

## Part 4.1 Submissions from Elected Representatives

Name: Cllr Peir Leonard (Arklow MD)

B5

### Issues raised

**It is indicated that this submission is on behalf of all Arklow MD members.**

#### Introduction

Due to a combination of high unemployment and over 15-30% of Arklow's population commuting to Dublin, we recommend that Arklow should be re-designated as a “self sustaining” town rather than a “self-sustaining growth” town until such a time until sufficient investment in essential road/bridge infrastructure, public transport, local employment and sufficient emergency services are implemented. If Arklow is allowed to grow in the next few years it will become a dormitory commuter town which will impact very negatively in terms of social wellbeing, health and the local economy. Building commuter housing that is car dependent goes against the Climate Emergency status that Wicklow County Council declared in 2019. With unemployment at 20%+ (high), approx 20% commuting to Dublin for work (low), poor transport links, Arklow could benefit from targeted “catch-up” investment to become more self-sustaining.

**The following is a list of priority items which we feel are imperative to the progression of Arklow Municipal District prior to its status becoming that of a “self sustaining growth town”.**

#### Roads & Infrastructure

- Construction of a southern interchange via a slip road from the M11 to the Vale Road.

Reason: To alleviate very serious and ongoing traffic congestion in Arklow Town Centre. The existence of only one point of access via the Nineteen Arches Bridge to cross the Avoca River poses a serious health and safety issue to Arklow. It also restricts the free flow of emergency services to the northern and southern sides of Arklow Town and lack of investment in a second bridge has led to the poor performance of Arklow Main Street shops and businesses with many buildings lying derelict or vacant for almost a century. With the proposed construction of Arklow’s waste water treatment plant in the near future and the proposed development at Kilbride Arklow of potentially 1400 houses there is no question that this piece of integral infrastructure must now be given top priority on the roads program for Wicklow.

- Construction and completion of the Rockbig to Knockmore roundabout road (Roadstone Road).

Reason: To provide direct access onto M11 for heavy goods vehicles and industrial traffic. Currently these vehicles have to drive through the town centre and residential areas to access the M11. The cost of repairing infrastructure that wasn’t designed to take heavy goods vehicles will eventually outweigh any investment in a new road. This measure will save money in the long run.

#### Footpaths & Cycle lanes

Completion of all interconnecting footpaths to connect Rathdrum, Meetings of the Waters, Avoca, Woodenbridge to Arklow.

*As part of Wicklow County Councils current climate emergency status we see these footpaths and cycle lanes as a priority. It is essential that we create safe alternatives and reduce our need for cars. This will have any benefits to our communities such as health, social, better air quality, economic/tourism etc.*

### **Public Transport**

Investment in public transport is essential before any further planning developments. Currently the majority of working people living in Arklow are commuting to the greater Dublin areas.

Introduction of more “park and ride” areas are essential together with additional “rail passing points” to facilitate additional train services are long overdue. We suggest that incentives for investors to construct “park and ride” facilities could be made in the form of a development levy exemption. We feel this would encourage more investment into these kinds of developments.

### **Economic Growth and IDAs**

We suggest that a task force be created to market both Arklow and Rathdrum IDAs.

With the proposed new Data centre due to commence construction in the near future both Arklow and Rathdrum can provide a very competitive offering to a variety of Tech business in the greater Dublin area.

### **Retail & Main Street**

Small scale local enterprise needs to be encouraged, local shops, local produce. We need to prevent any more development on the edge of the town i.e. shopping centres etc.

### **Maritime Economy**

Arklow has a huge amount of potential for both Maritime tourism, leisure tourism activities together with sea angling tourism & shipping. An investment in an ongoing dredging program to increase and maintain the depth of the water channel is key to unlocking Arklow’s Maritime potential. Regeneration of Arklow Harbour and facilities is necessary also to entice investors into this area. Arklow Harbour has all the key elements to provide a home to offshore wind farm maintenance and storage facilities.

We also have a vast amount of marine qualified workforce which if invested in could prove to be an extremely valuable resource for potential investment companies in this area.

With Brexit approaching there is opportunity to be had that needs to be investigated.

Arklow is a port town and less than one hour away from the greater Dublin area. The potential of new import and warehousing businesses needs to also be explored.

### **Tourism**

Arklow is a town of untapped potential. With its unique location and proximity to Dublin Arklow has the ability to provide a unique offering of accessible Eco/Maritime/Heritage Tourism.

Arklow has a very unique offering in that it can provide a “New Town” i.e. Bridgewater Shopping Centre, an “Old Town” Main Street, Heritage areas including the Riverwalk, South Quay and Harbour areas. Beaches & Natural Heritage areas such as “Arklow Marsh” , “Arklow Duck Pond” , “Glenart Forest”, “Avoca Riverwalk” are all very uniquely positioned within walking distance of the town environs. Together with the untapped maritime tourism from the proposed Blueway from Bray to Dungarvan Arklow can provide more than sufficient quality activities & experiences to provide entertainment for day sailors from Dun Laoghaire and Greystones marinas once the sewage treatment plant is commissioned and the Avoca River is clean.

Aughrim, Rathdrum, Arklow and Avoca have more than ample potential to achieve the status of tourist destinations in the new county development plan. Connected by the Avoca River and upper river catchment the time has come to realise and investment in what is potentially our greatest asset, The Avoca River.

Rich in heritage from the Avoca Mines to the ancient Viking Settlement in Arklow the Avoca River holds many great stories and narratives just waiting to be told. In many towns a villages throughout the world, the whole economy of a town has been built on river tourism. This needs to be capitalised on. The recovery of the Avoca River and the efforts to revive it are a story in themselves. A story of hope for the future generations.

With the regeneration of Arklow Harbour, South Quay and Riverwalk areas as part of the OPWs flood relief scheme it will be essential to also invest in the upper catchment areas of The Avoca. Reconnecting catchment areas, planting trees and creating wildlife corridors will all play a part in the recovery of the Avoca. A tree planting scheme along the Riparian Zones would benefit these wildlife corridors and should be connected with the Ancient Oak Forests along the Avonmore way creating a continuous and important areas of biodiversity which would sustain and support a wide variety of wildlife and bird species.

We propose that Wicklow County Council liaise with the OPW and obtain the building at Ballymurtagh/Avoca Mines. We feel that this would provide the perfect home for a heritage centre together with an environmental recovery project and purification system to mitigate the tailings which are still polluting the Avoca River.

The Avoca mining heritage has the potential to attract year long visitors from all over the world like the Arigna mining experience in Carraig on Shannon <https://www.arignaminingexperience.ie/> From industrial pollution, leaching mines and the input of raw sewage it’s time to reverse and recover our beautiful river and to restore the life that once called it home. Telling this story and using it to build a strong Eco tourism economy is the way forward. The potential of fresh water fishing tourism on the Avoca needs to be explored and considered as an ultimate goal and the journey towards it needs to begin.

### **Maritime Museum**

Arklow is home to one of the largest collections of maritime memorabilia in Ireland. With a rich history in seafaring and boat building Arklow Maritime Museum is home to some very rare seafaring articles from all over the world. With investment this museum has the potential to grow substantially into not only a maritime museum but a heritage museum for Co. Wicklow. We suggest that substantial investment in immersive experiences will play an important part in generating much needed footfall to the museum.

### **Pottery Museum**

Progression of this much needed amenity and tourist attraction in Arklow needs to be advanced. With the trend of immersive experiences we suggest that in addition to the pottery museum that additional artisan craft village be considered. Grennan Mill pottery school in Thomastown Kilkenny runs a biannual ceramics course. We suggest that a studio space for a resident potter be incorporated into the museum. This position could be run on a two year term in conjunction with Grennan Mills academic term and would support a newly qualified ceramist in setting up a small pottery business in Arklow. The pottery museum could also be offered as a home to Ceramics Ireland who have over 100 members. Currently in Ireland there is no dedicated point of sale for studio ceramics and small potters. This could be a major attraction for Arklow. In many small villages throughout Ireland a local pottery such as Louis Mulcahy on the Dingle Peninsula or Nicolass Moss in Bennettsbridge, Kilkenny provide a very important tourism attraction to their local economies. With Arklow’s rich history in ceramics and art the Pottery Museum could play in integral part in the regeneration of the Main Street. Grennan Mill also run a biannual international ceramic festival, there is potential for the Pottery Museum to run a similar festival in alternative years.

### **Kilbride Pyramid**

While a lot of heritage has sadly been lost in Arklow we still have some unique offerings. The potential tourism from Howards Mausoleum at Kilbride needs to be recognised and maximised. This pyramid can be seen from many viewing points throughout Arklow town but yet there is no information to relay this to tourists and visitors to the town. We suggest that proper tourism signage be installed at key locations throughout Arklow to promote this unique structure. This structure is also in need of more secure boundaries to prevent any future damage to this very unique and important national heritage site.

### **Kynochs Walk**

After a lot of investment of time and money creating this tourist attraction & walk, unfortunately, due to lack of investment in coastal erosion together with complex issues arising with access via the coastal walk because of the coastal erosion as it stands this tourist attraction is now inaccessible to the public. We suggest that Wicklow County Council prioritise the necessary coastal protection works to conserve this very important walk and heritage trail together with the natural heritage of the North Beach and Porters rock area. Preservation of the rights of way are also of extreme importance and enforcement and protection of all of our rights of way needs to be prioritised along our coastline.

### **Arklow Castle & Historic Core**

With the welcome investment of this substantial facelift for Arklow’s Parade Ground it will be essential to signpost this historic feature together with other key tourist attractions and promote it online via Wicklow Tourism.

