acknowledge the contribution of the granite kerbstones to Dunlavin ACA in the Town Plan and carry out an assessment to determine if they warrant inclusion on the List of Protected Structures.
5. Carry out an assessment of the three water hydrants and determine if they warrant inclusion on the List of Protected Structures.

Part 4.3.23 Enniskerry

Name	Issue Raised
Leddy family (D31)	<ul style="list-style-type: none"> • The drafting of this Wicklow plan changes from previous plans methodology, as Wicklow is required to review its plans following on from the adoption of RSES. Key new policy objectives in the RSES include - Healthy Placemaking, Climate Action and Economic Opportunity. • In the hierarchy of development plans, new national and regional policies take precedence over local development plans and place an emphasis on compact urban growth. Since An Bord Pleanala is being called upon to deal with anomalies by way of material contraventions it is sensible that Local Authorities be aligned with regional policies. • Hence, there is a general recognition that planning approach needs to change to adapt to changing circumstances, to meet the overriding challenge of climate change and increasing population. There is to be coordination between the counties in the region to better achieve these ends. • The significant shortfall in housing output to address current and projected demand is a national problem with lack of housing nationally having social and economic ramifications for sustainable national growth. 1 million or so extra population must be accommodated nationally; hence Bray is considered a growth area in the Regional Plan. Enniskerry is designated as a level 5 town. It is the closest town in Wicklow currently to both Luas and DART - two major transport and economic corridors. It can access Luas without using the N11. • We submit that the area marked OS2 on the Enniskerry Town plan within the Bray LAP in the current Bray LAP be thoroughly reviewed in the forthcoming plan. We appreciate the opportunity to offer our views as the people who live there and thus are most familiar with the practical day to day status quo. • We believe that currently in the Enniskerry plan, the conservation area marked OS2, while a convenient wash-over, or desktop exercise, incorrectly implies Bog Meadow, land at Monastery and Knocksink wood areas are a single entity. They in fact are worlds apart due to the local topography. • To borrow a phrase, because of 'the fashion of its spatial development history' Knocksink wood, Bog Meadow, and Monastery lands, for hundreds of years, under different ownerships, have developed very separately and independently. Because of their strategic location we feel that they should be designated to provide more practical functions in order to meet level 5 town objectives. • Knocksink Wood is a Natura 2000 site which is protected as such. Bog Meadow and Monastery lands are not part of the Natura designation. • Although the Bog Meadow, Monastery lands and Knocksink boundaries meet on the 2D map, a cursory walk on the land can evidence much. The boundary between Knocksink Wood and Monastery is at the highest contour to the east and west of the ownership boundary. Monastery Lands to the east fall approximately 10 meters towards the R117 Road and southwards to Enniskerry town centre. A detailed land survey has been carried out, based on this Aecom Consulting Engineers have provided a detailed drainage study. • Knocksink wood, a valley at the boundary with Monastery, is the opposite side of this high contour, being the other side of the hill. Knocksink's watercourses are drained by its own network of streams by gravity bypass Monastery land. The R117 divides Bog Meadow from Monastery land. • Road access and egress from Knocksink wood to the R117 is next to the boundary to Monastery land, and the internal Knocksink road follows along the boundary line with Monastery land to Knocksink public car park and interpretive centre. We witness

	<p>Knocksink as being one of the most popular dog walking venues in the locale.</p> <ul style="list-style-type: none"> • The three distinct areas are separated by roads which do not provide suitable collective potential with Knocksink wood for a corridor for wildlife, given their existing urban uses. The lands do not share the same watercourses. Monastery Lands do not drain into Knocksink wood nor vice versa. To encourage wildlife to cross the R117 on foot would not be safe. It really can't be a safe corridor. • We suggest Recreational designation would be more appropriate for Bog Meadow since it presently accommodates many activities such as football pitches, tennis, training grounds and other sporting activities. It is substantially handed over to a management company with a long lease for this purpose. • Bog Meadow needs to develop into what the town needs from it as a level 5 settlement. Level 5 settlements should ideally be serviced by the following community infrastructure: community/parish hall, multipurpose community space and/ or meeting rooms, local town park and open spaces/nature areas, outdoor multi-use games areas, playgrounds, playing pitches. • The Bog Meadow is the de facto town park for Enniskerry and should be improved as such. Bog Meadow is in the centre of the town potentially better connecting all the town’s amenities. There are natural pathways and linkage to the town which could be improved to significantly help to reduce car journeys and improve public safety. <ul style="list-style-type: none"> - The residents of Monastery Estate and neighbours regularly traverse the Bog Meadow to get to the local bus stops. Local BMX and bike riders have adapted part of the area as a cycle track. - There are many short-cuts to get from one end of the town to the other. - People should be encouraged to bike or walk from their homes to the town and its facilities, and central to this is the Bog Meadow. • Conservation status overlay is not logical and is now counterproductive to supporting policies and new objectives of WCC and the RSES. <p>Recent New Policy - in deciding how the town should develop there are many options given the fashion of its spatial development history. Again, the key parameters however, must be based on environmental protection, sustainability and developing the town in a manner that would generate the minimal number of car journeys.</p> <p>Recent New Policy - to ensure the continued vibrancy and life of these towns, the provision of a mix of residential, business, retail, leisure, entertainment and cultural uses will be encouraged. The priority shall be for the regeneration of under-utilized or derelict sites in the town core, followed by the development of new streets and squares, visually and functionally linked to the historiccentre.</p> <p>With the aim of '<i>Generating the minimum number of car journeys</i>' consideration should be given to developing convenient alternative pedestrian and bike linkages to facilitate same.</p> <p>Monastery land is within the town boundary and has been in agricultural use for over 300 years. Currently it is actively used as a stud farm breeding sport horses for competitions nationally and internationally. Approximately four acres of the farm around the existing residence are zoned existing residential (with two families in residence). 16 or so additional acres are in agricultural use.</p> <p>The fields are post and rail stud fenced, around an internal road network with piped water to drinkers in each field for the horses and foals. There is all-weather horse</p>
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	<p>jumping arena, with associated lighting. In previous development plans these lands were zoned agricultural.</p> <p>To help inform the consultation process, we submit an ecological report prepared by a suitable ecological expert - Open Field Ecology recently completed GLENAMUCK DISTRICT ROADS SCHEME Environmental Impact Assessment Report for Dun Laoghaire County Council.</p> <p>We have submitted previously an engineering feasibility report carried out by AECOM Consulting Engineers which refers to local drainage and roads considerations.</p> <p>We present these at issues stage as good plans need to be based on good data.</p> <ul style="list-style-type: none"> • Ireland’s development sprawl is the result of under zoning in towns. On the Mullinaveigue mile there are 22 households and only 2 are farmers who work there, the rest commute. In fact, Natura 2000 sites are affected by rainfall and precipitation absorbing carbon emissions, it bears repeating the national objective which address the overarching concern of climate change. Designating green breaks within level 5 town boundaries can no longer be considered sustainable. • Recent new Policy – Development should extend outwards from the town centre with undeveloped lands closest to the town centre and public transport routes (if available) being given preference i.e. ‘leapfrogging’ to peripheral area should be avoid; A strong emphasise should be placed on encouraging infill opportunities and better use if underutilised lands; and area to be developed should be contiguous to existing developed area. • In conclusion, obviously changes will be needed in the new plan to reflect RSES and new policies. The positive thing is that there is land available within the town boundary to help facilitate new Regional Spatial and Economic Strategy objectives. • Attached to this submission are (1) document entitled ‘Screening Assessment for rezoning application at Monastery, Enniskerry Co. Wicklow (dated March 2018) and (2) Aecom ‘technical note’ made as part of submission to the review of the Bray MD LAP in 2018.
<p>Lorna Kelly (D69)</p>	<p>I feel privileged to both live and work in Enniskerry, to raise and educated my children in Enniskerry, and to have a host of wonderful natural recreational facilities on my door step. I feel privileged that I integrate on many community levels with the diverse community that presently reside here through sporting activities, community festivals, community groups, school activities, and business & tourism activity. I feel privileged that I am in a position to welcome local, regional, national and international visitors to Enniskerry.</p> <p>Amongst all this privileged sentiment, I get annoyed and frustrated that such a village that is above remarkable is continually neglected, that it isn’t recognised as the Jewel of the Gateway to the Garden of Ireland – Our Wicklow, that could be a vibrant economic, local & national recreational location, tourist destination and amenity, sustaining its living and business community. I am eager that this pride of place and strong sense of civic respect and inclusivity continues without it being compromised by bad public policy decisions, this is the backbone of the submission statements and suggestions posed.</p> <p>Enniskerry should be a destination village and not be pulled into an urban suburb or commuter townland that is destroyed in the name of housing people quickly. There is already evidence of this emerging with the short sighted zoning of housing and business in rural, upland, inaccessible, environmentally significant locations, housing plans for dwellings with no personal recreational fresh air space, and the N11/M11 roads plan that will increase and move car congestion rather than removing it.</p>

This Enniskerry destination village could be a hub for outdoor recreational visitors including walkers, cyclists and leisure picnickers & amblers; a tourism hub for art, crafts. As the gateway to Co. Wicklow it could feed and connect and partner with other towns, villages and hubs in all of the Wicklow region - *Good examples of this type of village includes Snowdon in Wales.*

Rationale

I would promote our Council as custodians of the Enniskerry village to see that the natural assets that the village offers including: picturesque topography, built heritage, natural countryside beauty, birth place and burial place of some of Irelands finest artists, writers and film makers are exploited in a sustainable, imaginative, sensitive, interesting and daring manner as part of development planning,

Submission Focus

This submission focuses on Enniskerry with regard to the outlined mandatory objectives

- Zoning of land
- Provision of infrastructure
- Conservation and protection of the built and natural environment
- Development and renewal of areas that are in need of regeneration
- Preservation of the character of the landscape
- Promotion of sustainable settlement
- Transportation strategies

and under the above headings various aspects of the following ‘Issue booklet’ headings

- Compact Growth
- Climate change, flooding & Coastal Zone Management
- Housing Density
- Rural Housing
- Jobs, Place Making and Rural Development
- Town & Village Centres & retail
- Tourism & Recreation
- Heritage
- Transport
- Environmental Assessment

Have somewhat been addressed

Primary concerns

As Enniskerry comes under the Bray Municipal District, it is accepted that its designation as a Level 5 – Small Growth Town must be realised. It concerns me as Enniskerry is a Village - its topography, historical build environment, access routes and the natural limiting factors should be given strong consideration under the mandatory objective, these can be fulfilled without compromising its fundamental and distinctive attributes.

Statement: Designation of small growth town should be reconsidered. The village status should be respected, nurtured and enhanced. Mitigation of any plans that compromises should be given strong credence.

Zoning of Land

Enniskerry does have the capacity to sustain more housing and growth. But should not compromise the Village and its distinctive attributes.

- Various housing that is presently not in use, and the buildings that are sitting idle should be given a first priority for upgrade and regeneration e.g. *HSE Vacant Premises Church Hill, Vacant Premises HSE Enniskerry Road, Vacant Lot at rear of attached dwellings on Main Street, Site on edge of Village at junction of Enniskerry Road & Kilgarron Hill.*
- Further development be concentrated in close proximity to the heart of the village and that all housing development should be constructed in keeping with the historical footprint of the established Village e.g. slate roofing, granite walls etc.
- Housing should be south facing, should be mandatory that rain water harvesting infrastructure, passivity and the use of green technologies should be mandatory.
- Housing should be located so that home owners are capable of walking to the proposed upgraded, regular and comfortable public transport system.
- Housing should be located that common amenities could be utilised – common gardens, accessible parks.
- South facing constructions

Statement: Designation of zoned lands to the east of the village (Kilgarron Hill) is madness on the basis that it is inappropriate in its location, scale, density, height, layout and particularly in respect to the negative long term impacts on the village. There is no infrastructural provision. And really – why would you build a massive development half way up a mountain which should be nurtured for recreation (cycling, walking), rewilded by native woodland species as a community parkland which would attract visitors for long term well-being and support our ambition to take action with regard to our climatic commitments, and so forth a continuation of the Knocksink SAC would be more appropriate.

Statement: Zoning of land I believe should be made on the eastern side or north eastern side of the Village.

Provision of infrastructure (roads, transport, leisure and other)

There are 3 road routes into Enniskerry Village, there is not much room to expand on this which is good as it contributes to Enniskerry’s scenic rural environs.

Suggestions:

- Develop a park and ride infrastructure at the N11 J6a junction with a shuttle village bus moving on regularly up and down the 20 Bends.
- Develop the Bog Meadow Car Park by removing the wall, rebuilding it at the back of the car park and introducing an ‘island’ so that public buses, tourist buses have a location to turn and terminate and not cause village rattling and congestion, and eliminate the passing through element that presently exists
- Include public toilets, washing/showering facilities and introduce a custodian position for the maintenance and care of such.
- Pedestrianise areas of the village
- Direct traffic in a one way direction
- Increase the frequency of public transport, increase reliability of public transport and increase the comfort to make it an attractive proposition to commuters and visitors.
- Cycle lane Green Way, leading from the N11 along the Cookstown River up through

	<p>Enniskerry Village and on to the Wicklow Mountains in parallel to the road on the inside of hedgerows.</p> <ul style="list-style-type: none"> • Rewild the lands on Kilgarron hill (presently zoned for development) and construct a sculpture park in keeping with the natural woodland environment. • Include recreational eating areas including - picnic benches • As this is a busy cycling and walking village a fresh water community tap should be central to the village for access by all. • In the development of the Bog Meadow ‘Sport For All’ ensure a long lasting, sustainable and fit for future purpose facility is supported. <p>Conservation and protection of the built and natural environment</p> <p>Enniskerry is located at the foothills of the Wicklow and Dublin mountains and is surrounded by countryside and predominantly high quality green space. It is surrounded by lands that are SACs, areas of scientific interest, natural beauty and more. This area is an ecological and countryside, hill and forested mecca in close proximity to access and exit ports for the county and to all those dwelling in urban centres.</p> <ul style="list-style-type: none"> • Increase the biodiversity and sustainability of the countryside through ‘rewilding’ programmes • Ensure that lands are not zoned for development and building in a scattered fashion • Increase the recreational output and access to this region so that it can be a great attraction supporting local employment and community sustainability. • Implement a replanting practice in conjunction with all potential builds. • Enhance the public toilet facility which seems from observation to be a financial drain on resources through ongoing servicing cleaning and maintenance <p>Statement: Ensure buildings are maintained and built in keeping with the environment do not be persuaded by strong lobby groups, be above this. Developers in Ireland make a lot of money, greed should not dictate.</p> <p>Development and renewal of areas that are in need of regeneration</p> <p>The heart of the village and surrounds shows significant signs of dilapidation and neglected.</p> <ul style="list-style-type: none"> • The historic village boundary walls should be maintained, weeded and show cased • Signposting should be painted, cleaned and strong materials used instead of mass produced standard signage • All shop fronts should have restrictions in the materials and colour schemes used • Lighting lamp posts could do with annual maintenance, cleaning and painting. • Unused or horded land space should be opened to include potential for older independent dwelling small units, with common and functional garden space <p>Preservation of the character of the landscape</p> <p>This is pertinent for Enniskerry to maintain its strong character and inherent charm.</p> <ul style="list-style-type: none"> • Ensure all developments are in keeping with the built environment around them e.g. the development on the right of Kilgarron hill in the lands of Kilgarron house are modern and shameful too large for the plots that they are located, simple expectations like fascia boards and tiled roofs that match the original structure would enhance and give them a welcomed look. The boundary wall is a cemented capped modern wall, that could easily have been built in keeping with the boundary walls of the village, bog meadow and 20 bends roads.
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	<ul style="list-style-type: none"> • Ensure all rural dwelling developments should not be high rise • Ensure that all housing develop is undulating like the landscape • Ensure materials used are supportive to preservation of the character of the landscape – environmental and historical. • Protect biodiversity <p>Statement: Ensure the preservation of the landscape, in support of a strong climate change strategy make the trend of rewilding really trendy.</p> <p>Promotion of sustainable settlement Social and community development in the area is very welcome as there is significant under provision of WCC facilities in the regard in the area. The library service on offer has increased its hours and is a welcome contribution. If community gain is to be delivered I suggest that such facilities should be located within the village rather than peripheral locations</p> <ul style="list-style-type: none"> • Provision of public infrastructure for all ages would support a sustainable settlement • playground and outdoor structured exercise facilities, community centre/village resource centre • picnic benches for leisureful loitering • Potential for Village allotments and village planting and rewilding • Be more proactive with regard to legislation concerning vacant and derelict or horded sites <p>Statement: Good planning, good decision making and long term vision will promote sustainable settlement</p> <p>Transportation strategies Enniskerry is at pinch point with regard vehicle movement, significant treatment of the 3 roadway regarding - upgrading, public pathways and the dealing with driver and pedestrian and cycling traffic is required.</p> <ul style="list-style-type: none"> • More importantly a reliable, frequent and comfortable public service would encourage a move to use of the service, • park and ride capabilities from the edge of the N11/J6a road with a village ‘imp’ • A frequent train/bus corridor on the N11 network would remove the necessity for excessive commuting by car reducing congestion and the requirement or considered requirement to build yet more road networks. • Building of a ‘proper’ cycling facility in parallel with a strong social transport infrastructure would again support the movement away from car reliance.
Anita Tuesley (D89)	Fully supports the submission from Wicklow Planning Alliance, with the addition that the points made on sustainable development of local areas in accordance with the National Strategy (The National Planning Framework, the National Development Plan, and the Regional Spatial and Economic Strategy) also apply to Enniskerry, where we have seen unsuitable and unsustainable development and planning.
Cairn Homes (D101)	Cairn Homes welcome the review of the current Wicklow County Development 2015-2021 and the opportunity to make a submission in respect of the new County Development Plan. There have been significant changes in national planning policy over the lifetime of the existing development plan and the review offers an opportunity to align the emerging development plan with these and ensure Wicklow is in a position to respond to the

challenges ahead.

