#### List of persons and bodies who made submissions

No.	Name	Agent/ Representative
	Prescribed Bodies	
1	Department of Communications, Energy and Natural Resources	Stephanie Redmond
2	Department of Education and Skills	Lorraine Brennan
3	Health and Safety Authority	Alice Doherty
4	Office of Public Works	Kevin Byrne
5	Dublin Airport Authority	Tanya Murray
6	National Roads Authority	Michael McCormack
	Public Submission	
7	Holfeld Plastics Limited/Edmund Holfeld	Malcolm Lane
8	Walter Browne Ardea Ltd	Frank O Gallachoir Associates

#### Leonora Earls

From: Coordination Unit [Coordination.Unit@dcerr.gov.ie]

Sent: 04 August 2011 10:53

To: Planning - Planning and Development Secretariat

Subject: Re; Proposed Variation No. 2 (i) and (ii) to Wicklow CDP 2010 2016; Kilamcanogue Settlement Plan and Laragh-Glendalough Settlement and Tourism Plan

Our Ref: 6020

Dear Ms Earls,

With reference to your correspondence dated, 30<sup>th</sup> June, 2011 re above.

The Department of Communications, Energy & Natural Resources has no comments/observations to make at this time. This is without prejudice to any comments/observations Inland Fisheries Ireland may have in this regard.

Kind Regards,

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

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This is also to certify that this mail has been scanned for viruses.

Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaitear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach.

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

#### Leonora Earls Brennan, Lorraine [Lorraine Brennan@education.gov.ie] From: 22 July 2011 10:23 Sent: Planning - Development Plan Review Variation 2 Kilmacanogue Settlement Plan & Laragh-Glendalough Settlement Plan -To: Subject: County Development Plan 2010-2016 W Variation2 to Kilmacanogue & L... \*\*\*\*\* The contents and any attachment of this e-mail are private and confidential. They are intended only for the use of the intended addressee. If you are not the intended addressee, or the person responsible for delivering it to the intended addressee, you are notified that any copying, forwarding, publication, review or delivery of this e-mail or any attachments to anyone else or any other use of its contents is strictly prohibited.You are prohibited from reading any part of this e-mail or any attachments. If you have received this e-mail in error, please notify the system manager. Unauthorised disclosure or communication or other use of the contents of this e-mail or any part thereof may be prohibited by law and may constitute a criminal offence. Internet e-mails are not necessarily secure. The Minister for Education and Skills does not accept responsibility for changes made to this message after it was sent. Unless stated to the contrary, any opinions expressed in this message are personal to the author and may not be attributed to the Minister for Education and Skills. WARNING: Computer viruses can be transmitted via email. While this e-mail has been swept for the presence of computer viruses, you are requested to carry out your own virus check before opening any attachment. The Minister for Education and Skills accepts no liability for any loss or damage which may be caused by software viruses transmitted by this e-mail. \*\*\*\*\*\*\* \*\*\*\*\*\* acknowledged

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Ms. Leonora Earls Administrative Officer Planning & Development Wicklow County Council Wicklow

21<sup>st</sup> July, 2011

Dear Ms. Earls

# Re: Proposed Variation No. 2 (i) and (ii) to Wicklow County Development Plan 2010-2016: Kilmacanogue Settlement Plan and Laragh-Glendalough Settlement Plan.

I refer to your recent letter regarding the proposed variation to the above mentioned plans. The submission has been examined and as there are no changes in projected population figures for the area and accordingly, no changes likely to future school provision, the Department of Education & Skills has no further comment to make at this time.

Trusting the above is in order.

Yours sincerely

Lorraine Brennan Execcutive Officer Forward Planning Section

057 9324392 Lorraine\_Brennan@education.gov.ie





HSA Head Office, Metropolitan Building, James Joyce Street, Dublin I Telephone: 1890 289 389 Website: http://www.hsa.ie

Director of Services, <sup>1</sup>. Planning & Economic Development, Wicklow County Council, County Buildings, Wicklow Town.

COUN <sup>0</sup> 6 JUL 2011

04/07/2011

Re: Proposed Variation No. 2 (i) & (ii) to Wicklow County Development Plan 2010-2016: Kilmacanogue Settlement-Plan & Laragh-Glendalough Settlement & Tourism Plan

Dear Sir/Madam.

1 wish to acknowledge receipt of your correspondence dated 30 June 2011, regarding the above which has been noted.

If you have any queries please contact the undersigned.

Yours faithfully,

Alice Doherty

Inspector, Process Industries Unit



#### Leonora Earls

From: Sent: To: Subject:

- -

Peter Lowe [peter.lowe@opw.ie] 02 August 2011 16:44 Planning - Development Plan Review OPW Submission on the Proposed Variation No. 2(i) to the Wicklow County Development Plan 2010-2016 - Kilmacanogue Settlement Plan



Letter 110802 PL -WCC re OPW ...

