

WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

REPORT ON PRE-DRAFT CONSULTATION



**Wicklow County Council
Forward Planning
February 2015**

**REPORT TO THE MEMBERS OF WICKLOW COUNTY COUNCIL UNDER SECTION 11 (4) OF
THE PLANNING & DEVELOPMENT ACT 2000 (AS AMENDED)**

FEBRUARY 2015

**CHIEF EXECUTIVE'S REPORT ON PRE-DRAFT CONSULTATION
ON THE WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022**

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PART 1: INTRODUCTION

PART 1: INTRODUCTION

In accordance with Section 11 of Part II of the Local Government (Planning and Development) Act 2000 (as amended), Wicklow County Council has commenced the review of the 'Wicklow County Development Plan 2010-2016' and the preparation of the new 'Wicklow County Development Plan, 2016-2022'.

This report forms part of the statutory procedure for the review of the existing Plan and the preparation of the new Plan. Its purpose is to report on the outcome of the statutory consultation process and to set out the Chief Executive's response to the issues raised in the submissions received during the statutory public consultation period.

In accordance with the Planning Act, this stage of the review shall be **strategic** in nature for the purposes of developing:

- a) the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the development plan, and
- b) the core strategy,

and shall take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

1.1 Legislative background to the preparation of the Chief Executive's Report

The Chief Executive's Report is prepared and submitted in accordance with the requirements of Section 11 of Part II of the Local Government Planning and Development Act 2000 (as amended).

Section 11(4) of the Act sets out the requirements in relation to the preparation of the Chief Executive's Report. The Chief Executive's Report is required to:

- List the persons or bodies who made submissions or observations, as well as any persons or bodies consulted;
- Summarise the issues raised in the submissions and during the consultations, where appropriate but shall not refer to a submissions relating to a request or proposals for zoning of particular land for any purpose;
- Give the opinion of the Chief Executive to the issues raised, taking in to account the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, and any relevant policies or objectives of the Government or of any Minister of the Government, and
- State the Chief Executive's recommendations on the policies to be included in the Draft Development Plan.

In the case of each planning authority within the Greater Dublin Area (of which Wicklow forms part), this report shall summarise the issues raised and the recommendations made by the DTA and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the draft development plan.

This report must also summarise the issues raised and recommendations made by the relevant regional assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the draft development plan.

This report is required to be submitted to the members of the planning authority, or to a committee of the planning authority, as may be decided by the members of the authority, for their consideration. In this instance it is being submitted to the Members of Wicklow County Council.

1.2 Pre-draft consultation process

The pre-draft consultation stage commenced on the 28th October 2014 and ran for eight weeks until 23rd December 2014. The aim of the consultation process was to enable the public and interested parties to give their observations on the review of the existing Plan and the preparation of the new Plan, including what planning issues the new Plan should address. The consultation process included the following:

- Advertisements in local print media
- Advertisements in free newsletter 'Coutywise' (two editions in November and December 2014)
- Notification on Council's website, Facebook and twitter pages
- Setting up on an online portal for making submissions
- Creation of a online survey particularly aimed at younger citizens (all secondary schools were notified of this survey)
- Erection of posters in all Council offices and libraries
- Distribution of 'Wicklow County Development Plan 2016-2022 Issues Booklet' to all Council offices, libraries and secondary schools in the County
- Notification to all prescribed bodies
- Notification to all known community groups
- Notification to all known infrastructure providers
- Holding of public meetings in Bray, Wicklow, Arklow, Greystones, Blessington and Tinahely.

A total of **93** written submissions (hard copy and e-mail) were received within the statutory time period. A list of these submissions is included in Appendix 4. All written submissions are considered in this report; **however, any submission or any part of a submission relating to a request or proposals for zoning of particular land for any purpose does not appear in this report.**

All submissions have been scanned and are available for public viewing on Wicklow County Council's website. The original hard copies of the written submissions can also be examined at the County Buildings Planning Department public counter.

1.3 Members consideration of the Chief Executive's Report

This report is submitted to the Members for their consideration. The Members, following consideration of the report, may issue directions to the Chief Executive regarding the preparation of the Draft Development Plan and any such directions shall be **strategic in nature**, consistent with the draft Core Strategy and shall take account of the statutory obligations of the local authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government. In issuing directions, Section 11 (4)(f) of the Act states that the Members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates.

Any such directions must be issued not later than 10 weeks after the submission of this report to the elected Members.

1.4 The next stage of the County Development Plan review

Appendix 5 includes an indicative timetable for the preparation of the new County Development Plan. Following the consideration of this Chief Executive's Report by the Elected Members and the issuing of directions regarding the preparation of the Draft Development Plan, a 12-week period is allotted by the Act for the preparation of the Draft Wicklow County Development Plan 2016-2022. This means that the Draft Plan will be due for submission to the members in July 2015. Members will then

consider the Draft Plan and have 8 weeks to adopt / amend it before it goes on public display in September/October 2015.

1.5 Format of this report

The purpose of this stage of the plan making process is to determine the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the development plan, and to develop the core strategy.

To aid in reading this report, **Part 2** of the report will set out the proposed **Core Strategy** that has been crafted in light of the Council's statutory obligations, compliance with the Planning Act, with Ministerial guidelines, with higher order plans and taking into account the submissions received.

Following this, **Part 3** sets out a list of policy / objective recommendations arising from the public consultation process. It should be noted that it is intended to review and update if necessary all existing objectives in the current plan; as this review has not been completed, the policy / objective recommendations in Part 3 of this report will focus on any **new policies or objectives** that are being recommended, or any policies / objectives that it is proposed to **significantly alter**.

Thereafter **Part 4** will summarise and assess submissions received. Due to their special statutory status, submissions from elected representatives and prescribed bodies are each assessed individually and an individual response given to each issued raised. With respect to public submissions, the submissions are assessed according to topic.

Part 5 provide an assessment of submissions received with respect to Strategic Environmental Assessment / Habitats Directive (Appropriate) Assessment.

Part 6 provides a number of appendices referred to in the report.

1.6 Strategic Environmental Assessment & Habitats Directive Assessment

The new plan must undergo Strategic Environmental Assessment and Habitats Directive (Appropriate) Assessment. Whilst submissions were being sought on the overall plan, including issues relating to the environment and environmental assessment, the designated Strategic Environmental Assessment/Appropriate Assessment environmental authorities and the public were invited to make submissions on the scope and level of detail required for the Strategic Environmental Assessment and on any issue relating to the Appropriate Assessment. A report on any submissions received from either the environmental authorities or the general public with respect to the Strategic Environmental Assessment / Appropriate Assessment is set out in **Part 5** of this report.

PART 2: PROPOSED CORE STRATEGY

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1.0 Introduction

The purpose of the Core Strategy is to articulate a medium to longer term quantitatively based strategy for the spatial development of the area of the planning authority and in so doing to demonstrate that the development plan and its objectives are consistent with national and regional development objectives set out in the National Spatial Strategy and Regional Planning Guidelines (RPGs) and especially as regards:

- (1) the hierarchy and role of gateways, hub towns, county towns, other towns and villages and rural areas outlined in the documents above; and
- (2) the process of giving effect to the hierarchy above by setting regional and national population targets and associated requirements for housing land.

Whether zoning objectives are outlined in the relevant development plan or in subsidiary local area plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must agree with the Core Strategy of the county development plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local area plans.

1.1 Settlement Hierarchy

National Spatial Strategy & Regional Planning Guidelines for the Greater Dublin Area

The National Spatial Strategy embodies a spatial structure of Gateways and Development Centre Hierarchy leading the development of the regions, including hubs, towns, villages and rural areas having complementary roles within the structure. The entirety of County Wicklow is located in the 'consolidation zone' around the 'gateway' of Dublin.

The Regional Planning Guidelines for the Greater Dublin Area further expand on the spatial structure in this Dublin Region.

The Wicklow County Settlement Strategy accords with both the NSS and the RPGs, as shown in the following table and map.

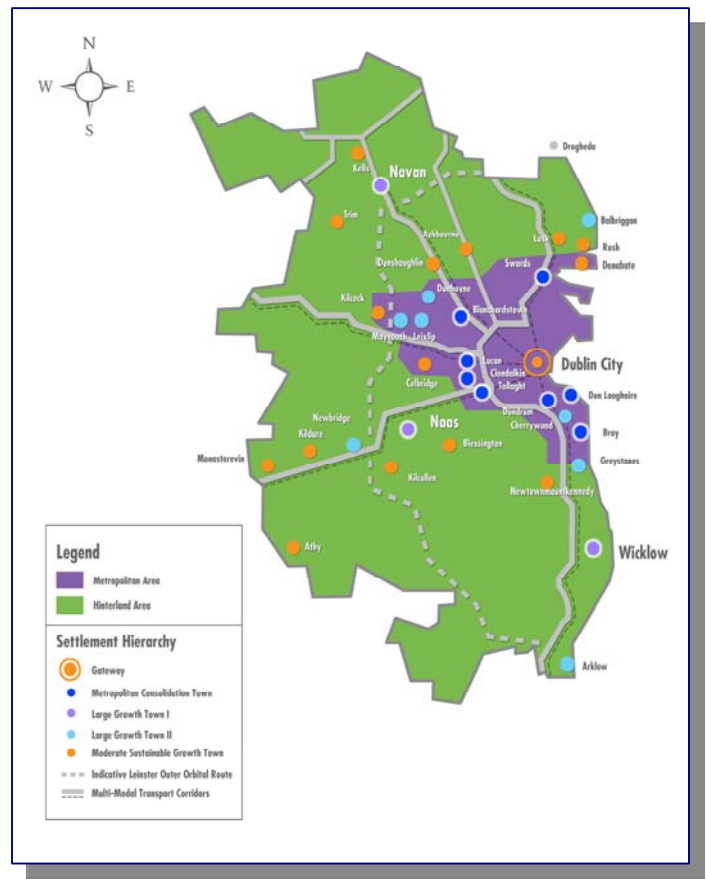
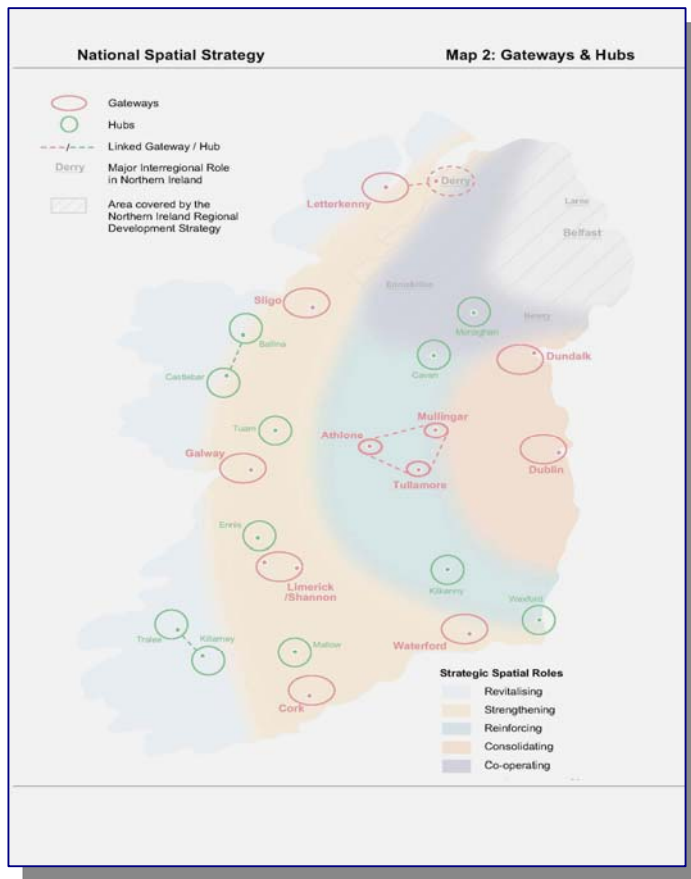


Table 1.1 County Wicklow Settlement Hierarchy

Settlement	National Spatial Strategy	Regional Planning Guidelines for the Greater Dublin Area	County Development Plan 2016	County Development Plan Level
Bray	Dublin CZ	Metropolitan Area Consolidation Town	Metropolitan Area Consolidation Town	1
Wicklow / Rathnew	Dublin CZ	Hinterland Area Large Growth Town I	Hinterland Area Large Growth Town I	2
Arklow	Dublin CZ	Hinterland Area Large Growth Town II	Hinterland Area Large Growth Town II	3
Greystones / Delgany	Dublin CZ	Metropolitan Area Large Growth Town II	Metropolitan Area Large Growth Town II	3
Blessington	Dublin CZ	Hinterland Area Moderate Growth Town	Hinterland Area Moderate Growth Town	4
Newtownmountkennedy	Dublin CZ	Hinterland Area Moderate Growth Town	Hinterland Area Moderate Growth Town	4
Ashford	Dublin CZ	Small Growth Town	Small Growth Town	5
Aughrim	Dublin CZ	Small Growth Town	Small Growth Town	5
Baltinglass	Dublin CZ	Small Growth Town	Small Growth Town	5
Carnew	Dublin CZ	Small Growth Town	Small Growth Town	5
Dunlavin	Dublin CZ	Small Growth Town	Small Growth Town*	5
Enniskerry	Dublin CZ	Small Growth Town	Small Growth Town	5
Kilcoole	Dublin CZ	Small Growth Town	Small Growth Town	5
Rathdrum	Dublin CZ	Small Growth Town	Small Growth Town	5
Tinahely	Dublin CZ	Small Growth Town	Small Growth Town	5
Avoca	Dublin CZ	Key Village	Rural Town	6
Donard	Dublin CZ	Key Village	Rural Town	6
Kilmacanogue	Dublin CZ	Small Growth Town	Rural Town	6
Newcastle	Dublin CZ	Small Growth Town	Rural Town	6
Roundwood	Dublin CZ	Small Growth Town	Rural Town	6
Shillelagh	Dublin CZ	Key Village	Rural Town	6

The proposed deviations are the designation of Avoca, Donard and Shillelagh as 'towns' (albeit 'rural towns') rather than 'villages' as set out in the Regional Planning Guidelines. The only difference in planning 'character' between these three settlements and three other towns in the 'rural town' category is their lower population (projected to be less than 1,000 in 2028) but otherwise all six towns defined as 'rural towns' share the same characteristics, that is, they are strong rural towns, with a substantial rural catchment and good range of services, including shops, schools and community facilities, as well as mains water and sewerage. This is generally more consistent with the definition of a 'key village' in the RPGs than the definition of a 'Small Town'.

*Please note it is recommended that Dunlavin is moved from 'Level 6 – Rural Town' to 'Level 5 – Small Growth Town'

1.2 Population

The new County Development Plan must, in accordance with the provisions of the Planning Act and various Ministerial guidelines, set out population targets for the County and the settlements within the County.

National population targets are generally provided by the Government through the Minister for the Environment on a cyclical basis, following publication of Census results and CSO forecasts. The last set of national targets published was in 2009, and it was on the basis of these targets, that the Regional Planning Guidelines for the Greater Dublin Area in 2010 set out population and housing growth targets for each of the counties in the GDA.

A review of the current Regional Planning Guidelines for the Greater Dublin Area will commence over the next 2 years and are hoped to be adopted by 2016. Until such new guidelines are produced, the current guidelines remain in force.

This presents a number of difficulties, given that this draft County Development Plan is being published in 2015, and a new plan adopted in 2016. In particular, the current guidelines only provide population and housing targets up to 2022, whereas the Wicklow County Development Plan will have a 12 year outlook, up to 2028.

Secondly, the current targets were based on 2006 Census results and population growth and population movement patterns that were prevailing at that time. In the intervening period since 2006, population patterns have shifted considerably, rendering the existing projections and targets outdated.

Therefore in order to progress the preparation and adoption of this plan, new population targets have been prepared, taking into account (a) population growth patterns since 2006, (b) more recent CSO regional population projections based on the 2011 Census and (c) the principles of the existing NSS and RPGs. In particular, cognisance has been taken of the current 2022 RPG population target for Wicklow of 176,800. The RPG office has advised that while it may no longer be reasonable to expect this level of growth by 2022, the option of extending the achievement of this target to 2028 may be considered substantially consistent with the spirit of the existing guidelines.

A detailed population working paper is included in the Appendix to this plan.

TABLE 1.2 PROPOSED POPULATION TARGETS

Year	2006	2011	2022	2025	2028	2031
Existing	126,196	136,640				
Target			158,000	167,000	176,000	185,000

1.2.1 Population distribution

The RPGs required that 42% of the total growth to be allocated to the Metropolitan Area settlements and that the 'majority' of the remainder to be allocated to the Growth Towns, weighted towards the Large Growth towns in the settlement hierarchy and also particularly towards towns with rail based public transport i.e. c. 70% of total population growth to be directed towards the 'growth towns'.

As in the previous County Development Plan, rigid adherence to these distribution requirements has led to difficulties – once the allocation for the metropolitan and other growth towns is distributed, and natural rural growth is taken into account, there is very little growth left to allocate to the 15 other towns in the County (Levels 5 and 6 in the hierarchy). The majority of these towns have capacity for growth, and to severely restrict development due to strict adherence to these population distribution requirements is considered a retrograde step, considering especially the investment in infrastructure that has been undertaken in these towns.

Furthermore, it is never possible to manage growth in any particular settlement to come in at an exact population figure at a set time, which is 2028 for the purposes of this plan. As development in 3 of the 6 growth towns, representing towards 35% of the projected county growth, is reliant on the cooperation and financing of the National Roads Authority and the Railway Procurement Agency (as is the case in Bray), or Irish Water (as is the case in Arklow and Blessington), it is not possible to predict this with any accuracy whatsoever. The town population allocations in this Plan have thus incorporated compensatory headroom of 15% to accommodate this uncertainty and to ensure that there will be sufficient capacity in other settlements if some growth towns are unable to deliver the necessary infrastructure to service their projected populations.

TABLE 1.3 PROPOSED COUNTY WICKLOW POPULATION TARGETS BY SETTLEMENTS 2011-2028

Designation	Town	2011	2022	2025	2028
Consolidation Town	Bray	29,339	36,237	38,119	40,000
Large Growth Town I	Wicklow / Rathnew	13,468	20,283	22,141	24,000
Large Growth Town II	Arklow	13,066	19,494	21,247	23,000
Large Growth Town II	Greystones/ Delgany	17,208	21,603	22,801	24,000
Moderate Growth Town	Blessington	4,780	6,540	7,020	7,500
Moderate Growth Town	Newtown	3,073	4,967	5,483	6,000
Small Growth Town	Ashford	1,484	2,675	3,000	3,250
Small Growth Town	Aughrim	1,315	1,758	1,879	2,000
Small Growth Town	Baltinglass	1,786	2,572	2,786	3,000
Small Growth Town	Carnew	1,145	1,698	1,849	2,000
Small Growth Town	Dunlavin	793	2,134	2,500	2,750
Small Growth Town	Enniskerry	1,940	2,302	2,401	2,500
Small Growth Town	Kilcoole	4,063	4,669	4,835	5,000
Small Growth Town	Rathdrum	1,638	2,843	3,171	3,500
Small Growth Town	Tinahely	956	1,308	1,404	1,500
Rural Town	Avoca	717	835	868	900
Rural Town	Donard	179	257	279	300
Rural Town	Kilmacanogue	799	897	923	950
Rural Town	Newcastle	817	1,065	1,132	1,200
Rural Town	Roundwood	780	1,052	1,126	1,200
Rural Town	Shillelagh	426	571	610	650
Urban total		99,772	135,761	145,576	155,200
Compensatory headroom			15%	15%	15%
	Large Villages	3,438	3,802	3,901	4,000
	Small Villages	1,087	1,354	1,427	1,500
	Rural clusters	1,009	1,133	1,166	1,200
	Open countryside	31,334	33,376	33,933	34,490
Rural Total		36,868	39,665	40,427	41,190
County total		136,640	158,000	167,000	176,000

Even in the scenario where there are no impediments to growth in any towns, and no town is allowed to growth by an additional 15% to compensate for lack of growth elsewhere, the combined total growth in the 'growth towns' would equate to c. 70% of total growth. Therefore this distribution is considered to be generally consistent with the principles of the RPGs.