Cairn Homes have delivered circa 250 new homes over a 3 year period in Greystones, Co Wicklow, and have sought planning permission for an additional 780 new homes over two sites also in Greystones. In addition, Cairn Homes own additional land in Greystones, Blessington and Enniskerry with capacity to deliver c. 1,200 new homes over the lifetime of the new County Development Plan. Cairn is committed to working with Wicklow County Council in the delivery of these much-needed new homes together with the associated infrastructure necessary to deliver new communities with improved and high-quality amenities.

It is in the context of these potential developments that this submission is made with its focus on the towns of Greystones, Blessington and Enniskerry and policies related to the delivery of housing and supporting infrastructure. It is recognised that submissions in relation to zoning cannot be made at this time and therefore this submission focuses on the more strategic policies contained within the development plan.

The Core Strategy and the Settlement Hierarchy:

The core strategy and settlement hierarchy are the central elements of the development plan, guiding development within the county and underpinning many of the policies and objectives. The core strategy and settlement hierarchy are required to align with the relevant national and regional policies. Since the existing Development Plan was adopted new Regional Planning Guidelines have been prepared for the enlarged Eastern and Midlands region (EMRA). The new Regional Spatial and Economic Strategy of the Eastern and Midlands Region (RSES) contains a less prescriptive settlement hierarchy than that formally contained within the Regional Planning Guidelines for the Greater Dublin Area. The RSES has designated Bray and Wicklow as Key Towns but has left the settlement hierarchy of towns beneath this level to the discretion of the local authority to determine.

The Issues Paper has posed some interesting questions in this light and Cairn responds to each in turn

What is the best designation for your town?

Under the existing settlement hierarchy Enniskerry status is as follows:

Level	Description	Definition	Town
5	Small Growth Town	Good bus or rail links; 10k from large growth towns.	Enniskerry

Cairn Homes would propose the following settlement hierarchy, which is consistent with existing hierarchy and reflective of each town’s position within Wicklow and the EMRA. An expanded justification for this hierarchy is also set out below.

Settlement Typology	Description	Town
Towns and Villages	Towns and villages with local service and employment functions.	Enniskerry

Enniskerry is a small town of less than 2,000 people according to the 2016 Census, located

on the edge of Dublin and Bray. Enniskerry has a strong character and retained a largely intact and vibrant village centre which provides local services for residents. Cairn has the capacity to deliver additional new homes and associated infrastructure to the south of the village and improve the vitality of the village over the lifetime of the new Plan. Enniskerry would appear to meet the definition for “*Towns and Villages*” the lowest level of settlement before “*Rural*”. This is consistent with its position in the existing development plan.

Do you think your town has the capacity to sustain more housing growth?

All the towns discussed have the capacity to sustain new housing developments, however some investment and improvements to infrastructure within the towns may be required to facilitate such development and enhance their desirability as places to live. These include investment in transport, wastewater infrastructure, and green infrastructure.

Transport:

Proposed upgrades to the N11 from Junction 4 to Junction 14 have recently been placed on public display and it is understood this project will likely progress, subject to planning, during the lifetime of the next development plan. These proposed upgrade works are welcome and will address the significant traffic delays experienced along the N11 particularly at peak times. However, there is also a requirement to improve public transport connections within Wicklow to help encourage more sustainable modes of transport.

All the towns would greatly benefit from improved bus services within the towns and to connect to other nearby large towns. We are aware public transport is outside the remit of Wicklow County Council but would encourage the Council to work with TII to improve services to these towns.

Green Infrastructure:

Public amenities and investment in green infrastructure can greatly enhance the amenity and quality of life within towns. In Enniskerry there may be opportunities to provide connections with the Powerscourt Estate.

How should we deliver compact growth in each of the County’s towns and villages?

This matter shall be discussed in more detail in response to the issue of Housing. However, Cairn would note that density ranges in Wicklow are generally quite low and not in line with national guidance. In our experience there is also a reluctance to permit multi-family unit typologies such as duplex units and apartments outside of the immediate town centre. A review of the density ranges in Wicklow and policies surrounding typology would help deliver more compact growth in line with national and regional policy.

Housing

The latest figures from Central Bank indicate 34,000 new homes must be built every year to 2030 in order to meet demand. The majority of these will be required in the GDA. Wicklow’s housing strategy will be critical in helping to meet this demand.

The size and nature of families in Ireland is changing, and this in turn will influence future housing needs. There is a growing requirement for a greater variety of housing types to mix the changing needs of society with a greater requirement for smaller units and apartments. According to the 2016 Census 89.9% of housing in Wicklow is traditional housing, while only 6.8% are apartments or similar. Greater diversity is therefore clearly needed in Wicklow’s housing stock. Additionally, the move in national policy towards consolidation of the urban area requires use of a wider variety of housing typologies.

Notwithstanding the above, Cairn would advocate that the emerging Development Plan

should not explicitly state a requirement for specific unit mixes, and if one is included, that it is evidence based and allows for flexibility to respond to changing societal and market demands. This is in accordance with SPPR 1 of the Sustainable Urban Housing: Design Standards for New Apartments 2018. Additionally, Cairn would suggest that Policy HD15 which requires the inclusion bungalows in developments be removed, and Policy HD13 which stipulates apartments should not be permitted outside of town centre locations. Instead these policies should be replaced by a policy advocating a mix of unit types on sites to meet housing needs. This will allow flexibility for both the Council and developers to respond to the changing needs of society and for a case by case determination on the appropriate mix on a site subject to wider considerations.

Determination of the housing needs of specific demographics within the county is a matter for the Council, and Cairn look forward to working with the Council’s Housing Dept were required to help meet these needs as appropriate. Cairn would encourage the Council to take a flexible approach in considering how these needs can met, including consideration of a variety of typologies such as duplex units and apartments. The ground floor units of duplex units and apartments which benefit from lifts may better meet the housing needs of specific groups such as the elderly or those with special needs compared to traditional housing. In new developments where a specific housing need is identified early, these units can be carefully designed in consultation with the Council and Approved Housing Bodies to ensure they meet the requirements of these groups.

Cairn have successfully worked with Wicklow County Council on the delivery of social housing units on all their housing schemes within the county to date and have the capacity to contribute significantly to the delivery of social housing units within Wicklow going forward. The changes in society which are contributing to shifts in the market demand for less traditional housing typologies, are also evident in the needs for social housing with increasing requirements for 1 and 2 bed units compared to 3 and 4 bed units. Cairn would encourage the Council in their preparation of the Housing Needs Assessment to accompany the draft development plan to consider a variety of typologies for meeting future social housing need.

The densities in Wicklow, in general, are significantly below national standards and indeed the densities applied in neighbouring counties such as Kildare and Dublin. Alignment of the density standards in Wicklow with the Sustainable Residential Developments in Urban Areas Guidelines, May 2009 would increase the densities achieved in Wicklow’s towns and villages without a significant change in the character of the areas.

In accordance with the Sustainable Residential Developments in Urban Areas Guidelines, Cairn would advocate the following densities:

- Town Centre and Public Transport Corridors: 50 units per hectare
- Outer Suburban and Greenfield sites: 35 – 50 units per hectare
- Small towns and villages: 20 – 35 units per hectare

In general, Cairn would advocate a target density range of 35-50 units per hectare on all residential land, particularly within the main towns such as Greystones and Blessington. In smaller settlements however such as Enniskerry a lower density of 20 – 35 uph may be more appropriate based on the character of such towns and the availability of infrastructure and services. Where appropriate densities outside these ranges should be permitted where specific site constraints may prevent achieving the stipulated density or to allow appropriate design responses to the surrounding area

Response of Chief Executive

Strategic context

The issues raised with respect to the National Planning Framework and Regional Spatial and Economic Strategy, and indeed other national policy goals / objectives, and their application to Enniskerry are noted; the new County Development Plan will as required accord with the provisions of Government policy, the new NPF and RSES, in particular in relation to the new Core Strategy, new settlement hierarchy, settlement growth provisions and housing density standards. These provisions will then be applied at the local level in the preparation of the next LAP for Enniskerry, which will address future housing and zoning requirements including the application of the zoning principles adopted in the new County Development Plan.

The RSES, as well as the CSO, defines ‘towns’ as settlements in excess of 1,500 in population. Enniskerry therefore falls into the ‘towns’, rather than ‘village’ category in the regional and County settlement hierarchy. It is accepted that some see Enniskerry as more of the village, but this is likely to be more of an emotional connection to a particular past vision of the place, rather than a reflection of current demographic definitions. It is proposed in the new settlement hierarchy to identify Enniskerry as a Tier 4 ‘self sustaining town’ as defined in the RSES, which are towns with *‘high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining’* and the future development targets and patterns shall be reflective of this designation.

Enniskerry local area plan / zoning requests

The land use plan for Enniskerry is the Bray Municipal District Local Area Plan that was adopted in 2018. This plan is not under review as part of the County Development Plan review process. Suggestions regarding the pattern and location of development / zoning would be matters for the next LAP review.

As set out in the Planning Act, requests or proposals for zoning of particular land for any purpose may not be considered at this stage.

Approach to zoning adjacent to Natura 2000 sites

The current County Development Plan sets out clearly the approach to zoning utilised where a Natura site (SAC / SPA) is in or in close proximity to a settlement. This approach has been carefully calibrated to comply with the requirements of the Habitats Directive and the Planning Act, based on advice from environmental experts as well as state agencies, and it is intended that the new plan will include a similar provision. As set out in the current County Development Plan:

Conservation Areas

There are a number of Natura 2000 sites located in or in close proximity to the settlements in Level 5. The sites themselves are protected from inappropriate development through the legal provisions of the Habitats and Birds Directives, as well as the Planning Act. Such sites, where they are located within the plan boundary of a Level 5 settlement, are shown on the heritage map associated with the plan as ‘Natura 2000’ site and on the land use map as a ‘conservation area’, which is not a land-use ‘zoning’ but an objective to signify that these are areas where the goal is to conserve and enhance habitats and attributes for which the site was selected for EU protection.

In a number of locations, there are lands adjoining Natura 2000 sites, which while not being included in the legally designated site, are linked to the site in terms of similar or supporting habitats, water flows or other characteristics which render them important to protect from inappropriate development which may have a direct or indirect affect on the designated site itself¹⁰. The extent of any such ‘buffer zone’ has been determined through both desktop and field assessment by the plan team and a professional ecologist, as well as consultation with the National Parks and Wildlife Service. This ‘buffer zone’ has similarly been identified as being within the ‘conservation area’.

The approach to zoning in the ‘conservation area’ has been as follows:

- 1. No lands within the actual Natura 2000 site have been zoned;*
- 2. Where the Conservation Area coincides with existing developed areas, the lands have been zoned for their existing use, which will essentially allow for the continuation of the existing use and its enhancement. Where permission is sought for development in such zones, the purpose of the Conservation Area objective is to flag at the earliest possible stage (which is the adoption of the development plan) that development on such lands may have the potential to give rise to impacts on the Natura 2000 site. In accordance with the provisions of the EU Habitats Directive 1992 and the Planning & Development Act, any proposed development with potential to impact upon a Natura 2000 site shall be subject to an Appropriate Assessment;*
- 3. Where the Conservation Area coincides with existing undeveloped lands, the lands will only be zoned for new development where it can be justified that such zoning and development arising therefrom is essential for the town to achieve its development vision and strategic objectives. In accordance with the provisions of the EU Habitats Directive 1992 and the Planning & Development Act, any proposed development with potential to impact upon a Natura 2000 site shall be subject to an Appropriate Assessment;*
- 4. Where the Conservation Area coincides with existing undeveloped lands, and the development of these lands is not essential for the achievement of the development vision and strategic objectives for the town, the land will be zoned ‘OS’ – **passive open space**. The only developments that will be considered in such area are those which contribute to the objective of the Passive Open Space zone (detailed in this plan) and that can be shown to not diminish the role and function of such areas, will not result in significant adverse impacts on any EU protected site and will not diminish the biodiversity value of the lands or the ability of plants and animals to thrive and move through the area.*

Bog Meadow, amenity, green infrastructure

The Bog Meadow sports and recreation area is zoned ‘Active Open Space’ in the Bray MD LAP which it is the objective ‘to facilitate the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for the development of new high quality active recreational areas’. This area does not have a ‘conservation status’ or ‘overlay’.

The suggestions for improvements to this area are noted and would be facilitated by the current zoning and objectives of the Bray MD LAP.

¹⁰ In accordance with Article 10 of the Habitats Directive, the aim is to protect and maintain linear landscape features which act as ecological corridors, such as watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, hedgerows and road and railway margins, and features which act as stepping stones, such as marshes and woodlands, which taken as a whole help to improve the coherence of the Natura 2000 network

The suggestion regarding alteration to zoning to provide for re-wilding cannot be considered at this stage of plan making, and indeed would be a matter for the next LAP review.

The management of publicly owned / operated open spaces would be local matters for the Municipal District and not a land-use matter for the County Development Plan.

The value of Knocksink Wood and the Powerscourt estate as green amenities is noted and it is an objective of the existing LAP to support and facilitate in cooperation with relevant landowners and bodies, the development of amenity routes around the town.

Transportation and movement

It will be a core principle of the new plan, and the LAPs that flow from it, that development patterns and design standards will promote and deliver a significant modal shift from private transport to active modes (walking and cycling) and sustainable modes (bus and rail) in relation to both new development and existing built up areas. In addition, the new plan will actively promote and require the development of infrastructure for significantly increased use of electric vehicles.

It is accepted that there are some locations in Enniskerry where the use of active modes of transport such as walking and cycling is challenging, due principally to lack of dedicated facilities, often limited by historic road widths and alignments, as well as topography. As set out in the current County Development Plan and LAP, the Council is committed to enhancing facilities for pedestrians and cyclists on an ongoing basis, through a variety of mechanisms including works under its own annual roads programme, through the development of accessibility projects funded by the NTA, and by supporting community lead projects.

Wicklow County Council is also committed to enhancing those elements of the public transport system within its remit, and lobbying for and supporting transport agencies for the delivery of new or enhanced services.

With regard to the development of the park-n-ride at Junction 6a, the NTA has recently established a bus based park-n-ride team to examine options in this regard, while the TII is currently developing an improvement scheme for the N11 to the east of Enniskerry.

Specific suggestions regarding localised car parking and road improvements are noted and could be facilitated by the current County Development Plan and LAP should they be found to be of benefit to traffic safety and movement in the area.

Other infrastructure

The operation of public toilets and water taps would be local matters for the Municipal District and not a land-use matter for the County Development Plan.

Tourism development in Enniskerry

The new County Development Plan, as with previous plans, will acknowledge the importance of tourism and recreation and the positive contribution they make to the economic and social well-being of the County. The current County Development Plan includes a chapter dedicated to tourism and recreation and it is intended to retain this in the new plan.