NB: The implementation of “Tourism Signage” on the M11 North and South of Arklow is essential. Signage should also clearly state that Arklow is a maritime town with a “Maritime Museum” & “Pottery Museum” “Pyramid” “Nineteen Arches Bridge” the oldest stone bridge in Ireland etc.

### **Cultural**

Arklow is in need of a community Art / Theatre space. In 2019 a local group of artists and musicians fundraised to open Arklow’s first theatre [www.asgard.ie](http://www.asgard.ie) this theatre is currently housed above a local pub on Lower Main Street, Arklow and is thriving with artists and performances on a weekly bases from both local people and well known national and international artists.

Arklow is also home to one of the longest running Music Festivals in the country “Arklow Music Festival”.

A community theatre/art centre could be used to provide many services such as Sunbeam House, Autism Initiatives, Grow.ie., The Vault Youth Club, Arklow Active Retirement, Arklow Cancer Support with purpose built art resource centre with facilities and equipment etc .

We would hope that this could be progressed if a suitable building becomes available to house such a venue (possibly the Old Ormonde Cinema could be renovated or given as part of any social contribution to the town from a potential developer).

While we have many sports groups and facilities in Arklow the arts has been underinvested in for a very long time and there is a real need for this community space in the town. It is proven that social connection plays a huge part in mental wellness and places like this are invaluable in every town and village.

Once a suitable property is allocated there is no reason a centre like this could not sustain itself and become independent of Council support.

### **Rural Transport & Infrastructure**

Additional services are needed to the Rural Link to connect our rural villages with Arklow.

### **Barndarrig**

We suggest that a much needed car park be incorporated into the Development Plan for St. Mary’s, Barndarrig Church.

### **Car Parking**

Provision needs to be made in the County Development plan for additional car-parking within the town centre. With an approx population of 14,000 residents Arklow has we suggest developing the car park in Castlepark into a multi-storey car park. With a minimal daily rate the revenue created could easily recoup any initial investment and after a few years the car park could be an important income resource for Arklow Municipal District.

### **New Graveyard**

St. Gabriel's cemetery is due to reach full capacity within the next 5 year period. Provision must be made for a new accessible graveyard with Arklow Town Environ.

### **St. Marys Park. (see fig 1)**

We propose that the car park behind St. Marys Park on Main Street be developed into a community raised “sky” garden. We feel this would allow a much needed additional community space/parade ground area which could be used throughout the year for community events and festivals. It could be designed in such a way to create a natural amphitheatre leading down to the river's edge which could potentially facilitate outdoor riverside concerts etc . Consideration could be taken to cover over this park also to create some all weather spaces to be enjoyed throughout the year. This would bring nature right back into the town centre and Main Street and help regenerate the diminishing footfall for local shops and business on the Main Street. While we are aware of the cost implications of such a project we believe this would benefit the whole community and also be a play an important role in the climate action and biodiversity plan.

### **Preservation of natural heritage**

- 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 for children 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 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.

- Arklow Rock Headland (also protected view)

- Natural Heritage area behind Arklow Rock & Nuns Beach.

- Wildlife Island on the Avoca River west of the Nineteen Arches Bridge. This is a beautiful feature on the Avoca and home to Herons, Swans, Ducks, Cormorants all of which call Arklow their home. The island together with its inhabitants is an integral part of Arklow’s character and contributes substantially to people’s mental wellness by lifting their spirits when they walk or drive across the Nineteen Arches bridge.

### **Preservation of Mature Trees**

- Trees, individually or in groups, make a valuable contribution to the landscape, to the visual appeal of the County and to biodiversity. We wish to propose that new policy be implemented to protect mature trees and that a notice of intent to remove a mature tree be brought before the municipal members for a vote before implementation of the removal.

- Tree planting schemes and creation of Arks (small pocket areas of biodiversity) should be part of the County Development plan also. Rural incentives to landowners to plant native trees around the boundaries of their fields could be an easy way to increase native tree cover .

### **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. These should be identified, drawn & linked together.

### **Open Space/Recreation**

● 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 “open space”.

● When a housing development is being planned it must include more open spaces and infrastructure to benefit our children’s future.

### **Preservation of built heritage**

● 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.

● Dry stone walls on the Navie bridge and Coolgreaney road are aesthetically pleasing and contribute to the character of these areas.

● “The Warrens” cottage on the Arklow Golf Links.

● “Nineteen Arches” bridge.

### **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. We suggest that a map identifying local rights of way be created and a process be put in place 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.

### **Flood Risk**

● 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.

● Any new development should have a water attenuation scheme within its own periphery and not contribute to an already overloaded drainage system.

● Public information and participation is vital to any newly planned proposals. Everyone should be considered a stakeholder, not just big companies.

### **Coastal Erosion**

● The whole of Arklow Bay requires review. The trend for rock armour has been a short term solution that has worsened the problem long term. 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. The North Beach in Arklow being prime example.

### **Local Produce & Supporting local producers**

Provision for a Community Garden & allotments needs to be incorporated into the plan. There are a few potential green field sites within the Arklow Environs namely 1) the green space adjacent to Harbour Court, Tinahask area. Provision for a farmers market where local producers can buy/sell or swap their produce.

### **Education**

While for the current population Arklow is sufficiently served at primary and secondary level schools there is a need for additional third level education. 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 could 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. With Arklow at the helm of the Oyster Regeneration research with Norri.ie and also home to the Irish Mussel Seed Company in its early stages of start up, with the right support Arklow could provide the perfect location to facilitate all of the above under one roof. The EU will be at the centre of initiatives like this . A steering group should be set up to investigate the potential of such a centre for Arklow and the ideal location would be somewhere in the vicinity of Arklow Harbour.

### **Inclusiveness & Accessibility**

We are aware and wish to support in full, the Disability Federation of Ireland’s submission to the Wicklow County Development Plan 2021 – 2027 and trust that Wicklow County Council will strive to have their recommendations incorporated into any future development plan not only in Arklow Municipal District but throughout the county also.

### **Conclusion**

We hope that wellness and sustainability and quality of living are put at the heart of our community and that the Wicklow County Development Plan 2021 – 2027 will endeavour to reflect this and incorporate the necessary actions to achieve these goals in any future planning.

### **Response of Chief Executive**

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Clearly a lot of time and effort has gone into this very detailed submission, which contains many excellent ideas and the CE welcomes such active participation from the members. 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, or budgetary matters. The role of the County Development Plan is that of land use and the plan puts 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.

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.

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.

However, with regard to various points raised:

### **Introduction**

It is agreed that the appropriate designation for Arklow in the new Core Strategy (please see Part 2 of this report) is “self sustaining” town rather than a “self-sustaining growth” town, particularly given the weak employment base in the town which means that workers are dependent on employment in other areas and this coupled with poor public transport connections has lead to high levels of car-based commuting. In addition, it is agreed that ‘catch-up’ is required with regard to wastewater treatment infrastructure and social / community services before significant additional development can occur in the town.

## **Roads & Infrastructure**

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.

Second Bridge: This is an objective in the existing Arklow LAP; Wicklow County Council’s Transportation, Water and Emergency Department has recently secured funding from the NTA to carry out a major transportation study for Arklow, which will examine this objective.

Rockbig to Knockmore roundabout road (Roadstone Road): This is an objective in the existing County Development Plan and Arklow LAP as outlined in Objective TR38.

## **Footpaths & cycle lanes**

There are a number of objectives in the current County Development Plan with respect to walking and cycling paths / lanes, Objectives TR9 to TR13, and it is recommended that same be retained in the new plan and strengthened where necessary.

The delivery of footpaths 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. With regard to the route suggested (Rathdrum, Meetings of the Waters, Avoca, Woodenbridge to Arklow) a portion of this route has already been delivered by the Council (The Meetings – Woodenbridge) and the new plan could include an objective for the delivery of the remainder.

## **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 and the Arklow LAP already contained objectives to that effect, (TR1 to TR7), and it is recommended that same be retained and enhanced where necessary in the new County Development Plan

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 such facilities on an ad-hoc and uncoordinated basis without the backing and support of the transport agencies.

With regard to the suggestion regarding levies, the application of levies or the amendment of an existing levy scheme are not matters for the development plan. The making of a levy scheme is reserved function of the members under Section 48 of the Planning and Development Act.

## **Economic Growth and IDA**

The setting up of task force to market both Arklow and Rathdrum IDA 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 and Rathdrum including but not limited



to Wicklow County Council and Local Enterprise Office, the IDA, Enterprise Ireland, the local Chambers of Commerce and the Town Teams.

**Retail & Main Street:** Small scale local enterprise, including retail, is already explicitly promoted in both the current County Development Plan in Chapter 6, specifically Objectives RT1, RT10 & RT11) and the Arklow LAP, specifically in the ‘*Strategy for Arklow*’. It is recommended that such support is retained and enhanced where necessary in the new County Development Plan.

**Maritime Economy:** The management of Arklow harbour is an operational matter and not one for the County Development Plan. It is agreed that regeneration of the lands around the river and harbour, and support to employment generating activities (such as off shore wind) is essential and this support is already provided by the current County Development Plan through Objectives TR38, TR39 and CCE7 and through WZ3 to WZ7 in the Arklow and environs LAP. It is recommended that these objectives be retained and enhanced where necessary in the new County Development Plan.

**Tourism:** It is agreed that Arklow is a town of untapped potential; this is clearly identified in the current Arklow and Environs LAP with the enhancement of tourism being a key element of the vision for the town, and the LAP includes a chapter dedicated to this section. Therefore the planning policy supports are already in place but should enhancement of same be desired by the members, this can be addressed when the Arklow LAP is next reviewed.

With regard to tourism in other locations in the wider Arklow Municipal District, this is addressed in the current County Development Plan. Again as a key element of the vision for the County it is addressed through a chapter dedicated to tourism and recreation; it is recommended that these objectives be retained in the new County Development Plan and enhanced where necessary.