Dear Sir/Madam,

Please find attached the OPW Submission on the Proposed Variation No. 2(i) to the Wicklow County Development Plan 2010-2016 - Kilmacanogue Settlement Plan.

If you have any queries please contact the undersigned.

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

\*\*\*\*\*\*\*\*

Regards,

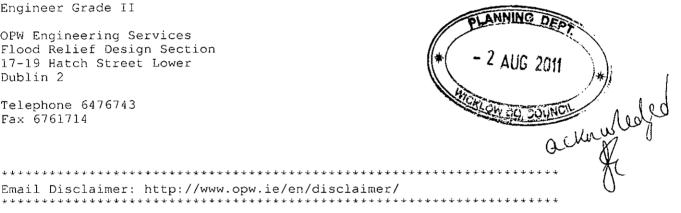
Peter Lowe

\_ \_

Peter Lowe Chartered Engineer Engineer Grade II

**OPW Engineering Services** Flood Relief Design Section 17-19 Hatch Street Lower Dublin 2

Telephone 6476743 Fax 6761714







Flood Relief Design Section Engineering Services Office of Public Works 17 - 19 Hatch Street Lower Dublin 2

Telephone01 - 6476743Fax.01 - 6761714

2<sup>nd</sup> August, 2011

Director of Services, Planning and Development, Wicklow County Council, County Buildings, Wicklow Town.

Ref:

# **Re:** OPW Submission on the Proposed Variation No. 2(i) to the Wicklow County Development Plan 2010-2016 – Kilmacanogue Settlement Plan

Dear Sir/Madam,

We wish to make the following comments on Proposed Variation No. 2(i) to the Wicklow County Development Plan 2010-2016 – Kilmacanogue Settlement Plan.

- 1. The OPW welcomes the carrying out of a Flood Risk Assessment as part of this proposed variation, and the following of the Planning System and Flood Risk Management Guidelines in drawing up the proposed Settlement Plan.
- 2. We welcome the inclusion of objective KM10 in the proposed Settlement Plan, and also the restatement of objectives and policies FL1-FL9 from the Wicklow County Development Plan.
- 3. On the second page of the Flood Risk Assessment, we note that in the last lines of the sections on the Assessment of Flood Risk on Primary and Secondary Lands, that tertiary lands are referred to, rather than primary and secondary lands (respectively). Is this correct? Also, the Assessment of Flood Risk on Primary and Secondary Lands sections both say that the Flood Risk Management Guidelines Justification Test would not be satisfied for these lands. Is this correct?

If you have any queries or would like to discuss the above comments, please do not hesitate to contact the undersigned.

Yours sincerely,

Peter Lowe Chartered Engineer Engineer Grade II Flood Relief Design Section The Office of Public Works Email: peter.lowe@opw.ie

Page 1 of 1 Leonora Earls Tanya Murray [tanya.murray@daa.ie] Subject: Proposed Variations No 2 (i) and (ii) to the Wicklow County Development Plan 2010-2016 From: Sent: Please find attached the DAA submission to the proposed variations No. 2 (i) and (ii) to the Wicklow County To Director of Services, Development Plan 2010-2016. Kind regards, Tanya Murray LANNING DED daa€≣ - 2 AUG 2011 Tanya Murray, Planning Team Dublin Airport Authority, T: 00353-1-814 4157 OW CO. COUN email: tanya.murray@daa.ie DISCLAIMER: The information contained in this email and in any attachments is confidential and is designated solely for the attachment(s) or the intended and in any attachments or must not use disclose conv distribute or retain this message the attachment(s) or any attachment(s) of this email, you must not use disclose conv distribute or retain this message the attachment(s) or any attachment(s) of this email, you must not use disclose conv. Proudly supporting the 3Ts (Turn the Tide of Suicide) - the DAA Charity of the Year 2011 DISCLAIMER: The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended Recipient(s). If you are not the intended recipient(s) of this email, you must not use, disclose, copy, distribute or retain this message, the attachment(s) or any part thereof. If you believe that you have received this email in error, please notify us immediately at the contact details set out below. Please also delete all Recipient(s). If you are not the intended recipient(s) of this email, you must not use, disclose, copy, distribute or retain this message, the attachment(s) or any part thereof. If you believe that you have received this email in error, please notify us immediately at the contact details set out below. Please also delete all conies of this email and any attachment(s) from your computer system Unless expressly stated, this email is not intended to create any contractual relationship. If this email is not sent in the course of the senders employment or fulfilment of his/her duries to Dublin Airport Authority. Dublin Airport Authority accepts no liability whatsoever for the content of this message or any part increated in you believe that you have received in your computer system. copies of this email and any attachment(s) from your computer system. Unless expressly stated, this email is not intended to create any contractual relationship. If this email is not sent in the course of the senders employment fulfilment of his/her duties to Dublin Airport Authority. Dublin Airport Authority accepts no liability whatsoever for the content of this message or any attachment(s) autrur had ged attachment(s). Dublin Airport Authority plc (DAA). Registered office: Dublin Airport, Co. Dublin. Registered Number: 9401 Ireland. Please refer any queries to infosec@daa.ie; This email has been scanned by the MessageLabs Email Security System. For more information please visit http://www.messagelabs.com/email