1.3 Housing

Assuming the following:

- (1) Average household size¹ for the various intervals between 2011 and 2028 at:

Year	2011	2022	2025	2028
Av HH size	2.79	2.41	2.3	2.19

TABLE 1.4 COUNTY WICKLOW HOUSEHOLD SIZES

- (2) 'Excess factor', which encompasses vacancy rate, at 6.5% for all target years

These are the housing unit targets for the plan period and up to 2028:

Year	2011	2022	2025	2028
Population	136,640	158,000	167,000	176,000
Housing Stock (existing)	54,351			
Housing Stock (required)		69,822	77,328	85,589
Increase (from 2011)		+15,471	+22,977	+31,238

TABLE 1.5 COUNTY WICKLOW HOUSING TARGETS

While the proposed new 2028 population target is compatible with the existing 2022 target from the RPGs of 176,000, the 'housing stock' target differs slightly due to an assumption being made about household size – it is assumed that household size will continue to fall following current trends. The RPGs in 2010 allowed for a total housing stock in Wicklow of 82,012 units in 2022 to meet this 176,800 population target – this is proposed to be increased to 85,589 for 2028.

To reach this target, it will be necessary to delivery an annual average housing completion rate of 1,838 units per annum 2011-2028.

This is reasonably consistent with the housing growth rate allowed to Wicklow in the current RPGs – 2,058 units per annum 2006-2022, taking into account the much slower rate of development that has occurred in the period 2008-2014.

¹ Ratio of enumerated population to the total number of housing units in categories A, B and C of the Census housing stock descriptions. Other categories of housing i.e. categories D, E and F are accounted for in the 6.5% 'excess factor' which includes the 'vacancy rate'.

1.4 Zoning

This development plan sets the population and housing targets for all 21 'towns' in the County up to 2028. However, it only provides 'zoning' for 13 settlements, the remainder of the settlements having their own stand-alone 'Local Area Plans', which will be reviewed after the adoption of this County Development Plan.

Local Area Plans

It is planned that these LAPs will be adopted during 2017-2019 period, in order of timeline priority (i.e. according to the date when each existing plan is due to expire). Each LAP will cover a period of 6 years (the latest plan to be reviewed having a timeline of 2019-2025) and zoning will be provided on the basis of the land needed to meet a 6 year horizon, plus 3 years zoning 'headroom' or 'market factor'², as recommended in the Development Plan Guidelines issued by the Minister. The horizons utilised for each plan will also be cognisant of the fact the LAPs have the potential to be extended to last for up to 10 years, but no plan will include a timeline beyond 2028.

Zoning Table A to follow shows the zoning requirements for the LAP towns, up to the year 2025, plus headroom.

This table shows that the majority of current LAPs do not have sufficient zoned land available to meet the 2025 population target (the exceptions being Blessington and Rathdrum which are very slightly 'over-zoned' to the tune of 2-3ha each). The review of each LAP will ensure that each plan is consistent with the CDP 'core strategy'.

Other town / settlement plans

With respect to the remaining towns and settlements, their plans form part of this County Development plan and are therefore being adopted with a 2016-2022 horizon. Zoning is therefore provided on the basis of the land needed to meet the 2022 population and housing targets, plus 3 years 'headroom'.

Zoning Table B to follow shows the zoning requirements for these settlements / towns, up to the year 2022.

Level 5: The majority of the town plans adopted for these towns prior to 2016 have a surplus of zoned land having regard to the population and housing targets set out in this new CDP. Where a surplus has been identified, the surplus land will be re-designated as a 'Strategic Land Bank' (SLB). The only exception is Enniskerry where a deficit has been identified. Therefore the new Enniskerry town plan forming part of this CDP will include additional zoned land to address this deficit.

Level 6: These are 'settlement plans' that don't have the same detailed zonings as LAPs or Level 5 'town plans'. The amount of residential development that is facilitated in these settlements is therefore not a function of the amount of 'zoned' land, but is dictated by the population and housing objectives set out in the CDP and the 'settlement plan' itself.

² "Headroom" or "market factor" which is 'extra' land that should be zoned over and above the minimum amount needed to accommodate the population target. Headroom is provided so as to allow for greater location choice and deal with any land supply inflexibility which may arise.

TABLE A: LAP SETTLEMENTS

Future Plan Type	Settlement	Population 2011	Housing Stock 2011	Core Strategy Population Allocation 2025	Total Housing Unit Requirement 2025	Housing Unit Growth Requirement 2011-2025	Housing Unit Growth Requirement + headroom ³	Total Housing Yield of existing zoned land ⁴	Shortfall/ Excess (UNITS)	Method of addressing shortfall / deficit
Level 1 LAP	Bray	29,339	11,518	38,119	17,651	6,133	7,934	4,689	-3,245	Future LAP
Level 2 LAP	Wicklow – Rathnew	13,468	5,399	22,141	10,252	4,853	6,272	5,640	-632	Future LAP
Level 3 LAP	Arklow	13,066	5,459	21,247	9,838	4,379	5,726	4,000	-1,726	Future LAP
Level 3 LAP	Greystones – Delgany	17,208	6,637	22,801	10,558	3,921	5,034	3,767	-1,267	Future LAP
Level 4 LAP	Blessington	4,780	1,865	7,020	3,251	1,386	1,782	1,840	+58	Future LAP
Level 4 LAP	Newtownmountkenedy	3,073	1,078	5,483	2,539	1,461	1,840	1,706	-134	Future LAP
Level 5 LAP	Kilcoole	4,063	1,402	4,835	2,239	837	1,030	782	-248	Future LAP
Level 5 LAP	Rathdrum	1,638	657	3171	1,469	812	1045	1,089	+44	Future LAP

TABLE B: OTHER SETTLEMENTS

Future Plan Type	Settlement	Population 2011	Housing Stock 2011	Core Strategy Population Allocation 2022	Total Housing Unit Requirement 2022	Housing Unit Growth Requirement 2011-2022	Housing Unit Growth Requirement + headroom ⁵	Total Housing Yield of existing zoned land ⁶	Shortfall/ Excess (UNITS)	Method of addressing shortfall / deficit
Level 5 Town Plan	Ashford	1,484	531	2,675	1,182	651	858	858	0	Balance
Level 5 Town Plan	Aughrim	1,315	592	1,758	777	185	278	373	+95	SLB surplus
Level 5 Town Plan	Baltinglass	1,786	769	2,572	1,136	367	521	649	+128	SLB surplus
Level 5 Town Plan	Carnew	1,145	491	1,698	750	259	365	515	+150	SLB surplus
Level 5 Town Plan	Dunlavin	793	313	2,134	943	630	840	845	+5	Balance
Level 5 Town Plan	Enniskerry	1,940	642	2,302	1,017	375	470	406	-64	Zone additional land
Level 5 Town Plan	Tinahely	956	419	1,308	578	159	231	463	+232	SLB surplus
Level 6 Settlement Plan	Avoca	717	282	835	369	87	120	127	+7	Amend Objectives
Level 6 Settlement Plan	Donard	179	92	257	114	22	37	96	+59	Amend Objectives
Level 6 Settlement Plan	Kilmacanogue	799	277	897	396	119	151	146	-5	Amend Objectives
Level 6 Settlement Plan	Newcastle	817	313	1,065	471	158	211	388	+177	Amend Objectives
Level 6 Settlement Plan	Roundwood	780	326	1,052	465	139	195	283	+88	Amend Objectives
Level 6 Settlement Plan	Shillelagh	426	200	571	252	52	83	80	-3	Amend Objectives

³ Equivalent of +3 years zoning i.e. to meet '2028' target⁴ As per plans adopted pre 2016⁵ Equivalent of +3 years zoning i.e. to meet '2025' target⁶ As per plans adopted pre 2016

1.5 Transport

The transportation strategy set out in the National Spatial Strategy, of the development of Strategic Radial Corridors, Strategic Linking Corridors and Strategic International Access Points are translated to the regional level through the Regional Planning Guidelines for the Greater Dublin Area.

Roads

The NSS identifies the N11 – M11 as **Strategic Radial Corridor** from Dublin to the south-east of Ireland. The RPGs identify the N11 – M11 as a **Multi-Modal Transport Corridor**.

The N11/M11 national primary route / motorway serves the eastern coast area of the County, while a second national route, national secondary route N81, serves the west of the County along the border with Kildare and Carlow.

The N11 / M11 is part of Euroroute 01 and has undergone significant investment in the last 20 years. The final section of dual carriageway between Bray to the north and the Wexford to the south is due to be completed in 2015 – the Rathnew to Arklow Scheme. Having regard to the limitations of the mainline rail route in the County (see below), the N11/M11 will continue to be the principal access corridor in the eastern side on the County.

The RPGs also identify the Leinster Outer Orbital Route, traversing the region from Arklow in the south-east, to the Naas-Kilcullen area in the west via a route similar to the existing R747 – N81 corridor.

The second national route in Wicklow, National Secondary Route N81, is not identified in the NSS or the RPGs as being of strategic or regional significance. The N81 has only undergone minor improvements over the last 20 years. The NRA National Road Design Office in 2012 published a 'preferred route' for improvements of the N81 from Tallaght to Hollywood, but this scheme has not been progressed as yet to consent or construction stage.

The County is served by a network of regional and local roads, which are essential for inter-County traffic and east-west connections and local movements.

- In light of the likely continuing car dependency to access the metropolitan region in the short to medium term, it is the strategy of this plan to facilitate and encourage measures to improve capacity and efficiency of the national routes and facilitate the improved use of the national routes by public transport;
- The priority for strategic road improvement will be
 - (a) the upgrade of the N11 in the north of the County, from the Dublin border as far as Kilpedder, in particular improvements to the M50 / M11 merge which is deficient in capacity, and all interchanges serving Bray;
 - (b) the upgrade of the N81 between the Dublin border and Hollywood.
- The priority for regional road improvement will be with east-west connector routes i.e. Wicklow – Roundwood – Sally Gap - (R763/4 – R759), Wicklow – Laragh – Wicklow Gap – N81 (R763 – R756) and the R747 (Arklow – Tinahely – Baltinglass);

Public Transport

The NSS identifies the Dublin – Rosslare rail line as a **Strategic Radial Corridor** from Dublin to the south-east of Ireland. The RPGs identify the rail line as a **Multi-Modal Transport Corridor**.

This is the only heavy rail line in the County, which is single track only from Bray and has only six functioning stations from Bray to Arklow. The settlement strategy exploits the towns along this route by allocating over two thirds of the population growth to these settlements.

It is proposed to extend the Luas light rail system to Bray – this extension is identified in the RPGs as a **critical strategic transport project** and the vast majority of the population growth for Bray is allocated for areas to be served by Luas. This will reinforce the role of Bray as the primary settlement in the County and will provide an option for removing car traffic from the N11/M11 north of Bray with the provision of park-and-ride facilities.

- It is the strategy of this plan to encourage and facilitate significant improvements to heavy and light rail infrastructure, including the provision of new lines and new stations.
- Improvements to the Dublin-Rosslare rail line, the extension of Luas to Bray – Fassaroe, the provision of car and bus park-and-ride facilities and improved penetration of local bus services in designated growth towns are the priorities for public transport.

1.6 Retail

The development plan includes a retail strategy for the entire County, which is consistent with the GDA Regional Retail Strategy. In accordance with the Retail Planning Guidelines, the retail strategy for Wicklow will include the following:

- Confirmation of the retail hierarchy, the role of centres and the size of the main town centres;
- Definition in the development plan of the boundaries of the core shopping area of town centres;
- A broad assessment of the requirement for additional retail floorspace;
- Strategic guidance on the location and scale of retail development;
- Preparation of policies and action initiatives to encourage the improvement of town centres;
- Identification of criteria for the assessment of retail developments.

Table 3.4 GDA and County Wicklow Retail Hierarchy

RETAIL STRATEGY FOR THE GREATER DUBLIN AREA	WICKLOW COUNTY DEVELOPMENT PLAN	
	METROPOLITAN AREA	HINTERLAND AREA
LEVEL 1 METROPOLITAN CENTRE Dublin City Centre		
LEVEL 2 MAJOR TOWN CENTRES & COUNTY TOWN CENTRES Bray, Wicklow	Bray	Wicklow
LEVEL 3 TOWN AND/OR DISTRICT CENTRES & SUB COUNTY TOWN CENTRES Greystones, Arklow, Blessington, Baltinglass	Greystones	Tier 1 Towns serving a wide district: Arklow, Blessington, Baltinglass Tier 2 Towns serving the immediate district: Newtownmountkennedy, Rathdrum
LEVEL 4 NEIGHBOURHOOD CENTRES, LOCAL CENTRES – SMALL TOWNS & VILLAGES	Bray Area: Boghall Road / Ballywaltrim, Vevay, Dargle Rd, Dublin Road / Little Bray, Albert Road & Walk, Fassaroe, Southern Cross Road Greystones Area: Delgany, Blacklion, Charlesland, Killincarrig, Victoria Road	Ashford, Aughrim, Avoca, Carnew, Donard, Dunlavin, Enniskerry, Kilcoole, Kilmacanogue, Newcastle, Rathnew, Roundwood, Shillelagh, Tinahely
LEVEL 5 CORNER SHOPS / SMALL VILLAGES		Barndarrig, Ballinaclesh, Coolboy, Glenealy, Hollywood, Johnstown / Thomastown, Kilpedder / Willowgrove, Kiltegan, Knockananna, Laragh – Glendalough, Manor Kilbride, Redcross, Stratford

The only minor deviation from the Regional Retail Strategy is the inclusion of Newtownmountkennedy and Rathdrum in Level 3. The County Development Plan makes a distinction between Tier 1 and Tier 2 centres in Level 3 to reflect this deviation. Newtownmountkennedy is selected as being appropriate

for this position having regard to its designation as 'Moderate Growth Town' in the Regional Planning Guidelines for the Greater Dublin Area, whereas Rathdrum is selected in the main because of the high level of growth planned in the settlement and its existing strong town centre.

1.7 Integration of environmental considerations into the plan

The development objectives of this development plan are consistent, as far as practicable, with the conservation and protection of the environment. This has been ensured through the continuous assessment of the elements that make up this plan at each stage of the plan making process, through Strategic Environmental Assessment and Appropriate Assessment under the Habitats Directive.

CORE STRATEGY MAP (to be produced on finalisation of core strategy)

PART 3: PROPOSED POLICIES AND OBJECTIVES

PART 3: PROPOSED POLICIES / OBJECTIVES

It is intended to review and update if necessary all existing objectives in the current plan; as this review has not been completed, the policy / objective recommendations set out hereunder focus on any **new policies or objectives** that are being recommended, or any policies / objectives that it is proposed to **significantly alter**.

Development principles

1. The new County Development Plan shall clearly articulate the vision and role of town centres, in providing for a range of uses, including commercial, residential, community and amenity uses, in order that towns remain vibrant and liveable.
2. The new County Development Plan shall clearly articulate a development strategy centred around phased and sequential development of settlements, from the centre out, with a clear preference for new development at locations that are well connected (in terms of walking, cycling and public transport services, if available) to the town centre and to other important locations such as schools, community facilities and employment locations.
3. The new County Development Plan shall set out the residential land zoning principles employed in the plan and to be utilised in Local Area Plans
4. The new County Development Plan will promote the development of 'serviced sites' on appropriately zoned land
5. The new County Development Plan shall include an objective that apartments are located only on suitable lands within settlements, including for example, lands within town / village / neighbourhood centres, mixed use lands (that are suitable for residential uses as part of the mix component) and lands within a reasonable walking distance of public transport / central areas.
6. The new County Development Plan shall provide that each landscape character area / type shall have landscape specific development policies and objectives that reflect the capacities and vulnerabilities of each landscape character area / type.
7. The new County Development Plan shall include a Wicklow Rural Housing Design Guide

Employment & Community Development

1. The new County Development Plan shall underpin the objectives of the new 'Local Economic and Community Plan'
2. The new County Development Plan shall clearly set out the employment land zoning principles employed in the plan and to be utilised in Local Area Plans

Tourism – Recreation & Heritage

1. The new County Development Plan shall include an assessment of public rights of way and walking routes, in particular those linking established amenity areas, with a view to including same in the new County Development Plan.
2. The new County Development Plan shall facilitate and support the proposed Kildare/Wicklow Tourism Destination Development Strategy.
3. The new County Development Plan shall include a review the boundaries and the features of the existing entries in the RPS that relate to the Avoca Mines

Local plans

Kilmacanogue: (a) To include Kilmacanogue and its environs in the next Bray and environs plan, due to commence preparation as soon as the new County Development Plan is adopted; (b) To examine the transport connections between Kilmacanogue and Bray in more detail and explore alternative methods to link Kilmacanogue directly to Bray without use of the N11/M11 and (c) To reinforce the distinct identity of Kilmacanogue in the Bray environs area and ensure that the two settlements do not coalesce

New / updated strategies to be prepared as part of review:

- 1. Housing Strategy**
- 2. Landscape Character Assessment**
- 3. Retail Strategy**
- 4. Strategic Flood Risk Assessment**
- 5. Strategic Environmental Assessment**
- 6. Appropriate Assessment**

PART 4: SUMMARY OF ISSUES RAISED, CHIEF EXECUTIVE'S OPINION ON ISSUES RAISED AND CHIEF EXECUTIVE'S RECOMMENDATIONS

Part 4.1 Elected Representatives**Submission No. 1****Name: Deputy Anne Ferris****Issues raised**

8. The stated 'Vision' for the county makes no reference to public infrastructure. The statement refers to "public services" however the provision of a public service is not the same thing as the provision of publicly owned infrastructure, for example, housing, roads and fire stations. The provision of such infrastructure is essential for the wellbeing of citizens but also forms a necessary foundation for the growth of the economy and the attraction of private investment. The term 'public infrastructure' should be included in the vision statement.
2. As part of the preparation process for the new CDP the effectiveness of the delivery of strategic goals in the existing CDP should be measured including the contribution of Wicklow County Council, other public bodies and the private sector to meeting existing goals.
3. The word 'conservation' is absent from the existing Strategic Goals of the county. There is mention of energy infrastructure but no mention of energy conservation. There is mention of the 'vibrancy of settlements' but no mention of conservation of heritage streetscapes or the county's cultural and amenity sites. Goals for energy conservation in new buildings and in existing public buildings should be included, as should a goal regarding the conservation of historic buildings, streetscapes and important landscapes.
4. The word 'tourism' is absent from the existing Strategic Goals of the county. For a county with such a high potential for tourism growth and having had such a long history of hosting tourists this is an area that needs more attention at a strategic level. It would be a good start to make tourism growth a strategic goal in Wicklow's CDP.
5. The word 'landscape' is missing from the existing Strategic Goals of the county. Wicklow's landscapes are amongst its most strategic physical assets and require prioritisation in any public policy documentation, particularly its County Development Plan. With a proposed new National Landscape Plan currently under consideration it is opportune for Wicklow CC to take a lead in prioritising the landscape within the strategic goals of its county development plan.
6. The use of the word 'ensure' in the existing 'Strategic Goal 4' as currently worded suggests that the only housing infrastructure envisaged in this goal is housing that is provided by the Local Authority completely within its own powers. This goal appears to ignore the importance of the provision of new housing stock by the private and voluntary sectors. The CDP should recognise the need for both public and private housing provision within the county. This goal could be improved by the use of wording such as 'to provide and to facilitate the provision of new housing'.
7. The existing 'Strategic Goal 7' as currently worded, gives priority to the development of new transport, water, waste, energy and communications infrastructure over the need to merely have 'regard to' important natural habitats. This thinking needs to be reversed, in line with European directives on habitat protection and Appropriate Assessment. It is now necessary to have more than mere 'regard' for important environmental habitats and it is time for a new prioritisation of the environment to permeate through Wicklow's CDP, beginning with its strategic goals.
8. The existing Settlement Hierarchy is out-dated. While there is justification on population grounds and in terms of its strategic proximity to Dublin, for having Bray at the top of the Settlement Hierarchy there is no justification for having Arklow and Greystones beneath Wicklow Town in terms of development and investment priorities. Arklow, Greystones and

Delgany saw population growth in the last census and these towns require as much attention as Wicklow Town when it comes to planning future development needs.