With regard to the tourism potential of the Avoca Mines mentioned, this is recognised in the current County Development Plan and it is recommended that this objective, T32, be retained and in the new County Development Plan and enhanced if necessary.

The delivery of new or enhanced tourism infrastructure and facilities would be an operational and implementation matter for the various Council departments and state agencies (such as Failte Ireland) active in this sector.

With regard to the ecology and biodiversity Avoca River specifically, this is already identified in the current County Development Plan as a ‘strategic green infrastructure’ asset, and the plan provides for a significant number of objectives to protect and enhance such areas as outlined in Objectives NH1 through the NH 38

It is recommended that these objectives be retained in the new County Development Plan and enhanced if necessary.

With regard to the suggestion that Wicklow County Council should liaise with the OPW and obtain the building at Ballymurtagh/Avoca Mines, this would be an operational matter and not a matter for the County Development Plan.

**Maritime Museum:** Investment in Arklow maritime museum would be an operational and budgetary matter and not an issue for the County Development Plan.

**Pottery Museum:** The advancement of this project as well as the design, future use and management structure of this facility, is an operational and budgetary matter and not an issue for the County Development Plan.

**Kilbride Pyramid:** The site is on the Record of Protected Structures. The erection of signage, as well as appropriate boundaries, as suggested would be an operational and budgetary matter and not an issue for the County Development Plan.

**Kynoch’s Walk:** The prioritisation of coastal protection works at north Arklow would be an operational and budgetary matter and not an issue for the County Development Plan.

**Arklow Castle & Historic Core:** The erection of signage as suggested would be an operational and budgetary matter and not an issue for the County Development Plan.

## **Cultural**

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.

## **Rural Transport & Infrastructure**

The current County Development Plan supports the delivery of new and enhanced rural transport 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 rural transport infrastructure and facilities would be an operational and implementation matter for the various Council departments and state agencies active in this sector in particular the Department of Transport and NTA that deliver the Rural Transport Programme.

## **Barndarrig**

Barndarrig is identified as village in the current County Development Plan and settlements of this small scale do not have detailed local development plans or specific development objectives for particular lands; however there is no impediment to the delivery of enhanced car parking in accordance with the village development parameters set out in the County Development Plan.

## **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 through Objective VP4. The delivery of new or enhanced car parking infrastructure and facilities would be an operational and budgetary matter for the Council.

## **New Graveyard**

The County Development Plan, being a strategic document, does not address local graveyard needs but does support the development on new facilities throughout the County where a need arises via Objective CD41. It is recommended that this objective be retained and enhanced if necessary in the new County Development Plan.

In addition, the current Arklow and Environs LAP, which is the more appropriate level of plan to address such a local need, already addresses the issue through Objective CD3.

The delivery of new or enhanced graveyard infrastructure and facilities would be an operational and budgetary matter for the Council.

### **St. Marys Park**

There is clearly merit to the idea of providing an extended park from the Main Street down to the river and linking up with riverine walks. This would have to be balanced however with the car parking needs in the town, which has already been identified by the submitter as an issue in the town centre.

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. In the intervening period, there is no reason why this could not be investigated as local project by the Arklow MD.

### **Preservation of Natural Heritage**

**South beach, Arklow:** The current County Development Plan provides policy support for the management of the coastal zone, as set out in Chapter 11 of the plan. It recommended that these provisions be retained and enhanced where necessary in the New County Development Plan. The management of this area is a local operational issue for Arklow MD and not a matter for the County Development Plan.

**Arklow marsh:** NHA designations are conferred by the state, and cannot be altered through the County Development Plan process. With regard to the possibility of studying the area, Wicklow County Council can commission such studies, should funding be made available for same.

**Avoca River:** The design of the future wastewater treatment plant and associated boundaries will be as per the development permitted by An Bord Pleanala.

**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.

**Arklow Rock Headland & Arklow Rock & Nuns Beach:** The request made for these areas is not specified, but the southern part of the Arklow Rock - Askintinny is already designated a pNHA. There is no listed prospect in this area. Any additional objectives desired for this area could be considered as part of the next review of the Arklow and Environs LAP.

**Wildlife Island on the Avoca River:** This ‘island’ which is a dynamic feature of the river is located in the Avoca River pNHA. The current County Development Plan provides for the protection generally of such designated areas but there is no specific protection in place for this island, and none are recommended given the intermittent and changing nature of this feature.

**Preservation of Mature Trees:** 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 other;
- 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.

Should there be specific trees or groups of trees that the submitter wishes to be considered for TPOs, these should be brought forth so that assessment can be carried out.

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.

### **Green Infrastructure (GI)**

The current County Development Plan does not explicitly identify existing GI assets<sup>1</sup> (green spaces, corridors etc) but rather sets out that GI assets should be identified at local plan level and this has been done for all plans prepared post 2016, including the Arklow LAP. Since the current County Development Plan was adopted, the Regional Spatial and Economic Strategy has been adopted which

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<sup>1</sup> 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

includes identification of significant regional and county level GI assets, and these will be shown in the new County Development Plan, along with additional assets if necessary.

### **Open Space/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.

### **Preservation of 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.
- 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..
- Dry stone walls on the Navie Bridge and Coolgreaney road: 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 objectives BH15 to BH 17. It is intended to retain or enhance these existing objectives as necessary in the new Plan.
- “The Warrens” 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 objective BH17
- “Nineteen Arches” bridge: This is a protected structure. 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.

### **Rights of Way**

The current County Development Plan includes number of public rights of way (PROW) for protection. It is recommended that this list be retained in the new County Development Plan and enhanced if

necessary. Any submissions received identifying specific PROWs for potential inclusion in the new County Development Plan will be evaluated and a recommendation made to the members.

### **Flood Risk**

The new County Development Plan will undergo Strategic Flood Risk Assessment (SFRA) to ensure that lands that are at risk of flooding are not zoned for inappropriate uses, unless the ‘justification test’ is satisfied.

With respect to surface water attenuation, the provisions of the current County Development Plan require *‘the separation of foul and surface water discharges in new developments through the provision of separate networks’* (Objective WI11) and *‘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’* (Objective WI12). It is recommended that these objectives are retained and enhanced if necessary in the new County Development Plan.

### **Public information and participation**

All Wicklow County Council’s development plans, all Wicklow County Council development projects under Part 8, all An Bord Pleanála consents and all planning applications are subject to public consultation.

### **Coastal 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) 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 Consulting Engineers 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.

### **Local Produce & Supporting local producers**

The current County Development Plan supports the development of allotments (Objective CD45) and it is recommended that such support be retained and enhanced if necessary in the new County Development Plan. With respect to the specific locations identified in the submission, these would be



more appropriately assessed as part of the next review of the Arklow and Environs LAP. The actual delivery of such facilities would be an operational and budgetary matter.

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.

### **Education**

The current County Development Plan supports the development of third level education (Objective CD10) and it is recommended that such support be retained and enhanced if necessary in the new County Development Plan. It would be beyond the remit of the County Development Plan to identify a particular education niche / sector for a particular location (as suggested) but rather its role as land use plan would be to ensure that there is adequate provision made in terms of zoned lands and development policies to support whatever education type need emerge.

The establishment of a steering group to investigate the potential for the development of a marine and habitat research would not be a matter for the County Development Plan.

### **Inclusiveness & Accessibility**

The current County Development Plan addresses inclusivity and accessibility and it is recommended that similar objectives be retained in the new County Development Plan and enhanced where appropriate, in light of submissions and advices received on the topic.

### **Conclusion**

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 be contribute to improved quality of life for all in Wicklow.

### **Recommendations of Chief Executive**

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1. In the new Core Strategy:
  - To ensure that housing growth is on the basis of sustainability principles and in particular to the availability of sustainable modes of movement both within and between settlements.
  - To identify Arklow as a “self sustaining” town in the new Core Strategy
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 address climate change directly in the new plan with a specific climate change chapter and indirectly throughout the entire plan by integrating climate change mitigation and adaptation into the plan objectives.
4. 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

- To work with and support the public transport agencies in the development of a coordinated park-n-ride strategy
- 5. 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.
- 6. To retain existing town centre and retail policies and objectives, and to enhance where necessary; in particular:
  - To continue the 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 existing policy support for the development of off-shore renewable energy, and associated on-shore facilities at appropriate locations.
- 8. To retain and enhance if necessary existing policy support for the enhancement of Arklow port and harbour
- 9. To retain and enhance if necessary existing policy support for tourism development in the County
- 10. To retain and enhance if necessary existing policy support for the development of the Avoca Mines
- 11. 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.
- 12. 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
- 13. To retain and enhance if necessary existing objectives for Coastal Zone Management.