In addition, the current LAP for Enniskerry includes a chapter on tourism and recreation, and specific objectives with regard to Enniskerry.

The County Development Plan is a land use framework plan and includes objectives to deal with the land use matters pertaining to the planning and development of tourism and recreation – it is not the ‘Tourism Plan’ for the County. Issues for example raised in relation to the better promotion of Enniskerry as a tourism ‘destination’ are outside the remit of the development plan. The County Development Plan does not **deliver** new tourism or recreation projects or facilities. The actual delivery of new facilities can be either by private developers or state agencies including the Council; the actual projects undertaken by the Council in this regard would be determined by operational and budgetary / funding considerations.

However, many of the issues raised are addressed in the **Wicklow Tourism Strategy & Marketing Plan 2018 – 2023**. This Tourism Plan sets out a vision of what can be achieved in Wicklow, identifies priorities, targets and detailed actions to ensure the County realises its tourism potential. The **Statement of Tourism Strategy 2017 – 2026** identifies a number of goals for tourism in Wicklow including the establishment of Wicklow as a year round destination, capture more overnight tourism, encourage the provision of alternative forms of accommodation, convert day visitors to staying visitors, integrate development of tourism infrastructure and assets and deliver sustainable development. These goals reflect many of the issues raised in the submissions. All of these submissions will be brought to the attention of the ‘Implementation Groups’ that are now in operation to deliver on the actions of the Wicklow Tourism Strategy & Marketing Plan 2018 – 2023

Housing

The new County Development Plan will provide for new housing targets, new residential zoning principles and new housing standards in accordance with the NPF, RSES and updated guidelines, some of which include Specific Planning Policy Requirements in relation to densities, height, unit mix etc. These principles will thereafter be applied in Enniskerry when the current LAP is reviewed.

These principles include prioritisation of regeneration and infill over greenfield development in the first instance, and the utilisation of land management tools such as the Vacant Site Levy and the Buy and Renew Scheme / Repair and Leasing Scheme / Long Term Leasing Initiative to stimulate re-use of vacant lands and properties.

In addition, the new plan, as with the current plan, will include requirements with regard to energy efficiency, open space provisions and accessibility to services and accessibility to all.

The current County Development Plan sets out a suite of policies and objectives with regard to the design of rural housing, and in addition, a Wicklow Rural Design Guide forms part of the current plan. The purpose of this guide is to ensure that necessary new rural development are appropriately sited and designed. It is intended that the new plan will maintain these provisions and enhance same if necessary.

Natural & Built Heritage

The Council is committed to protecting natural heritage and biodiversity, and this is addressed in considerable detail in the current County Development Plan and the Enniskerry LAP. As part of crafting the new plan, careful consideration will be given to the current approach and whether enhanced policies and standards are required. Separate chapters on Climate Change and Biodiversity are proposed for the new plan. In this regard, particularly guidance will be provided by the new Climate Action and Biodiversity Strategic Policy Committee and team. In this regard, supporting biodiversity

and sustainability of the countryside and new standards for landscaping in new developments will be considered.

The architectural and archaeological heritage of a town, village or place contributes greatly to the distinctive character of each local area. The Council is committed to safeguarding this heritage so that future generations may also enjoy this inheritance. In this regard, the strategy for built heritage as set out in the current County Development Plan is as follows:

- *To ensure that the protection and conservation of the built heritage of Wicklow is an integral part of the sustainable development of the county and safeguard this valuable, and in many instances, non-renewable resource through proper management, sensitive enhancement and appropriate development;*
- *to safeguard archaeological sites, monuments, objects and their settings above and below ground and water listed in the Record of Monuments and Places (RMP), and any additional newly discovered archaeological remains,*
- *to identify archaeologically sensitive historic landscapes;*
- *to ensure the protection of the architectural heritage of Wicklow through the identification of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding of designed landscapes and historic gardens, and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the County; and*
- *to support the actions in the County Wicklow Heritage Plan, in order to enhance the understanding, appreciation and protection of Wicklow’s built heritage.*

The implementation of this strategy has a number of elements, with the key function of the County Development Plan being to sensitively manage changes that occur to this heritage and by ensuring that significant elements, features or sites are retained.

Elements of our archaeological and architectural heritage are protected through a variety of means, including but not limited to the implementation of the provisions of the European Convention on the Protection of the Archaeological Heritage, the Convention for the Protection of the Architectural Heritage of Europe, the National Monument Acts and the Planning and Development Act 2000.

Structures or parts of structures, which form part of the architectural heritage of an area and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest in town / village centres including shop fronts and other heritage features may be protected via a number of means including by adding same to the Record of Protected Structures (where such high level of protection deemed warranted) or via the designation of the wider area as an **Architectural Conservation Area**, where the planning authority is of the opinion that such designation is necessary for the preservation of the character of the place, area, group of structures or townscape.

Enniskerry centre is designated an ‘Architectural Conservation Area’. This is identified in Chapter 10 *Heritage* in the current development plan.

The Council is committed to ensuring that new development in Enniskerry respects its character. However, the designation of an ACA does not prejudice innovative and contemporary design; on the contrary, in principle, design of a contemporary and minimalist style will be facilitated within ACA’s provided it does not detract from the character of the area.

Town Centre

The maintenance of public buildings or infrastructure (such as signage) is not a matter for the County Development Plan but a localised issue for the Municipal District. The Council has limited powers to interfere with private properties or require maintenance to a certain standard other than where

properties fall into a derelict condition. The Council has similarly limited control over paint colours utilised on property frontages, unless any such modification was deemed to interfere with the Enniskerry centre Architectural Conservation Area.

Community facilities

The Council is committed to maintaining and enhancing community facilities that are within its remit and supporting other state agencies in the delivery of community facilities and services (e.g. health services, education). The priority for the location of services is at the most accessible locations, with the priority given to town centres and places well serviced by active and sustainable modes of transport.

Where new or enhanced community facilities are required, the County Development Plan and LAP provision would support the delivery of same.

The current County Development Plan provides the planning policy support for the development of allotments and community gardens and it is intended that this will be maintained and enhanced if necessary in the new plan. The Local Authority may make the land available but the provision of such facilities is subject to funding.

Recommendations of Chief Executive

1. In the new Core Strategy, to ensure that the new development strategy for Enniskerry is based on the principles and requirements of the National Planning Framework and Regional Spatial and Economic Strategy, and in particular is framed around sound sustainability principles including the availability of local employment, service infrastructure (including community facilities and capacity) and sustainable modes of movement both within and between settlements.
2. With respect to housing
 - Prepare a new housing strategy to inform housing policy in the County Development Plan.
 - Review and update as necessary residential density provisions / standards in accordance with NPF / RSES and Ministerial guidelines
 - To review and update objectives to ensure a mix of house types and sizes in new residential and mixed-use schemes to cater for the varying household needs in the County.
 - Expand on the housing design objectives contained in the current plan (HD2, HD3) and include objectives requiring a tailored design approach for new residential development which is responsive to local context and the submission of a design statement with planning applications which shall outline the design rationale.
3. To retain and enhance where necessary objectives for improved public transport and sustainable modes of transport.
4. To include a new chapter specifically on Climate Change in the draft County Development Plan. The strategy and objectives of the chapter will have a focus on the land use and planning aspects of adaptation to and mitigation of climate change.

In the development of the new plan, particular regard will be taken of the need to align with national commitments on climate change mitigation and adaptation.

To support the implementation of the Wicklow County Council Climate Change Adaptation Strategy and to support the land use aspects of the strategy.

To integrate climate change mitigation and adaptation as guiding principles throughout the plan and in particular to address the areas of:

- Compact growth and crafting more sustainable settlement patterns
 - Sustainable and low carbon transportation
 - Enhancing public transport and access to same
 - Flooding, surface / storm water management
 - Natural resource management
 - Renewable energy
 - Low energy building design.
5. To maintain and strengthen if necessary natural heritage provisions of the plan, to ensure in particular the ongoing protection of biodiversity; to enhance information provided in the development plan regarding natural heritage assets.
 6. To retain and enhance if necessary existing policy support for Green Infrastructure.
 7. To maintain and strengthen if necessary built heritage provisions of the plan.
 8. To provide enhanced policy support and objectives in the new County Development Plan for community and social infrastructure such as (but not limited to):
 - community centres and arts venues
 - community gardens and allotments
 - facilities and supports for the elderly and the disabled.
 9. To retain existing town centre and retail policies and objectives, and to enhance where necessary; in particular to continue to prioritisation of existing town centres as the commercial and retail heart of settlements and to appropriately manage ‘edge of centre’ and ‘out of centre’ retail.
 10. To retain and enhance if necessary existing policy support for tourism development in the County.

Part 4.3.24 Kilcoole

Name	Issue Raised
Wilson Family (D55)	<ul style="list-style-type: none"> • Anne Wilson is the owner of a parcel of lands in Kilcoole that are zoned for employment. The lands have been partly developed. However, further development is constrained by the absence of the proposed Western Relief Road (R08) as identified in the Greystones Delgany Kilcoole LAP. • Objective R08 in the Greystones Delgany Kilcoole LAP states '<i>To provide for the development of a Western Distributor Road to bypass Kilcoole. The northern section of the route shall be developed in the long term, with linkage to the R774. It is a long term objective to develop an additional link between R761 intersection with Lott Lane and the Western Distributor Road. To provide for the development of a local access road in conjunction with the development of zoned lands at AP9: Bulford Action Plan and to provide for the development of a through link road from Main Street to the Western Distributor Road. This section of the route is necessary for the opening up of zoned lands (AP9 and E lands at Bullford Farm). Only 50% of development on these lands shall be permitted before the southern part of this road is completed</i>'. • Request that the County Development Plan recognise the proposed Kilcoole Western Relief Road (R08) as a priority specifically under the Regional or Local Roads Objectives section of the County Development Plan; • Indicate the road as a single carriageway "By-Pass" Road from the Druids Glen/Woodbrook Road generally along the alignment of the current Plan. • Provide for a series of roundabouts along the road as indicated (map included in submissions) providing access to the relevant developments: <ul style="list-style-type: none"> ○ Roundabout A – Bulford Business Campus; ○ Roundabout B – to Kilcoole Town Centre and AP9 Lands ○ Roundabout C – to SLB Lands ○ Roundabout D – back to the R761 and hence to the Southern Cross and N11 with future service to the N774 and also to service the CE lands at the convent. • In this way all of the proposed and current developments along the western side of Kilcoole can gain access to the N11 by using this 'By-Pass' road to gain access to the R761 and hence a short distance to the R774 and on to the N11. • It is submitted that this road does not need to be as significant as may have been originally envisaged and could be of a local distributor status as shown below. • 90% of the alignment of this road can be achieved within the land ownership of 2 parties (Anne Wilson and Paula Hanaphy), both of whom will be amenable to facilitating the construction of the road.
Colum O’Broin (D67)	<ul style="list-style-type: none"> • Kilcoole also has long planning pedigree, going back to its rapid growth in the early 1970s, but has been in the shadow of Greystones since. The previous CDPs for the past 25 years have always promoted growth in Kilcoole, and this has to some extent been realised. However the growth of commercial and employment infrastructure in this period has been considerable, again supplying what was envisaged for the ultimate population of the town, and more, as the density of employment numbers to the hectare has increased dramatically reflecting the move away from manufacturing to higher skilled services businesses. Kilcoole at this stage

	<p>provides the employment infrastructure for many types of businesses that would otherwise have been located in Greystones.</p> <ul style="list-style-type: none"> • Wicklow County Council appears to have realised this, together with the fact that higher level and bulk retail for Kilcoole and the railway station was located in Greystones, in deciding in the 2013 Local Area Plan to amalgamate Greystones and Kilcoole into a single planning unit, while protecting the unique features and community cultures of both by retaining a small greenbelt between the two towns. This made sense as the two communities exhibit great synergies. • Request that Greystones and Kilcoole are combined into one unit in the County Development Plan and designated as a Self-Sustaining Growth Town and included as part of the planned development of strategic development areas in Greystones (as envisaged in the Dublin Metropolitan Area Strategic Plan). • Given a combined population allocation that should, at least, be the same as the current populations allocated for each in the current County Development Plan.
<p>Kimpton Vale (D76)</p>	<ul style="list-style-type: none"> • Request that an appropriate planning policy framework is in place in the County Development Plan to ensure the most efficient and effective use of serviced and accessible lands at Kilcoole to support the future requirements of the County and to provide for and ensure such lands are utilised to help facilitate the needs of local communities, including the existing housing need in the vicinity. • Kimpton Vale owns a significant landholding in Kilcoole. • The Housing Need and Demand Assessment and subsequently the Core Strategy should take into account the existing housing need when approaching the allocation of housing growth and population in the county going forward. • Whilst Kilcoole could be designated as a ‘town’ under the Settlement Strategy for the new Development Plan, it is submitted that it would be more appropriate to link the growth of the town with the nearby Self-Sustaining Growth Town of Greystones and with Delgany. This would acknowledge the existing relationship between these settlements, the high quality public transport facilities serving the settlements and the potential to plan for greater growth in Kilcoole than would be possible under a ‘Town’ designation. • These towns are linked for the purposes of the current Greystones-Delgany & Kilcoole Local Area Plan 2013 – 2019, which is reflective of the appropriateness of a coordinated and joined-up approach to the development of the area. It is submitted that the relationship of Kilcoole with the Self-Sustaining Growth Town of Greystones should be maintained going forward under the new County Development Plan. • Notwithstanding the existence of a green belt between these two urban areas, the growth and development of these areas is linked functionally due to their close proximity. Kilcoole benefits from its proximity to Greystones and Delgany in terms of access to high quality transport links, retail and employment opportunities. The town of Kilcoole itself is served by commuter rail and bus services. • This relationship is acknowledged in Chapter 3 of the current County Development Plan. • The growth of Kilcoole should be dealt with in an integrated manner along with the adjacent areas of Delgany and Greystones. For the purposes of