The overall approach to the Settlement Hierarchy, which treats Wicklow's smaller settlements as if they were isolated and self-contained entities, requires a fundamental rethink. Kilmacanogue, for example, is at the bottom of the Settlement Hierarchy, yet is at the very core of one of the most critically needed infrastructure upgrades in the county, the alleviation of traffic congestion on the N11 at Bray. The quality of life for people living in Kilmacanogue is very much affected by the N11 plans and quality of life of hundreds of thousands of road users is dependent on what happens to the N11 in the area around Fassaroe and Kilmacanogue.

Enniskerry is also rated low on the Settlement Hierarchy yet in its position of 'a gateway town' to the Wicklow Mountains caters for a very high transient tourism population. This is not reflected in the Settlement Hierarchy.

Towns like Baltinglass also feature far down the Hierarchy despite attracting retail custom from a broad outer rural catchment.

9. Whatever population growth projections are adopted on an interim basis it would make sense for the Settlement Hierarchy to be related to the future population projections for each town and rural catchment. Currently this is not the case.
10. Future land zoning should attempt to prevent past mistakes from reoccurring. In this regard it would be beneficial to first review the effectiveness of the zoning strategy under the current CDP as a means of promoting strategies that have been successful and avoiding strategies which have been detrimental to society or to the landscape (e.g. ghost estates).
11. As part of the development of a new housing strategy under the umbrella of the CDP a full review of the existing public sector housing development capacity of Wicklow CC should be carried out. The local authority area requires a housing strategy that is directly linked to the housing need in the county but that is also related to the capacity of the Local Authority to fulfil that need. The Council needs a full assessment and report of the deliverable housing stock for the period of the CDP, including inter alia the quantity of appropriately located housing development and associated amenity land, the numbers of planned homes in each area that are ready to proceed from design to tendering and construction stages, the nature and extent of new and subsequent design phases, strategies for maintaining new builds.
12. The CDP needs to recognise more directly the influence of the adjoining capital city of Dublin on the population and employment patterns for the county. There is of course a strong requirement for local jobs but it is also the case that many people with jobs in Dublin choose to live in Wicklow for reasons of lifestyle and environment. The CDP needs to emphasise more its regional context within the Greater Dublin Area.

The development of the N11 within South County Dublin is every bit as strategic for many County Wicklow residents as the development of the N11 near Arklow. While it is essential to ensure that Wicklow is seen as an attractive employment base, it is also important to facilitate those residents of Wicklow whose jobs are not necessarily transferrable to Wicklow. These citizens require better transportation links including road, bus and rail. The improved links will have a dual effect of enhancing indigenous business by bringing shoppers and tourists into the county from the high population centre of Dublin and its international transport points.

13. The CDP needs to emphasise the desirability of better broadband infrastructure across the county.
14. The new CDP needs to take an overarching strategic view at tourism. As stated above, the Strategic Goals of the plan should be amended to include specific goals relating to tourism and landscape. The proximity of Wicklow to the high tourism traffic in Dublin and exploring the

- means of attracting more tourists from Dublin to Wicklow needs to be explored. The roles and responsibilities of the various tourism bodies within the county need to be documented.
15. The County Wicklow Retail Strategy needs to be aligned with the Population Growth Pattern Projections, the Settlement Hierarchy and the Housing Strategy. At present these key aspects of the CDP lack a coherent unity.
 16. Traditional town centre shopping should be at the heart of any new Retail Strategy however it would be a mistake to consider the town centres only as elements of the retail plan. The CDP should encourage a mixture of residential and retail occupation in our town centres. This can only be a meaningful aspiration if the Retail Strategy is aligned with the Housing Strategy, Settlement Hierarchy and population projections. The plan needs to emphasise the provision of public infrastructure including footpaths, enhanced streetscapes, public lighting and sensitively located car parking to underpin both residential and retail occupation of Wicklow's town centres.
 17. Rural development should be underpinned by a strong county landscape plan linked to the proposed National Landscape Plan. The CDP should facilitate the conservation of historic rural and farm buildings. The strong sense of community identity in rural parts of Co. Wicklow is not adequately captured in the current structure of the CDP's Settlement Hierarchy.
 18. The appropriateness of the introduction of an industry to a rural environment should be assessed on the basis of the potential environmental impacts and benefits of that business, its impact on the landscape and future tourism and its relationship to the cultural and farming/forestry heritage of the area in question.
 19. Consultation will be highly important in the more detailed planning for community infrastructure. In this regard the planning authority should actively (not just passively) seek out the views of young people and older people by communicating directly with schools and community organisations for views.
 20. In relation to Tree Conservation the CDP should not only document the individual trees protected under Tree Protection Orders but should also emphasise the role of and requirement for Tree Felling Orders for most other trees of significant girth.
 21. Environmental protection, landscape protection and sustainable tourism potential need to be more integrated within the new CDP.
 22. The Strategic Flood Risk Assessment to be carried out as part of this new CDP should not ignore areas where long delayed flood relief works are currently under construction, for example Bray. The assessment should include interim flood risk maps where works have not yet been completed.
 23. All proposal for Local Area Plans and Local Town Plans should be based on the findings of a periodic active (not just passive) consultation within the towns in question. The people of Wicklow should be openly and actively encouraged to engage in this process. Consultation avenues should include a more interactive computer based consultation platform.

Response of Chief Executive

1. For the purposes of the 'vision' set out in the existing plan, the term 'public services' is taken to include public infrastructure and is intended to cover a wide range of services and infrastructure financed and constructed fully or partially by, or on behalf of, the government, for housing, employment, recreational, and health and safety uses in the greater community. The term is intended to include public buildings, transport infrastructure (roads, bridges, pipelines, ports etc), public spaces (public squares, parks etc), utility services (water supply,

sewage, electricity etc) and other, usually long-term, physical assets and facilities. However, consideration will be given to the definitions used in the 'vision' and 'core strategy' to ensure that they are clear and understandable for all.

2. The plan team will not have the resources to undertake a complete audit of all actions of the Local Authority, other public bodies and the private sector with regard to fulfilling the strategic goals of the existing plan. However, it should be noted that all strategies, policies and objectives that flow from these high level goals are implemented on an ongoing basis through the development management process and in the investment / works plans by other departments of the Council. The Council also has an input into the investment plans of outside agencies, such as the NTA, NRA and Irish Water, such bodies at all times being informed of the goals of the County Development Plan. It should however be noted that the severe lack of development since 2010 in the County will make it somewhat difficult to determine if existing goals and objectives are having the desired outcomes.
3. Existing Goals 9 and 10 address the issue of conservation, both in terms of built and natural heritage, and energy:

GOAL 9 To protect and enhance the diversity of the County's natural and built heritage

Wicklow's built heritage wealth is reflected in its abundance of archaeological and historical sites and monuments ranging from the late bronze age right through Christian, Viking, Norman and medieval eras, large county houses, planned estate villages, Georgian houses and other vernacular structures as well as bridges, harbours, stone walls and structures and sites associated with mining, industrial, political and religious heritage. The County's natural heritage includes an excellent diversity of natural and semi-natural habitats such as marine, coastal, wetland, woodland, lake, river and upland habitats that in turn support a diverse and varied flora and fauna.

Our natural and built heritage is under threat and is being diminished by, in the main, the pressures wrought by population growth and economic change and development. The Council recognises heritage's intrinsic value, and the importance of protecting and conserving Wicklow's heritage potential to the economic, social, cultural and environmental development of the County.

Strategic Policies

- *To protect, conserve and enhance buildings, areas, structures, sites and features of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest;*
- *To ensure the conservation, wise management of areas of natural heritage value, and of features of natural interest and value such as woodlands, wetlands, watercourses and areas of unspoilt uplands. To protect plant animal species and habitats which have been identified in the Habitats Directive, Birds Directive, Wildlife Act (1976) and the Flora Protection Order 1999, and in particular, to ensure that any programme, plan or project carried out on foot of this development plan, including an variation thereof, with the potential to impact upon a Natura 2000 site(s) shall be subject to an Appropriate Assessment in accordance with Articles 6(3) and 6(4) of the EU Habitats Directive 1992 and "Appropriate Assessment of plans and projects in Ireland – Guidance for Planning Authorities" (DoEHLG 2009);*
- *To protect and promote the enhancement of the natural and built environment and the coastal zone as identified in the County Development Plan. Facilitate and strictly control appropriate development, prohibit development that is detrimental to coastal areas while minimising the adverse impacts of existing activities, promote the economic, social, cultural and environmental use of the coast, the bio-diversity of coastal cells and their critical support systems.*

GOAL 10 To address the climate change challenge, as a plan dynamic, throughout the County Plan, directly in the areas of flooding and renewable energy, and indirectly by integrating climate change and sustainable development into statements of plan policy, strategies and objectives.

We predominately use fossil fuels, non-renewable resources, such as coal, oil and natural gas, to generate energy. We inevitably face the depletion of these resources in the future and the associated risk of security of fuel supply. Furthermore the combustion of such fuels results in greenhouse gas emissions. The development of renewable energy shall be to the forefront of Wicklow County Council's policy formulation to ensure that our use and dependence on fossil fuels be reduced.

Flooding is an area of special planning concern, in the main attributable to the noticeable increase in the severity and frequency of flooding, and because of failure to appropriately take account of flood risk and the subsequent wide ranging costs incurred.

Strategic Policies

- *To facilitate the minimisation of emissions to the air of greenhouse gases in accordance with international and European agreements and the National Climate Change Strategy. In this regard, the Council will support any appropriate initiatives taken to provide for more sustainable forms of energy use;*
 - *To have regard to the National Climate Change Strategy (2007), the Government White Paper "Delivering a Sustainable Energy Future for Ireland - The Energy Policy Framework" (2007), the Wind Energy Guidelines for Planning Authorities (2006) and the Planning & Development Acts 2000 – 2007 in the development of appropriate strategies and objectives for the development of alternative and renewable energy, in particular Wind Energy;*
 - *To reduce energy demand in the areas of primary consumption being transport, electricity and heating, particularly through improved integration of land use and transportation planning and higher standards of building design;*
 - *To implement the provisions of the "Planning System and Flood Risk Management" Guidelines (2008), have regard to the guidelines, objectives formulated around flood management, avoidance of development in flood risk areas, reduction and mitigation of risk and flood risk management and assessment.*
4. The promotion of tourism is addressed as one strand of 'Goal 2', which addresses employment, enterprise and economic development, as set out to follow. This strategic goal is thereafter expanded in the chapter of the plan dedicated to tourism which sets out detailed objectives and development standards for a wide variety of tourism types and is unequivocal in its support for tourism projects, subject to best practice and protection of the environment. However, it is not the role of the County Development Plan to provide an overarching strategy for tourism in the County. The County Development Plan is not a 'tourism' plan – it is a 'land use' plan. The tourism strategy for the County is provided by the tourism agencies at work in the County, namely Failte Ireland, Wicklow County Tourism, Bray Tourism and the Economic Development Division of the Council. The role of the County Development Plan is to underpin the land use and development aspects on any strategies / objectives that these bodies adopt for the County. The new development plan will take into consideration the emerging 'Local Economic and Community Plan' which is being separately prepared in 2015, and any objectives it includes with regard to the tourist sector.

GOAL 2 To facilitate and encourage the growth of employment, enterprise and economic activity in the County, across all economic sectors and in all areas.

The promotion of economic activity is key to the future development of the County and may be facilitated through:

- *encouraging a broad range of enterprise development within the County thereby avoiding dependence on a specific sector;*
- *adopting a cohesive and co-ordinated approach to the provision of incubation/start up units throughout the County;*
- *identifying key success traits of current development initiatives and highlight what is creating blockages to future development and addressing these blockages;*
- *promoting the provision of necessary infrastructure required for the development of industry e.g. broadband;*
- *creating linkages with third level education providers;*
- *addressing regional disparities to ensure the benefits of growth and development are evenly distributed and dispersed throughout the County;*
- *promoting economic growth and potential employment opportunities in the rural areas of the County in order to sustain vibrant and sustainable rural communities.*

Strategic Policies

- *To enhance the range and number of employment opportunities in the County, to increase the jobs ratio (i.e. the ratio of jobs available in the County compared to Wicklow labour force) from 0.65 in 2006 to 0.7 by 2016 and 0.75 by 2020 and to reduce the excessive commuting distances and trip times undertaken by the County's working population;*
- *To facilitate the development of high technology and high value employment, including the manufacturing sector, research and development and science, to create a knowledge based economy and to build strong*

- linkages between education, research and employment, and promote the third level institute at Clermont as a centre of excellence;*
- ***To promote the development of the tourism sector in a sustainable and environmentally sensitive manner, to capitalise on the County's tourism and recreational assets and generate wealth and employment in the County through the provision and upgrading of tourism infrastructure that will extend the stay and spend of tourists in the County;***
 - *To protect and enhance key built and natural assets that are of integrity per se, and critical to the development of a sustainable economy;*
 - *To overcome the County's water infrastructural deficits and in particular wastewater infrastructure to ensure such under provision does not impede economic development and wealth creation;*
 - *To promote and facilitate the development and expansion of the electricity transmission and distribution grid and to encourage improved availability of a high quality, high-speed information, telecommunications and broadcasting networks.*
5. The protection of the landscape is addressed in 'Goal 6' and 'Goal 9' of the existing plan as set out to follow. However, it is considered that with the renewed focus on landscape protection emerging from the Government and with the concerns that are being expressed by the public with respect to the impact of wind turbines and pylons on the landscape, it is recommended that this issue be addressed in more detail in the new plan and in particular, that the existing Landscape Character categories and definitions be re-evaluated and updated / improved if required. .

GOAL 6 *To protect and enhance the County's rural assets and recognise the housing, employment, social and recreational needs of those in rural areas*

Wicklow's proximity to Dublin, which allows for easy access to the main commercial and employment centres of the Metropolitan area, coupled with its beautiful landscape and amenities, has lead to considerable urban generated pressure for housing in our rural area and smaller villages. This has resulted in competition for housing sites and difficulties for rural natives in securing suitable sites. In accordance with 'Sustainable Rural Housing – Guidelines for Planning Authorities' (DoEHLG) 2005, this plan recognises that people who are part of the rural community should be facilitated by the planning system in all rural areas, including those under strong urban-based pressures.

Furthermore, the decline in the primary sectors of agriculture, forestry and fishing has resulted in the need to diversify the rural economy into alternative resource based industries as well as appropriate non-resource based activities.

These housing and employment activities require to be accommodated in such a way that does not diminish the County's rural assets, including our landscape, nature designations, water quality and the safety of all road users, including pedestrians and cyclists.

Strategic Policies

- *Rural housing development shall be in accordance with the provisions of "Sustainable Rural Housing - Guidelines for Planning Authorities" (DoEHLG 2005), the sustainable settlement policy framework as articulated in the National Spatial Strategy and the rural housing strategy and objectives set out in this plan;*
- *That rural housing shall be accommodated where rural housing need has been established, where it strengthens the established structure of villages, smaller settlements and other rural areas, where it sustains and revitalises established rural communities and does not endanger key rural assets or the vitality and viability of the higher order County Settlements;*
- *To minimise the impacts of new rural housing, in terms of adverse effects on the landscape, water quality, natural and built heritage and road users;*
- *To address the changing nature of the rural economy by promoting the diversification of employment options and towards maximising the potential of resource based development in the areas of forestry, marine, rural enterprise and services, natural resources, renewable energy production, tourism and agri-tourism. To promote re-structuring and efficiencies.*

GOAL 9 *To protect and enhance the diversity of the County's natural and built heritage*

Wicklow's built heritage wealth is reflected in its abundance of archaeological and historical sites and monuments ranging from the late bronze age right through Christian, Viking, Norman and medieval eras, large county houses, planned estate villages, Georgian houses and other vernacular structures as well as bridges, harbours, stone walls and structures and sites associated with mining, industrial, political and religious heritage. The County's natural heritage includes an excellent diversity of natural and semi-natural habitats such as marine,

coastal, wetland, woodland, lake, river and upland habitats that in turn support a diverse and varied flora and fauna.

Our natural and built heritage is under threat and is being diminished by, in the main, the pressures wrought by population growth and economic change and development. The Council recognises heritage's intrinsic value, and the importance of protecting and conserving Wicklow's heritage potential to the economic, social, cultural and environmental development of the County.

Strategic Policies

- *To protect, conserve and enhance buildings, areas, structures, sites and features of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest;*
 - *To ensure the conservation, wise management of areas of natural heritage value, and of features of natural interest and value such as woodlands, wetlands, watercourses and areas of unspoilt uplands. To protect plant animal species and habitats which have been identified in the Habitats Directive, Birds Directive, Wildlife Act (1976) and the Flora Protection Order 1999, and in particular, to ensure that any programme, plan or project carried out on foot of this development plan, including a variation thereof, with the potential to impact upon a Natura 2000 site(s) shall be subject to an Appropriate Assessment in accordance with Articles 6(3) and 6(4) of the EU Habitats Directive 1992 and "Appropriate Assessment of plans and projects in Ireland – Guidance for Planning Authorities" (DoEHLG 2009);*
 - *To protect and promote the enhancement of the natural and built environment and the coastal zone as identified in the County Development Plan. Facilitate and strictly control appropriate development, prohibit development that is detrimental to coastal areas while minimising the adverse impacts of existing activities, promote the economic, social, cultural and environmental use of the coast, the bio-diversity of coastal cells and their critical support systems.*
6. Goal 4 does not relate exclusively to Local Authority developed housing. The Local Authority can 'ensure', for example, that private houses are built at the right locations and new developments include a range of house types, through its development plan objectives and planning consent processes.
7. The existing goals are not meant to be taken in isolation from the other goals and the overall objectives of the wider plan. Nowhere in the plan does it state that the development of infrastructure takes priority over the protection of habitats and in particular, existing Goal 9 (as set out above) is unequivocal that any new development with the potential to impact on Natura sites will be subject to Appropriate Assessment.