**Issues raised****1. Climate Change**

- a) Climate Change is the greatest risk to our country, county, communities, environment and economy. Mitigating its effects and adapting to its impacts should be the core principles behind all future planning. A CDP can include objectives on transport, energy, development standards and land use to mitigate CO2 emissions.
- b) Through development standards, increase the required capacity of all surface water drainage systems in future developments and provide for attenuation tanks.
- c) Include an objective that all new developments should include energy monitors.
- d) Include a community objective to improve future food security by identifying lands near urban areas for allotments and community gardening (possibly lands at risk of flooding or part of green belt areas)
- e) A portion of development contribution levies (surface water section) should be used for carbon sequestration projects e.g. forestry, bog remediation, upstream soft engineering etc based on the carbon footprint of a development and where such measures could positively impact on flooding or surface water management.
- f) Increase buffer zones for development from water courses and coastal waters. Apply a more precautionary approach to flood risk analysis in land zoning than that provided for in OPW historical flooding maps.
- g) Any land use, transport or development based public submissions to the Wicklow Climate Adaptation Strategy should be assessed for inclusion in the draft CDP

**2. Transport**

- a) The RSES identifies Bray and Wicklow as key growth towns. Whilst Bray is well served by public transport Wicklow is poorly served by rail and bus services leading to car dependency. This must be addressed by improving the jobs ratio in this region and by improvements to frequency and service of public transport, particularly the rail service. It is requested that this plan identifies the investment and upgrade of the Wicklow rail line as a necessary requirement to enable compliance with the RSES.
- b) The RSES delegates the identification of Self Sustaining Growth Towns to the CDP process and states that these towns should have ‘good transport links’. The assessment of ‘good transport links’ should emphasise public transport provision and not rely solely on car dependent transport links. The assessment should also identify if the frequency and range of public transport services in those towns is adequate to encourage modal shift from car to public transport.
- c) All towns, whether designated Key, Self Sustaining Growth, Self Sustaining, Town or Village should provide for improved pedestrian and cycling infrastructure to encourage active transport, road safety and an attractive alternative to car use for short journeys.
- d) Planning applications for any multi unit development should provide a route map showing safe cycling and walking routes to school, shops and public transport.
- e) The plan should provide a map for potential 30kph slow zones in all town centres and their approach roads for a 300 metre radius from town centre or variant depending on town layouts

- f) Ensure through development standards that multi unit developments provide adequate on street EV charging points and that ground floor units are provided with external charge points
- g) Include an objective to make all existing and new cycle paths raised or segregated. Investigate methods such as providing linear rumble strips (rumble bars), physical segregation barriers, raised road markings to further improve road safety and offer protection to cyclists and visual and tactile information for motorists

### **3. Environment**

- a) Identify suitable public lands for native tree planting in order to support native tree cover with the aim of increasing Wicklow’s forestry cover to meet national targets. Similarly, identify areas for rewilding.
- b) The proposed Wicklow to Greystones greenway has great recreational potential but this proposal must prioritise protecting and preserving the very environment to which it seeks to create access. If environmental concerns and impacts can be adequately addressed and mitigated, this green way should also be expanded northwards to Bray via the Cliff Walk and on to Dun Laoghaire local authority area via Bray Harbour
- c) Tree Preservation Orders: Trees in urban areas are afforded very little protection under current legislation. TPOs created during the CDP process provide some protection and consideration of urban trees. It is requested that during this plan process that adequate resources are provided for planning services to carry out a review of all TPOs and to carry out an assessment of previously requested TPOs.
- d) Protected Views: It is requested that the current method of showing protected views by an arrow on map is improved by providing a photograph(s) of the protected view which clearly shows the scope of the protected view

### **4. Rural Development**

Dispersed one off housing needs to be curtailed – over the past 5 years one off housing has accounted for approx 45% of permissions granted. This type of development is not sustainable in terms of environmental, societal, service and transport costs. An objective is required to encourage rural housing to be centred around and close to rural villages and towns with the aim of revitalising these towns, improving services and reducing the decline of rural towns and villages.

### **5. Economy**

The CDP aims to increase the jobs ratio to 60% by 2028 and this will have positive impacts on transport and quality of life. In order to increase the attractiveness of population centres for investment and job creation there needs to be a greater emphasis on place-making and improvement to public realm and amenity. A public realm framework is required for each large town that identifies the potential for improvements and linkage between such public open spaces within each town.

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## **Response of Chief Executive**

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### **1. Climate Change**

- a) It is agreed that climate change must be addressed in the new County Development Plan. This has been addressed directly in a number of 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.

It is intended that the new County Development Plan will go further than previous plans and will have a separate Climate Change chapter very much to the fore of the new plan and with influence through the all aspects of the plan. The Climate Change chapter will have regard to more recent State policy and legislation on climate change such as the National Mitigation Plan 2017, the National Adaptation Framework 2018 and the Climate Action Plan 2019), as well as Wicklow’s own Climate Adaptation Plan and follow on Climate Change Implementation Plan. Wicklow County Council also signed up to the Climate Change Charter in December 2019.

- b) 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.
- c) 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.

- d) The 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 at this stage 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. It is recommended that this could be an ‘implementation’ action by the Council’s new Climate Change office or CCSD department.

- e) Section 48 of the Planning Act provides that a Planning Authority may include conditions for 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. Public infrastructure and facilities means -
- (a) the acquisition of land,
  - (b) the provision of open spaces, recreational and community facilities and amenities and landscaping works,
  - (c) the provision of roads, car parks, car parking places, surface water sewers and flood relief work, and ancillary infrastructure,
  - (d) the provision of bus corridors and lanes, bus interchange facilities (including car parks for those facilities), infrastructure to facilitate public transport, cycle and pedestrian facilities, and traffic calming measures,
  - (e) the refurbishment, upgrading, enlargement or replacement of roads, car parks, car parking places, surface water sewers, flood relief work and ancillary infrastructure,
  - (f) the provision of high-capacity telecommunications infrastructure, such as broadband,
  - (g) the provision of school sites, and
  - (h) any matters ancillary to paragraphs (a) to (g).

Therefore, it may be possible that the levy scheme adopted by the members could make provision for the funding of the type of schemes described in the submission. The adoption of development levy scheme, and the type of projects that levies collected fund, is not a matter for the County Development Plan but rather is a reserved function of the members under Section 48 of the Planning Act.

- f) 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.
- With respect to flood risk, historical flooding maps are not the only, or indeed the main source, of information on flood risk in a given area; a Strategic Flood Risk Assessment (SFRA) will be carried out for the new plan as was carried out for the previous plan and all local plans since the current guidelines were brought in 2009.
- g) All submissions made on the development plan review process, relating to climate change or any other relevant topic, will be assessed as required by statute as part of the plan making process.

## **6. Transport**

- a) It is agreed that the jobs ratio and public transport services in Wicklow Town require improvement, to make the settlement more self sustaining and to reduce the damage to quality of life resulting from car based commuting. The current County Development Plan identifies that major transport improvements are required in the County, particular to the rail line, and it



is intended that these provisions will be retained and enhanced if necessary in the new County Development Plan.

- b) The Regional Spatial and Economic Strategy, following an assessment methodology set out in the strategy, has identified Bray and Wicklow – Rathnew as ‘key towns’ in the regional settlement hierarchy. All other towns have been evaluated using the NPF / RSES methodology in order to determine their most appropriate designation in the new Core Strategy (see Part 2 of this report). It is recommended that having regard to the generally low jobs ratio and the poor public transport services to settlements in the County, that no towns below Bray and Wicklow – Rathnew be designated as ‘growth towns’ but rather ‘self sustaining towns’ that require ‘catch up’ in services and employment before significant further housing growth can occur.
- c) The promotion of and support for the improvement of sustainable transport modes is a key feature of the current County Development Plan strategy. It is intended to retain this strategy and to enhance it as required, in light of any new advice or studies prepared at a national, regional or local level. In addition, as set out in Part 2 of this report, the proposed new Core Strategy is particularly guided by the need to promote the development of compact settlements, where more intensive use of pedestrian and cycling facilities will be possible to access local services and public transport.
- d) The ‘Development and Design Standards’ set out in the current County Development Plan require:
- *New pedestrian and cycle paths shall be designed in accordance with the standards set out in the Traffic Management Guidelines and the National Cycle Manual and shall ensure ease of connectivity to the surrounding area;*
  - *Footpaths shall be provided on all new local roads to allow for full permeability of residential districts by pedestrians. All footpaths shall be designed to accommodate those with mobility difficulties or who are wheelchair bound;*
  - *Cycleways shall be provided on arterial roads and link road. They will not be required on local access roads; instead the design of such roads should be based on reducing vehicular speeds and concentrate on making the road a safe environment for cyclists and children at play;*
  - *The use of shared road space, that is suitable for safe use by vehicles and cyclists / pedestrians may be considered in settlements in lieu of footpaths and cycleways;*
  - *Pedestrian and cycleways will be required to follow the most direct route from origin to destination, subject to safety considerations. In particular, such routes should be well supervised by surrounding development;*

It is considered that ongoing compliance with these requirements will ensure that safe cycling and walking routes will be provided in new developments. However, an additional requirement for an applicant to show on plans routes to key locations such as schools, town centres etc. can be added if desired.

- e) The current County Development Plan provides the policy support for the delivery of safety improvements, including traffic slowing / calming and it is recommended that these policy supports be retained and enhanced if necessary in the new plan. The drafting of a map for potential 30kph slow zones would be a matter for the Roads & Transportation Department of the Council and could not be done as part of the County Development Plan without the necessary road surveys / audits. These could be carried out at any time outside of the County

Development Plan review process and these proposals may be more appropriately raised and funded at a Municipal District level.

- f) 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:

| <b>Building type</b>                                    |  | <b>Requirement</b>   |
|---|--|--|
| 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.<br>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 for each residential unit with car parking located within the property boundary in any multi unit residential building car park (regardless of number of car parking spaces) and thereafter 1 charging point for every 10 spaces.

- g) The design of new or improvement of existing cycleways is guided by the design principles of the NTA ‘National Cycle Manual’ and 2019 DMURS ‘Design Manual for Urban Roads and Streets’, (Department of Transport, Tourism and Sport and the Department of Housing, Planning and Local Government). The current County Development Plan, in its ‘Development and Design Standards’ makes reference to these standards and it is recommended that this be maintained in the new plan. In terms of the installation of new measures on existing public road to improve safety, these could be carried out at any time outside of the County Development Plan review process and these proposals may be more appropriately raised and funded at a Municipal District level.