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Director of Services, Planning and Development, Wicklow County Council, County Buildings, Wicklow Town, Co. Wicklow,

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2<sup>nd</sup> August 2011

Filename: GP10-1010-078

### Re: Variation No. 2 (i) and (ii) to Wicklow County Development Plan 2010-2016: Kilmacanogue Settlement Plan and Laragh-Glendalough Settlement and Tourism Plan

Dear Sir/Madam,

With regard to the making of the proposed Variation No. 2 (I) and (ii) to Wicklow County Development Plan 2010-2016: Kilmacanogue Settlement Plan and Laragh-Glendalough Settlement and Tourism Plan, Dublin Airport Authority makes no comment at this time.

Yours sincerely,

Yvonne Dalton Head of Planning

An Bold Starbour Board of Dreading

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ANNING N COUNTY COUNC 27 JUL 2011 27 JUL 2011 COUNC Teach Naomh Máirtín / Bothar-Waterloo/-Baile Átha Cliath 4

Mr. D. O'Brien Director of Services Planning & Development Wicklow County Council County Buildings Wicklow Town Co. Wicklow Teach Naomh Máirtín / Bóthar<u>Water</u>loo / Baile Átha Cliath 4 St. Martin's House / Waterloo Road / Dublin 4 Teil: / Tel: + 353 1 660 2511 Facs: / Fax: + 353 1 668 0009

Dáta | Date 25 July, 2011

Ár dTag. | Our ReNRA11-82659

Bhur dTag. | Your Ref.

#### Re: Proposed Variation no. 2 (i) to the Wicklow County Development Plan, 2010 - 2016

Dear Mr O'Brien,

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The Authority welcomes referral of proposed variation no. 2(i) to the Wicklow County Development Plan, 2010 – 2016, incorporating the Kilmacanogue Settlement Plan. The Council will be aware that the Authority has previously submitted observations on pre-draft consultation relating to the preparation of the Kilmacanogue Town Plan.

It is noted that the Settlement Profile, section 2.1 of the Settlement Plan, identifies that the N11 has come to dominate the town, effectively acting as a barrier between the properties on the east side from the majority of services that are located on the west side of the N11. Section 2.3 acknowledges that there is a high volume of traffic using the N11 and the nature of this traffic combined with the junction layouts in the area results in conflicting movements at some locations.

It is noted that the Council proposes the inclusion of Objective KM 6 which seeks to promote the development of safe and accessible pedestrian and traffic routes.

The Council will note from the Authority's initial submission (February, 2011) on pre-draft consultation of the town plan, that the Authority has carried out analysis on the level of interaction between the national and non-national road network along the N11 route with a view to suggesting integrated road proposals for consideration. The Authority issued the 'M11/N11 Merging Study Report' and the 'N11 Corridor Review – Fassaroe Junction to Kilmacanogue, Co. Wicklow' Report to Wicklow County Council in April, 2010.

As outlined in the Authority's initial submission, the objective of the reports concerned is to identify a range of necessary road improvements, including walking and cycling facilities, that may be required to appropriately manage the strategic function of the national route in the context of associated local and regional road network needs between Fassaroe Junction and Kilmacanogue.

The Council may consider it beneficial to review the recommendations of the N11 Corridor Review report with a view to establishing specific proposals that can be incorporated into the plan to support Objective KM6, promote the development of safe and accessible pedestrian and traffic routes and address the lack of integration between the properties on the east side of the N11 with the majority of services located on the west side. The proposals also benefit through traffic on the strategic national road network.

The Authority would welcome a review of the proposed settlement plan having regard to the foregoing comments and it is hoped that the Authority's observations will be taken into consideration prior to the formal adoption of the proposed variation.

Rphost / Email: info@nra.ie Idirlion / Website: www.nra.ie

Yours sincerely, M Michael McCormack Policy Advisor (Planning)



#### Leonora Earls

From: Malcolm Lane [malcolm.lane@pdlane.ie]

Sent: 02 August 2011 13:25

To: Planning - Development Plan Review

Subject: Proposed Variation No.2(i) Kilmac

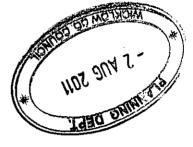
#### FAO:

**Director of Services, Planning & Development -**

See attached written submission on the Proposed Variation No.2(i) Wicklow County Development Plan 2010-2016 – Kilmacanogue Settlement Plan

on behalf of Holfeld Plastics Limited/Edmund Holfeld.