Furthermore, there are numerous objectives throughout the existing plan that underpin this goal further, for example:

BD1 *To produce a Local Biodiversity Action Plan (in accordance with the objectives of National Biodiversity Plan 2002), identifying species and habitats of importance at a County level, and identifying and promoting appropriate action for the conservation and management of these.*

BD2 *To ensure that the impact of new developments on bio-diversity is minimised and require measures for the protection and enhancement of bio-diversity in all proposals for large developments.*

BD3 *To maintain the favourable conservation status of existing and future Natura 2000 sites (SACs and SPAs) and Annex I-Habitats and Annex II-Animal and Plant species in the County.*

BD4 *Any programme, plan or project carried out on foot of this development plan, including any variation thereof, with the potential to impact upon a Natura 2000 site(s) shall be subject to an Appropriate Assessment in accordance with Article 6(3) of the EU Habitats Directive 1992 and "Appropriate Assessment of plans and projects in Ireland-Guidance for Planning Authorities" (DoEHLG 2009).*

BD5 *To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) in Wicklow.*

BD6 *The Council recognises the natural heritage and amenity value of the Wicklow Mountains National Park and shall consult at all times with National Park management regarding any developments likely to impact upon the conservation value of the park, or on issues regarding visitor areas.*

BD7 *To protect non-designated sites from inappropriate development, where it is considered that such development would unduly impact on locally important natural habitats or wildlife corridors.*

BD8 *To facilitate, in co-operation with the relevant statutory authorities and other groups, the identification of valuable or vulnerable habitats of local or regional importance, not otherwise protected by legislation.*

BD9 *The National Parks and Wildlife Service will be invited to prioritise the preparation of Management Plans for Natura 2000 Sites. This will facilitate the development of site specific Conservation Objectives in the context of the proper planning and sustainable development of the County.*

8. With respect to the settlement hierarchy, this is for the most part (certainly for the larger settlements) set at a State and regional level, and is not open for debate through this county plan process. Wicklow Town was designated as 'growth town', higher in the hierarchy than Arklow and Greystones by the elected members of the regional authority, due to it being the County town, on a rail line, with potential to be a significant development pole in eastern Wicklow, away from the draw / influence of the Metropolitan area. It should also be noted that while Greystones is designated a 'large growth town 2' in Regional Planning Guidelines for the Greater Dublin Area, its location in the 'Metropolitan Area' in fact gives it a 'higher' development potential status than the hinterland towns of Wicklow and Arklow. Furthermore, it is not considered that Arklow and Greystones receive less 'attention' or 'priority' than Wicklow Town in terms of public investment nor in terms of development plan policies / objectives.

With respect to the smaller towns, it is correct that in terms of population targets each town is treated as a 'self contained' entity, but in many other regards, such as employment planning, schools provision etc this is not the case. The planning for these other sectors is done by both the Local Authority and other agencies on a more regional or 'catchment' basis, taking into consideration the sphere of influence of the larger towns in the County.

With respect to the issue raised regarding Kilmacanogue, it is agreed that the development of this village should be considered in a wider sense e.g. in a combined 'local area plan' with Bray and its environs. This is a matter that was discussed with the elected members when the first Bray environs plan was prepared in 2009 but at the time there was some concern regarding the concept as there were fears that such an approach would render Kilmacanogue no more than a 'suburb' of Bray. It is recommended that Kilmacanogue and its environs are included in the next Bray and environs plan, due to commence preparation as soon as the new County Development Plan is adopted.

With respect to the issue of traffic congestion on the N11 through Kilmacanogue, the Council executive had previously proposed that possible routes be identified and land be 'reserved' for the development of a new road directly from Kilmacanogue to Bray south, by-passing the N11 and the Kilcrouney junction, to link Kilmacanogue more effectively with Bray and removing local traffic from the N11. However both the public and the elected members expressed objections to this idea and the concept did not move forward. It is recommended that this route be reconsidered in the next Bray Town and environs local area plan.

With respect to Enniskerry and its position in the existing hierarchy, it is not 'very low' in the hierarchy. Levels 1-4 are the 'growth towns' as defined by the RPGs. Enniskerry is not a designated growth town and therefore the 'highest' rank it could hold in the hierarchy is Level 5, which is its current designation.

With respect to Baltinglass, its position in the hierarchy is 'as high' as consistency with the RPGs would allow, but in recognition of its role, particularly as a service town for a wide hinterland, the existing Regional and County Retail Strategy has allowed for heightened 'retail status' for the town. Section 5.3.3 of the existing County Development Plan and the Baltinglass Town Plan re-emphasise the differences between Baltinglass and other towns in Level 5 in the hierarchy and provide for appropriate planning policies to reflect the nature of this town.

9. The settlement hierarchy is 'related to' the future population projections for each town, and the other factors that must be considered as detailed in response to Item 8 above, in particular consistency with the RPGs. It would not be consistent with the RPGs or the Planning Act to consider only population projections in setting the settlement hierarchy, as is suggested.
10. Wicklow County Council has taken a very responsible and restrained approach to zoning and it is not considered that significant 'mistakes' have been made in the past by the Council in this regard. There are few 'ghost estates' in County Wicklow and certainly no such unfinished estates are in that condition due to 'bad zoning'. There are no unfinished estates in the county

that are being considered for demolition and it is considered highly likely that all of these developments will be completed in the short to medium term. Furthermore, no lands that are subject to flooding have been zoned nor have protected or vulnerable landscape or habitats. As in recent local plans, such as the Wicklow Town & Rathnew development Plan 2013, elected members have shown that they are willing to address any over or under zoning that has occurred in the past, and it is expected that any imbalances in zoning requirements in other towns will be addressed by the members through the new County Plan and local plans adopted on foot of it. Furthermore, the new plan will set out clearly the zoning principles to be followed in any local plans, and the members can of course input to those principles.

11. As part of the new Housing Strategy, an audit of all Local Authority land suitable for housing will be carried out. The Housing Department of Wicklow County Council is already actively working on making such lands ready to develop, when funding becomes available.
12. As the interrelationship between Wicklow and Dublin in terms of employment patterns is a regional issue, this is addressed in the Regional Planning Guidelines for the Greater Dublin Area and will be address in more detail in the forthcoming Regional Economic and Spatial Plan for the Dublin Region (expected to be published in 2016). The forthcoming 'Local Economic and Community Plan' is due to provide a detailed economic and employment strategy for the County and it will be the role of the County Development Plan to underpin any land use and development objectives included in the LECP. Furthermore, the fact that some people who live in Wicklow will choose to work in Dublin, even if similar jobs are available in the County, is reflected in the 70% jobs ratio that is targeted in the current plan.

It is agreed that improved transport links are required between Wicklow and Dublin, particularly from those commuting to Dublin for employment. Increased capacity in the DART, the extension of the LUAS to Bray and improvements to both the M11 / M50 junction and the interchanges off the M11 in the north of the County will be included as objectives of the new development, but it must be also recognised that such infrastructural improvements are outside of the control of Wicklow County Council.

13. The need for improved broadband is acknowledged in both Strategic Goal 2 and Chapter 14 of the existing County Development Plan. It is recommended that these objectives will be continued in the new plan.
14. The existing County Development Plan includes a chapter on tourism and sets out detailed objectives and development standards for a wide variety of tourism types and is unequivocal in its support for tourism projects, subject to best practice and protection of the environment. However, it is not the role of the County Development Plan to provide an overarching strategy for tourism in the County. The County Development Plan is not a 'tourism' plan – it is a 'land use' plan. The tourism strategy for the County is provided by both the tourism agencies at work in the County, such as Failte Ireland, Wicklow County Tourism and Bray Tourism and the Economic Development Division of the Council, for example through the forthcoming Local Economic and Community Plan. The role of the County Development Plan is to underpin the land use and development aspects on any strategies / objectives that these bodies adopt for the County.
15. The County Retail Strategy is aligned with the Regional Retail Strategy as required under statute and as clearly articulated in the current County Development Plan, is aligned with the settlement hierarchy and population projections for each town. The amount of new floor space targeted for example is a clear result of calculations based on population, town catchments, family incomes, existing retail floor space and floorspace turnover.
It is correct that the different designations and 'levels' in the settlement hierarchy and retail hierarchy appear to lack coherence and may be confusing. The table below sets out both of these hierarchies together, and it probably doesn't make much sense. They are not however 'inconsistent' as they are describing something different.

SETTLEMENT	SETTLEMENT HIERARCHY		RETAIL HIERARCHY	
	GDA	CDP	GDA	CDP
BRAY	1	1	2	2
WICKLOW / RATHNEW	2	2	2	2
ARKLOW	3	3	3	3
GREYSTONES / DELGANY	3	3	3	3
BLESSINGTON	4	4	3	3
NEWTOWNMOUNTKENNEDY	4	4	4	3
ASHFORD	5	5	4	4
AUGHRIM	5	5	4	4
BALTINGLASS	5	5	3	3
CARNEW	5	5	4	4
DUNLAVIN	5	5	4	4
ENNISKERRY	5	5	4	4
KILCOOLE	5	5	4	4
RATHDRUM	5	5	4	3
TINAHELY	5	5	4	4
AVOCA	6	6	4	4
DONARD	6	6	4	4
KILMACANOGUE	5	6	4	4
NEWCASTLE	5	6	4	4
ROUNDWOOD	5	6	4	4
SHILLELAGH	6	6	4	4

16. It is agreed that town centre shopping should be at the heart of the new retail strategy. It is not the case at present however that the town centres are considered only in the context of their retailing function. While the existing Retail Strategy does address the retail role of town centres, the 'Strategic Goals' and Chapter 5 of the current plan set out a vision for towns including all of the uses required to make town attractive, vibrant and liveable, such a residential, community and amenity uses. The existing plan does encourage a mixture of uses in town centres and in particular encourages residential use above ground floor commercial uses. In all 'housing' and 'land availability' assessments carried out for the core strategy and housing strategy, and indeed in local area plans, the development of new residential units in existing town centres is addressed and included.
- With regard to the infrastructure required in town centres, such as footpaths, public lighting, car parking as mentioned in the submission, the existing plan addresses all of these requirements in detail in both Chapters 5 and 11. It is recommended that the new plan will continue to address these topics.
17. It is agreed that the rural development objectives should be based on strong County landscape assessment; however, this cannot at this stage be based on a 'National Landscape Plan' which has not been produced by the Government to date (a draft 'National Landscape Strategy for Ireland' was published in July 2014). Furthermore, the Government has not provided any landscape character assessment guidelines for the state since 1999, which are now outdated. It should be further noted that during the course of previous development plans, the suggestion that rural development objectives e.g. with respect to rural housing, would be landscape zone specific i.e. different criteria would apply in different landscape zone types, was not accepted by the majority of the Council. It is however intended to undertake a fresh evaluation of the existing landscape character assessment for the County as part of this plan review process and so adjust the landscape categories where required. It is also recommended that the new plan will set out differing development criteria based on landscape vulnerability.

18. In accordance with the objectives set out in Chapter 8 of the current Plan, the appropriateness of the introduction of an industry to a rural environment is assessed on the basis of the potential environmental impacts and benefits of that business, its impact on the landscape and future tourism and its relationship to the cultural and farming / forestry heritage of the area in question.
19. With respect to consultation, the development team has in fact been extremely active in reaching out to the public and in particular to the groups mentioned (younger and older people). For example, every secondary school in County Wicklow was contacted and sent a consultation pack, including an 'Issue Booklet', submission forms and links to an online survey specifically designed for younger people. With respect to older people, numerous groups representing the interests of older people were contacted and invited to make submissions, to come to public meetings or to attend private meetings if preferred, such as the County Wicklow Network for Older People, numerous active retirement groups and 'old folks' associations, community associations and social inclusion networks (a total of 91 different organisations across all sectors of the community were also contacted in this regard).
It should also be noted the public have numerous other ways in which to input to decision making with respect to community infrastructure, in particular through the forthcoming Local Economic and Community Plan and through any consent procedures (such as planning applications and Part 8s) that would be required for new developments.
20. There is no such instrument as a 'tree felling order' and it is assumed that the submission is referring to tree felling licences. Under Section 37 of the Forestry Act 1946, it is illegal to uproot any tree over ten years old or to cut down any tree of any age (including trees which form part of a hedgerow), unless a Felling Licence has been granted by the Forestry Service. Felling Landowners are required under the Forestry Act to give notice of intention to fell trees, following which prohibition orders are normally served. These remain in force pending the issue of a Limited Felling License, which can include environmental and replanting conditions. General Felling Licenses are normally granted to large estates where a management programme is in place, or in respect of lands to facilitate new planting, or for silvicultural thinnings. The requirement for a felling licence for the uprooting or cutting down of trees does not apply where:
- a) The tree in question is a hazel, apple, plum, damson, pear, or cherry tree grown for the value of its fruit or any ozier;
 - b) The tree in question is less than 100 feet from a dwelling other than a wall or temporary structure;
 - c) The tree in question is standing in a County or other Borough or an urban district (that is, within the boundaries of a town council, or city council area).
- Other exceptions apply in the case of local authority road construction, road safety and electricity supply operations.

The Forestry Service consults with Wicklow County Council in the assessment of any such licence applications.

These statutory requirements are set in the 1946 Forestry Act and those wishing to fell a tree are legally obliged to comply with this Act, whether or not the provisions of this Act are set out in the County Development Plan. Given the quantity of primary and secondary legislation, as well as regional and local policies / programmes, that are in place with regard to environmental protection in general, it would render the plan particularly cumbersome and impenetrable to list all such laws / documents and set out the role and responsibilities of each. National primary and secondary legislation requires to be complied with – it is not the responsibility of a land-use plan to ensure that all such laws are complied with or advertised. However, the plan will set out, particularly in the chapters relating to habitats and the natural environment, the key pieces of EU and national legislation that relate to each topic.

21. It is agreed that environmental protection and landscape protection should be integrated with the new plan. It is considered that the existing plan, which meets all statutory and Ministerial requirements in these areas, adequately addresses these areas, but where any opportunities arise to strengthen plan provisions, they will be taken. In particular, it should be noted that the plan will be subject to full Strategic Environmental Assessment, which identifies any environmental vulnerabilities and sensitivities in the plan area, assesses the potential impacts of plan provisions on such features, and sets out necessary mitigation measures.
As set out above, the County Development Plan is not a 'tourism plan', but a land-use plan which aims to underpin and support the land use and development elements of tourism plans developed by appropriate tourism bodies.
22. The Strategic Flood Risk Assessment that will be carried out for the plan will comply with the flood risk management guidelines published by the DoE and the OPW. In accordance with this guidance, the presence of flood protection structures shall be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.
23. With regard to local plans that form part of this County Development Plan, the plan team have actively sought the views of the public in each town as part of this first stage consultation process. There will be further opportunities for the public to participate and comment when the draft plan is published. It should be noted that these plans are updates of pre-existing plans, which were all drawn up following extensive public consultation. With respect to local plans that are to be prepared after the adoption of the new County Development Plan, further public consultation will be held as normal. The plan team actively encourages the public to participate, and regularly hold public meetings, reach out to specific groups and organisations, prepare publicity campaigns etc. This is not considered 'passive' engagement.
With regard to 'interactive computer based consultation platforms', new platforms are always being developed, with two brand new tools having been designed for this stage of the County Development Plan review.

Recommendations of Chief Executive

1. To carry out a review and updating where necessary of the existing County Landscape Character Assessment.
2. Each landscape character area / type shall have landscape specific development policies and objectives that reflect the capacities and vulnerabilities of each landscape character area / type.
3. The next Bray Town and Environs Local Area Plan shall
 - include Kilmacanogue and its environs
 - examine the transport connections between Kilmacanogue and Bray in more detail and shall explore alternative methods to link Kilmacanogue directly to Bray without use of the N11/M11.
4. The new County Development Plan shall clearly articulate the zoning principles used for both the town plans that form part of the County Development Plan and for local area plans that will be drawn up after the adoption of the County Development Plan.
5. The new County Development Plan shall include as an objective the improvement of transport linkages from Wicklow to the Greater Dublin Area, with a particularly emphasis on improvement to public transport and addressing national route capacity issues.
6. The new County Development Plan shall include as an objective the improvement of communications infrastructure, in particular broadband services.

7. The new County Development Plan shall clearly articulate the vision and role of town centres, in providing for a range of uses, including commercial, residential, community and amenity uses, in order that towns remain vibrant and liveable.
8. The new County Development Plan shall set out development and design standards for new developments.

Submission No. 2**Name: Cllr Nicola Lawless****Issues raised**

1. Settlement hierarchy: Delgany Village is in as Greystones - Delgany which is shown as a metropolitan area a large growth town. I feel that Delgany should be on its own and not included with Greystones. Delgany village has increased over the years in housing and some small businesses but they are still lacking in facilities which need to be considered for this area to meet the demand of the increase population to the village.
2. Under land zoning and planning, I would like to see restriction of fast food chains or similar outlets getting planning or being able to apply to build or open near schools, crèches or playgroups that would target our children and their health in anyway. In light of the recent planning application of Mc Donald's which could be located by 3 main schools, I feel strongly that this should be part of our CDP.
3. With regard to the consultation question - are there certain groups in society that find it difficult to access housing? My answer to that question is yes - we are all aware of the ongoing housing situation and the lack of sociable and affordable housing within the county. With construction slowing starting again I feel that it is very important that we make use of Part V, we need to make sure when housing development is happening within the county that we get the best for the people. 20% of sociable housing is very important. The need for 1 bed units and 3 bed family homes are of huge demand and this should be taken into consideration when planning for a development is submitted.
4. **Schools:** With the population of Greystones-Delgany in 2011 at 17,208 and it predicts it will increase to 24,000 by 2022. The CDP will have to allow for the development of new primary schools in the area. Over the last number of years it has become difficult for a parent to get a place in the local primary schools in the area. We currently have 7 primary schools within the Greystones/Delgany area but they are full. I feel it is important that land is zoned for this and that the county council work with the department of education to see that we have an extra school to provide education to our children within the surrounding areas.
5. **Developing infrastructure to address social exclusion, poverty & disadvantage reverse social and economic decline:** It is extremely important that we have community based infrastructure that all members can use. Presently in Greystones there is a community room which is based in Shoreline but Cllr Lawless considers that this does not meet the needs of the people in the area.
I feel we need a purpose built community centre to help and support the area and surrounding areas within our LEA of the Greystones District. At the moment we do have an FRC (family resource centre) in Greystones which is run by the Child and Family Agency. It is presently in a two bed house where it operates and hires room space in Dr Ryan's centre for programs it may run. This centre is vital to the area as it works with social inclusion, community development and family support. It is the only FRC in the whole of county Wicklow. The FRC provides services in low cost council, play therapy, Domestic Violence Clinics, Rainbows, seniors groups, community education, youth and children to name but a few. By the county council supporting facilities like this one in time it will help to decrease social inclusion, provide community education encourage people back into the work force or back to third level education. It is also vital to help families by providing family support and working with other services within the area of Greystones LEA and strengthening communities.
6. **Youth:** Synergy supports for children and young people: Presently we have some very good facilities for our children, playgrounds, skate parks, sports but that there is one thing we don't have for Greystones which is a youth café or a youth club as such. I have done focus group sessions with some of our youth in the Greystones area and the same problem comes up time

and time again. Somewhere for our youth to go to that is adorable and accessible to all. Again this comes back to planning and zoning for community facilities.

7. With respect to the consultation question - are the needs of everyone in your community being met? This is something we need to look at, we have members of our community who may have disabilities and cannot access many areas of our town or villages. When we are planning for our area we need to take into consideration, the accessibility for public transport, good roads, footpaths and also making our local business more aware of community members who may have difficulty accessing their business.

The local disability action group in Greystones has approach the council about the Greystones Gold star awards. This scheme has been successful in other towns like Cashel.