## 7. Environment

- a) It would not be feasible for the County Development Plan to go to such a level of detail of identifying public lands across the entire County for native tree planting or rewilding, particularly without any survey / assessment carried out to support same. It is considered that this suggestion may be more deliverable at a town or MD level, or could be integrated into the

next County Biodiversity Plan and should be supported by appropriate professional advice and studies to determine if suitable sites are available. A ‘Tree Management Plan’ for trees on Council owned lands is already being considered as a priority action item in the implementation of the Council’s Climate Adaptation Strategy.

- b) It is agreed that the possible Wicklow to Greystones greenway has great recreational potential but such a project must go hand in hand with protecting the environment – a study is currently being undertaken by Wicklow County Council to look at these issues. With respect to the delivery of a greenway from Greystones northwards, while the nature of the cliff walk would not render ‘greenway’ designation possible, the existing Bray Head SAAO and current County Development Plan provides for the maintenance and enhancement of amenity routes on Bray Head, and it is recommended that this be retained in the new plan. The final element of the route, from Bray to Dun Laoghaire via the harbour, is being examined as part of the harbour masterplan which is in train and is supported by existing policies and objectives of the Bray MD Local Area Plan.
- c) Tree Preservation Orders: It is intended that as part of the plan review process, an assessment of some, not all, existing TPOs will be undertaken (an assessment of an existing TPO will only be undertaken if an issue has arisen with the designation) as well as an evaluation of any new tree / tree groups requested since 2016.
- d) It is agreed that a photograph of each listed view would enhance its clarity; however it is not proposed to be undertaken at this time due to the resources and timeframe available.

## **8. Rural Development**

The current County Development Plan restricts one-off rural housing to those with a bona fide necessity to live in the rural area. The current policy will require review in light of the provisions of the NPF. It is agreed that rural settlements should 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.

## **9. Economy**

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.

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### **Recommendations of Chief Executive**

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1. In the new Core Strategy:
  - To ensure that housing growth is on the basis of sustainability principles and in particular to the availability of sustainable modes of movement both within and between settlements.
  - To identify all towns below the key towns of Bray and Wicklow-Rathnew as ‘self sustaining’ towns.

2. To place Climate Change front and centre in the new county Development Plan with a separate chapter and 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
3. To provide for enhanced policy support for community gardens and allotments
4. To review watercourse setbacks and 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.
5. To provide strong policy support for improvement to public transport in the County, for the provision of enhanced walking and cycling networks
6. To make provision for the following standards for EV charging within the Appendix on Design Standards

| <b>Building type</b>                                    |  | <b>Requirement</b>   |
|---|--|--|
| New buildings and buildings undergoing major renovation | Non-residential buildings with more than 10 parking spaces within property boundary. | Installation of at least 1 recharging point. Installation of ducting infrastructure for at least 1 in 5 parking spaces.  |
|   | Residential multi-unit buildings.  | Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces)<br>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  |

7. To undertake a review of (some) existing and proposed TPOs.
8. To revise the rural housing policy in accordance with the provisions of the NPF and RSES.
9. To provide for enhanced policy support for regeneration of villages.

**Issues raised****Key Strategic Objective 2: Housing**

There is a need for an objective related specifically to the unique housing needs of people with disabilities. For example: *“Address the accommodation needs and provide opportunities for independent living for people with disabilities, through engagement with the Disability and Housing Steering group and implementation of Article 19 of the United Nations Convention on the Rights of Persons with Disabilities”.*

**Under CCSD:**

**C3:** Could mention people with disabilities specifically, but it’s already covered under the reference to marginalised groups.

**C6:** I would add the highlighted piece *“Review the play and recreation policy for the county and guide the process of planning and developing sporting, recreational, play and amenity facilities and activities that are accessible to all”*

**Economic development**

I would look for something to be added that recognises the economic value of providing opportunities for people with disabilities, and other disadvantaged groups, to gain and retain employment. Maybe *“To support disadvantaged groups, who are more likely to be unemployed and / or experience poverty to gain and retain meaningful employment to add to the economic development of the county”.*

**Travel**

I would ask for highlighted bits to be added

|              |   |
|--------------|---|
| <b>TWES4</b> | To promote walking and cycling and the continued provision of public transport options <u>which are accessible to all</u> within the County                                 |
| <b>TWES6</b> | To provide optimum parking solutions, including pay parking <u>and a sufficient provision of disabled parking bays, parent and child and age friendly spaces</u> countywide |

I’d ask for something to be added like *“To create obstruction free footpaths and improve the general accessibility of streets and roads”*

**C4:** I would add “accessible communication”

**Response of Chief Executive**

This appears to be a submission for the ‘Corporate Plan’ rather than the County Development Plan review as the references throughout are to the Corporate Plan objectives.

However in terms of the submission items that are relevant to the County Development Plan:

**Housing:** The County Development Plan is accompanied by a chapter on ‘Housing’, ‘Development and Design Standards’ for new housing and a ‘Housing Strategy’. These all promote and encourage a range of unit types and sizes. With respect to housing for those with disabilities, the private market is not required to provide for specially designed units but rather must at a minimum comply with the Building regulations Part M. With regard to the Council’s own housing delivery programme, the Council implements the ‘National Guidelines for the Assessment and Allocation of Social Housing Provision for People with a Disability’ (DoHPLG 2017) and its own 5 year strategic plan 2015-2020 for housing people with a disability.

**Accessibility:** The current County Development Plan addresses accessibility to services generally and for those with disabilities where relevant to a land use plan; while this would be more an issue for the LECP than the County Development Plan, the provisions of the plan will be reviewed in order to determine if there are opportunities to integrate more ‘Universal Design’ criteria and requirements into the plan objectives and development standards.

**Community / play facilities:** The current County Development Plan provides the necessary policy support for the delivery of enhanced community facilities that are accessible to all in society. The current County Development Plan supports the delivery of the Council’s separate ‘Play and Recreation’ strategy and it is recommended that this is retained in the new plan and enhanced if necessary.

**Economic development:** The current County Development Plan supports economic and employment creating development, of the right form and at the best locations; it is recommended that this support is retained in the new plan and enhanced if necessary. It would be beyond the scope of the County Development Plan, which is a land use plan, to address the types of employees a business might have, but it can ensure, in conjunction with the Building Regulations, through best practice design, that all work places are accessible to all in society.

**Public Transport:** The current County Development Plan supports the enhancement and improvement of public transport facilities. With respect to accessibility of transport services, transport providers are bound by statute and Government policy and in particular the Department of Transport, Tourism & Sport’s (DTTAS) Sectoral Plan, under the Disability Act 2005, which is called ‘Transport Access for All’ (2012). This concept is based on the principle of Accessible Public Transport which does not distinguish between people with disabilities and other passengers. In 2018, DTTAS consolidated all of the actions from the NDIS, CES and other Government Accessibility strategies - assigned to DTTAS, its agencies, other state agencies and public transport operators - into an Accessibility Work Programme. This has 56 Actions, primarily in the public transport area, and is updated quarterly. This uses this programme to monitor progress in making public transport more accessible.

**Parking bays:** Commercial premises have no legal obligation to provide disabled parking spaces but the current County Development Plan requires the provision of disabled parking bays in car parks of over 10 spaces at a rate of 5% of the spaces (minimum 1), and provides minimum space dimension sizes. It is recommended that this be retained in the new plan. There is no current requirement to provide designated parking for those with children, or the elderly, although many businesses are now providing same. It is considered that this should be addressed in the new plan.

**Footpaths:** The current County Development Plan, as well as national road design standards, requires the delivery of new and improved roads and footpaths to be accessible and safe for all. The Roads and Transportation Department as well as each MD strives to manage the road and footpath network to ensure it is obstruction free and free from risk to users.

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### Recommendations of Chief Executive

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1. 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.
2. The new County Development Plan will continue to promote the development of new housing in right locations, to maximise accessibility to services for all and encourage the delivery of the range of unit types and sizes in all new developments.
3. To provide strong policy support for improvement to public transport in the County, and for the provision of enhanced and safer roads and footpaths.



4. To include new standards for ‘parent and child’ and ‘elderly’ parking.

**Issues raised**

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**Roads**

1. That this Council supports and will take all necessary action to help implement the proposed new N81 from Tullaght to Hollywood Cross.
2. That this Council will work to ensure funding is obtained for improvements of all parts of the N81 from the Dublin border to the Carlow border. In particular to widen the road and to facilitate pull in points.
3. That this Council will immediately commence the process of completing the ring road of Blessington.
4. That this Council will build a footbridge over the river Slaney at Baltinglass to allow pedestrian use of the crossing at the current bridge.
5. That this Council will put in place a traffic solution to the N81- R747 junction in Baltinglass to improve safety.
6. That this Council ensures that the full length of Regional roads have road markings

**Rural Planning**

7. That large villages that are not under population pressure be treated like small villages for the purposes of rural planning.
8. That consideration be given to splitting the county into population pressure areas and low population pressure areas for the purpose of rural planning qualification policy. This to result in an easing of planning restrictions in these low population pressure areas. This is to recognise that the one size fits all policy is not appropriate.
9. That the appropriate emphasis in wording be put in place to ensure that social need is clearly superior to views and prospects when it comes to rural planning.

**Housing**

10. That this council supports and will engage with the department on providing one off rural social housing to suitably qualified applicants.

**Response of Chief Executive**

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**Roads**

1. The current County Development Plan explicitly supports the delivery of the Tullaght to Hollywood Cross upgrade. It is recommended that these provisions be retained in the new plan. With respect to securing the delivery of same, this would be a matter for TII and would be dependent on funding via the National Development Plan. At this time it is understood that this project is not listed for funding in the current programme 2018-2027.