	<p>housing allocation and population growth, this will involve dealing with this overall area in a comprehensive and integrated manner, including apportioning housing delivery to encourage the sustainable growth and development of Kilcoole under the new core strategy.</p> <ul style="list-style-type: none"> • Kilcoole is considered to represent an opportunity for compact, sustainable growth, based on logical, infrastructure-led extension of the town. The 2016-2022 Development Plan identifies a shortfall in zoned land within Kilcoole to meet its population target, which is to be addressed in the future LAP for the area. We request that the new Plan support this and additional growth for Kilcoole. • Whilst some local infrastructural constraints have been highlighted by Irish Water as part of the SHD process for the Bullford application, the applicant has been liaising with Irish Water to address such constraints in the context of the ongoing SHD pre-application process in respect of the southern portion of their landholding. Greystones waste water treatment plant has been designed with capacity to cater for Delgany and Kilcoole. It is understood that Irish Water are investigating whether some minor upgrades to local pumping infrastructure is required to facilitate any significant development projects. It is considered appropriate to provide for a sustainable level of population growth to vindicate this investment of public monies in the resourcing and servicing of the area. • Appendix 3 of the National Planning Framework sets out a methodology for a tiered approach to land zoning. Kilcoole provides an opportunity to designate appropriately located lands for development over the forthcoming Development Plan period, which have existing access to services. • Further lands at Kilcoole may be suitable for Tier 2 zoning, as defined in the NPF. Such lands may not currently benefit from access to all necessary services to enable immediate development, but these lands have the potential to become fully serviced within the lifetime of the plan. • The current designated strategic landbank to the west of the town of Kilcoole constitutes an opportunity to provide for appropriately located population growth over the lifetime of the forthcoming new Development Plan. • The town of Kilcoole has the capacity to sustain housing growth over the operational period of the new Development Plan, based on existing population, local services, good quality public transport links and the limited growth experienced during the last development plan period. • The town of Kilcoole has seen only muted housing delivery to date, however the town is considered to be well served in terms of infrastructure and services to support further growth. It is also noted that the town provides opportunities for further delivery of services and amenities, due to the existence of currently undeveloped lands along the main street, which are at present subject to a town centre zoning. The SHD development currently at pre-application stage includes delivering important new infrastructure and facilities on the main street, including community uses, retail and employment locations, and a childcare facility. • In the context of the SHD pre-application process, the WCC Community Section was consulted. It was noted that Kilcoole is well served in many respects (with a community hall, a scout den, and a recently completed playground) however there was an identified need for an innovation / community hub-type facility. Therefore, it is considered that the delivery of
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	<p>such a facility should accompany future housing delivery in the town.</p> <ul style="list-style-type: none"> • In terms of local school provision, the Minister for Education and Skills, announced plans on 13th April 2018 for the establishment of a new 8 classroom primary school in Kilcoole, forecast for completion in the short term. This announcement followed demographic exercises carried out by Government into the current and future need for primary and post-primary school places across the country. The proposed size of the school is based on current projected need and responds to patronage and demographic demand in the area. • It is submitted that Kilcoole has the commensurate services to underpin past and future housing delivery and population growth, subject to the integrated delivery of additional services along the main street, concurrently with residential development. • It is submitted that Kilcoole provides an opportunity for a compact extension of its existing built up area, in particular via contiguous development to the west of the main street. This approach to the development of the town has the benefit of concurrently mending the gaps in the streetscape along the main street and allows for the delivery of mixed uses onto this key street, with sustainable, compact residential development further to the west and northwest. • The town of Kilcoole requires a range of housing types and formats to respond to existing demand. The current SHD pre-application proposal constitutes a range of houses and duplex / apartment units, with higher densities providing an urban edge to the main street, with more apartment type development and a mix of uses, and densities and intensity of development reducing to the west. This mix of housing types and formats is considered appropriate for Kilcoole in a broader sense, as the town could benefit from a greater overall mix of housing types (at present the housing stock is weighted heavily towards detached and semi-detached houses, at low densities). • Whilst Kilcoole is not considered suitable for city centre type densities, it is considered that the town does have the capacity, and would benefit from, higher density development, to provide a more sustainable development pattern going forward. Hitherto, the development of the town has focused primarily on lower densities, often circa 20 dwellings to the hectare or lower, whereas current policy, including the National Planning Framework and the Guidelines for Sustainable Development in Urban Areas underline the need for compact, sustainable development in order to reduce land take and encourage a reduction in car usage by creating walkable urban areas which are less spread out. • A denser urban form of c. 35 units per hectare can offer significant benefits also in terms of the efficiency of servicing residential development, when compared to a more dispersed development pattern. • In Kilcoole, increased density can be achieved by delivering a mix of uses and higher densities on town centre lands along the main street, with densities and heights reducing further away from the main street. The existing gaps in the streetscape in the centre of Kilcoole provide a unique opportunity to mend the urban fabric of the town, whilst introducing elements of mixed use and higher density development which provide for direct access onto the main street and to local facilities and amenities. • It is respectfully submitted that the growth of the town of Kilcoole should be dealt with in an integrated manner under the forthcoming new County
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	Development Plan, along with the adjacent areas of Delgany and Greystones. This is reflective of the functional connections between these urban areas as acknowledged under the current Local Area Plan for the area.
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Response of the Chief Executive

Settlement Hierarchy

Kilcoole was included with Greystones-Delgany for the purpose of preparing a Local Area Plan in 2013. The introduction to the LAP notes *'This local area plan provides a strategy for the exclusive growth of each settlement, whilst giving due recognition to the reality of the strong links between the settlements and the relatively large degree of cross-sharing of certain services, facilities and infrastructure between the settlements including community, recreational and retail services and shared transportation and water services infrastructure'*.

As is recognised in the LAP and the current County Development Plan, Kilcoole is a distinct settlement and does not form part of the settlement of Greystones- Delgany. The LAP provides for the exclusive growth of each settlement. The Census also recognises Kilcoole and Greystones-Delgany as distinct settlements. In addition, while Greystones - Delgany is in the Dublin Metropolitan Area' as defined by the Regional Spatial and Economic Strategy, Kilcoole is not. It is, therefore, not proposed to amalgamate these settlements in the County Development Plan for the purpose of the core strategy, the settlement hierarchy and the allocation of population targets.

The new draft Plan will include a new settlement hierarchy, which will comply with the regional settlement hierarchy.

Relevant Regional Policy Objectives:

RPO 4.1: *In preparing core strategies for development plans, local authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.*

The regional settlement hierarchy identifies two types of settlement that sit below key towns on the hierarchy. These are 'Self-Sustaining Growth Towns' or 'Self Sustaining Towns'. Self-Sustaining Growth Towns are settlements with a moderate level of jobs and services include sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining. Self-Sustaining Towns include towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining.

In determining a settlement hierarchy for the County, the RSES advocates the use of an evidence-led asset based approach. The asset base compiles information across 25 different indicators which considers not just historic population growth, but a wider number of relevant factors to build an overall profile of settlements, in terms of their scale and functions, human capital and placemaking assets, enterprise eco-system, connectivity and environmental and infrastructure capacity. The asset base assessment is used to identify which settlements in Wicklow have the greatest capacity and

potential for growth, while ensuring that future growth is sustainably managed. This assessment has been carried out for Kilcoole and it has been determined that the settlement comes within the definition of a self-sustaining town. In accordance with Section 4.7 of the RSES, self-sustaining towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. Kilcoole is an important service centre for its residents and for the surrounding area and future growth needs to be matched with adequate services and employment opportunities to ensure it becomes a self-sustaining town.

It should be noted that Greystones-Delgany, following this same asset based assessment, has also been determined to come within the definition of a self-sustaining town, not a self-sustaining growth town.

Population Growth

The NPF requires that local authorities apply a tailored approach to the growth of towns and villages. This is set out in NPOs 7 and 9 (Please refer to Section 4.3.1 Vision and Core Strategy for more detail).

The NPF Implementation Roadmap sets out County Population Projections to 2031. The population projection for County Wicklow for 2031 is 164,000. This is significantly below the target in the current development plan – 176,000 in 2028. Accordingly this requires a change in the population growth strategy for all of the settlements including Kilcoole. The new targets are addressed in the draft core strategy, which forms part of this report.

Zoning and Infrastructural Assessment

The National Planning Framework sets out a two-tier approach to the land zoning as follows:

Tier 1: Serviced Zoned land

This zoning comprises land that are able to connect to existing services. These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands.

Tier 2: Serviceable Zoned Land

This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan.

Services include road and footpath access, public lighting, foul sewer drainage and water supply.

NPO72a requires that a standardised tiered approach is applied to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan. NPO72b requires that the Planning Authority make a reasonable estimate of the full cost of delivery of the specified services and prepare a report detailing the estimated cost at draft and final plan stages. The infrastructural assessment must be aligned with the approved infrastructural investment programmes of the relevant delivery agencies, for example, Irish Water, or be based on a written commitment by the relevant delivery agency to provide the identified infrastructure within a specified timescale (within the lifetime of the plan). NPO72c and Appendix 3 state that land that cannot be serviced within the lifetime of the plan should not be zoned.

This assessment will be carried out for Kilcoole as part of the next review of the Local Area Plan.

Western Relief Road

Objective R08 in the Greystones Delgany Kilcoole LAP is a local road objective to provide for the development of a distributor road to aid in local traffic circulation around the western side of Kilcoole town centre. This is not considered to be a strategic road objective that requires inclusion in the County Development Plan. This objective will be reviewed as part of the review of the Greystones-Delgany and Kilcoole Local Area Plan.

Housing Density & Mix

Higher density development has the potential to deliver sustainable and inclusive communities provided it is well designed and at the right locations. The objective should be to create high quality places by achieving an efficient use of land appropriate to its context, while avoiding the problems of over-development. The National Planning Framework (NPO 35) requires that increased residential densities be achieved in existing settlements *‘through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights’*.

SPPR 4 of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) states *‘It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

1. *the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
2. *a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
3. *avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more’.*

In order to comply with SPPR4 the new County Development Plan shall include a policy on residential density that requires all new multi-unit residential development to comply with the standards set out in the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG 2009). The standards set out are as follows:

- For large towns (defined as those with a population of 5,000 or more), minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station and 35 - 50 dwellings per hectare on outer suburban / greenfield sites. Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares.
- For small towns and villages (defined as those with a population ranging from 400 to 5,000) the Guidelines indicate the following standards:
 - Centrally located sites – 30 to 40 + units per hectare for mainly residential schemes may be appropriate or for more mixed use schemes.
 - Edge of Centre Sites – 20 to 35 dwellings per hectare.
 - Edge of small town / village – densities of less than 15 – 20 dwellings per hectare (as an alternative to one-off housing) as long as such development does not represent more than 20% of the total new planned housing stock of the small town or village.
- For villages under 400 population the guidelines state that any individual scheme for new housing should not be larger than 10 – 12 units.

Higher density does not necessarily mean high-rise. It requires a more considered approach to the layout and design of development ensuring that there is less usable open space and may include a greater variety of housing formats. Terraced housing offers an opportunity to achieve relatively high

density. The Plan will include policies to require that all new development is of a high quality and respectful of its setting in terms of visual and residential amenities.

The delivery of sustainable communities will be a core aim of the new County Development Plan. In order to enable the development of sustainable communities, it is considered that the new Plan should include a policy to encourage a wide variety of housing types, sizes and tenure that reflect the County’s household composition. As part of the housing strategy, an analysis of existing demographics will be undertaken to inform future housing mix requirements and policy. By providing a good mix of house types it will be possible to create sustainable neighbourhoods that cater for a variety of people and allow people the choice and opportunity to remain in their community while availing of accommodation that caters to their changing needs at particular stages of their life. It is noted that a number of Specific Planning Policy Requirements (SPPRs) in relation to housing mix are included in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018).

Recommendations of the Chief Executive

1. Identify Kilcoole as a self-sustaining town in the new Draft County Development Plan 2021-2027.
2. Include a new policy on residential density that requires new residential development to be in accordance with the standards set out in the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG 2009).
3. Include a policy to require a mix of house types and sizes in new residential and mixed-use schemes to cater for the varying household needs in the County.

Part 4.3.25 Rathdrum

Name	Issue Raised
Karen Kennedy (D83)	<p>Market Square: One aspect of the development strategy in the Rathdrum Local Area Plan (LAP) is as follows: To reinforce and improve the visual appearance of the central area of the town and encourage development that will enhance the town’s vitality and vibrancy. The Market Square needs to be redeveloped as a priority and the recommendations from Appendix D Conservation Area Appraisal document should be followed through on; <i>"Market Square fails to make its full impact through lack of adequate definition in the surface and through its use as an undisciplined parking area. This space could be turned into a great asset to Rathdrum by returning it to an open area, free of parked cars and with well-thought out paving and street furniture".</i> (p 31)</p> <p>Schools: Under section 3.6 the LAP notes that <i>'With respect to education, the Department of Education is satisfied that there is adequate capacity in both the primary and secondary schools in the town to cater for the targeted population expansion'</i> (p 23 LAP). Currently both the primary and secondary schools would appear to be at maximum capacity, based on their planning application for more school rooms/space, and with the project population growth of 3,500 by 2028 a new school plan needs to be revisited with the Department of Education. The current sites are limited in their future scope so a greenfield site should feature in the future plans for Rathdrum. Further education/college/training facilities should also be considered and could be incorporated into a new school campus.</p> <p>Traffic Management System: A seamless traffic management system is required in order to the town to function at its best and a survey/action plan should be considered as a priority.</p>
Orlagh Evans (D86)	<p>Schools: Having read the last LAP for Rathdrum in regards to education I noted under section 3.6 (community development) that the Dept of Education were satisfied that the local school had the capacity to deal with a growth in population. However given the increase in pupil numbers in the schools in the last 2-3 years and given the projected population growth, I feel this is no longer the case. As a parent of young children, I am aware the pupil numbers have increased by close to 20% in the last 2-3 years and the schools are now at capacity. I feel plans may need to be put in place for a new and/or amalgamated primary school with adequate playing areas and space and facilities as the current schools seem restricted with regards to expansion opportunities</p>

Response of Chief Executive

Chief Executive’s Note on the Rathdrum Local Area Plan

Currently Rathdrum has its own ‘stand alone’ Local Area Plan (LAP) that was adopted in 2017. Rathdrum is categorised in the current CDP as a ‘Level 5 Small Growth Town’, along with the settlements such as Ashford, Aughrim, Tinahely, etc. In the past LAPs would have been adopted for most Level 5 Towns. However, changes to the Planning Act in 2010 allowed the Planning Authority to incorporate development plans for towns with a population of less than 5,000 into the CDP hence over the years seven of the Level 5 Towns have had their plans incorporated into the CDP. It is intended to incorporate the Rathdrum’s plan into the CDP process as part of this review. This will help to consolidate the plans for such settlements and ensure consistency in the written statement layout and land use map zonings.

Market Square

It is agreed that Market Square needs to be upgraded and given the location and layout of the Square on the main street an upgrade has the potential to be a significant contribution to the public realm of the town. Market Square has had approval for upgrade works and a small scheme has received funding under the Town and Village Renewal Scheme to enhance this area. Additional funding is required to advance the upgrade works. The current objectives of the Rathdrum plan facilities the redevelopment of Market Square and such objectives will be updated as part of the new plan making process. Rathdrum town centre is the subject of an application to the Rural Regeneration Development Fund 2020, with the upgrade of Market Square a key element of the scheme.

Schools

As part of the Local Area Plan 2017 process, through the prescribed body consultation process, the Department of Education were satisfied that there was adequate capacity in both the primary and secondary schools in the town to cater for the targeted population expansion. However in order to ensure that a school extension can be facilitated if required, lands adjacent to Avondale Community College and Rathdrum National School have been zoned for community use and the objectives of Action Area 1 require lands to be reserved for expansion of St. Saviour’s National School if found necessary. As part of the new Town Plan making process for Rathdrum, the Department of Education will be consulted again with regard to school provision and any requirements will be accommodated in the new plan.

Traffic Management System

The management of the traffic and parking in Rathdrum has been looked at a number of times over the years. In 2011 the ‘Rathdrum Accessibility and Traffic Calming Scheme – Preliminary Design Report’ was prepared by consultants for Wicklow County Council; however, there has been no funding to develop this further or to implement measures. Rathdrum town centre is currently the subject of an application to the Rural Regeneration Development Fund 2020, with traffic management a key element of the scheme. The local plan for Rathdrum facilitates such works and any new plan will continue to facilitate such works.

Recommendations of Chief Executive

1. To incorporate the land use plan for the settlement of Rathdrum into the County Development Plan’s lower tier plans.
2. To review the existing objectives of the Rathdrum Local Area Plan 2017 – 2023 and to update where necessary in the drafting of a new plan in the County Development Plan for Rathdrum.