The Greystones Gold star Awards will acknowledge businesses and community groups that take steps to make their business and facilities more accessible for people with disabilities. The gold star award could be rolled out throughout the county, which would help in tourism and the local economy.

What are the benefits of this for the county?

- Local businesses will benefit by attracting new customers and benefit from increase visitor numbers
- Accessible Tourism - There are 140 million people with special access needs in the EU this adds €780 billion to tourism sector.
- Access Earth App - It's a website and App that provides information on hotels, restaurants, shops that have accessibility for disabled customers

How the county council can support this by carrying out review of the e.g. Greystones Access Audit this in time could be done for all towns and villages within the county. We could also support the business taking part in the Gold Star Initiative by carrying out any necessary works to footpaths at their entrances. Other areas are maintaining pedestrian lights and the signal for the visually impaired at crossings, cutting back over hanging trees and bushes on public footpaths, carry out review of disabled parking within the towns.

Other examples of the Gold Star award are 2012 Wexford County Council formed the Gold star task and also Tipperary Town and Cashel.

Response of Chief Executive

1. Delgany has been historically associated with Greystones, in a planning policy perspective, for some time, and the two settlements are strongly linked both physically and in terms of shared services (water services, roads, schools, telecoms, higher order shops, etc) and communities. In light of this long standing connection, the 'settlement' of 'Greystones' as identified in the Regional Planning Guidelines for the Greater Dublin Area as a metropolitan area town, is considered to include both Delgany and all other areas located within the boundary of the Greystones - Delgany Local Area Plan (such as Killincarrig, Blacklion and Charlesland). It is not clear from the submission if what is being sought is a separate local plan for Delgany, and / or its 'separation' from the wider settlement of Greystones in terms of population targets, planning policy etc. However, if this is the case, it is not clear what this might achieve. It is considered that Delgany has much better prospects for improvements in services being identified as part of a growth town in the RPGs, as national and regional investment priorities flow directly from the development hierarchy and priorities set out in the NSS and RPGs. Furthermore, the existing LAP clearly recognises the entity of Delgany as a distinct part of the wider settlement and includes numerous Delgany specific policies and objectives. It is considered therefore that Delgany is adequately served by existing designation and development objectives.
2. With respect to fast food chains or similar outlets near areas where children are educated or congregate, Ministerial guidelines on Local Area Plans published in June 2013, state that:

"Regardless of the physical or locational context for local area plans, planning also has an important role to play in promoting and facilitating active and healthy living patterns for local

communities. For example, the local area plan can promote active and healthier lifestyles by ensuring that:

- future development prioritises the need for people to be physically active as a routine part of their daily lives;
- pedestrians, cyclists and users of other modes of transport that involve physical activity are given the highest priority in transport and mobility strategies, policies, and objectives;
- public open spaces are located and delivered in a way that ensures they are capable of being easily reached on foot or bicycle by routes that are secure and of a high standard and that take biodiversity issues into account in their design;
- any new workplaces are linked to walking and cycling networks;
- play areas are designed to encourage varied and physically active play; and
- exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced such as the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks.

The Chief Executive would have a number of concerns about the inclusion of an objective with regard to the location of fast food chains vis-à-vis schools, parks etc for the following reasons:

- (a) There is no further guidance from the Government on this issue, in particular what 'careful consideration' might mean, how 'appropriateness' might be assessed and what 'in the vicinity' might mean. In the absence of clear guidelines or what the Minister is suggesting, it is not known if any objectives adopted by individual Local Authorities would be legal and not discriminatory or contrary to EU laws in any way.
- (b) While the focus of the Ministerial guidelines above is to reduce the exposure of young people to foods that are high in fat, salt and sugar, it singles-out only 'fast food' outlets in this regard, and does not mention other types of food outlets that sell such food types (i.e. hot food for immediate consumption, often fried), such as convenience stores, supermarkets and 'traditional' cafes and restaurants.
- (c) The guidelines single out a food type that is potentially harmful to young people yet do not mention controlling outlets selling other products that are potentially bad for young peoples' health in the vicinity of schools, parks etc such as confectionary, chocolate bars, ice-cream, crisps and sugary drinks, or indeed alcohol (many school going children are over 18). For example, a standard chocolate - caramel bar can have up to 4 times as much sugar as a 'fast food' double burger.
- (d) As it is not clear what kind of controls are being suggested by the guidelines, it is not clear what 'exemptions' or 'conditions' might be appropriate. For example, were 'exclusion zones' around schools, parks etc to be applied, as are used in some locations in the UK, should similar 'exemptions' to those used in the UK be applied? In the UK where such zones are implemented, town and neighbourhood centres are generally excluded from the restricted zone, as these are the places designated for mixed use development, where one expects to find a range of products and services for sale. Indeed, it is a tenet of current thinking on 'sustainable planning' that mixed use centres be provided at the heart of communities, where residents can avail of a wide range of services, including retail, restaurants, community and education uses etc in one location, thereby reducing vehicle trips, allowing for more efficient development of public transport and allowing for improved social connectivity.

It is not recommended therefore that an objective be included in the new County Development Plan with respect to fast food outlets, unless:

- (a) the same restriction is to be applied on all outlets selling potentially health harming products, and
- (b) in the application of any 'exclusion zone', designated town and neighbourhood centres, as well as 'core retail areas' would be exempted from the zone.

3. With respect to social and affordable housing, a new Housing Strategy will be drawn up as part of the new County Development Plan which will assess affordability issues in the County as well as housing supply deficit, and the types and sizes of new houses that will be required. For the time being, Part V will continue to apply to all new developments, at a rate of 20%. However, the Minister for the Environment has recently announced that the new Planning Bill will include proposals to reduce this to 10%, and for social housing only (i.e. there will be no requirement to provide for affordable housing).
4. With respect to the zoning of land for new primary schools in Greystones – Delgany, this was considered and addressed in the recently adopted Greystones – Delgany and Kilcoole Local Area Plan 2013. This LAP made provision for a number of sites zoned 'CE' which would be suitable for new schools in this district, in particular in Charlesland and Kilcoole, where the highest concentrations of new housing development has occurred in recent years. Furthermore, schools may also be developed in range of other zones types e.g. in residential zones, so there are currently numerous options for site acquisition in the event that the Department of Education determines that additional school construction is required. The Local Authority works closely with the Department of Education in recommendation sites for zoning in the development plan process and in acquiring sites once a need for a new school is determined.
5. With respect to the provision of additional community infrastructure in Greystones – Delgany, as set out above with respect to schools, there are numerous sites zoned CE in the LAP which would be suitable for such developments, and such development is also permitted in principle in residential, town centre and other mixed use zones. However, a development plan does not 'deliver' such new facilities, but puts in place a framework that allows for such facilities to be developed by either public or private agencies. The delivery of such new facilities would involve the acquisition of land / property and the sourcing the funding and. This would appear to be more a matter for consideration in the forthcoming Local Economic and Community Plan and in the annual budget process, and any submissions made to the County Development Plan process which appear to cross over into the LECP will be forwarded onto the team preparing the LECP.
6. As above, the development plan zones land and provides a framework of policies and objectives that would allow for the development of youth facilities in Greystones – Delgany. This matter is similarly considered more relevant to the LECP and for the annual budget process.
7. In the crafting of local area plans in particular, existing or potential future accessibility to public transport and to good roads / footpaths is an important consideration in the designating of new lands for development. It is also a critical consideration in the assessment of all planning applications. With respect to the other issues raised regarding accessibility, such as making our local business more aware of community members who may have difficulty accessing their business, unfortunately this is not a function of the County Development Plan, but again, it is matter that will be passed on to the LECP team and the Accessibility Unit.

Recommendations of Chief Executive

1. The new County Development Plan and associated Housing Strategy shall:
 - Assess housing needs in the County over the plan period, and put in place appropriate strategies and objectives to address housing deficits
 - Be compliant with Part V of the Planning Act with respect to Social and Affordable Housing

Submission No. 3**Name: Cllr Steven Matthews****Issues raised**

1. Implement greenways / walking trails / way marked ways to connect coastal paths between Bray and Wicklow to Wicklow Way via Sugarloaf Mountains to promote and encourage local, national and international tourism.
2. Assist/promote/incentivise the forestry industry to grow, to create local rural employment and promote woodchip industry (short rotation willow planting industry etc).
3. Assess existing town centre buildings for adaptation to encourage commercially viable investment (retaining facade and architectural heritage when possible).
4. Continually audit and publish a list of existing vacant sites and brown field sites for development within existing town boundaries. Maintain an on-line database of vacant commercial sites, brownfield and derelict sites and promote to real estate/commercial investment/IDA etc
5. Maximise town centre site occupancy before permitting 'out of town centre' development. Defer 'outer' town centre development, where over zoning is present until optimum occupancy is achieved in 'inner' town centres. Develop existing 'brownfield, and commercial vacant sites to optimum occupancy before zoning for out of town development.
6. Implement a policy that addresses the issue of surface water run-off from private lands on to public lands.
7. Develop 'safe routes' to schools in urban areas, prioritising linked walkways and cycle-ways to schools.
8. Develop locations to facilitate urban school bus service drop off/pick up points
9. Plan a long term strategy for public transport interchanges and hubs in larger urban areas
10. Set a limit for proximity of development to motorway and national road interchanges / roundabouts
11. Rezone lands within SFRA areas as recreational open space
12. Promote the Register of Protected Structures. Promote TPOs.
13. Promote architectural heritage and locations of historical interest, develop urban way marked trails with historical/cultural/architectural/arts themes as a tourism initiative to encourage longer stays and increased exposure for towns. Looped walks through towns with for e.g.: 'Wicklow; Place of Cultural Interest' logo or plaque erected on buildings, sites and streets and on-line tourist map
14. Actively encourage community groups; coastcare / tidy towns / neighbourhood watch etc to grow 'sense of space and place'.
15. Promote coastal / sea recreation, sea sports based tourism and training facilities on East coast
16. Carry out an audit of sports and arts facilities to allow assessment of needs and levels of provision in each town or area

17. Set a minimum BER rating of 'B' for controlled development
18. Implement a policy that requires that a commercial rate is charged for the use of public open space for commercial events

Response of Chief Executive

1. As part of the plan preparation process, it is intended to investigate key public rights of way and amenity walking routes, in order that they can be identified on the plan maps and objectives include with respect to same. The routes mentioned will certainly form part of the list examined.
2. It is an objective of the existing County Development Plan to promote forestry development, forestry employment and the use of wood products for renewable energy creation (Existing Objective FTY 7 - *To encourage the development of forestry for timber biomass which can be used as a renewable energy source*) and it would be intended to provide similar objectives in the next County Development Plan.
3. It is not the role of a development plan to 'assess' buildings but to put in place a framework that allows for new development, including changes of use, and renovation of existing buildings, in a manner compatible with proper planning and sustainable development, including the protection of architectural heritage. The current County Development Plan addresses all of these issues, including challenges of meeting modern space needs for retail and retail services in existing town centres, and the types of uses that will be facilitated and encouraged in town centres, and it is recommended that similar objectives be included in the next plan.
4. While there is merit in the suggestion that the Local Authority maintain a database of vacant and brownfield sites with a view to promoting their re-development, that is not the function of a land-use plan, which is concerned with providing a framework for the future development of the County.
5. As articulated in the current County Development Plan and the various local plans already in force, the priority development area in any settlement is the town core (particularly for commercial and retail development, as set out in the County Retail Strategy and employment objectives). However, it is undeniable that there is a lack of available sites in most of the centres of our towns, and as a result, land is required to be designated for new development on the periphery and outside of the historical core areas. Where there is a demand for new development (such as new housing) and no town centre sites are suitable in size or configuration or none come to the market, it would be unreasonable to refuse permission for a zoned 'edge' or 'out of centre' site, subject to the development site meeting all normal planning requirements with respect to connectivity to the town centre, availability of services etc. That does not however diminish the objective for town centres to be the development priority.
6. The existing County Development Plan provides a number of objectives and development standards with respect to surface water run-off (as set out to follow) and it is intended that the new plan will contain similar provisions.

Objective SW2 – Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system;

Section 12.7.4 Surface & storm water systems

All new developments shall be designed to ensure:

- *the on-site collection of surface water separate from foul water;*
- *surface water is appropriately collected on site to prevent flow onto the public roadway, adjoining properties or into the public foul sewer / sewage treatment plant;*

- *the appropriate on-site disposal of surface water (where the scale and amount of water generated makes this feasible) e.g. through soakpits. For larger scale developments, it may be necessary to demonstrate through soil and subsoil tests that the site is capable of absorbing the surface water generated;*
 - *where on-site disposal is not feasible and discharge to surface waters is necessary, that the system has been designed in accordance with Sustainable Urban Drainage measures (SUDS) and in particular, that run-off has been attenuated to greenfield conditions;*
 - *discharges to water courses shall be channelled through adequately sized filters / interceptors for suspended solids and petrol/ oils prior to discharge.*
7. It is an objective of the existing County Development Plan to provide, improve and maintain safe walking and cycling routes to and from key locations in all communities, including schools, shops and public transport locations, and it is recommended that such objectives are maintained in the next County Development Plan. Furthermore, it is recommended that all local plans will identify existing and / or potential new walking and cycling routes, and set out what actions may need to be taken with respect to such routes.
 8. It is an objective of the existing County Development Plan to promote the improvement of all bus services, including bus stops, and it is recommended that such objectives are maintained in the next County Development Plan.
 9. The National Transport Authority, in conjunction with local authorities and other agencies, is responsible for long term and strategic transport planning. In this respect the NTA has published a draft 'Transport Strategy', an 'Integrated Implementation Plan' for the Greater Dublin Area, which includes County Wicklow and a Wicklow specific 'five year investment framework' (2013-2017). These plans and frameworks address various modes of transport and the linkages between these and measures required to improve connectivity, including the development of hubs and interchanges. It is an objective of the current County Development Plan that the Local Authority will work with the NTA in achieving the required transport improvements to the County and it is envisaged that a similar objective will be included in the new County Development Plan.
 10. The existing County Development Plan includes objectives with respect to building line set backs with respect to all designations of roads, including motorways and it is recommended that such objectives are maintained in the next County Development Plan.
 11. In accordance with 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (DoEHLG / OPW 2009), a Strategic Flood Risk Assessment will be carried out as part of the new County Development Plan. It is assumed that the point raised in this submission relates to the zoning of lands at high risk of flooding for recreational open space. If this is correct, it is pointed out that these guidelines set out what types of land uses are should be allowed on lands that are at high risk of flooding. The guidelines set out that recreational use can be made of lands at high risk of flooding, as well as other 'water compatible' uses such as docks, marinas and wharves; navigation facilities; ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location; water-based recreation and tourism (excluding sleeping accommodation); lifeguard and coastguard stations; amenity open space, outdoor sports and recreation and essential facilities such as changing rooms; and essential ancillary sleeping or residential accommodation for staff required by uses in this category (subject to a specific warning and evacuation plan). Where such high risk flood zones are identified in the SFRA, and the zoning of the land for development purposes cannot be justified, then the appropriate use for which to designate the land will have regard to the type of 'water compatible' uses described above.
 12. It is not exactly clear what is meant in the submission by 'promote' the record of protected structures and TPOs, but in accordance with statutory provisions, the new County Development Plan will include a RPS and a record of TPOs as in previous plans.
 13. It is agreed that places and features of architectural, historical local interest should be promoted and linked with walks as tourism initiative; the existing provisions of the County

Development Plan would certainly facilitate and encourage such initiatives. However, the delivery of such initiatives would not be a matter for the County Development Plan, but rather for the various tourism agencies operating in the County. The Local Authority would certainly be happy to work with such agencies as it has in the past to identify features that might be of interest to visitors and to develop such trails.

14. The County Development Plan is a land use plan, which sets a framework for future development in the County. The CDP is not a 'community activation' plan – this would be more a matter for the forthcoming LECP, and the issue raised will be brought to the attention of the LECP team.
15. The existing County Development Plan promotes and facilitates coastal / sea recreation / sea sports based tourism and it is intended that the new County Development Plan will include similar objectives.
16. The Local Authority already holds a database of all sports and arts facilities, which is regularly updated. This allows the Sports and Arts divisions of the Community, Cultural and Social Development Department of the Local Authority to continuously assess the needs in each area. The CCS department works closely with the Planning Department to ensure that lands are zoned and objectives are put in place for the County as whole and for each local plan to ensure any deficiencies in sports or arts facilities can be addressed.
17. The BER rating system is a function of the Building Regulations, rather than the County Development Plan.
18. The setting of commercial rates is not a matter for the County Development Plan.

Recommendations of Chief Executive

1. The new County Development Plan shall include objectives that facilitate and support:
 - The forestry sector, including the production of renewable energy sources from timber
 - Commercial activity in town centres
 - The protection of buildings of heritage value
 - The provision of new or maintenance of existing safe walking and cycling routes to and from key locations in all communities, including schools, shops and public transport locations
 - Improved public transport service and facilities
 - The work of the NTA and other transport agencies
 - Tourism initiatives based on our built and natural heritage
 - Recreational use of our coastal areas.
2. The new County Development Plan will require the design of new developments to address:
 - surface water run-off
 - appropriate building line set backs from public roads
 -
3. The new County Development Plan shall include
 - a Record of Protected Structures
 - a Record of Tree Protection Orders
 - an assessment of public rights of way and walking routes, in particular those linking established amenity areas, with a view to including same in the new County Development Plan.

Submission No. 4**Name: Cllr Grainne McLoughlin****Issues raised**

1. That Wicklow County Council, as part of their open space policy, includes a policy for the introduction of a parks department in Wicklow County Council with dedicated staff for managing existing facilities and to plan for future provision. Good quality, safe and welcoming parks are an integral part of our culture and they contribute greatly to the creation of sustainable communities.

Wicklow, besides having a National Park has a network of parks for active recreation, relaxation, peace and tranquility and escape from the rigours of daily life. Parks provide the spaces where children and young people can meet, learn and play. Parks also contribute to wildlife and biodiversity and to local pride and community well-being. Moreover, the quality of our public parks and open spaces adds value to the local economy by providing an attractive base for business investment and a significant heritage offering for local tourism.

Good quality pavements carefully aligned through designed and natural landscapes provide the opportunity for less active members of society to exercise by walking, which is the most popular means of exercising.

Cllr McLoughlin proposes that within the remit of the Parks Department would also be the following: Heritage, Playgrounds, Recreational Activities, Historical Houses, Trees, Biodiversity and cemeteries

2. That Wicklow County Council adopts an exclusion zone for new fast-food restaurants around schools and playgrounds in Wicklow of 0.5km. Like every other county Wicklow has a childhood obesity problem and research shows that a quarter of 11-year-olds are now clinically obese and health experts have warned that Ireland faces a multi-billion euro healthcare nightmare by 2035 unless concrete steps are taken to reduce youngsters' consumption of pizza, chips and burgers. Whilst appreciating that parents play an integral part in prevention of obesity in Children, the subliminal message in fast food advertising (signage etc) and locations around schools is not conducive to positive healthy eating education and practice.

Response of Chief Executive

1. The establishment of a parks department is not a matter for the County Development Plan, which is a land use plan, which sets a framework for the future development of the County. The establishment of a new department in the Councils an operational and budgetary matter.
2. This issue is addressed already in this report, as set on p47.