2. The current County Development Plan explicitly supports the delivery of improvements to the N81. It is recommended that these provisions be retained in the new plan. With respect to securing the delivery of same, this would be a funding matter for the Council’s Transportation Water and Emergency Directorate, rather than a matter for the County Development Plan.
3. The current Blessington Local Area Plan explicitly supports the delivery of the Blessington inner relief road. As this is a local road objective, it is not a matter for the County Development Plan but consideration can be given to including same as an objective of the new County Development Plan given its importance. With respect to securing the delivery of same, this would be a funding matter for the Council’s Transportation Water and Emergency Directorate and Kildare County Council, rather than a matter for the County Development Plan.
4. The current Baltinglass Town Plan supports the delivery of a pedestrian bridge over the River Slaney. It is recommended that this objective be retained in the new plan. With respect to securing the delivery of same, this would be a funding matter for the Council’s Transportation Water and Emergency Directorate, rather than a matter for the County Development Plan.
5. The current Baltinglass Town Plan does not include an objective with regard to the R747 – N81 junction; it is recommended that this local objective be included in the new plan. In the intervening period until the new County Development Plan is adopted, this improvement scheme could be discussed with respect to priorities and funding with the Council’s Transportation, Water and Emergency Directorate.
6. The marking of roads would not be a matter for the County Development Plan, but rather an operational and budgetary matter for the Council’s Transportation Water and Emergency Directorate and the Baltinglass Municipal District.

### **Rural Planning**

7. 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.
8. The rural housing policy will require to be reviewed to accord with the provisions of the NPF. In particular, the National Policy Objective 19 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 pressure’ as defined by the NPF has been undertaken, and this has revealed that all of the County is under ‘urban pressure’. Therefore it is recommended, in order to be consistent with the NPF, that a common rural housing policy be applied across the entire county.

9. The new rural housing policy must accord with the NPF. Given that the entire county is under ‘urban pressure’ the policy requires that rural housing be facilitated *‘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’*. Although a consideration, compliance with the NPF does not provide for the prioritisation of social need above siting and design criteria.

In this regard, statutory Ministerial guidelines on rural housing state: *Landscape character assessment can help to inform policies in the development plan on the location and siting of rural housing. Landscape character requires a policy response in terms of the appropriate location and siting of rural housing in a manner that will not detract from those aspects of important landscapes considered valuable. Particular care should be taken to protect those features that contribute to local distinctiveness, including:*

- *The pattern of landscape features (land-cover, habitats, trees);*
- *Historic and archaeological areas and features,*
- *Water bodies (including rivers, lakes, estuaries and coasts), and*
- *Ridges, skylines, topographical features, geological features, and important views and prospects.*

## Housing

10. The delivery of social housing by the Council is a matter for the Council’s Housing Department policy, which must be consistent with the County Development Plan.

## Recommendations of Chief Executive

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1. To retain the following roads and transportation objectives in the new County Development Plan and to enhance where necessary:
  - Tallaght to Hollywood Cross upgrade
  - Upgrades to Deering’s and Hangman’s bends, and
  - Local alignment and width improvements south of Hollywood cross
  - Pedestrian Bridge over the River Slaney in Baltinglass
  - 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.
  - To work with and support the public transport agencies in the development of a coordinated park-n-ride strategy
2. To add the following roads and transportation objectives to the new County Development Plan:
  - Blessington Inner Relief Road
  - Improvement to the R747 – N81 junction in Baltinglass
3. To review the County settlement hierarchy in accordance with the provisions of the NPF and RSES, including the growth objectives for smaller settlements and villages.
4. To review the rural housing policy in accordance with the provisions of the NPF and RSES.

**Issues raised****Key principles**

1. Community well-being should be a key aspect of the CDP.
2. In order to create strong and resilient communities, I believe it is important that the principles of localism, sustainability and bottom-up community development are encouraged. Small, indigenous enterprise and industry should be promoted, including local food and energy production.
3. Nature based solutions should be examined first and foremost when considering how to address any of our problems such as flood relief and flood protection.
4. To recognise the inherent value of areas of high environmental importance, and place no economic, tourism or recreational pressures on them. Appreciate them purely for the ecological services they provide.
5. Our neighbourhoods should be easily and safely accessed on foot or by bicycle but should also be accessible to those with limited mobility or in wheelchairs. Wicklow should be an inclusive county – to be enjoyed by all.
6. ‘Community building’ (i.e. enabling all members of the community – young and old, to mix and interact) should be encouraged through the planning process to a greater extent than it is at the moment. This includes greater inclusion of community space (incl. green, active open and play space) than is currently required under the planning guidelines.
7. Infrastructure needs, such as transport, or a commitment from the relevant agencies to fund/ provide should be required, must be met prior to new developments being built. In order to do so, overarching plans, such as transport plans, should be developed as part of the local area planning process.

**Community Facilities**

8. That each local area plan be required to conduct a social audit of villages and towns.
9. That there is an increase in the amount of community facilities, including pitches, community centres, community crèches, required via the LAP.
10. That each town and village have available to it a community centre and youth club.
11. That each town and village have a co-working and meeting spaces available for public use.
12. Provide community gardens and allotments spaces in each town and village.
13. Provide public park areas in each town and village, in recognition of the importance of meeting places to communities.
14. Cycle spaces be provided to encourage cycling.
15. Community buildings should have solar panels included.
16. That all new public buildings be required to solar panels, swift bricks and rooftop gardens (where appropriate).
17. All playgrounds should be accessible and inclusive, and be based on the principle of side-by-side play.

**Retail**

18. Paid parking regimes in each of the town areas should be devised to be flexible and primarily used to encourage shoppers into the area, rather than be seen as a revenue-raising mechanism. It is important that we focus on retaining and supporting these central shopping areas (as they

are the ‘backbone’ of our communities) and avoid out-of-town developments/shopping that will drain vitality from them.

### **Residential developments**

19. Phasing of developments should ensure that community buildings are provided and available for use prior to the housing.
20. When community facilities are required as part of a development, minimum standards should apply (e.g. in the case of playing pitches, size, quality etc should be set out).
21. Original hedgerow retained where possible. In boundary areas where this is not possible, or where there is no existing hedgerow, native hedgerow should be planted to ensure a natural corridor around the entirety of the site.
22. Planting across housing developments should be native species, and the developer should be cognisant of the All Ireland pollinator plan recommendations.
23. No clustering of social housing should be allowed and all Part V unit should be spread evenly throughout any developments.
24. Fast charging points should be provided, particularly near the apartments and duplexes, as there will be no opportunity for those residents to charge from their homes.
25. Consideration should be given to the creation of planted rooftops, perhaps in the community facilities.
26. Water efficiencies of buildings should be considered as part of any development, including grey water and rainwater usage.

### **Biodiversity & Climate**

27. Use the CDP to ensure the protection and enhancement of our natural environment.
28. That the Council first examine natural based solutions when considering works required to deal with flood relief and protection.
29. That areas of local environmental importance be mapped and protected, in consultation and cooperation with the local community.
30. That WCC examine the need for wildlife bridges as part of any large road developments. In addition, wildlife gaps should be provided in medium strips.
31. That road infrastructure be recognised as potential wildlife corridors (planted areas running parallel to the road) and that, where possible, these land areas be expanded and allowed to generate wild areas.
32. The importance of our riverine corridors be recognised and enhanced.
33. That the CDP aims to identify core natural areas and to connect them with wildlife corridors in all our towns, villages and rural areas. This could be as simple as continuous lines of hedgerow.
34. That an energy audit of the county be conducted as a first step in the CDP. This can inform our climate action policies.
35. That the energy usage of large scale developments, such as data centres, be considered as part of the environmental impact of those developments; and that they must be capable of generating their own energy as part of the permissions.

### **Support for Community Pool. West Wicklow**

36. I would like to express my support for the proposed community swimming pool for the Blessington/West Wicklow area. As our populations grow in size, it is important that community facilities such as these become standard across our county. The ability to swim is a life lesson



that all children and adults should be able to participate in. I strongly believe that this principle should be recognised in our County Development Plan.

## Response of Chief Executive

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### Key principles

1. It is agreed that community well-being should be a key aspect of the County Development Plan; in this regard however it should be borne in mind that the County Development Plan, which is concerned with land use only, is only one in a suite of strategies and policies, by both the Local Authority and other state agencies, that aim to contribute to an enhanced standard of living for all in society. In order to ensure that the provision of the County Development Plan contribute to the goal of health and well-being insofar as is within its remit, it is intended that the new plan will undergo a health and well-being ‘audit’.
2. It is agreed that in order to create strong and resilient communities, the principles of localism, sustainability and bottom-up community development should be encouraged. The County Development Plan will endeavour to do so as appropriate given its remit as a land use framework. In addition, the current County Development Plan, through Chapter 5 and Objectives EMP18 and 19 explicitly facilitates small, indigenous enterprise and industry including local food and energy production and it is recommended that these objectives be retained and enhanced where necessary in the new plan.
3. 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 particular 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 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.
4. The current County Development Plan recognises the value of areas of high environmental importance as evidenced by the Natural Heritage Objectives NH1 through to NH23 of the current plan. It is recommended that these objectives be retained and enhanced where necessary in the new plan.

With regard to the possible economic, tourism or recreational pressures these areas may come under, and which can often bring benefit to the population and economy of the County, the County Development Plan cannot control what development proposals are made, but can control, through the application of the above referenced Natural Heritage objectives, whether any project is considered to be permissible in light of the overarching goals of the plan to

protect and enhance the well being of the county, including its natural assets. The County Development Plan and the planning system aims to balance the sometimes competing social, economic and environmental demands on our space and make provision for all sectors, but at the right locations and of the right design.