Hard copy in post.



Yours Sincerely

Malcolm Lane PD Lane Associates

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

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

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



02/08/2011

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Desmond Lane SE MISH PGS Malcolm Lane 64, MRH/R ANGEDS architecturs urban design planning anginearing

Proposed Variation No. 2(i) Kilmacanogue Settlement Plan Wicklow County Development Plan 2010-2016

#### SUBMISSION TO:

#### Wicklow County Council

ON BEHALF OF: Holfeld Plastics Limited / Edmund Holfeld Kilmacanogue Co. Wicklow

BY:

PD Lane Associates Architecture & Planning Urban Design & Engineering 1 Church Road, Greystones, Co.Wicklow

July 2011

1 Church Road Greystones Co Wicklow Ireland T +353 1 287 6697 F +353 1 287 0109 E Info@pdlane.ie W www.pdlane.ie

#### SUBMISSION

Wicklow County Council published Proposed Variation No. 2(i) to the Wicklow County Development Plan 2010-2016, Kilmacanogue Settlement Plan, July 2011. This submission is being made on behalf of Holfeld Plastics Limited/Edmund Holfeld in the context of this recently published Settlement Plan.

The attached map identifies the total landholding, at this location, in the ownership of Holfeld Plastics Limited/Edmund Holfeld outlined in red. The area of land to which this submission specifically relates is highlighted in orange ('the Subject Lands'), as per the recently published Settlement Plan. The Subject Lands have full access to services inclusive of public roads, drainage and water supply and is adjacent to existing commercial development to the south along the N11.

The Subject Lands are outside the proposed Settlement Boundary of the proposed Settlement Plan. The Subject Lands should be included in the proposed Settlement Boundary and zoned accordingly as Secondary Lands, as per the remainder of the landholding which is being used for employment and light industrial purposes. Secondary Lands are designated as Mixed Use Zones: 'To provide for the sustainable development of a mix of uses including residential, employment, community and recreational uses that provide for the needs of the existing settlement and that allows for the future growth of the settlement.'

It is contended that the Subject Lands are critical for the existing operators (on the remainder of the landholding) to expand their operations, without having to re-locate offsite in light of future potential expansions of their businesses. It is contended that any employment lands being used by operators in the current market conditions is of benefit to the County and local area, and any situation whereby successful operators may require expansion and further local employment is in the interests of proper planning and sustainable development.

We note the proposal to zone additional lands for residential purposes within the proposed Settlement Boundary.

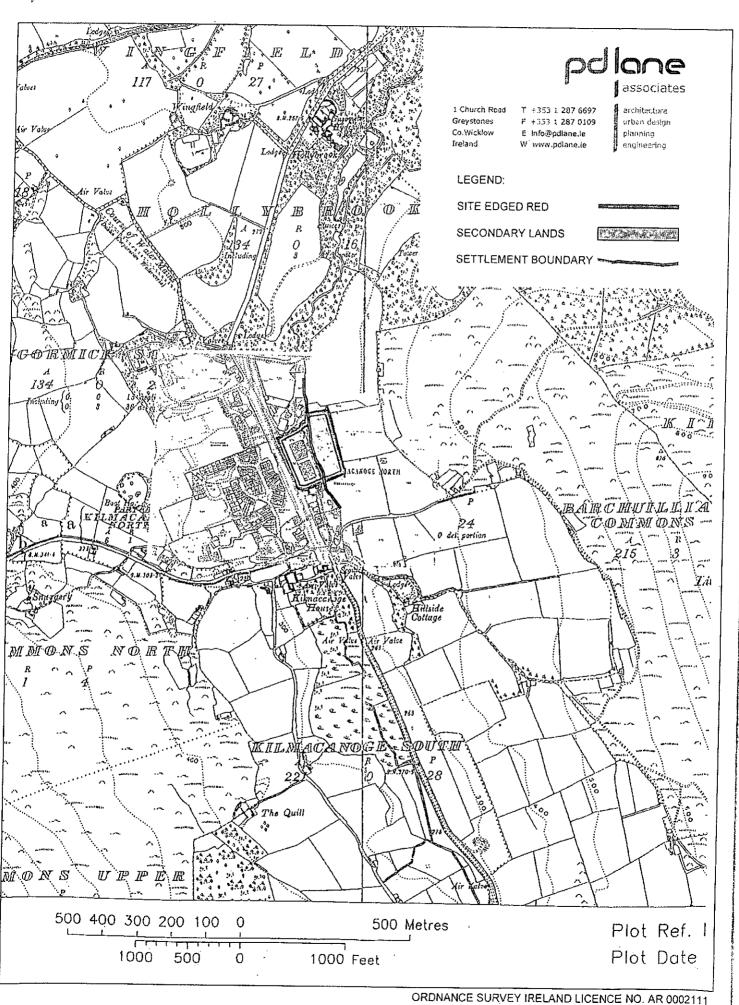
Furthermore, the Subject Lands are located at Kilmacanogue North, which is within the 'Metropolitan Area' designated in the Regional Planning Guidelines for the Greater Dublin Area 2004-2016. The National Spatial Strategy ('NSS') advocates the importance of consolidation of growth within the Dublin Metropolitan Area.