Recommendations of Chief Executive

None

Submission No. 5**Name: Cllr Derek Mitchell****Issues raised**

1. The importance of improving the M50/N11 road from the merge to Kilpedder before any population expansion takes place. This is clearly dealt with in the Regional Planning Guidelines for the Greater Dublin Region to 2022 S6.3.2 and in Strategic Policy PIP1, table 9, where improvements to this road and public transport are identified as being required. This location is the only specific section identified as needing improvement in the Region. This should include road improvements, Luas to Bray, rail improvements and express busses on the N11.
2. Fast public transport needs to be provided to Cherrywood, Sandyford and preferably west Dublin industrial estates where so many people from Wicklow work. At present they have no alternative but to drive. This should connect to the west of Bray and Greystones.
3. The plan should include linking Greystones to the N11 Glenview interchange as a written and mapped objective.
4. Fast food restaurants should not be allowed within a KM of schools.
5. Commercial developments with car movements should be required to provide right turn lanes/boxes so traffic can pass inside cars. The development of Aldi at Mill Road in Greystones did not have this, when it easily could, and this delays traffic even though it is not fully open.
6. Specifically in relation to Greystones-Delgany, the road from Delgany to Blacklion needs to be urgently completed with cycle lanes on both sides. There are 5 schools along this and safe cycling and walking facilities must be provided to discourage driving to schools.
7. Delgany should be given Heritage Status.

Response of Chief Executive

1. It is agreed that the transport improvements suggested are fundamental to future development in the County and it is intended that improvements of the national road network including the M11 / M50 merge and of various interchanges, particularly in north Wicklow, will be included as objectives of the new plan. Similarly, it is intended that improvements to public transport, including LUAS to Bray and various bus and rail improvements will be identified in the new plan, as they are in the current plan.
It is considered that it is not necessary to halt all population expansion in the County in advance of these infrastructural improvements, as the delivery of these improvements is outside of the control of the Local Authority and may in fact take the pressure off the various infrastructure agencies to improve this infrastructure.
2. It is agreed that there is a lack of public transport facilities linking Wicklow to west Dublin. The County Development Plan can certainly encourage and facilitate the development of new public transport linkages from Wicklow to west Dublin, but the delivery of such services is a function of the NTA and the various transport providers.
3. The Greystones – Delgany Local Area Plan 2013 includes a mapped and written roads objective with respect to a direct link from 'Greystones north' to the Glenview Interchange. This objective can be included in the new County Development Plan.
4. This issue has been already addressed in this report as set out on p47.

5. The design of road entrances and junctions for new developments is guided by national road design guidance, in particular the Design Manual for Roads and Bridges (NRA) and the Design Manual for Urban Roads and Streets (DTTS / DoECLG). In the case of large developments, the volumes of traffic flows to / from the site are predicted using standardised methodology as is the capacity of the existing road network, and the required design of any entrance / junction, with respect to sightlines, right turning lanes, is based on these flows and capacities. In the case of the development mentioned (Aldi Greystones), the traffic predictions and junction analysis submitted by the applicant, which justified the design of the junction, was considered acceptable by the Council's professional engineers assessing the application.
6. With regard to the road between Delgany and Blacklion, the completion of this road is an objective of the Local Area Plan and a road reservation has been included in that plan. The delivery of this objective may be more appropriately dealt with in the Council's programme of works or three year capital programme.
7. There is no such planning or statutory designation as 'Heritage Status'. Buildings can certainly be included in the Record of Protected Structures, towns / areas can be designated 'Architectural Conservation Areas' and National Monuments can be designated by the National Monuments Service. All of this has been done in Delgany. However, there is no planning tool available to designate a town a 'Heritage Town'. (Note: In 1994 Bord Failte initiated a scheme whereby towns could be designated as 'heritage towns' for the purposes of tourism literature and marketing, subject to them fulfilling certain criteria, but this did not confer any sort of legal or statutory heritage status on the town. It is understood that this initiative has been discontinued).

Recommendations of Chief Executive

1. The new County Development Plan shall include as a key objective the improvement of transport linkages from Wicklow to the Greater Dublin Area, with a particularly emphasis on improvement to public transport and addressing national route capacity issues.
2. Include the existing road objective 'RO1' from the Greystones – Delgany and Kilcoole LAP 2013 (Greystones north to Glenview link) in the County Development Plan road objectives.

Submission No. 6**Name: Cllr Jennifer Whitmore****Issues raised**

Key Principles

1. In order to create strong and resilient communities, Cllr Whitmore believes 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.
2. 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.
3. '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.
4. A key feature of the future CDP should be that of broadband provision. Broadband is the most underdeveloped and important of strategic services for the future development of County Wicklow and the provision of poor broadband impacts on all aspects of the CDP – retail, rural, tourism, employment etc. In fact, most of the goals addressed by the pre-draft county development plan document are severely impacted by the absence of proper provision of next generation access broadband. For example,
 - Goal 3: Broadband will have an impact on several transportation challenges. It can reduce the need to commute by re-enforcing local employment; eliminate journeys by enabling access to many web based services such as online banking or bill payments and enable telecommuting.
 - Goal 5: Schools, especially primary schools, must be able to provide the equal access to education resources as those in more developed areas or equally rural children will fall victim to a two tier system.
 - Goal 10: Addressing climate change with distributed renewable energy systems will require Smartgrids which in turn require an internet connection.
 - Goal 10: Enabling communities to work locally and effect a reduction of transport through quality broadband provision will reduce the county carbon footprint.It is critical that broadband features strongly in the 2016 CDP.

Housing

5. Housing developments should contain an appropriate mix of housing including social, housing suitable for elderly / disabled persons, young families etc.
6. Each housing development should have a community space, e.g. green space with play area, or communal buildings, where these different groups can interact and 'build communities'.
7. There will be a particular need for one and two bedroom homes as our population ages.
8. If possible, social housing should be built to be adaptable, allowing it to be easily modified with changing demographics e.g. the simple division of a 4 bed family home into 2-bed apartments.
9. In addition, housing developments should include an appropriate mix of complementary design types.
10. Both energy and water efficiency should be promoted and encouraged. Social housing should take the lead in this regard.
11. Policy mechanisms should be introduced to encourage zoned land to be developed rather than allowing this land to be 'set-aside' and undeveloped for years.

Enterprise and Employment

12. The provision of secure, accessible and reliable broadband is key to the development of Wicklow's employment offering. Broadband assets in Wicklow should be identified and their availability to broadband users maximised. To facilitate future broadband provision, new developments and civil engineering works (e.g. Irish Water) should include conduit for fibre.
13. The unique proposition of each area in the county should be identified and built upon. For example, the proximity of Greystones to Dublin city and nearby universities, its transport links and demographics make it ideally suited to high-tech, innovation jobs.

Retail

14. 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 that will drain vitality from them.

Social, community and cultural development

15. Planning for social and community development should be cognisant of the changing demographics of areas and there should be proactive plans in place to address these changes over time. For example, particularly young estates such as Charlesland in Greystones will require facilities for teens in 5-10 yrs – these community services should be in the process of being developed / sourced now.
16. Active open space identifies green space that may be private in nature and should not be the key determinate in the amount of green space required per head of population. There should be a requirement in each LAP for an amount of green space (i.e. open and communal) required per head of population.
17. The requirement for play space provision in a new development should be lowered from 75 to 50 units. To facilitate greater interaction between all members of the community, public seating should be provided by developers in estates. Consideration should also be given to requiring communal buildings to form part of developments, particularly large developments.
18. Healthy communities should be encouraged. I believe that, as per national LAP guidelines, there should be a specified area around schools whereby the location of fast food outlets should not be permitted. (this recommendation is also supported by Cllr. T Fortune).

Response of Chief Executive

1. It is agreed that 'localism', 'sustainability' and 'bottom-up community development' are important to communities. The County Development Plan will play a certain role in the achievement of these objectives, but it must be kept in mind that it is a land use plan, and its principal function is to set a land use framework within which development can occur. It is not a community activation plan in the sense that an outcome of the process is the establishment of new community networks and platforms for the community to input to decisions about their area. The ways in which the community can input for example to planning applications is clearly set out in law in the Planning Act and Regulations and the contents of the County Development Plan cannot change this. Being prepared concurrently however is the new 'Local Community and Economic Plan' might have better potential to address these issues. With respect to local enterprise, the existing County Development Plan explicitly promotes such development, and it is expected that similar objectives will be included in the new County Development Plan.
2. It is agreed that neighbourhoods should be easily and safely accessed by all in society, and this is a high level objective of the existing County Development Plan (Goal 8), supported by a range of objectives contained in Chapter 11 (Roads and Transportation) and Chapter 15 (Social

- and Community Infrastructure). It is intended that similar objectives will be included in the new plan.
3. The existing plan promotes community building but as set out in Chapter 15 of the current plan, the term "community development" refers to a complex and broad range of actions and measures involving a wide range of practitioners and bodies with the common aim of improving various aspects of local communities. There are however two key strands to the development of 'sustainable communities':
 - Facilitating communities in developing the skills, capacities and projects needed to enable them to have a greater say in the management of their own futures;
 - Facilitating access to the goods, services and powers structures within society for all, and particularly for those that are marginalised and powerless ('social inclusion').

Land use planning plays the following roles in delivering these aims:-

- (1) Facilitating the delivery of community projects, through
 - the reservation of land for community uses in County and local development plans;
 - managing the expansion of residential development commensurate with the community facilities available;
 - requiring the delivery of new community facilities as part of development proposals;
 - cooperating with other services providers in the delivery of new facilities;
- (2) Facilitating improved physical access to goods and services through
 - directing new facilities to suitable locations and in particular, to the locations where people live or locations that are easily accessible by public transport, cycle or foot;
 - requiring all new facilities to be accessible and useable by those with special needs, including mobility or other impairments;
- (3) Facilitating an overall improvement in the quality of the built environment, which contributes substantially to our perception of places and communities.

It is intended that the new plan will address those aspects of 'community development' that come within the remit of a land use plan.

With respect to open space specifically, the County Development Plan and the local plans that emanate from it, are crafted to be consistent with the County open space, play, sport and recreation and social inclusion policies, drawn up by the Community, Cultural and Social Development department of the Local Authority, following detailed analysis of community needs and consultation with communities. It is considered in this regard that development plans in Wicklow make more than adequate provision for the development of open space and play space. A land-use does not however 'deliver' these facilities – its role is to put in place a framework whereby these facilities can be delivered by a wide range of private and public agencies.

4. The existing County Development Plan promotes the improvement of telecommunications infrastructure, including broadband, and it is intended that the new plan would include similar objectives.
5. The existing County Development Plan requires a mix of unit types and tenures in all developments, and it is intended that the new plan would include similar objectives.
6. The existing County Development Plan requires new housing developments to include open space, and it is intended that the new plan would include similar objectives. For large scale developments (which are defined as developments that would increase the housing stock in a settlement by more than 10%), the developer is currently required to carry out a 'social infrastructure' audit, to determine if social and community facilities, such as community

- buildings in the area, are sufficient to meet the needs of the new population and where deficits are identified, proposals are required to either rectify the deficiency (e.g. by building a new community building on the development site) or by suitably restricting or phasing the development in accordance with the capacity of existing or planned community facilities. It is intended that similar provisions will be included in the new plan.
7. While the existing County Development Plan does specify that new developments are required to include a range of unit types and sizes, the plan does not specify that 1 and 2 bedroomed units *must* be included in any particular development, as it is considered that market demand will dictate the types of units required. It would be undesirable for the Planning Authority to insist on such units in a development where there is no demand, and were it to insist on same, such units might end up empty and derelict. The current plan does promote the construction of unit types that can change configuration e.g. apartment units that could be merged to form larger units or vice versa, and it is intended that this objective will be included in the new plan.
 8. In the design of any Local Authority housing development, the Housing Department of the Council will have regard to the provision of the County Development Plan. Therefore any objective included with regard to units being adaptable to change housing size needs, would be considered in the design of Local Authority housing.
 9. The existing County Development Plan requires new developments to have a mix and complementary design types, and it is intended that similar objectives will be included in this new plan.
 10. Energy and water efficiency are promoted in the existing County Development Plan and it is intended that similar objectives will be included in the new plan.
 11. It is agreed that measures to encourage zoned land to be developed would be beneficial; this is being considered at a national level through the new Planning Bill (vacant site levy and 'use it or lose it' clauses on permissions), but there are no current mechanisms to achieve this at a local level.
 12. The issue of broadband provision has already been address in this response. The new development plan will continue to include objectives supporting and facilitating the development of new telecommunications infrastructure. It is not within the remit of the County Development Plan to insist that service providers, such as Irish Water, provide conduits for other companies.
 13. The Enterprise Department of the Local Authority has carried out many initiatives aimed at identifying the unique assets of the County, in order that they can be promoted to employers e.g. the Wicklow 'Think Tank' project, the 'Wicklow Open for Business' campaign, the town fact sheets, employment road-shows etc. With the inception of the new LEOs and the development of the forthcoming Local Economic and Community Plan, there will be ongoing activity in this area. The objectives of the new County Development Plan will underpin and facilitate these initiatives.
 14. The characteristics of any paid parking regime in any town is not a matter for the County Development Plan, but rather an operational matter for the Roads Department and the budgetary process of the Local Authority.
 15. It is agreed that planning for social and community development should be cognisant of the changing demographics of areas. The role of the County Development Plan is limited however in this regard to ensuring that community facilities developed at any time are designed in such a way as to be adaptable to future needs. The planning system however cannot force a change of use of a building from say a privately run crèche to an internet café (suitable for teens) or a meeting place for the older generation. This is an issue that is possibly more appropriately addressed through the Community, Cultural and Social Development Department of the

Council, who would provide guidance to both the Planning Department and private developers in the appropriate design and location of any new community facilities due to be built. Furthermore, the new LECP process, which will require the LECP to be reviewed every 5 years, would allow for the identification of changing community needs in different areas over time, and would allow these needs to be anticipated and planned for. In this regard, this submission will be passed on to the LECP team for consideration.

16. The 'Active Open Space AOS' zoning used in local plans is intended to indicate lands that are either in existing active open space use or are considered optimal for new active open use. The zoning process is not concerned with the ownership of the land, but rather the suitability of the land for the use indicated. Where a developer is required to provide AOS as part of a new development, the Local Authority will engage with the developer to determine what type of AOS is required in that area, and how the Local Authority would see it being developed, and managed. The existing policy does not require that all new AOS must be handed over / sold to the Local Authority so that it can be publicly owned / managed and open to all, although that would be the preferred outcome. In reality however there would simply not be the public resources to purchase, develop and manage such a vast amount of land; for example given the population expansion targeted for Bray, Wicklow and Arklow in the new County Development Plan, this would equate to at least 60 acres in each of these towns. The reality in Ireland is that the majority of sports facilities are operated by 'private clubs' with the Local Authorities tending to manage and maintain passive parks / walks and playgrounds / mixed use games areas, skate parks etc.

It should also be taken into consideration that many 'private' clubs have very open membership policies, with no or small fees for joining, and often provide more than just one sport or activity.

17. With respect to the suggestion that the requirement for play space provision in a new development should be lowered from 75 to 50 units, the existing 75 unit size is considered reasonable; however the Chief Executive would have no issue with this being reduced to 50 units. It is also agreed that the provision of seating might be beneficial to residents; however, the provision of seats can also be a rallying point for younger people in the evening, that sometimes causes extreme stress to the occupants of adjacent houses.

With respect to community buildings, this is already addressed in response to point 6 above.

18. With respect to the issue of exclusion zones for fast food outlets around schools, this has already been addressed in this report, as set out on p47.

Recommendations of Chief Executive

1. The new County Development Plan shall include objectives that facilitate and support:
 - local enterprise
 - accessibility
 - community development
 - the development of improved broadband
 - water and energy conservation

2. The new County Development Plan shall set out design standards for new housing developments, that include:
 - a mix of unit types
 - social and / or affordable housing in accordance with Part V
 - appropriate amount and design of open space, including the provision of suitable play / seating areas for children of different ages and adults
 - the design of building being flexible so that smaller units can be converted in larger units and vice versa
 - a range of house designs in development within an overall unified theme

3. The new County Development Plan shall continue require the carrying out of social infrastructure audits for large scale developments, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

Part 4.2 Prescribed bodies**Submission No. 7****Name: An Taisce****Issues raised****1. General/ strategic planning and zoning**

- New CDP must set out a clear, rational, evidence based and plan led strategy for future spatial development and address the significant challenge of energy scarcity and climate change. CDP to be grounded in principles of sustainable development. Comply with 2010 requirements re evidence based approach to land use zoning and have regard to considerations including phased development, flooding etc. Need to be consistent with Regional Planning Guidelines and NSS.
- CDP to be informed by public participation / notification of prescribed bodies in accordance with statutory requirements.
- SEA/AA regulations shall be applied.
- Planning authority must protect NAMA asset portfolio.
- Glossary to be included. 'User-friendly' language/ terminology to be used in CDP text.

2. Fossil Fuels and Climate Change

Strategy for future should be to break dependence on oil and future energy needs to be met by renewable sources. A climate change strategy should be prepared. List of relevant reports included for the consideration of the planning authority in the preparation of objectives.

3. Sustainable Transport and land use patterns

- Strategy to be in compliance with national smarter travel policy and NTA regional transport strategy. Need to reduce transport demand by creating compact walkable settlement patterns, promote walking and cycling and promote sustainable land use and transportation settlement patterns.
- Planning applications to be accompanied by mobility management plans.
- Investigate alternatives to one-off housing, e.g. serviced site policy.
- Greenbelt policy to be implemented in peri-urban areas.
- Discontinue major new road objectives.

4. Economic and employment development

- Energy scarcity will compromise economic growth. Strategy to be framed with principles of post-carbon, low energy, low consumption.
- Need to support local enterprise based on local indigenous resources and local markets, e.g. manufacturing, agriculture.
- Include policy on farmers markets.
- Out of centre retail development to be prohibited.
- Need to revitalise town centres – e.g. use of brownfield/ infill sites.
- Need for restrictions on retail warehouse change of use and large floor plate multiples.
- Need to CPO lands for site assembly in town centres.
- Need for physical infrastructure audit.
- Need for employment land survey.
- Small scale employment development proximate to residential areas to be favoured over large scale parks.

5. Water/ infrastructure

- Need to comply with all relevant European and national statutory requirements and relevant guidance on water and flooding issues.
- Need for alignment between planned development and infrastructure investment programmes.
- Implement policies for water conservation, e.g. SUDS, integrated constructed wetlands, green roofs.

6. Natural capital and ecosystem services

- Need for green infrastructure strategy.
- Comply with AA/SEA legislation and National Biodiversity Plan 2010-2015.

7. Social capital and public participation

- Designate land for allotments.
- Communities should be planned having regard to health implications of the built environment and increasing obesity levels. Implement 'Irish Heart Foundation –Building Young Hearts, 2010'. Fast food developments in proximity to schools should be discouraged.

8. Cultural and built heritage

- Designate more ACAs.
- Protect views and prospects.
- Adhere to national guidelines.
- Review of S.48 levies for protected structures.

9. Implementation and monitoring

- Include implementation and monitoring schedule – focus on phased and sequential development.
- Appoint implementation officer.
- Planning applications to include a sustainability matrix/statement.

10. General

- Review of development levies and parking charges to support principle of proper planning and sustainable development.

11. Appendices

- Appendix 1 includes a list of suggested implementation and monitoring measures.
- Appendix 2 includes a list of 'transition' measures to guide preparation of the CDP, e.g. public participation, 'vision' making
- Appendix 3 sets out list of measures for the achievement of the reduction of climate emissions.

Response of Chief Executive

1. General/ strategic planning and zoning

- The CDP will be prepared in accordance with the statutory requirements set out in the Planning and Development Act 2000 (as amended).