5. It is agreed that neighbourhoods should be easily and safely accessed on foot or by bicycle and should also be accessible to all. The current County Development Plan contains numerous objectives and development standards with this goal at the fore, for example Transportation and Roads Objectives TR9 through to TR13, as well as Community Development Objectives CD2 through to CD4. It is recommended that these provisions to retained and enhanced if necessary in the new plan.
6. It is agreed that ‘community building’ should be encouraged; insofar as this is relevant to a land use framework, the County Development Plan strives to facilitate this. With respect to open spaces, the development standards contained in the current County Development Plan relate in particular to the quantum and location of open space in new developments so that it is proximate and accessible to the maximum number. It is acceptable that the objectives of the plan do focus particularly on the need to provide for safe play space for children in new open spaces, and make little reference to other users such as the elderly or the disabled. It is recommended that this be addressed in the new plan.
7. As set out in Part 2 of this report, the recommended revised Core Strategy is particularly driven by the infrastructural capacity of towns to accommodate new growth. In this way new development will not be promoted where there is an existing deficiency in necessary services and facilities that is unlikely to be remedied during the lifetime of the plan. Where new infrastructure is in train or planned and is / will be sufficient to support further development, the nature of this infrastructure will be detailed in this plan (and the local area plans that flow from it). It is recommended that the new plan includes enhanced provision with regard to the assessment of infrastructure capacity in advance of permitted new development. The current plan already includes a requirement for applicants to carry out ‘social infrastructure’ audits, and it is recommended that this objective be strengthened in the new plan and this type of objective be utilised for other support infrastructure as well , for example a requirement to carry out a transportation infrastructure audit as part of a proposed development.

In addition, it is agreed that Local Transport Plans should be prepared for the larger towns, and it is recommended that this be an objective and a requirement of the process of making new Local area plans for these towns after the adoption of the new County Development Plan.

### **Community Facilities**

8. Local Area Plans consider the capacity of any town to accommodate new development, and a review of social / community facilities in undertaken especially with regard to education and open space / recreation. This could certainly be strengthened in future LAPs to address areas such as health care, community spaces, and culture and arts venues. In this regard it is recommended that the new plan includes a health and well-being ‘audit’ which will allow the key factors that contribute to community well being to be identified and address where possible in the new plan.

With regard to smaller towns and villages, the County Development Plan preparation process has since 2008 included an audit of the facilities available in all such small settlement and their position of each settlement in the hierarchy and the future growth parameters set for same has been based on the infrastructure available. It is recommended that this assessment be carried out for the new plan.

9. Local Area Plans do not deliver new community facilities – they are land use plans that set the framework (location, density 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 developers as part of conditions of planning permission, through development levies or delivery by the Council itself. The actual projects undertaken by the Council in this regard would be operational and budgetary matters.
10. The community facilities that are deemed necessary for each settlement are dependent on its size and role in its surrounding area. The CCSD department of the Council has in this regard devised a community facilities hierarchy which is the basis for the objectives of the County Development Plan and LAPs that flow from it. The details of this community facilities hierarchy are set out in Chapter 8 of the current County Development Plan.
11. The existence of co-working spaces in every town in the county would certainly contribute to numerous economic, social and climate change goals. The County Development Plan would certainly support such development, but the development plan does not deliver such facilities. This would be an operational and / or funding matter for the Council or each Municipal District. In this regard, it is recommended that the new plan provides the explicit policy support for such use.
12. The existence of community gardens and allotments spaces in every town in the county would certainly contribute to numerous economic, social and climate change goals. The County Development Plan would certainly support such development, and in the case of zoning plans that form part of the County Development Plan, provides for the zoning of land for ‘open space’ where such development would be feasible but the development plan does not deliver such facilities as this is an operational and / or funding matter for the Council.
13. The existence of a public park in every town in the county would certainly contribute to create more cohesive communities. The County Development Plan would certainly support such development, and in the case of zoning plans that form part of the County Development Plan, provides for the zoning of land for ‘open space’ where such development would be feasible but the development plan does not deliver such facilities as this is an operational and / or funding matter for the Council.
14. The provisions of the current County Development Plan support the delivery of bicycle parking spaces. It is recommended that such policy support be retained and enhanced where necessary in the new plan. The development plan does not deliver such facilities as this is an operational and / or funding matter for the Council.
15. The 2017 amendment to Part L (Conservation of Fuel and Energy) of the Building Regulations, provide for the implementation of requirements of Articles 2,3 4, 6 (part of), 7, 8, 9(3,b) of the EU Energy Performance of Buildings Directive – EPBD (recast) (2010/31/EU of 19 May 2010).

These requirements include:

- application of a methodology for the calculation of the energy performance of buildings on the basis of a general framework set out in Annex I to the EPBD (recast).
- setting of minimum energy performance requirements for buildings and the application of these requirements to new buildings to achieve Nearly Zero Energy Buildings;
- ensuring where buildings undergo major renovation that the renovated systems and components meet minimum thermal performance requirements in so far as this is technically, functionally and economically feasible.
- ensuring that when a building element that forms part of the building envelope and has a significant impact on the energy performance of the building envelope, is retrofitted or replaced, the energy performance of the building element meets minimum energy performance requirements in so far as this is technically, functionally and economically feasible.

Solar panels are one of a number of technologies (but not the only one) that can contribute to more sustainable energy and heat generation. The NZEB (nearly zero energy building) standard will apply to all new buildings occupied after the 31st December 2020. For Public Sector bodies, the standard will apply to all new buildings owned and occupied by the 31st December 2018. As with previous Building Regulations there are transitional arrangements in place where buildings are occupied after these dates but work commenced prior to 31st December 2018 for Non Domestic Buildings and 31st October for Domestic Buildings.

For all new non-residential builds, such as community centres, an equivalent to a 60% improvement in energy performance on the 2008 Building Regulations is required. This means an improved energy performance for the fabric, services and lighting specification. It also introduces a mandatory requirement for renewable sources. The renewable sources must in general provide 20% of the primary energy use, however there is flexibility where the building is more energy efficient than the regulations. This typically corresponds to an A3 Building Energy Rating.

In light of the national Building Regulations and these NZEB requirements, it is not considered necessary for the County Development Plan to separately require the installation of solar panels on all new community buildings; however the plan refers and supports the construction of all new builds to these National Standards

16. Swift bricks provide a mechanism for building nesting accommodation for swifts into brickwork. There is no statutory obligation for the developers of new buildings to provide same; however the action items in the Council’s Climate Adaptation Strategy will and the policies outlined in the new County Development Plan can encourage same. With respect to rooftop gardens / green roofs / green walls, the current County Development Plan promotes these and this provision can be maintained in the new plan.
17. It is agreed that all playgrounds should be accessible and inclusive to all. The design of new playgrounds by the Council is based on the Council’s adopted ‘Play Policy’, prepared by the CCSD Directorate. The current County Development Plan provides the policy support for the implementation of the Council Play Policy through Objective CD26 and it is recommended that this policy support be retained in the new plan.

## **Retail**

18. It is agreed that paid parking regimes should primarily be used to support activity in town centres e.g. facilitating short term parking for shoppers, rather long term use by commuters. It is agreed that town centres need to be supported to retain their core shopping function and their role as the heart of communities. The current County Development Plan sets out a range of policy supports in this regard under Retail Objectives RT1 - RT 4 and RT10 - RT 12 , and it is recommended that these be retained and enhanced where necessary in the new plan:

## **Residential developments**

19. It is agreed that new development should be appropriately managed to ensure necessary community infrastructure is available to residents. The current County Development Plan requires this (as provided by Housing Development Objective HD8) and it is recommended that these provisions be retained and enhanced where necessary in the new plan.
20. Where community facilities are required to be delivered as part of a private development, developers are directed to determine the required location, layout and size of the facilities in consultation with the Council’s Community, Culture and Social Development Directorate. As standards and requirements may change and evolve in these regards during the currency of any County Development Plan, it is not recommended that exact standards be set out in the County Development Plan, but rather the Council’s community facilities / play / sport policies and standards continue to be developed and adopted by the CCSD directorate and SPC.
21. The current County Development Plan provides explicit policy support for the protection of hedgerows and integration into new developments through Natural Heritage Objectives NH 12 and NH 19 and specific detail in the Development and Design Standards with regard to greenfield developments. It is recommended that these provisions be retained in the new plan and enhanced if necessary.
22. The current County Development Plan provides explicit policy support for the planting of native species through Natural Heritage Objectives NH14 and NH18 and specific detail in the Development and Design Standards with regard to Tree Planting. It is recommended that these provisions be retained in the new plan and enhanced to make reference to the All-Ireland Pollinator Plan and any forthcoming Pollinator Plan for County Wicklow.
23. The manner in which the Council requests Part V units be delivered is set out in the Housing Directorate’s ‘Part V Policy’. As standards and requirements may change and evolve in this regard during the currency of any County Development Plan, it is not recommended that exact standards be set out in the County Development Plan, but rather the Council’s Part V policies and standards continue to be developed and adopted by the Housing Directorate and associated SPC.
24. 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.<br>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 recommend 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.

25. The current County Development Plan supports the development of green roof / rooftop gardens where possible within the Appendix ‘*Development and Design Standards*’ and this provision can be maintained and enhanced in the new plan.
26. The current County Development Plan requires new buildings to incorporate water saving measures within the Appendix ‘*Development and Design Standards*’ and this provision can be maintained and enhanced in the new plan.