Wicklow County Development Plan 2010-2016 sets out a settlement strategy policy which aims to locate population growth and channel development in line with the principles of the National Spatial Strategy and the Regional Planning Guidelines. This includes the promotion of local growth within the existing settlements of Co. Wicklow, particularly large and small settlements. The inclusion of the Subject Lands within the Settlement Boundary for Kilmacanogue will contribute positively to the achievement of this development plan policy.

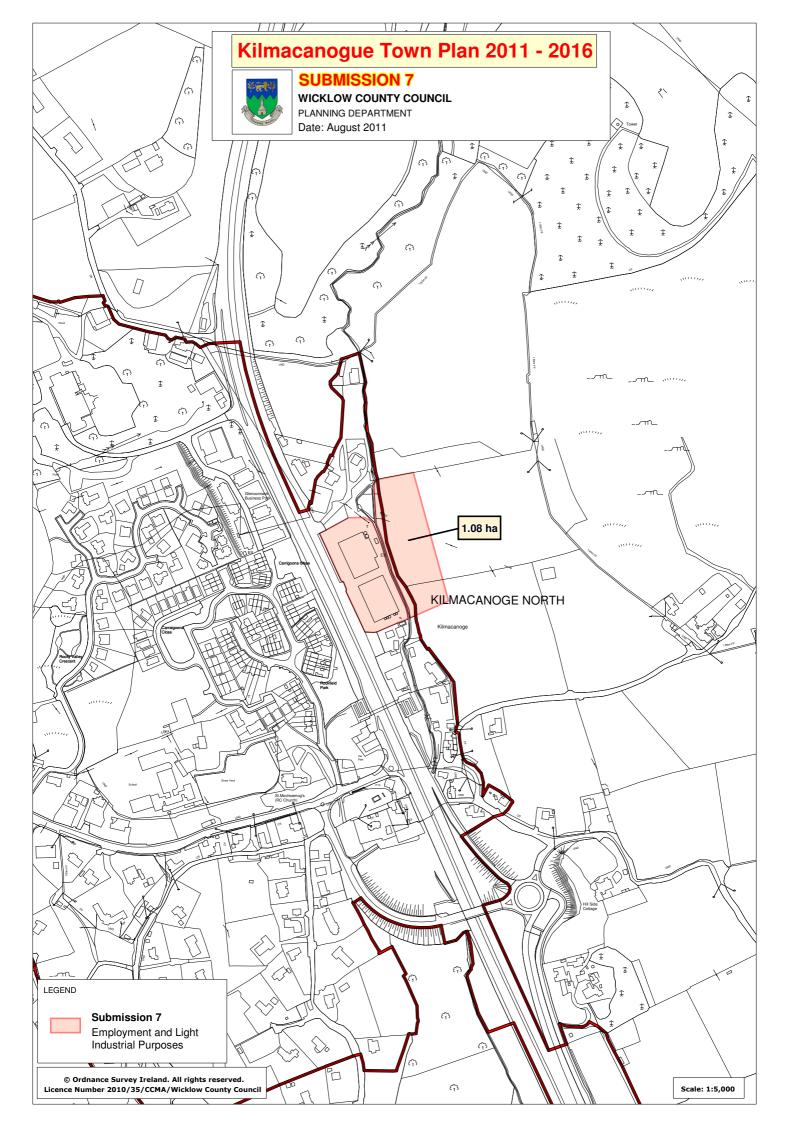
Therefore, we respectfully request Wicklow County Council to include with the Settlement Boundary of the Kilmacanogue Settlement Plan the Subject Lands for the future potential expansion of employment/light industrial uses on the landholding.

Malache Kans

Malcolm Lane BA MRUP MA (UD) PD Lane Associates



© ORDNANCE SURVEY IRELAND LICENCE NO. AR 0002111



## **SUBMISSION**

# PROPOSED KILMACANOGUE SETTLEMENT PLAN 2011

# LANDS AT HOLLYBROOK, KILMACANOGUE

**ARDEA LIMITED** 

2<sup>nd</sup> August 2011



16 Parklands Office Park, Southern Cross Road, Bray, Co.Wicklow 01 276 2512 01 276 2516 info@fogassociates.com www.fogassociates.com



Planning & Development Consultants

Our Ref: J05-200

Senior Executive Officer Planning Department Wicklow County Council Whitegates Wicklow Town

Date: 29th July 2011

## <u>PROPOSED VARIATION NO. 2(I) WICKLOW COUNTY DEVELOPMENT PLAN –</u> KILMACANOGUE SETTLEMENT PLAN - ARDEA LIMITED

Dear Madam,

We act on behalf of Mr. Walter Browne of Ardea Ltd., Lonsdale House, Avoca Avenue, Blackrock, County Dublin, in regard to the Proposed Variation No. 2(I) of the Wicklow County Development Plan – Kilmacanogue Settlement Plan. Our submission follows.