Part 4.3.26: Level 6 Settlements

Name	Issue Raised
<p>Avoca Tidy Towns & Community Courthouse CLG (C8)</p>	<p>Avoca Avoca Tidy Towns proposed that WCC and Irish Water unite to purchase the property known as Nagles in Avoca (former public house, residence and 4 acres of land with river frontage) for the future development / enhancement of Avoca Village. This property has the potential to provide vehicular access to the WWTP at Ballanagh, which may facilitate its upgrading. This would also facilitate the development of a short term car park in the centre of the village and a park in the centre with a potential playground.</p>
<p>Roundwood and District Council (C20)</p>	<p>Roundwood Roundwood area is a vibrant community. The Roundwood and District Council attempts to cover issues from Calary in the north to Annamoe and Moneystown southward and westward to Sally Gap. Thus these comments cover the district and hinterland of Roundwood village. The population of Roundwood village has increased in recent years. There has also been a population increase in the surrounding townlands and hinterland. The village itself has become a gateway to the Wicklow mountains due to its proximity to Dublin both for Dubliners and international tourists. Recreational facilities for visitors are mainly walking and cycling.</p> <p>How we would like Roundwood to develop in the future:</p> <ul style="list-style-type: none"> • Maintain the great sense of community. There are over 50 different community clubs and groups. Many of these are intergenerational that foster even more pride in the area. However there is also a lack of youth facilities for those not sport orientated. • Maintain the village main streets as far as possible as they are, so not altering the main architecture of the village further. The view from the Main St (R755) to the reservoir is such an enviable and unusual feature for a village. • Develop more accommodation for tourist; possibly a hotel, but even lateral thinking - occasional use (as required) bedrooms in private houses within the village using cafes/restaurants for breakfast as done elsewhere. • A secondary school • Business hub for remote working with high speed broadband (100 GB) that would reduce need for commuting. Thus reducing carbon emissions. Currently broadband speeds have improved but are still restrictive. • Mobile phone coverage is poor and erratic in areas. • Develop a renewable energy microgrid using solar PV and/or water power thus reducing carbon emissions. • Ensure all new developments are carbon neutral. • A park and ride hub where there is improved public transport links. <p>Main issues facing Roundwood and how these should these be addressed in the development plan</p> <p>Parking: A major problem in Roundwood village is a lack of parking. On weekdays this is seen particularly as parents leave or collect children from school. The catchment area for the school is large, limited school buses result in numerous cars delivering the pupils. Parking on the R755 or outside the school on the Lough Dan road can cause traffic constriction despite all the safety measures in place. This is exacerbated at weekends when walking groups park on the main streets and head off for day hikes. Available parking for locals going shopping or for visitors to go for a meal is dramatically restricted.</p>

	<p>As the R755 is the main route to Glendalough, there are times when there is only one lane, obviously not appreciated by the tour buses.</p> <p>Schools: The primary school in the village serves the younger children. There is no secondary school. Secondary students have to travel to local towns. Some are able to get buses but otherwise it is a parental commute.</p> <p>Harnessing economic potential having regard to the town’s proximity to the reservoir, amenity routes and the Wicklow Mountains</p> <ul style="list-style-type: none"> • Increase parking area close to the amenities, ideally monitored with CCTV. • Increase tourist accommodation • More off-road cycle tracks, also suitable for racing cyclists. Could be possible almost instantly on R759 to Sally Gap with minimum disturbance as space beside the road. • Theft from hire cars could be reduced if no hire company identifiers. <p>Opportunities to improve visitor management especially during peak tourist times One way system at least at weekends, to maintain traffic flow, using the reservoir as a roundabout. Turning at the north end of the village at Synnott’s corner from the R755, following the road round reservoir and returning at south end, to the R755 at the Church with the left option to Glendalough and the right to the Main Street. This would improve visitor experience in the village as calmer rural atmosphere would reign. (Precedent - use of Trinity College, Dublin as a roundabout originally laughed at but has been used successfully for about 50 years!)</p>
Cressinda Lynch (D33)	<p>Donard</p> <ul style="list-style-type: none"> • Donard is missing a playground and a café (with the exception of the community café). • It needs more accessible walking trails into the beautiful mountain areas. • It feels quite run down and short of businesses on the main street. Healthy eating cafes, vintage clothes shops, and arts festivals could liven up the area. • With respect to Housing: <ul style="list-style-type: none"> - Has potential due to proximity to N81. - Need Social houses, built by the council instead of developers. - Need fixed rent rates, rented directly from the council. - Should meet the German Passivhaus standards for a 70% reduction on fuel costs for tenants. • A new Educate Together School.

Response of Chief Executive

In accordance with the proposed new Core Strategy a set out in Part 2 of this report, all existing Level 6 rural settlements are proposed to be categorised as Rural ‘Small Towns’ following the typology set out in the RSES.

In support of the overall pattern of rural and small town development, the NPF *‘seeks to protect areas that are under strong urban influence from unsustainable over-development on the one hand, and to encourage population to be sustained in more structurally weak areas, that have experienced low growth or decline in recent decades, on the other, while sustaining vibrant rural communities’.*

The RSES acknowledges that rural areas are facing many challenges ranging from urban generated pressures in some areas to a declining and ageing population in other areas, changes to economic structure and lack of access to infrastructure and new technologies. The County Development Plan will

provide a tailored response to the development of each rural settlement, reflecting their capacity to absorb growth in a sustainable manner.

It is intended that the new County Development Plan will review the overall policies and objectives for all of the existing Level 6 settlements to accord with the provisions of the NPF and RSES.

AVOCA

With regard to WCC purchasing property within Avoca Village, this is not within the remit of the County Development Plan.

ROUNDWOOD

Traffic management: It is acknowledged that there are parking issues in Roundwood, with a lack of parking spaces leading to haphazard parking, especially at peak school times and during the peak tourism season. This in turn leads to traffic congestion at times on the main street. The current plan for Roundwood incorporates objectives seeking the provision of additional car parking facilities for the village to be included in any significant development close to the main street. Such objectives will be retained and enhanced where necessary in the new plan.

The provision of a park-n-ride in Roundwood is not considered necessary as there is a very limited public transport service in the area with no current plans to increase the public transport at the moment. In general Wicklow County Council and the NTA are committed to the delivery of more ‘park-n-rides’, with the NTA recently having established a dedicated park-n-ride team to look at this issue. It is considered that it would be more effective to have a coordinated county / regional strategy for park-n-rides rather than allowing the delivery of such facilities on an ad-hoc and uncoordinated basis without the backing and support of the transport agencies.

Views: The view from the main street towards the reservoir is protected through the development objective for these lands. Such an objective will be retained and enhanced where necessary in the new plan.

Secondary School: The Department of Education is responsible for the development of future schools to settlements. Given the limited population size of Roundwood it would not be envisaged that the Department would seek to build a secondary school here. However, the current plan, as well as the future plan, will ensure that the planning policy support for the development of a new school, if a need is identified, is supported.

Tourist accommodation / digital hub: The development of such uses as tourist accommodation and a digital hub are facilitated in the existing plan at the appropriate location and subject to proper planning and sustainable development criteria. It is intended that the new plan will continue to facilitate such development.

Mobile phone coverage is not an issue for the County Development Plan; the plan fully facilitates the enhancement of telecommunications throughout the county however it is a matter for the mobile phone companies / Telecom regulator.

The delivery of **renewable energy schemes** is not an issue for the County Development Plan; the plan fully facilitates the development of renewable energy schemes at appropriate locations.

Tourism visitor management: The County Development Plan, including the Roundwood settlement plan, being land-use plans, would not play a role in the management of tourists / visitors. The current

plan, as well as the strategies and programmes of various agencies engaged in tourism management and promotion, would provide policy support for the drawing up of a tourism development and management plan for the area. The development of such a plan could be progressed at any time by the various Council departments and agencies involved in economic and tourism development, such as the Wicklow Municipal District Council, County Tourism and Failte Ireland, subject to funding and resources.

DONARD

Uses and activities in the village: The current plan for Donard provides the planning policy support for the delivery of new or enhanced community, recreational and cultural facilities / activities in Donard such as playgrounds, walking trails and arts festivals. The delivery of such services / events would likely require the engagement of a number of bodies / agencies including the Council’s Community, Cultural and Social Development Department, the County Arts officer, landowners and the local community, as well as sourcing of funding.

Educate together school: The Department of Education is responsible for the development of schools in settlements, however given the limited population size of Donard it is not anticipated that a new school would be necessary at this time in Donard. However, the current plan, as well as the future plan, will ensure that the planning policy support for the development of a new school, if a need is identified, is supported.

Housing: It is noted that there is a desire for more housing in Donard, the draft Core Strategy for the new County Development Plan, as presented in Part 2 of this report shows that it is envisaged that Donard will grow in population and new housing will be facilitated in the village. The issue of rent rates for social housing is a matter for the Housing Department. The design and energy rating of any new Wicklow County Council housing is currently being considered by the Housing Department under the draft Energy Plan which is in development. For more details on Housing refer to the Housing Section of this report (Section 4.3.4)

Recommendations of Chief Executive

1. The current Level 6 Settlement Plans for these towns will be reviewed and amended where necessary in accordance with the proposed new settlement hierarchy, population / housing / employment growth targets and the emerging development objectives for towns at this level. The issues that have been raised in these submissions will be taken into account in the drafting of the new plans.

Part 4.3.27 Level 7 Large Villages, Level 8 Small Villages, Level 9 Rural Clusters and Level 10 Rural Area

Name	Issue Raised
Wicklow Planning Alliance (C17)	<p>Rural Housing</p> <p>WPA does not understand the reference to “<i>genuine rural housing needs</i>”. Surely all children who want to leave the family home and become independent have genuine housing needs. The sons and daughters in most families have a preference to live in the locality where they grew up and near their parents. WPA finds the inference that somehow the needs of rural families are more genuine is troubling. The children that grew up in Irish town and elsewhere in inner city Dublin would love to be able to afford to live beside their parents but cannot afford to do so because these areas have become gentrified. WCC should not be pitching rural families against urban families or suggesting that some areas should be exempt from planning law.</p>
Wicklow Uplands Council (C27)	<ul style="list-style-type: none"> • WUC is committed to supporting those who live, work and recreate in the Uplands areas and is concerned that there should be due recognition for particular needs away from the towns and villages. The rural landscape is a living landscape which has supported homes, livelihoods and recreation. • WUC welcomes the emphasis on planning new housing in existing settlements and avoiding urban generated housing in Wicklow’s scenic landscapes. It is reasonable too that people who would choose to live in rural areas of significant landscape quality should need to demonstrate ‘a functional, economic or social’ requirement (National Planning Framework policy). • Within those parameters the Uplands Council is committed to supporting those who live and work in County Wicklow. Families will continue to have the opportunity of developing new skills: at home, in the City and abroad, thus generating new ways of managing life in rural areas, to maintain and develop the County rural structure. To assist in achieving these objectives, appropriate new housing provision in rural areas should encourage a further generation to succeed and thrive, bringing new social potential to a changing economic environment. • The need for diversity of housing in rural areas is acknowledged in the Plan proposals. It suggests compact development of varied requirements, not so much through private housing provision, but also in social housing for special needs, the elderly and overcoming difficulties in accessing housing in rural areas. Social housing may need to focus on small towns and villages, but there will also be special requirements for people in the more remote areas.
Billy Timmons (D49)	<p>Rural Areas</p> <p>It is appreciated that if one is over prescriptive in this policy area that there may be unintended consequences. The submitter was a member of the Council during the preparation of the County Development Plan 2004-2010. They sought to include a policy whereby a family or member of a family who were inherently rural based but for various reasons lived in an urban area could qualify for a rural planning. Trying to formulate a wording that would achieve the objective was difficult. There is no doubt it is the same today. At the time, as an example, reference was made to the number of people that were rural based and had moved into Arklow and Avoca in the previous decades and the possible impact of the policy. No wording was included but a decision was made to look at applications on a case by case basis in a sympathetic manner. In general this was successful. However on occasion the spirit of the proposal may not have been upheld and that may have resulted in what unfair decisions. It is assumed that this was not the intention, but in the absence of an appropriate wording this could happen. This policy should be examined with a view to facilitating such cases.</p>

<p>Liam Kenna (D59)</p>	<p>Housing in the Open Countryside</p> <p>HD 23 under Wicklow County Development plan 2016-2022 sets out the 16 circumstances where a development/person is considered for a single dwelling in the open countryside. Namely:</p> <p><i>1. A permanent native resident seeking to build a house for his / her own family and not as speculation. A permanent native resident shall be a person who has resided in a rural area in County Wicklow for at least 10 years in total (including permanent native residents of levels 8 and 9), or resided in the rural area for at least 10 years in total prior to the application for planning permission.</i></p> <p>Is 10 years still relevant to the planning section? I believe 10 years is a good span to prove a person is a permanent native resident but in some cases people who are proving over 10 years are not deemed to qualify to build in a level 10 area. There cannot be any grey areas with this as it is very clear in the way it is stated. I think this needs to be discussed as this is one of the main policies in rural planning and if it’s not being accepted in all cases of compliance then something must be done.</p> <p><i>2. A son or daughter, or niece/nephew considered to merit the same position as a son/daughter within the law (i.e. when the uncle/aunt has no children of his/her own), of a permanent native resident of a rural area, who can demonstrate a definable social or economic need to live in the area in which the proposal relates and not as speculation.</i></p> <p>Majority of applicants qualify under this or number 3 and I think it works quite well.</p> <p><i>3. A son or daughter, or niece/nephew considered to merit the same position as a son/daughter within the law (i.e. when the uncle/aunt has no children of his/her own), of a permanent native resident of a rural area, whose place of employment is outside of the immediate environs of the local rural area to which the application relates and who can demonstrate a definable social or economic need to live in the area to which the proposal relates and not as speculation.</i></p> <p>Majority of applicants qualify under this or number 2 and I think it works quite well.</p> <p><i>4. Replacing a farm dwelling for the needs of a farming family, not as speculation. If suitable the old dwelling may be let for short term tourist letting and this shall be tied to the existing owner of the new farm dwelling where it is considered appropriate and subject to the proper planning and development of the area.</i></p> <p>It is believed more weight needs to be given to people who are trying to renovate or replace existing farm buildings as their own dwelling if they can prove they are tied heavily to agriculture. I also think people who qualify for a rural dwelling in an area where their parents may have a farm but, have purchased a farm in a separate location in rural Wicklow with a view to setting up their own farm occupation; should be given priority to build on the new farm instead of trying to coerce them back to their parents’ farm. I would also like to see if it is possible (it may not be possible, but it is at least worthy of discussion, so we have a clearer picture) figures on income or land size being required to be classed under this section.</p>
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5. *A person whose principal occupation is in agriculture and can demonstrate that the nature of the agricultural employment is sufficient to support full time or significant part time occupation.*

It could be possible (it may not be possible, but it should at least be discussed) that figures on income or land size being required to be classed under this section.

6. *An immediate family member (i.e. son or daughter) of a person described in 5, who is occupied in agriculture and can demonstrate that the nature of the agricultural employment is sufficient to support full time or significant part time occupation.*

It could be possible (it may not be possible, but it should at least be discussed) that figures on income or land size being required to be classed under this section.

7. *A person whose principal occupation is in a rural resource-based activity (i.e. agriculture, forestry, mariculture, agri-tourism etc.) can demonstrate a need to live in a rural area in order to carry out their occupation. The Planning Authority will strictly require any applicant to show that there is a particular aspect or characteristic of their employment that requires them to live in that rural area, as opposed to a local settlement.*

It could be possible that (it may not be possible, but it is at least worthy of discussion, so we have a clearer picture) figures on income or exact type of jobs being required to be classified under this section.

8. *A close relative who has inherited, either as a gift or on death, an agricultural holding or site for his/her own purposes and not for speculation and who can demonstrate a definable social and / or economic need to live in the area to which the proposal relates.*

9. *The son or daughter of a landowner who has inherited a site for the purpose of building a one off rural house and where the land has been in family ownership as at 11th October 2004 for at least 10 years prior to the application for planning permission and not as speculation.*

This clause needs to be addressed and possibly merged with another clause, it is very open ended.

10. *An emigrant who qualifies a permanent native resident, returning to a rural area in County Wicklow, seeking to build a house for his/her own use not as speculation.*

11. *Persons whose work is intrinsically linked to the rural area and who can prove a definable social or economic need to live in the rural area*

This clause needs amending to include more detailed definition and guidelines are needed.

12. *A permanent native resident that previously owned a home and is no longer in possession of that home (for example their previous home having been disposed of following legal separation / divorce / repossession, the transfer of a home attached to a farm to a family member or the past sale of a home following emigration) and can demonstrate a social or economic need for a new home in the rural area.*

13. *Permanent native residents of moderate and small growth towns, seeking to build a house in their native town or village within the 60kph / 40mph speed limit on the non national radial roads, for their own use and not as speculation as of 11th October 2004.*

14. *A person whose business requires them to reside in the rural area and who can demonstrate the adequacy of the business proposals and the capacity of the business to support them full time.*

It could be possible that (it may not be possible, but it should at least be discussed) figures on income being required to be classed under this section.

15. *Permanent native residents of the rural area who require a new purpose built specially adapted house due to a verified medical condition and who can show that their existing home cannot be adapted to meet their particular needs.*

16. *Persons who were permanent native residents of a rural area but due to the expansion of an adjacent town / village, the family home place is now located within the development boundary of the town / village.*

There needs to be a definitive cut off point to this clause, i.e. the boundary has moved in the past 10 years, but this should be discussed.

Whilst most of the above 16, give good guideline requirements to qualification for a rural dwelling, I believe that some are outdated and need to be removed while others are not applied during planning application as there are far too many grey areas. I think this list needs to be revisited and for each point a more detailed list of criteria needs to be given, as at present the criteria are very much open to interpretation. Any of my sentiments, in particular, I would like to be revisited however I think this whole section should be looked at, discussed and debated so that clear guidelines could be established. This would make the guidelines easier for Agents, Clients and planners to follow and adhere to, in difficult cases for planning and remove any scope for individual interpretations.

Ribbon Development

Ribbon Development is used in an application for rural planning for refusal reasons but without clear definition in the County Development Plan. The definition for ribbon development for rural planning as set out in the appendix for the national guidelines, sustainable rural housing guidelines for Planning Authorities (April 2005) which indicates that guidelines recommend against creation or exacerbation of ribbon development with it noted that such would be defined by 5 or more houses existing on any one side of a given 250m of road frontage. I propose that the above definition or similar be added to the new County Development Plan to alleviate the problem.