### Biodiversity & Climate

27. Insofar as it is within the remit of a development plan, the provisions of the current County Development Plan have at their core the protection and enhancement of our natural environment; this is a plan ‘dynamic’ that links to all aspects of the plan, from the ‘Vision’ through to the development standards. In addition, the plan must by statute undergo Strategic Environmental Assessment and Appropriate Assessment, in order to ensure that the provisions of the plan do not give rise to damage to but rather enhance the natural environment. It is intended that the new plan will continue and enhance this strategy. To this end it is proposed that Climate Action be placed front and centre in the new plan with a separate chapter on Climate Action.
28. 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 particular 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.

29. The current County Development Plan provides information on maps on all protected sites, such as SACs, SPAs, NHAs / pNHAs, Nature Reserves etc. At a more local level, if local areas of special value are identified through the local plan making process, these are identified in such plans; however this is only possible after a full ecological study is carried out (i.e. must be evidence based). It would not be possible through the County Development Plan to undertake such a wide study of all possible areas of local biodiversity, and this could perhaps be an ongoing annual action of the heritage / biodiversity plan to have all such possible sites evaluated.

Since the current County Development Plan was adopted, the Regional Spatial and Economic Strategy has been adopted which includes identification of significant regional and county level ‘green infrastructure’ assets, and these will be shown in the new County Development Plan, along with additional assets if necessary.

30. The current County Development Plan facilitates and supports measures such as wildlife bridges or wildlife gaps in medium strips if they are determined to be the most appropriate measures for addressing any identified adverse impacts on species through current Natural Heritage Objectives NH 8, NH10 and NH12. It is recommended that similar objectives be provided in the new plan. The provision of such measures in major road schemes would be a matter for the TII Road Design Office (in the case of national roads) and the Council’s Transportation Water and Emergency Services Directorate (in the case of regional and local roads) and the need for same would have to be determined on a case by case basis, following environmental / ecological assessment.

31. ‘Road Infrastructure’ is not identified in the current County Development Plan as potential wildlife corridors due to the inherent dangers to animals presented by road traffic and the need generally to keep road verges clear of vegetation so no obstructions are created. In addition, the verge may be subject to the effects of salting, gritting, wheel splash, high wind speeds, high noise, disturbance from parking, construction activities and maintenance and as a result, may have limited potential in providing for restoration of landscape quality or conservation of biodiversity. Where wide verges are possible, and where same would not interfere with road safety criteria, it may be possible to treat such area to provide for additional habitat for wildlife or to restore connectivity between habitat areas. The TII, in its publication ‘*A Guide to Landscape Treatments for National Road Schemes in Ireland*’ gives guidance on the approach to different zones along the road verge that would be potentially applicable to smaller road schemes as well.

Whether such safe corridors can be provided will ultimately depend on the width of the verge available for any given road scheme, which is often curtailed by topography, road design issues



and land ownership. However, the provision of wide road verges can be promoted in the new plan if desired, as well as the identification of same as possible wildlife corridors.

32. The current County Development Plan recognises the importance of our riverine corridors as set out in Natural Heritage Objective NH12 referenced above and Objectives NH20, NH21 and NH23. It is recommended that similar objectives be provided in the new plan.
33. With reference in the submission to ‘core natural areas’, the current County Development Plan and local plans that flow from it, identify the significant value of natural corridors, rivers / watercourses and other green infrastructure assets. It would not be feasible to identify all and every possible corridor / wildlife link through the whole County at the county plan level, but at a local plan level, every effort is made to identify important corridors and to establish buffer zones designated as ‘OS’ in zoning plans.
34. According to the SEAI, an ‘energy audit’ is an inspection, survey and analysis of energy flows for identification of energy savings opportunities in a building, process or system to reduce the amount of energy input into the system, without negatively affecting the output(s).

As set out in the Regional Spatial and Economic Strategy,

*‘local authorities, in preparing their development plan, 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 to be 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’.*

In this regard, it is understood that guidelines are in development, and these will be considered in the crafting of the new plan.

35. The environmental matters that must be considered in Environmental Impact Assessment are those set out in statute; and as such are not matters for the County Development Plan. The first EIA Directive was adopted in 1985 (Directive 85/337/EEC) and, following the adoption of amending Directives in 1997, 2003 and 2009, a codified Directive was adopted in 2011 (Directive 2011/92/EU). The 2014 EIA Directive (Directive 2014/52/EU), which amended the codified 2011 Directive (2011/92/EU) but did not replace it, entered into force on 15 May 2014.

The provisions of the 2014 EIA Directive were transposed into Irish planning legislation on 1st September 2018 with the intention of simplifying the rules for assessing the potential effects of projects on the environment, whilst improving the level of environmental protection. The new approach pays greater attention to threats and challenges that have emerged since the original rules came into force over 30 years ago. This means more attention to areas like resource efficiency, climate change and disaster prevention, which are now better reflected in the assessment process. EIA provisions in relation to planning consents are currently contained in the Planning and Development Act, 2000, (as amended) (Part X) and in Part 10 of the Planning and Development Regulations, 2001 (as amended). The regulations set thresholds at and above which an EIA is required, however the local authority (or An Bord Pleanála) may require that an Environmental Impact Assessment Report (EIAR) be prepared, even if the development is below the threshold but if it is likely to have a significant effect on the environment.

With respect to energy use by data centres, it is unlikely that it would be legal to insist on such developments only using own-generated energy but as set out in response to Point 15 above, non-residential building, such as data centres, are required to meet NZEB (nearly zero energy building) after the 31st December 2020,

### **Support for Community Pool West Wicklow**

36. Wicklow County Council supports the development of a pool in West Wicklow and explicit policy support for same will be included in the new plan.

### **Recommendations of Chief Executive**

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1. 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.
2. To place Climate Change front and centre in the new county Development Plan with a separate chapter and 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
3. To provide strong policy support for improvement to public transport in the County, for the provision of enhanced walking and cycling networks
4. To retain and enhance policies and objectives with regard to enterprise development to ensure that entrepreneurialism and enterprise is promoted, smaller, local businesses are fully supported and the development of co-working spaces / hubs is facilitated.
5. To review and enhance development standards with respect to the layout, design, location and landscaping of open spaces in new developments, in particular to ensure that
  - such spaces provides for the needs of all in society
  - enhancement of natural heritage, habitats and biodiversity is a key consideration.
6. To provide for enhanced policy support for community gardens and allotments.

7. To review and enhance existing policy provisions with regard to ‘social infrastructure audits’ and to develop further policies / objectives with regard to additional assessments required as part of larger scale housing applications.
8. To make provision for the following standards for EV charging within the Appendix on Design Standards:

| <b>Building type</b>                                    |  | <b>Requirement</b>   |
|---|--|--|
| New buildings and buildings undergoing major renovation | Non-residential buildings with more than 10 parking spaces within property boundary. | Installation of at least 1 recharging point.<br>Installation of ducting infrastructure for at least 1 in 5 parking spaces.   |
|   | Residential multi-unit buildings.  | Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces)<br>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  |

9. To provide explicit policy support for a community swimming pool in west Wicklow.

**Issues raised****Housing Strategy**

- The settlement strategy as structured is the basis upon which housing construction operates. It has provided for large scale housing projects in our major urban areas and allowed one off housing for a limited number of people who qualify under settlement strategy rules.
- However it needs to be reviewed and revamped in part, in particular the link between large and small villages and the ability of residents in these villages to secure a home in their own area.
- In many cases limitations are placed on expansion with villages due to infrastructural constraints, the unavailability of building land or the prohibitively high cost of land.
- With this in mind there is real merit in reviewing the Level 9 Rural Clusters and their role in the settlement strategy. They have the potential to alleviate pressure on both small and large villages and reduce the need/demand for one off housing in the rural areas, Level 10. In reviewing the Rural Clusters consideration should be given to expanding or redrawing existing Clusters and to adding additional areas to this category, areas of existing clustered rural settlement, that are closely linked with larger villages.
- Examples include Ballylusk, adjacent to both Glenealy village and Ashford town, previously the location of a primary school and shop and Crone, Redcross, a settlement of almost 20 homes and fully intertwined with the village of Redcross. Killiskey (already designated Level 9) needs to be reviewed, again an area where there was both a school and a shop, but the initial boundaries within the cluster were inadequate and failed to provide the number of affordable sites anticipated.
- In conclusion, the settlement strategy, once reviewed and made fit for purpose can be of great assistance to towns and villages across Wicklow, however a review is essential to ensure that the strategy meets the current housing need.

**Response of Chief Executive**

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 (that were not as strict as the ‘open countryside’ policies), thereby taking pressure off open countryside locations - they were not intended to ‘take pressure off’ larger towns and villages.

The identification of these clusters has not had any significant impact in reducing demand for houses in the open countryside and there has been limited demand for housing in these clusters since their inception; the only clusters that have seen development have generally been in areas under the urban shadow of larger towns, indicating that demand may be urban, rather than rural generated.

In accordance with the principles of the NPF these are not locations that should be prioritised for new development having no services and in fact to do so would be contrary to the provision of the NPF and Regional Spatial and Economic Strategy which seek to promote development in small towns and villages that have an existing urban fabric that can be regenerated, 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.

With regard to the areas mentioned, to particularly promote development in locations such as Ballylusk, Crone or Killiskey, on the basis of services having existed in the past, would only seek to undermine the strengthening and the attracting of investment in the small towns and villages in these areas, namely Ashford, Glenealy and Roundwood.

In compliance with the NPF, it is proposed that focus is required on making these small towns and larger villages more attractive for living, by enhancing the infrastructure and accessibility, by identifying and servicing suitable lands for development, and by seeking funding from new Government funds such as the RRDF to deliver these objectives.

### **Recommendations of Chief Executive**

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1. To review the County’s settlement hierarchy, and the development objectives that will apply for each settlement type / area, to accordance with the provisions of the National Planning Framework, the Regional Spatial and Economic Strategy and relevant Ministerial guidelines.