# Our client requests the Council to include his lands within the settlement boundary of Kilmacanogue with an objective to create employment and foster local enterprise.

We refer to our previous submission dated 7<sup>th</sup> February 2011 at pre-draft stage. This submission supersedes this earlier submission. Please contact us if we can be of any further assistance on any of the matters raised. Please address all correspondence to the undersigned.

Grevstones

Yours sincerely

rank O'Galla*d*hóir

Dip. T.C.P., M.Sc., M.I.P.I.

Enc: Kilmacanogue Proposed Settlement Plan Submission Map 1 Lands at Hollybrook, Kilmacanogue, County Wicklow.

#### SUBMISSION

#### PROPOSED KILMACANOGUE SETTLEMENT PLAN LANDS AT HOLLYBROOK, KILMACANOGUE COUNTY WICKLOW

#### ARDEA LIMITED

## **1. INTRODUCTION & SUBMISSION OBJECTIVE**

#### **1.1 Submission Objective**

Our client's lands comprise circa 11.6 ha. (28.7 acres), immediately to the north of Kilmacanogue village at Hollybrook, see Map 1. Our client requests the Council to:

#### Our client requests the Council to include his lands within the settlement boundary of Kilmacanogue with an objective to create employment and foster local enterprise.

It is our clients' intention to:

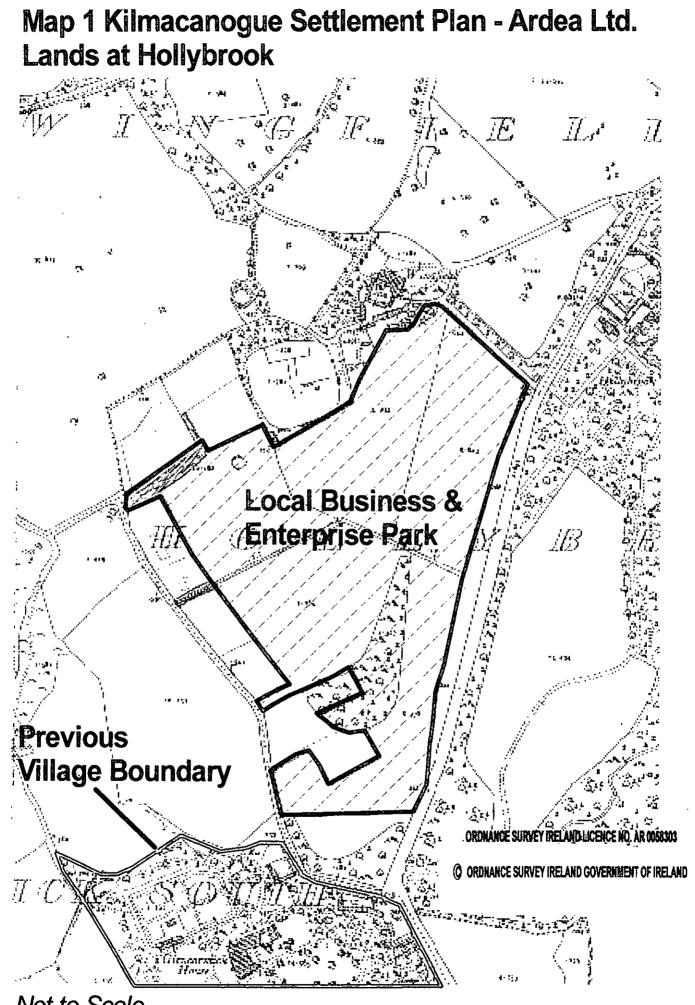
- Provide incubator/start up units for local employers.
- Produce an action area plan for the subject lands to ensure sufficient buffers and boundary treatment from adjacent development and the N11.

#### 1.2 The Subject Lands

The subject lands have been described in the previous submission. For completeness we repeat a description below. The lands are bounded by the N11 to the east and by the Glencormac to Carrigoona local county road to the west. The land is currently in agricultural use. There is a small mature deciduous woodland copse to the centre of the lands. The land is level to undulating and slopes gently from west to east and from north to south. The lands are adjacent to a Wicklow County Council Roads Depot at Jameson's Corner. These Council lands could be incorporated into any development proposed for this area.