Under the current County Development plan 2016-2022 Appendix 2 - Single Rural House Design Guidelines, I believe the above arguments could be dealt with in this section for reference for Agents, Clients and planners so there is a greater abundance of detail. Through doing this; it will give clear and precise guidelines in the Rural strategy in Wicklow.

Definition by distance from family home to site for rural planning

This is a grey area in rural planning that I would like to see more definite rules in the new county development plan which should benefit Agents, Clients and planners alike. I would like to see in the County development either of the following two options put into place;

	<p>1. A set distance that can be agreed upon for the distance from a person’s family home to a proposed site in Level 10 area. Be it 10km or 5km that could be discussed. Something similar to the Level 9 a criterion which is very definite “be a resident for at least 10 years duration in County Wicklow of a settlement/area designated as Level 7-10 in the County settle hierarchy that is within 10km of the rural cluster in question prior to making of application/purchase of new house” Or</p> <p>2. Rural to rural is acceptable i.e. if you qualify under HD23 in Wicklow in an area you qualify in all of Level 10 areas in Wicklow.</p>
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Response of Chief Executive

Level 7 Large Villages, Level 8 Small Villages and Level 9 Rural Clusters

It is intended that the new County Development Plan will review the overall policies and objectives for rural villages to accord with the provisions of the National Planning Framework and Regional Spatial and Economic Strategy.

Rural cluster are very small groups of housing with no services; they were originally identified in a variation to the 1999 County Development Plan in 2002 and promoted as places where people could build a rural house subject to certain criteria being fulfilled and would therefore reduce the impact of rural housing on the open countryside. The reality is that the identification of these clusters has not had any significant impact in reducing demand for houses in the open countryside. The NPF and RSES seek to renew and develop existing settlements that have a certain level of services and the development of which can promote sustainable living patterns, such as the ability to walk to school or avail of public transport services.

Level 10 Housing in the Open Countryside / Rural Housing Policy

The current County Development Plan restricts one-off rural housing to those with a bona fide necessity to live in the rural area. The rural housing policy will require to be reviewed to accord with the provisions of the NPF and government guidelines and the issues raised in the submissions will be taken into account where appropriate.

In particular, the **National Policy Objective 19** of the NPF which states:

Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:

- *In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;*
- *In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.*

An assessment of the area under ‘urban influence’ as defined by the NPF has been undertaken, and this has revealed that the entire County of Wicklow is under ‘urban influence’; therefore it is

recommended, in order to be consistent with the NPF, that a common rural housing policy be applied across the entire county.

Rural settlements (large and small villages) will be promoted for development, and this is provided for in the current plan, but it is acknowledged that policy support should be enhanced in the new plan in light of the focus on this in the NPF and RSES.

Recommendations of Chief Executive

1. To revise the housing in the open countryside / Rural Housing Policy in accordance with the provisions of the NPF and RSES.
2. To revise the housing in the rural villages housing policy in accordance with the provisions of the NPF and RSES.

Part 4.3.28 Development and Design Standards

Name	Issue Raised
Newtownmountkennedy Community Forum (C11)	<ul style="list-style-type: none"> Housing in the towns of Wicklow bears no distinctive qualities to other counties. Every town seems to have a collection of magnolia semi-d’s with PVC windows and no distinctive or native characteristics. The new CDP should make the most of its scope and identify some “Wicklow” styles or materials that can be used going forward to support a sense of place in the county. Wicklow has an abundance of natural and built heritage that we can draw influence from.
Keep Ireland Open (C16)	<ul style="list-style-type: none"> Development and design standards should be addressed at the end of each chapter. The layout of the development and design standards needs to be improved and made clearer.
Wicklow Planning Alliance (C17)	<ul style="list-style-type: none"> Building design – importance of orientation. Layout - Give priority to people rather than cars. Building height should be no more than four storeys. Recent development in Delgany has very poor design standards. They are not place-making. They have poor orientation and lack privacy.
James Scott (D7)	<ul style="list-style-type: none"> In rural towns and villages, short pedestrian streets radiating off the main road should be encouraged to allow further development behind the main roads. Underground parking and indeed basements in general should be encouraged to further provide sustainable density.
Keith Scanlon (D12) Eleanor O’Farrell (D13) Ann Scanlon (D17) Patricia Ryan (D18) Tina Roche (D19) Tessa Stewart (D26) Noreen Keville (D28) Ann Teehan (D29) Isobel Connolly (D32) Alison Ryan (D34)	<ul style="list-style-type: none"> Build estates that are pedestrian friendly with high quality housing (low energy and low water use). Locate car parking in one shared separate area and not distributed beside every house. Ensure high density housing has good access to well designed public open space.
Igor Cusack (D14)	<ul style="list-style-type: none"> Height of new buildings should be restricted to three or four storeys. Electric charge points should be provided on all new buildings.
Tricia Cusack (D23)	<ul style="list-style-type: none"> Need more imaginative estate design - look at garden suburbs such as Moor Pool in Birmingham. Broken street lights are being replaced with white (daylight) LED lighting. This has been proved to disrupt sleep rhythms of humans and to disturb wildlife. If the Council wants a healthy population and a green environment, not only should this policy be modified but existing white LEDs should be replaced.
Sinead Wallace (D35)	<ul style="list-style-type: none"> Build estates that are pedestrian friendly with high quality housing (low energy and low water use). Ensure open access for wildlife between gardens – no concrete walls, biodiversity friendly hedging and open fencing. Locate car parking in one shared separate area and not distributed beside every house. Ensure high density housing has good access to well designed public open space.

Rosa Murray (D43)	<ul style="list-style-type: none"> • Trees and pollinators should be a standard requirement for all planning permissions granted. • All new builds to be eco-friendly.
Annette Vaucanson (D61)	<ul style="list-style-type: none"> • Build estates that are pedestrian friendly with high quality housing (low energy and low water use). • Locate car parking in one shared separate area and not distributed beside every house and apply the same principle to refuse collection with shared bins rather than one at every house. • Ensure high density housing has good access to well designed public open space.
Anita Tuesley (D89)	<ul style="list-style-type: none"> • Building design – importance of orientation; • Layout - Give priority to people rather than cars; • Building height should be no more than four storeys; • Recent development in Delgany has very poor design standards. They are not place-making. They have poor orientation and lack privacy.
KRA Visionary Project Partners (D95)	<ul style="list-style-type: none"> • Build estates that are pedestrian friendly with high quality housing (low energy and low water use). • Any car dependent house should provide EV charging for at least one electric car. • Ensure high density housing has good access to well designed public open space. • Locate car parking in one shared separate area and not distributed beside every house.
Judy Osborne (D98)	<p>Submissions made on previous county development plans resubmitted. (The references to policy and objectives therefore relate to plans prior to the current development plan). The following summary identifies the key issues that are relevant to the Development and Design Standards in the current county development plan.</p> <p>Summary of issues from the 2003 and 2008 Submissions</p> <ul style="list-style-type: none"> • The use of sustainable criteria to assess applications for development as used in the National Spatial Strategy Asset Test for proposed residential developments in towns. • Master planning or framework planning that go beyond the two dimensional to envisage the three dimensional expectations needs to be implemented to ensure sustainable urban design reflecting the environmental carrying capacity of the area, planning for critical urban mass in designated towns and pedestrian friendly design that facilitates walking and cycling, strengthening community and the social capital that may become increasingly important in the next period. • Designing for efficient space and energy efficiency. • Dwellings shall incorporate adequate storage facilities as well as facilities for drying clothes, recycling waste and composting (whether individual or communal). • Wicklow county Council should require sustainable landscape design. Depending on the extent of development in a particular context, plant material may comprise more or less native or naturalised species – more of these in rural areas and a greater acceptance of ornamentals in developed areas and large private estates. In general, landscaping should include food-producing species, both fruit and nuts. Hard landscaping shall comprise permeable paving and / or gravel where feasible (for example on private. driveways) in order to minimise the load on the surface water

system and materials shall be locally sourced where feasible.

Urban Design

- The Council should be using an Architect with urban design experience to review applications for residential and commercial developments. It is suggested that there may be some benefit in appointing a panel of suitably qualified people from the County to assist in the critique of development applications as regards urban design. As is stated in previous sections of this submission it has been established that the best means of control is by the use of agreed criteria to evaluate development proposals. Thus any application should consider urban and village design under a number of headings including Character Continuity and enclosure, Quality of the public realm, Legibility, Adaptability, Diversity and Permeability.
- The parameters are well rehearsed in such documents of the Urban Design Compendium that also elucidate the economic value of good design. However there are also social and environmental benefits to good design. The aim is to facilitate the development of communities, fostering a sense of identity and trust that may lead to a greater sense of citizenship essential to the well being of any democratic political system. This requires that developments are pedestrian friendly, safe and attractive. This has not been the experience to date in the design of developments in towns and villages in County Wicklow.
- Urban Design Development guidelines have failed to result in well designed development. Recently opened new estates still offer poor layouts and a total failure to consider adjoining developments.
- New policies for Urban Extension and Design are proposed.
- A very strong statement regarding the need to provide pedestrian friendly design is essential and reference could be made to the European Charter of Pedestrian Rights.
- Wicklow County Council should require for all residential development clear indication of proper provision for pedestrians and a strong sense of public realm. Pavement heights must make due provision for prams, bikes and wheelchairs and those who have walking difficulty. There will be a clear preference for ‘soft and green’ fronts with continuous private landscaping, involving a minimizing or elimination of walls, as well as for generous planting in the public realm and minimising of high estate boundary walls. Regarding the latter, connectivity between different estates must be given serious consideration, being appropriately located and designed to clearly identify and celebrate the opportunity of passing from one to the other.
- Public open space must be located so as to create useful but also meaningful form that is an integral part of the overall estate form. Enclosed courtyards formed by duplex and apartment developments must be inviting with ground surfaces and facades designed to encourage a sense of openness and connection that ostensibly encourages communal use and passive surveillance.
- Wicklow County Council should have special regard to the expansion of urban areas in terms of proper integration with the existing cores and suburbs. It should recognise such problems as sprawl, poor interface of quite different land uses, the need for adequate connectivity, poorly located and configured public open space, consumption of the open space provided by the original institutional fringe around urban cores, creeping conurbation and the dominance of roads and traffic in many areas resulting

	<p>in severance of residents from amenities / services, noise and a lack of a sense of place and physical harmony. It should recognise that these problems have, to a fair extent, been caused by a planning approach driven by a prioritisation of infrastructure and land use.</p> <ul style="list-style-type: none"> • For the planning of urban extension as well as of change in existing areas, the Council shall have regard to the complexity of contemporary urban shape and form, involving development types that differ significantly in regard to overall requirements and site specific (location relative to main roads and/or urban core, access, road widths, site / plot size, plot sequence and building types). It should recognise that the morphology (shape / form) of contemporary urban areas is frequently disjointed, unbalanced in the spatial extent of its land use components and unarticulated due to a conflict of development kinds or types. There is, therefore, a need to relate overall morphological considerations (macro morphology) of towns and their expansion to the smaller scale involved in respect of each development type (micro morphology). • This embracing of the two scales of macro and micro-morphology can be described as a typo-morphological approach. It should inform forward planning that recognises the distinctive physical character of different areas and uses, their character and place in the overall urban structure as well as the relationship between different kinds of development and their own unique physical nature and requirements. • Such development kinds include, original urban cores, institutional fringe, suburban housing estates, industrial estates, business parks, and rows of big metal box pavilion buildings along roads (e.g. Bollarney Road) and isolated buildings in their own grounds (e.g. schools and hotels). These in isolation or in various combinations make up the urban fabric. The physical nature and requirements of each must be considered. • This approach also concerns process and thus accepts change as an integral part of urban life and development. Notwithstanding, its merits as a tool for conservation where warranted are appreciated. More specifically, this approach has the potential to achieve at the macro morphological scale overall integrity of urban form, special cohesion of different land uses / types, improved interface of these types and well considered urban profiles that incorporate articulation and hierarchies of form. • Each kind of development shall be identified typologically in respect of its buildings, plot, plot series, streets, blocks and tissue (identifiable morphological units) and recommendations provided regarding alteration and/or significant change. This approach permits a reasonable degree of prescription in order that the integrity of each kind of development shall not be destroyed. The Council appreciates, however, the need for flexibility in order to accommodate necessary change and innovation. • In order to illustrate the latter, four examples are cited, as follows: <ol style="list-style-type: none"> 1. The poorly integrated area around Broomhall where suburban housing interfaces with a school site and commercial / industrial blocks as well as the Wicklow Town Relief Road (Ashtown Lane). A poor understanding of the nature of these types of development in respect of their respective sites, roads, interrelationship (function, scale, access) and inadequate concern for the public realm have resulted in spatial awkwardness and disharmony (note the visual confusion, and clash of scale of this area as viewed adjacent to Rathnew Cemetery from the Tinakilly Hotel avenue). Moreover, this
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	<p>area could have proved an important buffer between an expanded Wicklow Town and Rathnew, rather than continuing amorphous sprawl. An appreciation of the overall morphology of Wicklow Town and Rathnew should have informed their respective expansion in principle, prompting the use of existing boundaries (e.g. hedgerows, streams, cemetery, roads) to structure expansion and the typologies involved in the different kinds of development concerned. Suburban housing backing and siding on to public roads creates a sense of hardness and denies the possibility of an enriched public realm.</p> <ol style="list-style-type: none"> 2. Close to Broomhall, are the lands around the Village Mill where industrial blocks are effectively ‘dropped into’ an area otherwise zoned for suburban residential development. The success of such land use mixing clearly necessitates a different response regarding building, plots, site, block and street / road, including a sensitively designed public realm. Inserting industrial units into a residential area, if appropriate in the first place, requires sensitivity of design especially regarding form and interface. 3. The recently completed bank building on Main Street, Wicklow, which: (a) ignores the original burgage pattern that is a legacy or Anglo-Norman towns; (b) obtrudes in profile with grossly excessive and inexpressive bulk as viewed from the Bridge and: (c) creates a strong horizontality in elevation across what was originally a few plots that is in severe contrast to the remainder of the streetscape. The inclusion of a form-based approach, including typomorphological criteria, in the relevant development plan would have positively controlled such a proposal. The newly completed bank building, in terms of integration, is insensitive regarding its scale, massing and façade, and does not have the municipal or public use that might justify such difference. 4. Rathnew Village lacks an identifiable, i.e. it is relatively amorphous. A clear morphological vision is required in order to achieve integrity of urban form and fabric and allow for development and expansion at an appropriate scale and with appropriate building type / use. <ul style="list-style-type: none"> • Of particular importance is the preservation of nature where possible, especially as an integral part of urban morphology that articulates character areas, distinguishes districts / urban tissues, creates contrast with built form, incorporates nature and engenders linkages with the surrounding landscape. <p>Issues Pertaining to the Design of Dwellings</p> <ul style="list-style-type: none"> • Dwellings shall incorporate adequate storage facilities, in accordance with the most stringent requirements as well as facilities for drying clothes, recycling waste and composting (whether individual or communal). • Other current policies that are failing us are shop front design, no enforcement of shutters and garish lighting. In architectural conservation areas neon signs must be banned. <p>Road Signage</p> <ul style="list-style-type: none"> • Another issue that requires attention is the proliferation of unnecessary road signs that litter the towns and countryside. For example on the one km stretch of road forming the Rathdrum by-pass, which has almost 70 road signs (if one reads from either end), most of which are repetitive. In
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Germany the authorities have decided to cut back radically on road signs - in this country we are going in the opposite direction. The main objections to all of these road signs are: Most are not necessary. They can be very ugly and destroy the landscape particularly in scenic areas. The huge signs detailing who funded the road and the engineer, county manager and a host of others that had some sort of peripheral involvement constitutes a lot of information that the motorist has neither a need nor desire to know. They are also very costly. There could be considerable budget savings in a tight financial situation and the saved money could be spent on minor repairs that are urgent. Most of all, these signs constitute a distraction and hence a traffic hazard. Sometimes they are badly placed leading to an obstructed view of the roadway.