The Act requires the preparation of a 'core strategy', which shows that the development objectives in the development plan are consistent with the national and regional development

objectives that are set out in the NSS and the Regional Planning Guidelines for the Greater Dublin Area. In addition, the Act requires that the development plan is consistent with other national plans, policies and strategies that relate to the proper planning and sustainable development. The 'core strategy' requirements set out in the Act require the application of an 'evidence' based approach to zoning, whereby information is provided on the amount of land zoned and whereby it is demonstrated that the correct locations are chosen for zonings, in accordance with national guidelines for the establishment of sustainable settlement and transportation strategies. The plan shall promote measures to address climate change issues.

- Public consultation carried out in accordance with the requirements of the Planning and Development Act 2000 (as amended). The statutory requirement for the preparation of the reports of the Chief Executive on the issues raised during the public consultation periods ensures the transparency of decisions made with respect to the plan.
- The legislative requirements for SEA and AA shall be applied in accordance with the Planning and Development (SEA) Regulations 2004 (as amended) and the Planning and Development Act 2000 (as amended).
- The Planning and Development Act 2000 (as amended) sets out the purposes for which objectives may be indicated in the development plan. The protection of the NAMA asset portfolio is not a purpose for which an objective may be indicated.
- The planning authority will endeavour to ensure that the written text is 'user-friendly' and accessible to ensure that the public clearly understands the objectives set out in the plan.

2. Fossil Fuels and Climate Change

- As per the requirements of the Act, the plan is required to include objectives for the promotion of a sustainable settlement and transportation strategy in urban and rural areas, including the promotion of measures to (i) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources, (ii) reduce anthropogenic greenhouse emissions, and (iii) address the necessity of adaptation to climate change.
- Climate change is addressed throughout the existing plan, both in the strategic goals, but also throughout the plan under various headings such as energy, transport, flooding and building design. It is intended that these goals and objectives would be maintained in the new plan, and that the new plan will address climate change in a more structured manner, which may entail the preparation of a stand alone Climate Change Adaptation Strategy.

3. Sustainable Transport and land use patterns

- As required by the Planning and Development Act 2000 (as amended), the plan is to be consistent with the transport strategy of the NTA and shall promote a sustainable settlement and transportation strategy.
- The current plan includes standards requiring the preparation of mobility management plans for large scale employment developments. It is envisaged that these standards will be reviewed, updated and carried forward into the new plan.
- The current plan does not include a specific policy on serviced sites. It is agreed that an objective should be included in the new plan to set out the planning authority's view on the development of serviced residential sites being proposed by developers or landowners on appropriate lands within the settlement boundary.

- The planning authority zones land for greenbelt uses, as appropriate, throughout the county, where it is an objective to prevent the urban boundary of separate settlements from merging. Settlements that are at a higher risk of 'merging' include Bray, Kilmacanogue, Enniskerry, Greystones and Kilcoole. The designation of lands for greenbelt uses in these areas will be considered in the context of the preparation of local plans.
- All roads objectives will be reviewed, taking account of the strategies of the various transportation authorities such as the NTA, the Department of Transport and the NRA. However, it is unlikely that a policy excluding major roads will be included.

4. Economic and employment development

- The plan shall include objectives for the promotion of a sustainable settlement and transportation strategy in urban and rural areas, including the promotion of measures to address climate change issues.
- It is the strategy of the current plan to generally require employment generating development to locate on zoned land within existing settlements, and to allow the development of appropriate rural based enterprises at appropriate locations where, amongst other considerations, there is a proven need to develop there. The Chief Executive is supportive of this strategy and agrees with the strategy to take advantage of the county's comparative advantages and to support the development of enterprise based on local indigenous resources. The forthcoming 'Local Economic and Community Plan' is due to provide a detailed economic and employment strategy for the county and it will be the role of the County Development Plan to underpin any land use and development objectives included in the LECP.
- 'Chapter 10: Retail' of the current plan includes an objective on farmers' markets. This objective should be reviewed, updated and carried forward into the new plan.
- The strategy for retail development shall be in accordance with the Retail Planning Guidelines for planning authorities (DoECLG, 2012) and the principles of the Retail Strategy for the Greater Dublin Area 2008-2016. In accordance with this guidance, retailing will be promoted in appropriate locations in accordance with the sequential approach, whereby the preferred location for retail development is within the town centre and edge or out of centre locations will only be considered in exceptional circumstances.
- Objectives will be included to support town centre revitalisation.
- An objective will be included on retail warehousing, in accordance with the guidelines. The guidelines indicate that there should be a presumption against further development of retail parks unless a particular need is identified. This matter will be considered in the updated retail strategy.
- Policy TR8 of the current plan states that positive consideration shall be given to the re-configuration of existing retail provision in higher order settlements to accommodate large modern retail units. This objective should be reviewed, updated and carried forward into the new plan.
- The development plan does not include objectives for the carrying out of compulsory purchase orders for any purpose, nor does it need to. This is a mechanism available in law to the Local Authority, should it consider it expedient.
- The plan will include objectives for the provision of infrastructure including transport, energy and communication facilities, water services infrastructure and ancillary facilities or services.

- The current plan includes an assessment of the amount of available zoned employment land in growth centres, and strategic objectives for the amount and type of employment uses to be provided across the settlements of the county. This information will be reviewed and updated in the new plan. Land zoned within settlement plan areas for employment uses shall be undertaken on the basis of a transparent methodology and shall be located having regard to objectives for the promotion of a sustainable settlement and transportation strategy.

5. Water/ infrastructure

- The plan will comply with 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (DoEHLG / OPW 2009). A Strategic Flood Risk Assessment will be carried out as part of the new County Development Plan.
- It is the strategy of the current plan to protect, improve and conserve the county's water resource, to facilitate the provision of necessary water infrastructure, in a sustainable manner; and to manage and mitigate the risk and consequences of flooding. This shall be undertaken in accordance with EU Directives on water, the River Basin Management Plans, the Groundwater Protection Scheme and source protection plans for public water supplies. The Chief Executive is supportive of this strategy and considers that the objectives set out in Chapter 12 on water services and flooding should be reviewed and updated as appropriate in the new plan.
- The 'core strategy' sets out the strategy for development across the county in accordance with national and regional guidelines. It is the opinion of the Chief Executive that the 'core strategy' is the supreme strategy for development across the county and that infrastructural investment should be provided to achieve the goals of the 'core strategy'. It should be noted that the development plan is not a capital investment plan. It is a strategy which allows for appropriate development to be undertaken at a time when public or private sector investment is available for development.
- While the current plan includes objectives with respect to water conservation; these will be reviewed and updated as necessary in the new plan.

6. Natural capital and ecosystem services

- The current plan includes objectives relating to the green infrastructure of the county. These objectives will be reviewed, updated and strengthened as appropriate, in the new plan. Consideration will be given to the preparation of a green infrastructure strategy.
- The plan will be prepared in accordance with SEA and AA legislation and will be prepared having regard to Actions for Biodiversity 2011-2016.

7. Social capital and public participation

- The current plan includes an objective to facilitate the appropriate development of allotments (refer OS4, Chapter 15). This will be reviewed and updated.
- Re health implications/ obesity vis-à-vis built environment – this matter is considered in detail on p47 of this report.

8. Cultural and built heritage

- The current development plan and local plans include a significant amount of objectives for the protection of built and natural heritage, including views and prospects and ACAs, in accordance with national planning guideline documents. The objectives set out in Chapters 16, 17 and 18 will be reviewed and updated as appropriate.

- The review of the development levy scheme and does not fall within the statutory remit of the matters considered in a development plan.

9. Implementation and monitoring

- It is the duty of the planning authority to take such steps within its powers as may be necessary for securing the objectives of the development plan. A report shall be prepared 2 years after the making of the development plan on the progress achieved in securing the objectives of the plan.
- Re: Implementation Officer - the staffing of the planning section is not a matter for the development plan process. Public consultation is carried out by the authority in accordance with the statutory requirements of the Act.
- Re: sustainability matrix – All planning applications are assessed on the basis of their compatibility with proper planning and sustainable development.

10. General

- The making of the development levy scheme and parking charges are not matters of consideration for a development plan. These schemes do not fall within the statutory remit of the development plan.

11. Appendices

- noted

Recommendations of Chief Executive

1. General/ strategic planning and zoning

- The Wicklow CDP 2016-2022 shall be prepared in accordance with the statutory requirements set out in the Planning and Development Act (2000) as amended and the Planning and Development (SEA) Regulations 2004 (as amended).
- The plan, in so far as is practicable, shall include a layout, content and written text that is legible and 'user-friendly', so that the objectives of the plan are clear, concise and legible; to enable members of the public to understand the objectives of the plan.

2. Fossil Fuels and Climate Change

- Review and update objectives in accordance with the requirements with the Act for the promotion of measures to reduce energy demand, reduce greenhouse gas emissions and to address the necessity of adaptation to climate change.

3. Sustainable Transport and land use patterns

- The plan shall include an objective relating to the development of serviced sites by developers or landowners, for residential purposes on appropriate lands within settlement boundaries.
- Review and update standards for the preparation of mobility management plans.
- Consider greenbelt designations in the context of the preparation of the Settlement Plans that are included within the CDP.

4. Economic and employment development

- To carry out a review and update of the County Wicklow Retail Strategy, taking account of issues raised above.
- To carry out a review and update of the economic development strategy, taking account of issues raised above.

5. Water/ infrastructure

- Review and update objectives for water services infrastructure, water conservation, flooding etc., taking account of the issues raised in this submission.

6. Natural capital and ecosystem services

- Review, update and strengthen as appropriate, objectives pertaining to the use of green infrastructure.

7. Social capital and public participation

- Review and update current objective for allotments

8. Cultural and built heritage

- Review and update all objectives pertaining to natural and built heritage.

9. Implementation and monitoring

- Review development management standards and update as appropriate.

10. General

- none

12. Appendices

- none

Submission No. 8**Name: Department of Arts, Heritage and the Gaeltacht****Issues raised**

1. Comply with relevant Conventions, EU legislation and national guidance and circulars.
2. Re designated sites: Include natural heritage section. Designated sites to be mapped and zoned appropriately with objectives - have regard to boundary changes. Consult Geological Survey Ireland on geological and geomorphological heritage. No conflicting policies should be in place for sites that cross county boundaries.
3. Have regard to protected species outside of designated sites.
4. In accordance with Article 10 of Habitats Directive, plan should include provision to encourage management of features of the landscape which are of importance to wild fauna and flora – these ecological corridors contribute to coherence of Natura 2000 network.
5. Ensure the protection of hedgerows (e.g. along townland boundaries) and protected species including bats. Removed hedgerows should be replanted.
6. Wetland/ river habitats contain protected species. The plan should recognise the importance of wetland habitats and should ensure protection. Floodplains should be undeveloped and allow for protection of habitats – have regard to Flooding guidelines, 2009. Consult IFI on fish species – have regard to 'Planning for watercourse in the urban environment". Protect freshwater pearl mussels, where appropriate in accordance with relevant guidance.
7. Protect ground and surface waters. Ensure water services infrastructure in place prior to development. Ensure proposed water abstractions or waste water discharges do not impact on Natura 2000 sites.
8. Road works objectives should be accompanied by full regard to ecological considerations and appropriate mitigation measures.
9. Protect against introduction of alien species.
10. Amenity development: Biodiversity can be damaged by amenity development, e.g. use of coast, along rivers, mountains. Developments can impact on protected species. Otter habitat is considered to be 10m either side of watercourse – suitable distance to be maintained to water edge. Pedestrian and cycle routes need ecological assessment in their planning and design and should not target sensitive ecological sites or parts of sites, as such routes have potential for disturbance to habitats and species, including as a result of noise, lighting, etc.

A submission is included specifically pertaining to the SEA Scoping for the Environmental Report of the Wicklow CDP 2016-2022. This is considered in Part 5 of this report.

Response of Chief Executive

The plan will be prepared in accordance with all relevant legislation and guidance.

The mapping of designated sites is the responsibility of NPWS and is not a matter for the planning authority. The Department of Communications, Energy and Natural Resources (including GSI) have been consulted as a prescribed body.

The planning authority will endeavour to ensure that conflicting policies are not in place for designated sites that cross county boundaries.

The current plan includes objectives for the conservation and protection of the environment, including archaeological and natural heritage and the conservation and protection of European sites. These objectives will be reviewed and updated in the next plan.

The plan shall include objectives for the encouragement, pursuant to Article 10 of the Habitats Directive, of the management of features of the landscape, such as traditional field boundaries, waterways etc., important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species. The objectives of the current plan will

be reviewed, updated and strengthened where appropriate, pursuant to the requirements of Article 10 of the Habitats Directive.

The current plan includes a number of objectives that promote the sustainable recreational use of natural resources. These will be reviewed, updated and strengthened where appropriate in the new plan.

The SEA and AA process ensures that appropriate consideration is given to the environmental and ecological effects of all objectives, including objectives for the development of new roads. Mitigation objectives are attached to address adverse environmental effects, where appropriate.

The existing Landscape Character Assessment contained in the current County Development Plan will be reviewed and improved as necessary as part of the plan review process.

Recommendations of Chief Executive

Review, update and strengthen, where appropriate, objectives pertaining to geological and natural heritage, in light of the issues raised in the submission from the Department of the Arts, Heritage and Gaeltacht.

Review and update landscape character assessment. In undertaking this review, the planning authority will have regard to the correct management of landscapes that are of major importance for wild flora and fauna including watercourses, woodlands, hedgerows, marshes and road/railway margins etc.

Submission No. 9**Name: Department of Communications, Energy and Natural Resources****Issues raised**

1. The environmental issues raised in this submission are raised in the context of the requirement to undertake an SEA of the plan, the strategic goal "to protect and enhance the diversity for the county's natural built heritage" and the preparation of the Avoca Settlement Plan.
2. Regard should be paid to geological heritage and promotion of its scientific, educational and tourism potential, as appropriate. An audit of geological heritage of County Wicklow will be published in 2015.
3. The Department is the landowner of Avoca former mines area. While the Department is supportive of the long term vision to promote the Avoca Mines site for tourist uses, in the short term the priority of the Department is to remediate the site on health and safety grounds. Once the site has been made safe for public access, the mining heritage and tourism potential may then be developed on a phased basis. It is the intention of the Department that this remediation is to be undertaken in a manner that does not compromise the environmental, heritage or future tourist potential of the area.
4. The current Record of Protected Structures includes sites at Avoca Mines which are listed as *spoil* or as *disturbed ground*. These areas are not individually identified and any disturbed ground or spoil in the entire former mine site (the curtilage) could therefore be interpreted as a protected structure. The spoils at Avoca Mines are contaminated with metals and arsenic that pose a risk to human health and which ultimately discharge to the Avoca River and groundwater causing pollution. East Avoca Pit and Cronebane Pit pose physical risk hazard of slab slides, failures and rock falls. Designation of spoil piles/mine waste as protected structure should be removed, to facilitate remediation without detriment to the heritage of Avoca.
5. Monitoring data for the Avoca mining areas can be provided for SEA.
6. Copy of letter provided from Minister for the Marine and Natural Resources to Wicklow County Council, dated 19 February 1999, indicating a concern that the protection of Avoca Mines as protected structure may compromise required health and safety works.

Response of Chief Executive

1. The environmental issues raised will be addressed in the plan and through the Strategic Environmental Assessment process.
2. The existing County Development Plan addresses the protection and promotion of geological heritage (Chapter 17, Section 17.6) and it is intended that the new plan will contain similar and enhanced (if necessary) objectives, which will have regard to the Audit of Geological Heritage Sites which was commissioned by Wicklow County Council in partnership with GSI in 2014.
3. The Department's intentions with respect to the Avoca Mines site are noted. As many areas and features of the mines are protected structures, the Department will be required to comply with the provisions of the Planning Act and Regulations with respect to works at protected structures and would be expected in particular to not commence any works without prior consultation with the Council to determine whether certain works would be exempted development or require planning permission.
It is also important that any health and safety works that might be carried out would not undermine the current objectives of the County Development Plan (which is would be intended to retain) to develop this site in the future as a tourism and amenity resource. For example, the capping of mine shafts (for safety reasons) in an inappropriate manner may irrevocably

damage the ability of future generation to enjoy and understand the history of the mine. The Department's commitment to not compromise the environmental, heritage or future tourist potential of the area is welcomed.

4. With respect to the definition of the areas / features that are or should be protected, it is recommended that as part of this plan review process, which includes a review of the Record of Protected Structures, that consultation is carried out with Department of Communications and other relevant heritage agencies, with a view to clarifying the exact boundaries of the 'protected structure' and the features specifically to be protected.
5. The *spoil heaps* and *disturbed ground* are included within the descriptions of mining features on the RPS due to their significance as physical remnants of former mining / industrial heritage. It is recommended that as part of this plan review process, which includes a review of the Record of Protected Structures, consultation is carried out with Department of Communications and other relevant stakeholders, with a view to identifying the features of special interest to the character of the protected structures and to determine the respective curtilage.
6. Noted. The Dept of Communications is a designated authority for the Strategic Environmental Assessment process and has already been invited through the scoping process to provide such information.
7. Noted. As set out in response to item 4 above, Wicklow County Council intends to review the RPS with respect to the above mines sites.

Recommendations of Chief Executive

To review the boundaries and the features of the existing entries in the RPS that related to the Avoca Mines

Submission No. 10**Name: Department of Education and Skills****Issues raised**

The Department of Education and Skills submits the following:

1. Information provided to outline how Department calculates educational infrastructural requirements.
2. School sites should be in close proximity to community facilities. Multi-campus school arrangements encouraged. Both of these approaches can reduce land take for school development.
3. Following documents provide guidance in relation to site suitability for educational provision:
 - a. 'Technical Guidance Document 025 – Identification and Suitability Assessment of Sites for Primary Schools'
 - b. 'Technical Guidance Document 027 – Identification and Suitability Assessment of Sites for Post Primary Schools'
 - c. DoEHLG planning guidelines –Sustainable Residential Development in Urban Areas' (2009)
 - d. 'Code of Practice for Planning Authorities and provision of schools' (Department of Education and Skills, 2008)
4. Memorandum of Understanding between the Department of Education and Skills and the City and County Managers' Association on the acquisition of sites for school planning purposes, is in place. In relation to additional educational needs identified for this plan, subject to availability of resources and on foot of a formal request to the Manager of your local authority, it would be the Department's intention to request, at an appropriate time, that WCC would take the lead on behalf of the Department in relation to the identification/acquisition of suitable school sites as required.
5. Lands adjacent to existing schools should be, where possible, protected for possible future educational use to allow for school expansion.

Response of Chief Executive

It is intended that the new County Development Plan will provide a framework and guidance that will ensure delivery of future primary and post primary requirements of the plan area, having regard to guidance received from the Department of Education and Skills. The Council is committed to the process of the acquisition of appropriate lands for future school sites, in conjunction with the Department.

Recommendations of Chief Executive

All town and settlement plans shall provide for the future primary and post primary requirements of the plan area. These plans should include:

- (a) an assessment of existing and future school needs,
- (b) objectives to for the provision of schools infrastructure to meet the needs of existing and future populations, and
- (c) the reservation of lands for schools need on land use zoning maps.

Development standards set out in 'Section 15.3.3. Education' of the current CDP shall be reviewed and updated in the forthcoming CDP, in accordance with the guidance documents referenced by the Department.