There are three access points to the lands from the county road to the west. There is also access from the site to the old county road at Jameson's Corner. The eastern boundary of the lands extends from the existing by-passed section of road at Jameson's Corner to a

Frank O'Gallachóir O'Gallachoir & Associates Ltd. 2



Not to Scale

point close to the vehicular entrance to Wingfield House. The lands are traversed by a high-tension electricity line, which runs generally south to north parallel to the N11.

## 2. WICKLOW POLICY BACKGROUND

The Wicklow policy background is set out in the Wicklow County Development Plan 2010-2016 and in the Proposed Kilmacanogue Settlement Plan

### 2.1 2010 Wicklow County Development Plan - Kilmacanogue

The 2010 Wicklow County Development Plan contains the following policies in relation to Kilmacanogue. The Kilmacanogue Settlement Plan when adopted will be a variation of this County Development Plan.

- Kilmacanogue is a Level 6 Small Town in the County Wicklow settlement strategy. It is designated as a rural town on the same level as Roundwood, Shillelagh, Dunlavin and Avoca. Policy in relation to Rural Towns (Level 6) such as Kilmacanogue is that they should be prioritised *"for moderate growth"* and investment. Such settlements shall absorb demand for new housing from inside and outside of the County.
- Level 6 Rural Towns such as Kilmacanogue are defined as "strong rural towns with a good range of infrastructure services which are suited to accommodating a significant element of urban generated housing demand". Such Rural Towns "are considered to contain the potential to consolidate rural development needs and support the maintenance of essential rural social and community infrastructure such as schools, shops, public houses, post offices and local sporting organisation's".
- Kilmacanogue is at level 4 in the County Retail Strategy which is the same level as towns such as Roundwood, Shillelagh, Tinahely, Kilcoole and Enniskerry. However whereas these towns have a significant range of shops there is only one convenience store in Kilmacanogue excluding Avoca Handweavers which is a speciality and tourist shop.
- Policy is to prepare a Local Area Plan for Kilmacanogue during the lifetime of the current Wicklow County Development Plan.
- The 2006 population of Kilmacanogue was 839 persons. The population projection for the village is 1,100 persons for 2020 i.e. an increase of 31%.

# 2.2 2010 Wicklow County Development Plan - Employment Policies in Relation to

#### <u>Level 6 Towns</u>

Policy RH2 at part 6.3 of the County Development Plan is to "strengthen the established structure of villages and smaller settlements to support local economies and to accommodate additional population in a way that supports the viability of local infrastructure, businesses and services such as schools and water services".

Chapter 3 of the Wicklow County Development Plan recognises the need to enhance the range and number of employment opportunities in the Council and to increase the jobs ratio. The reason for this is to reduce the excessive commuting distance and trip times taken by the County's working population.

Similarly Chapter 7 of the Wicklow County Development Plan recognises the need for employment zoning and employment creation in all settlements. It states that all settlements from Level 1 to Level 8 perform a vitally important function in sustaining the local community and in providing enhanced opportunities for the creation of new enterprise. All settlements should therefore ensure that sufficient land is provided which caters for the specific needs of local employers and to create employment opportunities for residents.

There is a similar objective in Chapter 7 of the Wicklow County Development Plan to zone land in development plans for all levels of settlements in the County, for small businesses which are involved in processes that are considered incompatible with residential areas and also in order to promote enterprise and to ensure adequate provision of incubator/start-up units and general industrial processes and light industrial or employment generating activities.

### 2.3 Proposed Kilmacanogue Settlement Plan Policies and Objectives

We note the following conclusions policies and objectives in the Proposed Kilmacanogue Settlement Plan.

• It is an objective of the proposed plan to identify the special characteristics of Kilmacanogue and accordingly to craft objectives assistance to meet the town specific needs. The plan seeks to formulate appropriate Kilmacanogue specific development objectives and guidance, compatible with those of the County Development Plan to assist in the development management process in managing sustainable progress for the town.