Noise and Light Pollution

- Light and noise pollution are the two key sources of irritation to most of us and whilst these may not seem to carry the most serious impacts they certainly have the most immediate impact on the enjoyment of the environment.
- Light pollution is caused by excessive artificial light being directed into the night sky. Outdoor lighting can cause intrusive and unnecessary pollution in both urban and rural areas, although it is in the countryside that light pollution is most noticeable. Illuminated advertisements, floodlit sports facilities, security lights and streetlights can all contribute to light pollution. Excessive light in the night sky is visually intrusive and is also a significant waste of energy. The visibility of the stars is much reduced by light pollution. Light pollution can disturb people’s sleep and affect local ecology.
- It is therefore important in the interests of visual amenity and energy conservation that light pollution is prevented and where possible reduced. Through good design of lighting, the reduction of light pollution should not conflict with the principles of crime prevention and safety. The County Council should seek to minimise light pollution. Details of any lighting scheme required as part of any new development shall be submitted as part of the planning application. Where appropriate, the local authority will use conditions to limit the hours of illumination. Conditions will be attached to any floodlighting approvals given for evening usage of sports facilities such as pitches, tennis courts and golf driving ranges to control light intensity, light spillage, and hours of use. Applicants will be expected to demonstrate to the local planning authority that: (a) the lighting scheme proposed is the minimum needed for security and working purposes; (b) that it minimises potential pollution from glare and spillage through careful siting and appropriate shielding; (c) in the edge of town and village locations, and in rural areas, landscaping measures will be provided to screen the lighting installation from view from the neighbouring countryside areas, and; (d) there will be no dazzling or distraction of drivers using nearby highways.
- Noise generating sports - Where there are development proposals for sport or recreational uses that will generate high levels of noise, permission will be considered where the following criteria are met:
 1. The proposal will not cause an unacceptable level of disturbance to local residents;
 2. The proposal will not cause an unacceptable level disturbance to farm life stock and wild life;

	<p>3. The proposal will not conflict with enjoyment if areas for informal recreation.</p> <ul style="list-style-type: none"> • Where there are development proposals for hotels and/or music venues that generate high levels of noise, permission will be considered where the following criteria are met: <ol style="list-style-type: none"> 1. The proposal will not cause an unacceptable level of disturbance to local residents; 2. The proposal will not cause an unacceptable level disturbance to farm life stock and wild life; 3. The proposal will not conflict with enjoyment if areas for informal recreation; 4. The proposal shall demonstrate noise-containment measures; 5. The proposal will limit noise during night-time hours. <p>Open Space</p> <ul style="list-style-type: none"> • Access to open space is a major issue in all the main towns and most of the villages. A Green Strategy is required which provides much stronger controls to protect existing space in town centres and provide new space to encourage physical activity, both active sport and walking. In a report by Dr Richard Mitchell from Glasgow University, and Dr Frank Popham, from the University of St Andrews, it was said that across the country, there are "health inequalities" related to income and social deprivation, which generally reflect differences in lifestyle, diet, and, to some extent, access to medical care. This means that in general, people living in poorer areas are more likely to be unhealthy and die earlier. However, the researchers found that living near parks, woodland or other open spaces helped reduce these inequalities, regardless of social class. When the records of more than 366,000 people who died in the UK between 2001 and 2005 were analysed, it revealed that even tiny green spaces in the areas in which they lived made a big difference to their risk of fatal diseases. Although the effect was greatest for those living surrounded by the most greenery, with the "health gap" roughly halved compared with those with the fewest green spaces around them, there was still a noticeable difference. The change was particularly clear in areas such as heart disease and stroke, supporting the idea that the presence of green spaces encourages people to be more active. However, the researchers said that other studies had suggested that contact with green spaces also helped reduce blood pressure and stress levels, perhaps even promoting faster healing after surgery. They wrote: "The implications of this study are clear - environments that promote good health might be crucial in the fight to reduce health inequalities." They called for planning authorities to consider making more green spaces available to improve the health and wellbeing of their residents. • Professor Barbara Maher from the Lancaster Environment Centre said her research had shown that roadside trees improve health by protecting people from pollution. "Urban and roadside trees may be an under-used resource both in terms of acting as natural 'pollution monitors' and actively screening people, especially, children and the already ill, from the damaging health effects of particle pollution," she said. Thus tree planting should also be strengthened. • Some housing estates are required to plant a tree in every front garden. Maybe this should be standard. These matters can be considered in detail in a Green strategy. Experienced landscapers could be approached to
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	<p>prepare this section.</p> <ul style="list-style-type: none"> • The hierarchy of space within an area is also important and the designation of space for active and passive recreation. The submission seeks the instatement of a Parks Department within the Council with dedicated funds to co-ordinate and promote the establishment of parks in towns and villages. • Rural villages no longer provide adequate opportunities for children to play safely, with increased volumes of traffic on country roads making them unsafe for walking or cycling and poor urban design with unsupervised land away from passive surveillance making parents reluctant to leave children alone. Play parks will become an essential part of healthy urban living as villages expand with residential development. <p>Design in rural areas</p> <ul style="list-style-type: none"> • Examples of best practice can be included. • It is noted that the previous County Development Plan refers to a set of guidelines for agricultural buildings. This is a very useful document (dated but still applicable) however it has not been used. This could be reprinted and/or incorporated into the new plan. • Control of advertising in rural areas is not adequately addressed in the current plan. In particular criteria should be included that would prohibit large plastic advertising structures related to petrol filling stations as these contrast poorly with a rural environment
<p>Plan 8 Architects (D102)</p>	<ul style="list-style-type: none"> • Request to amend the work of development standards for granny flats / independent living unit to create more flexibility for younger families requiring temporary accommodation. Change the maximum to 63 square metres and to include two bedrooms. • The Sustainable Urban Housing Design Standards for Apartments should apply to duplex units. The current open space standards that apply to own door duplexes are too onerous and are prohibiting the development of duplexes. A planning search carried out revealed that there have been no duplex units granted in the County since May 2016. • That consideration be given to relaxing of private open space standards for conversion of commercial to residential in town centres such as Bray, Arklow and Wicklow. This would encourage change of use of vacant properties and help with urban regeneration.

Response of Chief Executive

The submissions relating to development and design standards are welcomed and make some very valuable points. The quality of place has an impact on all aspects of our lives. The *Development and Design Standards (Appendix 1 of the current County Development Plan)* are in place to help evaluate development proposals and ensure that new development is designed to a high standard and makes a positive contribution to the County.

Layout and Legibility of the Development and Design Standards

The layout and order of the Development and Design Standards document will be reviewed with a view to improving the legibility of the document. It is considered that a separate Development and Design Standards document works well in terms of ease of use and it is therefore not proposed to integrate this document into each chapter of the development plan.

Design, Layout and Overall Quality of Residential Development

The NPF recognises that *‘quality of design is critical for making places attractive and distinctive. Architectural quality and well-designed spaces can help to enhance our urban areas and create desirable places in which people want to live, work or visit and contribute to ongoing quality of life and well-being’*.

The current County Development Plan includes policy and development standards that inform the design and layout of new buildings. These policies and standards will be reviewed to ensure their compliance with the NPF, RSES and new policy particularly the Specific Planning Policy Requirements (SPPRs) of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) and Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018).

The Urban Design Manual, which accompanies the Guidelines for Sustainable Residential Development in Urban Areas (2009) provides comprehensive guidance on design issues and identifies 12 design criteria for new development. These criteria are incorporated into the Development and Design standards in the current development plan and it is noted that these are the key factors that will be evaluated in the assessment of any development proposals:

1. *Context: How does the development respond to its surroundings?*
2. *Connections: How well is the new development / site / neighbourhood connected?*
3. *Inclusivity: How easily can people use and access the development?*
4. *Variety: How does the development promote a good mix of activities?*
5. *Efficiency: How does the development make appropriate use of resources, including land?*
6. *Distinctiveness: How do the proposals create a sense of place?*
7. *Layout: How does the proposal create people-friendly streets and spaces?*
8. *Public realm: How safe, secure and enjoyable are the public areas?*
9. *Adaptability: How will the buildings cope with change?*
10. *Privacy / amenity: How do the buildings provide a high quality amenity?*
11. *Parking: How will the parking be secure and attractive?*
12. *Detailed design: How well thought through is the building and landscape design?*

The current Plan expands on these criteria and provides design guidance and standards for new residential and mixed use development. The standards identify the need for different approaches depending on the location of the site and the scale of the development.

For large scale development on greenfield sites, the applicant is required to agree a vision for the area with the Planning Authority - this includes setting out *‘the type of place that is envisaged, the design ethos and the influences on form and design emerging’*.

New small to medium scale housing developments that are adjacent or within the existing built up area are required to fit in with the existing built fabric of the settlement - *‘Visual integration and physical connectivity with the area surrounding the site will be required to be at the fore of any design model and while the format and design should complement the prevailing pattern of development in the area and should not degrade the residential or visual amenities already enjoyed in the area, new developments shall meet the highest standards of modern layout and design even if this means a development that is very different from its surroundings’*. These standards will be retained and strengthened where possible.

The design and layout of new residential development should relate successfully to the structure and character of the settlement. Each site presents its own challenges and opportunities. The design

response for each housing development should be informed by the site’s characteristics. It is proposed to expand on the housing design objectives contained in the current plan (HD2, HD3) and include objectives requiring a tailored design approach which is responsive to local context and the submission of a design statement with applications for residential schemes which shall outline the design rationale.

It is proposed to retain the design guidance contained in the Development and Design Standards in the new plan and include further detail on the architectural quality of new residential development and detailed design guidance to ensure that new development is of a high quality and visually appealing.

In terms of building design and orientation, it is noted that the issues raised are addressed in Section 10 of the Development and Design Standards. This Section sets out ‘*Design Standards for improved energy efficiency*’ relating to building location, orientation, room layout, avoidance of overshadowing, window sizing and position, ventilation and shade. It is proposed to retain this in the new plan and strengthen where considered necessary. The standards with regard to a building’s energy rating are set out in the Building Regulations.

Permeability

One of the legacies of residential layout design in the recent past has been that design considerations were often dominated and driven by the need to make provision for cars to the detriment of pedestrians and cyclists. A key challenge for urban design is to successfully promote the other functions of ‘the street’ by promoting a sense of place and encouraging walking and cycling. The Development and Design standards in the current plan require new development to place a high emphasis on permeability and legibility. The current Plan makes numerous references to the Design Manual for Urban Roads and Streets (DTTS & DECLG 2013).

The Design Manual for Urban Roads and Streets (DMURS) sets out an integrated design approach for streets in urban areas to balance the needs of all users and to put well-designed streets at the heart of sustainable communities. DMURS requires a shift in focus from conventional approaches that are concerned with movements of traffic to more sustainable approaches concerned with streets as places and multi-modal movement. The current County Development Plan (Section 7 of the Development and Design Manual) requires the design of new local roads or improvements to comply with DMURS.

The Manual sets out detailed guidance for street layout and the design of urban blocks. The design guidance provided in the Development and Design Standards will be reviewed in accordance with DMURS and enhanced where possible. In addition, it is proposed to include an objective in the plan to require that the design and layout of new residential development achieves highly permeable, well connected streets in accordance with best practice as set out in the Design Manual Urban Roads and Streets (DTTS & DECLG 2013).

Public Realm

Public realm includes all external spaces that are publicly accessible, including streets, parking areas, footpaths, squares and parks. It includes the publicly accessible space between buildings along with the spaces and the buildings or other structures that enclose them. The public realm should contribute positively to a coherent urban structure. All new development should be designed so that it enhances and contributes to the overall attractiveness and amenity value of the public realm. Streets and spaces should be designed so that the functions of its parts are clear and the need for signs, barriers and the like is minimised.

It is proposed to strengthen the ‘Centre and Retail’ chapter to provide a strong focus on the diverse function of town and village centre. As part of this it is considered that a section should be included on public realm and this could be supported by additional standards in the Development and Design Standards. It is proposed to include an objective to require that all planning applications for development that includes communal space (roads / footpaths / open space) should be required to submit a Public Realm Strategy. Details of the public realm should include street hierarchy, pavement treatment, permeability, open spaces and meeting places, landscaping and tree planting, surfacing and street furniture including lighting, signage and seating.

Storage Facilities

The current development plan requires that all buildings *‘be provided with a suitable area on site for the keeping of waste storage receptacles for mixed dry recyclables, organic waste (composters) and residual waste’*. Specific standards for waste storage are set out in Section 9 of the Design and Development Standards. This will be retained in the new plan and amended if considered necessary.

The Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018) set out minimum standards for storage in apartment developments. The Development and Design Standards will be reviewed having regard to these guidelines and amended where considered necessary. With regard to storage in housing it is considered that the development and Design Standards should be strengthened to require that all new housing provides adequate storage facilities for residents.

Height

The County Development Plan cannot include height restrictions. This is following on from SPPR1 in the Urban Development and Building Height Guidelines for Planning Authorities (2018) which states: *‘In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height’*.

The Guidelines also states that *‘the development plan must include the positive disposition towards appropriate assessment criteria that will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development’*. The Development and Design Standards will be reviewed having regard to the Urban Development and Building Height Guidelines and amended accordingly.

Standards for Granny Flats / Independent Living Units

The standards set out in the current development plan facilitate the development of a temporary independent living unit. This type of development is specific to cater for a family member that wants to have a separate living unit but needs to be near family for support. The purpose of this type of development is not to cater for the longer term housing needs of a young family. Such a development might be better addressed as extension and subdivision of a dwelling unit. It is proposed to review the standards for independent living unit and strengthen if considered necessary.

Open Space and Landscaping

Open space is addressed in more detail in Sections 4.3.9 and 4.3.10 of this report. The importance of high quality open space is acknowledged in terms of the many benefits it provides. The standards in the current development plan are considered adequate to require the provision of high quality open space as part of a residential or mixed use scheme. Notwithstanding, the section on open space will be reviewed and strengthened where considered necessary.

The current County Development Plan encourages and provides for the planting of native species as set out in Objectives NH18.

NH18 *To encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native, and appropriate local characteristic species, in all new developments.*

Furthermore the *Development and Design Standards* include the following:

- *In order to integrate development into the landscape, buildings shall be screened or shelter belted with principally native species of planting.*
- *Tree planting can be used to complement hard-landscapes in high-density / urban developments and re-enforce and enhance existing natural features and integrate development with surrounding landscape. A landscaping plan shall be designed as an integral part of all new residential estates and shall be submitted with the planning application. This plan shall highlight existing landscape features to be retained and detail new landscaping including species, number, size and location. The plan should put an emphasis on the use of native species where possible. Planting schemes shall take account of future maintenance requirements.*

However, it is considered that the development plan would benefit from an objective to encourage greater consideration for biodiversity in the design, layout and planting of open space areas. Additional detail will be included in the Development & Design Standards. This will be guided by the Heritage & Biodiversity Plan and any advice or recommendations from the Climate Change and Biodiversity SPC.

In terms of the boundary treatment between new dwelling houses, the current development plan requires that *'all boundaries shall be of solid construction i.e. they form a complete screen barrier with no gaps if timber boundaries are utilised, they must be bonded and supported by concrete posts. Concrete post and plank walls will not be permitted for any boundary visible from the public domain'*. This measure is in place to ensure residents are afforded adequate privacy in their rear garden and to ensure that boundaries are sturdy and safe. Concerns raised with regard to the wildlife are noted. Accordingly this boundary standard will be reviewed in accordance with any available literature or guidelines and in consultation with the Heritage Officer and amended if considered necessary.

Private Open Space

With regard to the request that consideration be given to relaxing of private open space standards for conversion of commercial to residential in town centres it is noted that the *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018)* indicate that *'For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, private amenity space requirements may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality'*. The County Development Plan will be reviewed in accordance with the Design

Standards for Apartments and updated accordingly. However it is noted that the current development plan does provide a flexible approach for dealing with infill development. The Development and Design Standards note *‘For infill type development in defined town / village cores, a relaxation in public open space required will be considered if this is required to fit in with the existing layout and prevailing density of that area or in the interests of high quality layout and design. In such cases, it must be clearly shown that the level and design of private open space provided is sufficient’*.

In terms of open space serving duplex units, the standards will be reviewed having regard to the *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018)*.

Car parking

The current development plan does not specifically require / promote the provision of underground car parks or basements nor is it opposed to such development. In accordance with the NPF, the new development plan will include a strong focus on compact growth and require an efficient use of land. In some instances this could entail a development including underground car parking or basement facilities.