- The water supply to Kilmacanogue is directly from the Dublin City Council trunk main. There is sufficient capacity in the public sewer network which discharges into the main Bray collection system.
- The Settlement Vision for Kilmacanogue is for it to "be a cohesive community of people enjoying distinct and interrelated town and rural environments; a natural surroundings are protected under hand; where opportunities abound to live and work in the town; allowing people to enjoy the benefits of rural living and at the same time consolidate rural development needs and support and the maintenance of essential social and community infrastructure in the town".
- In relation to Settlement Objectives, it is noted that there is no settlement objective to increase the range and availability of local employment for people in the town or within this catchment area. This is quite different from the settlement and development objectives prepared for the Proposed Laragh and Glendalough Settlement and Tourism Plan which provides for new local employment within the settlement. This is surprising given that Laragh-Glendalough is a Level 7 Large Village whereas Kilmacanogue is a Level 6 Small Town in the County Wicklow Settlement Strategy i.e. a more important and bigger settlement.
- In relation to the Primary Lands in the Town Core Zone, it is noted that the zoning objectives make no reference to industrial use or starter or incubator units. Only retail and commercial/office uses are referred to as being permissible. Similarly objectives 11 and 12 make no reference to industrial, workshop or incubator industrial units being permissible.
- In relation to the Secondary Lands: Mixed Use Zone, the proposed settlement plan Makes no reference to employment uses save for objective 22 which quite specifically refers only to existing employment areas and excludes consideration of new employment creating developments.
- Similarly in the Tertiary Lands: Peripheral Zone, there are no opportunities for new employment developments in the proposed settlement plan.
- On page 6 of the proposed plan it is stated that it is an objective of the Council that development be undertaken in an orderly and sustainable manner. It does allow for the phasing of development including *"the promotion of an appropriate balance of employment, residential and service facilities and other uses that are required to increase the self-sufficiency of the settlement"*. However as previously stated, there are no locations identified for or policies permitting new employment uses in Kilmacanogue. Indeed the page 6, the proposed settlement plan states that notwithstanding the fact that areas are designated for mixed use development, policy is that at locations where different types of land uses adjoin, that the amenity and visual integrity of these areas will be protected. This section refers particularly to cases where residential and employment development in these mixed use zones.

## **3. SUBMISSION**

#### 3.1 Submission Detail

Our client requests the Council to

- Extend the village's boundary at Hollybrook to include these lands as outlined in this submission.
- Include an objective to create employment and foster local enterprise on the said lands.

#### **3.2 Sustainable Village Expansion**

There are no significant undeveloped lands within the Kilmacanogue settlement boundary available for new employment development. It is our considered opinion that the only sustainable option for the further expansion of Kilmacanogue village is to the north, in the vicinity of our client's lands, because the following areas need protection.

- Kilmacanogue Marsh towards the south and the listed prospect of the Great Sugar Loaf from the N11.
- Quill Road which is unsuitable for road improvement and where development would seriously interfere with the character of the area and listed views.
- The proposed Great Sugarloaf Special Amenity Area Order which is likely to extend down to the Rocky Valley road towards the west.
- The Rocky Valley Area of Geological Interest and High Amenity Area
- The preserved views of special amenity value from the R755 Kilmacanogue to Roundwood Road.
- The expansion of Kilmacanogue village towards the east across the N11 is not sustainable because of:
  - The number of traffic and pedestrian movements generated
  - The long length of pedestrian trips to the village centre
  - Seriously interference with listed views of the Little Sugar Loaf from the N11.

#### 3.3 It Provides for Local Employment Generation

The Proposed Kilmacanogue Settlement Plan does not make provision for any new employment development in the town. Indeed the report on the submissions made at pre--draft stage expressly states there is that there is no need to designate additional land within the settlement for a new employment development. It states that sufficient employment opportunities will be available within the Bray area.

The policies in the Proposed Kilmacanogue Settlement Plan will mean that the only local employment opportunities available in Kilmacanogue will be from existing employers. Local entrepreneurs and businessmen will have to invest and carry out developments in Bray instead of in their own town. The policies outlined are contrary to the various policies in the existing Wicklow County development plan 2010-2016.

- RH 2 which states that the Council will support local economies.
- Chapter 3 which seeks to reduce commuting times and distances travelled to work.
- Chapter 7 which recognises the need for employment zoning and employment creation in all settlement development plans.
- Chapter 7 which also states that is that it is an objective to zone land in the development plans for all levels of settlement; for smaller businesses and in order to promote local enterprise and adequate provision of incubator or start-up industrial units and general industrial processes.

We consider that our client's proposal addresses the local employment issue in Kilmacanogue. Our client's proposals for an employment and enterprise zoning would address some of the future employment needs in the Kilmacanogue area, reduce commuting and traffic generation and would help it to become a more self-contained settlement for its residents.

Moreover our client's proposal will allow new employment opportunities to be developed away from the mixed-use zones identified in the settlement plan. This separation will lead to greater protection of residential amenities within the mixed use zones.

## 4. CONCLUSION

We request the Council to take these matters into account in considering the Kilmacanogue Settlement Plan. The appropriate zoning of our client's lands will facilitate local employment and enterprise developments in the village and local

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employment creation. It does not materially contravene any local planning policies. It would

- Support the development of Kilmacanogue village as a self-contained settlement
- Provide local employment and the Kilmacanogue area and
- Restrict commuting to work from Kilmacanogue.

We request Wicklow County Council to zone these lands for appropriate business uses within an action area.

relichow Frank O'Gallaghóir

Dip. T.C.P., M.Sc., M.I.P.I.

Date: 29<sup>th</sup> July 2011