The current Development plan provides that car parking does not always have to be located uniformly along the front of houses. It is proposed to retain this in the new Plan. It is not considered appropriate to include a standard requiring that all car parking should be in one shared separate area and not distributed beside every house as this may unduly restrict the design and layout of a new development. In addition, issue may arise in the serving of communal spaces with EV charging points.

EV Charging Points

The current County Development Plan requires the provision of EV charging points in new developments. However, national standards in this regard are likely to increase, with the Government initiating public consultation on new Regulations in December 2019, which would require:

Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Ensure the installation of at least 1 recharging point. Ensure the installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Ensure the installation of ducting infrastructure for every parking space within property boundary.
New (single-unit residential) buildings	New dwelling with car parking space located within the property boundary.	Ensure the installation of appropriate infrastructure to enable the installation of recharging points for electric vehicles
Certain existing (non-residential) buildings	All non-residential buildings with more than 20 parking spaces within property boundary.	Ensure the installation of at least one recharging point by 2025

It is recommended that the new County Development Plan provides for enhanced standards along these lines but with the additional requirement that at least 1 charging point (not just ducting) be provided

in any multi unit residential building car park (regardless of number of car parking spaces) and thereafter 1 charging point for every 10 spaces.

Noise and Light Pollution

There are objectives included in Chapter 9 ‘Infrastructure’ of the current development plan to minimise light and noise pollution. There are also numerous references to noise and light pollution throughout the Development and Design Standards. The current development plan requires that lighting is designed to limit the potential for light pollution and is environmentally friendly. This is addressed under the various sections, for example in Business, Commercial and Employment Developments, Sports Ground.

Since the adoption of the current County Development Plan, new regulations have come into effect with regard to environmental noise (SI 549/2018), which provide for the designation of ‘quiet areas’ following study, consultation and approval by the Minister. These regulations will be considered in the crafting of the new plan to determine what role the County Development Plan may have in relation to same.

The Development and Design Standards will be reviewed to ensure that light and noise pollution is adequately addressed.

Design in Rural Areas

The current development plan includes design standards for commercial / employment development in rural areas (including agriculture, forestry and quarries). The Plan states *‘all structures located in a rural area shall be required to satisfy the highest standards of location, siting and design, including scale, massing, orientation, choice of materials and landscaping so that they are satisfactorily integrated into their rural setting. The Planning Authority will encourage traditional building styles and avoid substandard or unsuitable building designs’*.

The current development plan (Chapter 9 Infrastructure) includes a policy to restrict advertising signage:

AS1 *Advertising signs will not be permitted except for public service advertising. This is to avoid visual clutter, to protect and preserve the amenity and/or special interest of the area, to ensure traffic safety and where applicable, to preserve the integrity of buildings, particularly those listed for preservation. Strictly temporary signs may be permitted to advertise permitted development, subject to an assessment of the cumulative impact of signage in the area and having regard to the particular environment of the site.*

In addition the section in the Development and Design Standards on Commercial / Employment Development in Rural Areas states ‘Advertising signage will generally not be permitted’. The standards on signage will be reviewed and strengthened where considered necessary.


Recommendations of Chief Executive

1. Review the Development and Design Standards in accordance with recent national and regional policy and guidelines and update where necessary.
2. Review the layout and legibility of the Development and Design Standards document and improve where considered necessary.

3. Review policy and design standards relating to height and design of new residential development to ensure their compliance with new policy particularly the Specific Planning Policy Requirements (SPPRs) of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) and Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018).
4. Include a policy to require that the design and layout of new residential development achieves highly permeable, well connected streets in accordance with best practice as set out in the Design Manual Urban Roads and Streets (DTTS & DECLG 2013). Provide additional guidance in the Development and Design Standards to support this policy.
5. Include a new objective to require that all planning applications for development that includes communal space (roads / footpaths / open space) should be required to submit a Public Realm Strategy.
6. Amend the development and design standards to require that all new housing provides adequate storage facilities.
7. Improve the section on landscaping to require greater consideration for biodiversity in the design, layout and planting of open space areas.
8. To strengthen the standards for EV charging points within the Development and Design Standards and include the requirement that at least 1 charging point (not just ducting) be provided in any multi unit residential building car park (regardless of number of car parking spaces) and thereafter 1 charging point for every 10 spaces.
9. To strengthen the standards on signage and where considered necessary.
10. Review the Development and Design Standards to ensure that light and noise pollution is adequately addressed.

Part 4.3.30 Strategic Flood Risk Assessment (SFRA)

Name	Issue Raised
Ashford Development Association Ltd (C1)	<ul style="list-style-type: none"> River Vartry from below Bramble Glade through Mount Usher Gardens, Hunters Hotel and down to the Broadlough. This is the flat part of the River Vartry with little height change. When the water flows over the spillway at the Roundwood Reservoir, flood occurs. In 1860 this was 138 days a year and now it is less than 60 days. We need to maintain the tradition flood plains and prevent building in these areas. There is plenty of land in Ashford that is not along the flooding part of the River Vartry. Make sure it is clear to the Public that we take our Rivers seriously and need them for the future of Wicklow as the “Garden of Ireland”. If we are to maintain that special place, we must make sacrifices. There is sufficient building land on high ground and not in the vicinity of rivers for our needs. The current Strategic Land Reserve designations should be withheld though the next plan to keep these places free from development that might remove flood plains.
County Wicklow Public Participation Network (C2)	<ul style="list-style-type: none"> Uplands in better condition will reduce flooding risk Re-wetting peat lands Protection of flood plains No building on flood plains Ensuring sustainable drainage works
Wicklow Planning Alliance (C17)	<ul style="list-style-type: none"> Please specify that Natural Flood Management Solutions (for Rivers and Streams) must always be tried as the first priority before hard engineering Flood Management solutions. There is significant flooding along Three Trout Stream and where Blackberry Lane crosses Three Trout Stream. There is also significant surface water run-off on Blackberry Lane and in Delgany generally. It seems wasteful. There should be a strategy to capture and save such water. Any planning permission granted for a new development in a flood risk area should contain a condition noting the risks associated with flooding. The Council should embark immediately on a programme to lift the lids off all culverts and let rivers and streams flow naturally. Where rivers and streams overflow or spill out of their channels the flooded areas should be treated as public open spaces like in other European countries.
Delgany Community Council (C19)	<ul style="list-style-type: none"> Flood risk areas can be managed by ensuring that any development in close proximity addresses potential impact on the floodplain. In some cases flood plains can be developed to a limited extent as walking routes. Specify that Natural Flood Management Solutions (for Rivers and Streams) must always be tried as the first priority before hard engineering Flood Management solutions.
Keith Scanlon (D12)	Specify that natural flood management solutions (for rivers and streams) must always be tried as the first priority before hard engineering Flood Management solutions.
Tessa Stewart (D26)	Known strategies that are not expensive exist for implementing new sustainable green river banks after river wall strengthening. The bareness of the new walls in the Dargle, as with the Dodder in Dublin, show that this is a consciousness that badly needs to be developed. Frames can be pinned onto the walls with greenery, which then eventually becomes localised.
Bernie and Dinny Ivers (D37)	The alignment of the stream to the rear of our property in Avoca (marked with yellow dot) is incorrect the stream flows to the rear not through the property. We brought this to the attention of CFRAM at public consultation in Avoca Community Hall. We have never been effected by flooding river or coast as suggested by

	<p>explanation of colour coding on the right of the map</p> 
<p>Billy Timmons (D49)</p>	<p>The strategic flood risk assessment needs to be thoroughly examined, particularly where it can have a negative or blocking impact on positive possible future development in an action area plan.</p>
<p>Mick Mulligan (D50)</p>	<p>Only very limited building (if any) should be permitted on known current flood plans unless adequate flood defences are made a condition of the planning permission (although this will have a knock on effect in other areas). I would include in this, areas identified as at risk due to coastal erosion and rising sea levels.</p>
<p>Simon Murphy (D60)</p>	<ul style="list-style-type: none"> • Baltinglass Town Centre and parts of Parkmore Estate in Baltinglass Town are flood risk areas which has been identified many years ago. Baltinglass Town Centre and the lands along the River Slaney bank from Eldon Bridge to the north through Parkmore Estate and to Holdenstown Bridge need to be included in the proposed SFRA, to be correctly assessed and to reduce the quantity of lands adjacent to Baltinglass Town Centre which could be excluded from development by the future Baltinglass Town development plan. • Demand for development in flood risk areas should be managed in line with the recommendations of the SFRA complimented with innovating planning. Development does not necessarily involve permanent structures. Development can include innovative use of flood plains. The Local Authority should use its planning expertise to actively promote innovative development of flood plains of strategic benefit to communities, which reflects the level of risk balanced with the spinoff benefits to the local community.
<p>Con Nyhan (D87)</p>	<p>Granting of planning permission for building in the flood plain of the Avoca River is also contrary to EU Law. Any further developments / building in the flood plain would be in contravention of EU Flood Directives.</p>

Response of Chief Executive

Strategic Flood Risk Assessment

The new plan will be accompanied by a Strategic Flood Risk Assessment (SFRA) prepared and informed by ‘The Planning System and Flood Risk Management – Guidelines for Planning Authorities’ (2009). The purpose of a SFRA primarily is to provide an assessment of all types of flood risk to inform land-use planning decisions in the draft CDP. The SFRA enables the local authority to undertake the

sequential approach, including the justification test, allocate appropriate sites for development and identify how flood risk can be reduced as part of the development plan process.

The SFRA can also be used to assist other planning decisions (e.g. development management) however in any instance a site specific flood risk assessment may be required when assessing a planning application for development.

The Local Authority Waters Programme (LAWPRO) is a shared service working with Local Authorities and state agencies to develop and implement River Basin management Plans in Ireland, as required under the EU Water Framework Directive.

Protection of Rivers and floodplains from development

The current County Development Plan places a high level of protection on rivers and their floodplains, it provides for a minimum buffer of 10m along water courses, but in many cases, a more extensive buffer is provided based on avoiding areas at risk of flooding or to protect vulnerable ecology. These setbacks can be increased if necessary, but it is recommended that this is only on the basis of evidence supporting same. There are a number of existing objectives in the plan that do so, here are some of the main objectives. Such objectives will be reviewed in the drafting of the new plan and updated if necessary.

With respect to the granting of permission for development in flood plains, such development is permissible in accordance with the ‘Planning System and Flood Risk Management Guidelines’ (2009) if the provisions of the ‘justification test’, set out in those guidelines is passed (Objective FL4).

FL3 *The zoning of land that has been identified as being at a high or moderate flood risk (flood zone A or B) shall be in accordance with the requirements of the Flood Risk Guidelines and in particular the ‘justification test for development plans’ (as set out in Section 4.23 and Box 4.1 of the guidelines).*

FL4 *Applications for new developments or significant alterations/extension to existing developments in a flood risk area shall comply with the following:*

- *Follow the ‘sequential approach’ as set out in the Flood Risk Guidelines.*
- *Flood risk assessments will be required with all planning applications proposed in areas identified as having a flood risk, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site).*
- *Where a development is proposed in an area identified as being at low or no risk of flooding, where the planning authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment may be required to be submitted by an applicant for planning permission.*
- *Restrict the types of development permitted in Flood Zone A and Flood Zone B to that are ‘appropriate’ to each flood zone, as set out in Table 3.2 of the guidelines for Flood Risk Management (DoEHLG/OPW, 2009).*
- *Developments that are an ‘inappropriate’ use for a flood zone area, as set out in Table 3.2 of the guidelines, will not be permitted, except where a proposal complies with the ‘Justification Test for Development Management’, as set out in Box 5.1 of the Guidelines.*
- *Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines.*
- *Generally a Flood Impact Assessment will be required with all significant developments and a certificate (from a competent person stating that the development will not contribute to*

flooding within the relevant catchment) will be required with all small developments of areas of 1 hectare or less.

FL5 *To prohibit development in river flood plains or other areas known to provide natural attenuation for floodwaters except where the development can clearly be justified with the Flood Risk Guidelines 'Justification test'.*

FL9 *For developments adjacent to all watercourses of a significant conveyance capacity or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse to allow access for channel clearing/ maintenance / vegetation. A minimum setback of up to 10m (or other width, as determined by the Council) will be required either side depending on the width of the watercourse.*

NH20 *To facilitate the implementation of the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and the EU Groundwater Directive to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality.*

NH21 *To resist development that would interfere with the natural water cycle to a degree that would interfere with the survival and stability of natural habitats.*

NH22 *To prevent development that would pollute water bodies and in particular, to regulate the installation of effluent disposal systems in the vicinity of water bodies that provide drinking water or development that would exacerbate existing underlying water contamination.*

NH23 *To minimise alterations or interference with river / stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of generally 10m along watercourses should be provided (or other width, as determined by the Planning Authority) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. In all cases where works are being carried out, to have regard to Regional Fisheries Board "Requirements for the protection of fisheries habitat during the construction and development works at river sites"*

NH24 *To ensure that any development or activity with the potential to impact on ground water has regard to the GSI Groundwater Protection Scheme (as shown on Map 10.09).*

Drainage

The current County Development Plan addresses in some detail storm and surface water infrastructure and the need for attenuation in new developments. The use of sustainable drainage works are required with all new developments within urban areas, through the implementation of Sustainable Urban Drainage Systems (SUDS). It is intended that the current policies and objectives will be retained and enhanced if necessary in the new County Development Plan.

WI12 *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system.*

Uplands / Upper river management

There is of course value in upper river management for dealing with downstream flood risk. However the management of upstream lands would be more appropriately addressed through an OPW lead upstream catchment policy at a national level rather than through the County Development Plan.

Natural Flood Management Solutions

With respect to the implementation of natural based solutions initially before man made / hard engineered solutions, the OPW in 2018 published 29 Flood Risk Management Plans to address flood risk in Ireland, such plans setting out the ‘whole of Government’ approach to managing flood risk and specifically including ‘Natural Water Retention Measures’ such as restoration of wetlands and woodlands. The County Plan fully facilitates the implementation of such solutions.

Vartry River, Ashford

The areas highlighted as being liable to flood in Ashford are noted and along with Floodmaps.ie, will be reviewed in detail as part of the updated Flood Risk Assessment for the Ashford Plan, which is included in the County Development Plan review process. The Vartry River has been included in the Office of Public Works (OPWs) extensive Catchment Flood Risk Assessment and Management (CFRAM) study and it shows where the Flood Zone A and B are along the Vartry River. As no more detailed site specific information on the areas of flooding is available, the OPWs Floodmaps will be the primary source of information referred to when carrying out the updated Flood Risk Assessment (FRA) for Ashford.

Three Trout’s Stream, Delgany

The areas around the Three Trout’s Stream that are mentioned as having a high flood risk are noted, this area is covered under the existing Greystones / Delgany Local Area Plan 2013 and associated SFRA. During the review process of this LAP, following the adoption of the County Development Plan 2021, a SFRA will be carried out as part of the local plan making process.

Dargle River, Bray

With respect to the Dargle River walls, the flood scheme did not provide for explicit ‘greening’ or vegetation camouflaging measures for the walls, but rather it was expected that in time nature would take its course and recolonise infrastructure works. There is merit however in the suggestion and while there is no current project in train to install measures to assist re-vegetation, this is something that could be looked at in the future as a local biodiversity project led by the Bray Municipal District, subject to funding.

Local Stream, Avoca

The alignment of the local stream in Avoca is noted and along with the OPWs Floodmaps.ie, will be reviewed in detail as part of the updated Flood Risk Assessment for the Avoca Settlement Plan, which is included in the County Development Plan.

Slaney River, Baltinglass

The areas highlighted as being liable to flood in Baltinglass are noted and along with Floodmaps.ie, will be reviewed in detail as part of the updated Flood Risk Assessment for the Baltinglass Plan, which is included in the County Development Plan review process. Parts of the Slaney River, including the

majority of the Baltinglass settlement boundary, has been included in the OPWs extensive CFRAM study and it shows where the Flood Zone A and B are along the Slaney River; the OPWs Floodmaps will be the primary source of information referred to when carrying out the updated Flood Risk Assessment (FRA) for Baltinglass.

Recommendations of Chief Executive

1. To carry out a Strategic Flood Risk Assessment for the new County Development Plan, as required by statute and guidelines.
2. To carry out an appropriate Flood Risk Assessment for the new Town and Settlement Plans within the County Plan, as well as any County Development Plan zonings, as are required by statute and guidelines.
3. To review and update / strengthen the Flood Risk objectives in accordance with national, regional and local policy and strategies.