Submission No. 11**Name: Eirgrid****Issues raised**

'Grid25 Implementation Plan 2011-2016 (IP)' is EirGrid's strategy for the development of the national transmission grid for the future. Government supports this strategy. Of particular reference to County Wicklow is Section 2.5.3, which refers to the requirement for the strengthening of the infrastructure system in the south east region. EirGrid will seek to maximise the use of existing corridors where possible, through up-rating the existing 110kV and 220kV circuits.

Grid link project is largest part of Grid25 strategy. The project reinforces the transmission network of south-east and addresses matters including the integration of renewable and conventional generation ensuring security of supply in south-east to support future demand and interconnection with Great Britain or France. Stage 1 consultation has been undertaken outlining a number of 1km feasible route corridors for overhead lines. EirGrid is now considering underground and overground option routes for project, both onshore and offshore.

Request that following be inserted in CDP:

While the technology alternative options are being continuously reviewed, the principal drivers for the Grid Link Project outlined below, remain unchanged:

- *The integration of new renewable generation,*
- *Ensuring that security of supply is maintained and*
- *The facilitation of possible future interconnections with Great Britain or France*

It is recognised that the development of transmission lines for electricity interconnectors will contribute to the on-going development of a single European electricity market in compliance with Directive 2009/72/EC and Regulation 714/2009.

It is anticipated that growth in the Dublin area will give rise to demand for energy supply and a pressure to connect the region with other regions via the hinterland area that includes County Kildare.

The Council will support and facilitate the requirements of the major service providers, such as Bórd Gáis, EirGrid and the ESB, where it is proposed to enhance or upgrade existing facilities or networks or to provide new infrastructure subject to landscape, residential amenity and environmental considerations including where appropriate environmental assessments in accordance with EU Directives i.e. EIA, Habitats and Floods Directives. The Planning Authority recognises the need for the development and renewal of transmission networks, in order to meet both economic and social policy goals.

Objectives GE1, GE2 and GE3 of the current plan should be retained.

Response of Chief Executive

The Chief Executive recognises the need to provide infrastructure for the future electricity needs of the county and region. An appropriate balance is required between the economic priority to provide services infrastructure and the need to protect the amenity, environmental, heritage and landscape assets that are unique to County Wicklow. The policy set out in the current plan is considered adequate to achieve the aims of maintaining and strengthening infrastructure networks.

Recommendations of Chief Executive

It is considered that the policy set out in the current County Development Plan provides for the appropriate development of services infrastructure. This should be retained and repeated in the forthcoming plan. This policy is set out as follows:

Electricity Transmission & Distribution

Electricity generation installations require grid connection (obviously other than small scale projects). Depending on the amount of electricity generated, grid connection can be either through direct connection to the transmission network (110KV/220kV), controlled by Eirgrid or to a local distribution system (normally 38kV), controlled by ESB networks. The Commission for Energy Regulation (CER) regulates grid connections. Physical proximity to the grid is a consideration in the siting of new installations, but will not on its own normally determine the viability of any project, as new transmission lines can be constructed to virtually any location.

In order to facilitate the expansion in electricity generation installation, particularly wind farms, the grid itself will require development and expansion. In Wicklow, the grid has three lines – from Fassaroe in the north to Arklow in the south (roughly along the N11 corridor), from Turlough Hill in the Wicklow Gap down to Hollywood and from Baltinglass to Hollywood. It is important for the future development of electricity in the County that these strategic pieces of infrastructure are protected from inappropriate development in their immediate environs and that their scope for development is maintained. The corridors along these routes can therefore be considered 'strategic infrastructure corridors'.

Transmission & Distribution Objectives

GE1 To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required;

GE2 To suitably manage development within 35m of existing 110KV/220kV transmission lines;

GE3 To support and facilitate the development of landing locations for any cross channel power interconnectors.

Submission No. 12**Name: Environmental Protection Agency (EPA)****Issues raised**

This submission raised issues that relate to the preparation of the SEA Environmental Report and to the preparation of the Wicklow CDP 2016-2022

1. www.edenireland.ie is new GIS web based tool to assist in SEA process.
2. Water Framework Directive – plan should integrate the update to River Basin Management Plans and associated Programme of Measures. Need to provide for protection of Slaney, Vartry and Dargle water networks, designated bathing waters and freshwater pearl mussel sub basin catchments (Derreen Catchment).
1. Ensure commitment is included to collaborate with Irish Water to resolve deficiencies in water services infrastructure, e.g. Arklow, Bray, Greystones public supply.
2. Have regard to potential for cumulative effects.
3. Mitigation measures required to address negative environmental effects.
4. Comply with monitoring requirements.
5. Comply with flood risk assessment requirements.
6. Consider effects on designated sites within 15km of plan area including Wicklow Mountains, Murrough, Slaney River Valley and Red Bog Natura 2000 sites.
7. Ensure the protection and enhancement of undesignated biodiversity sites. Consideration to be given to wetlands. Consider the review of County Heritage Plan during lifetime of CDP.
8. Notice to environmental authorities be given in accordance with SEA regulations.

Response of Chief Executive

All issues raised are noted.

The current plan includes objectives for the promotion of compliance with environmental standards and objectives established under European Regulations for water bodies and groundwater, and which are included in the Eastern River Basin Management Plan. These objectives will be reviewed and updated as appropriate.

The current plan includes objectives for the protection and enhancement of biodiversity. These objectives will be reviewed, updated and strengthened in the next CDP. The plan should have regard to the function of wetlands for the protection and enhancement of biodiversity and habitats and for water attenuation and the role that this plays in flood mitigation.

The planning authority will facilitate Irish Water in the provision of water services infrastructure across the county.

A flood risk assessment shall be carried out in accordance with 'The Planning System and Flood Risk Management – Guidelines for planning authorities' (DoEHLG, 2009).

The local authority will comply with the Planning and Development (SEA) Regulations 2004 (as amended), which requires the monitoring of the significant environmental effects of the implementation of the development plan, insofar as resources allows. Consultation will be carried out with the prescribed environmental authorities in accordance with these Regulations.

Appropriate Assessment will be carried out in accordance with the statutory requirements set out in the Planning and Development Act 2000 (as amended) and relevant guidelines.

The 'County Wicklow Heritage Plan 2009-2014' will be reviewed in 2015.

Recommendations of Chief Executive

Review, update and strengthen where appropriate, all objectives relating to the provision of water infrastructure and management of water bodies, having regard to the issues raised in the submission from the Environmental Protection Agency.

Submission No. 13
Name: Fáilte Ireland**Issues raised**

1. Fáilte Ireland welcomes the opportunity to make a submission and intend to make a more detailed submission once the draft County Development Plan has been published.
2. Fáilte Ireland is currently developing, in consultation with key stakeholders, an overarching brand proposition for the whole east and south of Ireland. This brand proposition is intended as a complementary, yet distinct, macro proposition to those of the Wild Atlantic Way and Dublin. It is envisaged that the Kildare/Wicklow destination would form a key element of this wider proposition. It is envisaged that the East & South proposition – which is yet to be attributed a brand name and identity – will be based on the relative richness of the built heritage and the history that this area has to offer to the visitor. The key stand-outs for Wicklow include, *inter alia*, its monastic heritage (e.g. Glendalough) and its collection of Great Houses and Gardens. Both of these heritage asset sets appeal directly to the target overseas market segment entitled the Culturally Curious. From a domestic market perspective, Wicklow will continue to appeal as a short break destination, as well as a popular destination for walking.
3. During 2015, Fáilte Ireland will work closely with the Kildare Wicklow Destination Steering Group, which has been established and which comprises key stakeholders from both counties, to develop a strong sub-proposition for Kildare and Wicklow under the overarching East & South Proposition, and as part of this to prepare and implement a plan for the development of memorable tourism experiences throughout the destination.

Response of Chief Executive

1. Noted.
2. The proposed Kildare/Wicklow Tourism Destination Development Strategy and its propositions are noted and it is recommended that the new County Development Plan should include objectives that facilitate and support this strategy. It is important to note here that from a land use perspective the County Development Plan has a limited yet important role to play in the development of the tourism industry with the overall aim of maintaining and facilitating the expansion of the tourism product within the county.
3. Noted.

Recommendations of Chief Executive

The new County Development Plan shall include objectives that facilitate and support the proposed Kildare/Wicklow Tourism Destination Development Strategy.

Submission No.14**Name: Fisheries Ireland (IFI)****Issues raised**

1. County Wicklow's rivers and their tributaries support Atlantic-salmon, Sea-trout and resident Brown-trout populations. With Sea lamprey and Freshwater Pearl Mussel also present in some rivers. The Development Plan in considering the protection of the quality of the aquatic environment must address not only water quality but also include the protection of the physical environment, hydrological processes and biodiversity.
2. Water Quality, Targeted Population Projections and Waste Water Infrastructure
 - (a) Sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants over the full duration of the plan in order that the ecological integrity of the ultimate receiving waters are protected. The wastewater infrastructure is deficient in a number of the towns within the County and in setting out population targets for these settlements, the plan should be cognisant of the existing deficiencies in the sewer network and the time scale within which these deficiencies may be rectified. It is imperative that this development plan works in harmony with the Water Services Programme of Irish Water.
 - (b) The Planning and Development Act 2000 requires that the plan must "be consistent as far as possible with National Plans, Strategies and Policies which relate to proper planning and sustainable development". The policy of granting planning permissions for developments with associated increased loading on inadequate or already overloaded municipal sewage treatment plants is clearly not a sustainable practice. Taking account of the adverse effects of increased wastewater discharges on the general well-being and quality of rivers, Inland Fisheries Ireland considers that in areas where treatment facilities necessary for development do not exist, planning permissions should either be refused on the grounds that such development is premature or the developer should be constrained by an appropriate condition requiring that connections to sewer will not be permitted until sewage works upgrading is completed and operational. In suitable locations a developer could be required to install a package treatment plant capable of providing full secondary treatment for a proposed development until such time as the sewage works upgrading and expansion is completed and operational.
 - (c) The EU Water Framework Directive (2000/60/EC) entered into force in December 2000 requires the protection of the ecological status of river catchments – this encompasses water quality and requires the conservation of habitats for ecological communities. One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that river systems be protected on a catchment basis. It is important to address the issue of commitment to both surface and ground water quality protection. The preparation of a water quality management plan is essential in this regard. The achievement of "good-status" for all waters in line with the aims of the Water Framework Directive is a key environmental goal and requirement.
 - (d) According to the Central Fisheries Boards report "The Quantification of the Freshwater Salmon Habitat Asset in Ireland" a total of 261 discrete migratory salmonid "fishery systems" were identified nationally of which 173 are recorded as "salmon & sea trout" and 88 as sea trout only. Of these rivers, the Avoca system ranked 17th overall with regard to the fluvial habitat accessible to salmon. Fish-kills are a regular occurrence on the Acid Mine Drainage (AMD) affected stretch of the Avoca River under low / medium flow conditions. Migratory salmon, sea trout and lamprey (juvenile fish on their seaward run and adult fish returning from the sea to spawn) pass through the 8 mile AMD affected stretch of the Avoca River. This

is only possible when there are adequate flows to sufficiently dilute the toxic effects of the Acid Mine Drainage discharges to the Avoca. The CDM feasibility report on management and remediation of the mine site identifies the spoil piles as a principal cause of AMD to the Avoca. The current record of protected structures in the existing Development Plan includes a number of sites listed as spoil or disturbed ground at Avoca. The CDM report confirms that *'When exposed to rainfall, all spoil piles generate acid conditions and release metals into ground and surface water'*. *The average metal concentrations of spoil piles in all areas affect human and ecological health*". Ongoing inclusion of these features as protected structures will prevent their remediation and this diffuse drainage will continue to contribute an unacceptable polluting load to the Avoca.

3. Aquatic Habitat Protection

(a) A continued policy in relation to aquatic habitat protection is essential in the Development Plan. The current planning regulations do not sufficiently address issues of watercourse protection and management. The impacts of some developments on the aquatic environment may only become apparent in the long term. Developments such as road and bypass development, urbanisation, flood relief, afforestation, river drainage have caused and are causing major disturbances to the physical habitat. "Development" can require that extensive sections of watercourses be drained, altered and diverted, flood plains may be modified to accommodate housing and industrial development, impermeable surface areas in towns and on motorways have increased giving rise to increased runoff, and smaller streams and rivers have been culverted to accommodate development. The Council under the terms of the EU Water Framework Directive (WFD) (2000/60/EC) is legally obliged to protect the ecological status of river catchments and channels. Therefore consideration has to be given to other factors including flow, drainage, dams, bank erosion, quality of instream vegetation and riparian habitat etc.

(b) The impacts of development when not policy driven or environmentally managed are numerous, i.e. destruction of instream habitats, interference with fish spawning and nursery areas, obstruction of fish passage, removal of angling pools, changes in flow regimes. The above is an indication of some effects on fisheries which can be caused by development. The destruction of riparian areas along river banks results in fragmentation of riparian habitat within the river corridor, loss of cover for fish and aquatic animals and can further reduce the value of waterways as amenity areas.

(c) To insure that impacts from development/change in land use practices (including flood plain development) do not interfere with the aquatic environment it is essential that those areas adjacent to waterways (riparian buffer zones) are managed in a manner which will lessen impacts to these habitats. A riparian/buffer zone is a vegetated area near a stream, which helps shade and partially protect a stream from the impact of adjacent land uses. It is a discrete ecological and geographical entity. It is the point of contact between the land (i.e. the terrestrial ecosystem) and the freshwater body (i.e. the aquatic ecosystem). It plays a key role in protecting/improving water quality in associated watercourses (streams, rivers, and lakes), thus providing environmental benefits. With the decline of many aquatic ecosystems due to development (both urbanisation and agricultural production), riparian buffers have become a common conservation measure aimed at improving water quality and lessening pollution impacts. The riparian/buffer zone must be sufficiently wide to protect the watercourse. Riparian buffers in addition to water quality benefits (bank stabilisation, interception of nutrients, sediments and pesticides) also provide habitat benefits in terms of providing shade, enhancing instream diversity (overhanging vegetation creates niches and supplies invertebrates and leaf-litter into the aquatic zone) and help mitigate habitat fragmentation by providing connectivity i.e. as linear features in the landscape, riparian zones/woodlands can reduce fragmentation by connecting isolated habitats/woodlands, thereby creating greater structural diversity and critical mass. The width of the riparian/buffer zone will depend on factors such as land use, land topography (e.g. slope), soil type, channel width/gradient and critical habitats to be protected.

(d) IFI should be consulted in relation to any development (greenfield development or redevelopment of brownfield sites) that could potentially impact on the aquatic ecosystems and associated riparian habitat. IFI can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats.

(e) The protection of habitats outside designated areas and a Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian habitats. IFI is opposed to any development on floodplain lands.

4. River Crossing Structures

(a) The impacts of poorly designed river/stream crossing structures can be serious in terms of habitat loss. Prevention of the free upstream migration of fish species such as Salmon, Trout and Lamprey effectively results in the loss of spawning habitat upstream of the barrier to migration. This could have serious implications for the populations of fish species concerned and contravenes the legal obligation under the WFD to protect the ecological status of river catchments and channels. Indeed, it is an offence under the Fisheries Acts to prevent the free passage of fish. When structures are being designed for crossing fisheries waters, consideration must be given to the following biological criteria: species of fish required to safely pass; size of fish required to pass (life stage); time of year in which fish passage is required; and, high and low design passage flows etc. Bridges and bottomless culverts have the least impact on fish passage. IFI recommends that the Plan should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.

(b) Under Article 5 (1) of WFD there is a requirement for Member States to carry out, for each River Basin District "a review of the impact of human activity on the status of surface waters and groundwater's". Gargan et al., (2011) comment that the WFD considers that "*in Ireland the Water Framework Directive Freshwater Morphology Programme of Measures and Standards identified barriers to fish migration as one of the principal issues placing channels "at risk" in terms of failing to achieve good or high status as required under WFD*". In 2012 through the Wicklow Heritage Forum, Wicklow County Council coordinated The Wicklow Bridge Project. With project partners National Parks and Wildlife Service and Birdwatch Ireland, IFI assessed the level of risk to fish migration associated with 103 watercourse crossings (bridge/culvert/barrier sites) throughout Wicklow. IFI have successfully partnered with WCC and landowners on four impassable structures with very encouraging results and significant environmental benefit. An objective and commitment within the Development Plan to progress this work would be hugely beneficial for fisheries development and overall biodiversity.

5. Sustainable Urban Drainage Systems (SUDS)

The requirement for the inclusion of SUDS for surface water disposal is a positive indicator of the Council's intention for the sustainable development of the area and should, in conjunction with good management of the site, aid in flooding and pollution management. Such a design should be included in all development design proposals.

6. River Management Policies

(a) River Management Policies should be an integral part of any development programme and all waterways within the area considered as a natural resource requiring protection and development. The following mechanisms for protection of the aquatic environment could be considered for inclusion in Area Strategic Management: River Corridor Management Areas, Special Preservation Orders and/or Special Amenity Areas.

(b) Within the context of the Plan, a watercourse could be assessed in relation to its existing aesthetic, amenity and recreational value, its potential for improvement and protection and the requirements to achieve this potential i.e. control of further physical interference, water quality deterioration, access, community participation etc. Rivers and watercourses are assets which provide a basis for the development of visual and amenity features of the areas through which they flow. In housing and industrial site planning they provide a feature around which landscape design and development can be based. They can provide a focus for the involvement of the communities in the protection of water quality and the biological/wildlife diversity of aquatic habitats within these areas. The 1997 Habitats Regulations and Special Areas of Conservation (SAC) Directive does not extend to the inclusion of all aquatic habitats of fish bearing importance or of amenity value. Therefore the reliance of the Development Plan on these area designations solely will exclude significant numbers of waterways which are in need of protection. IFI requests that the Development Plan provide for the maintenance and preservation of all watercourses and associated riparian habitats.

(c) In determining the likely significant effects of plans or programmes, regard should be given to the need for the sustainable development of the inland and marine fisheries resource (including the conservation of fish and other species of fauna and flora, aquatic habitats and the biodiversity of inland and marine water ecosystems). Consideration should be given to potential significant impacts on a number of matters like Water quality, Biological Diversity, Surface water hydrology, Areas of natural heritage importance, Sport and commercial fishing and angling, etc.

The County Development Plan should create the policy framework for sustainable development, be consistent with River Basin Management Plan(s) and comply with the requirements of the EU Water Framework Directive (WFD) (2000/60/EC), while promoting the integration and improvement of natural watercourses in urban renewal and development proposals.

Response of Chief Executive

1. The existing County Development Plan provides a number of objectives and development standards with respect to the county's rivers and tributaries and the protection of the aquatic environment and it is intended that the new plan will contain similar provisions.
2. (a) With regard to wastewater capacity and population allocations, the NSS and the RPGs allocate the population targets for the main settlements in County Wicklow with the other settlements population allocation following the appropriate high level strategy guidance. Treatment capacity should not dictate our growth targets. The provision of the waste water treatment is now under the remit of Irish Water and it is proper planning that Irish Water have regard to the development plan population allocations and that IW seek to ensure the infrastructure is in place or planned to be in place to facilitate the development of a settlement. It is important to note however, through the development management process in Wicklow County Council, development will not be permitted where there is no WWTP capacity.

(b) It is noted that the Planning Act requires that the new plan must be consistent with national planning strategies. It is noted that granting developments within associated increased loading on inadequate or overloaded WWTPs is not a sustainable practice and through the development management process in Wicklow County Council development will not be permitted where there is no WWTP capacity; where increased capacity is under construction the development may be granted with a holding condition. It is not a policy of the Council to permit individual WWTPs where there is a public WWTP scheme within the settlement. It is important to note that it is not a policy of the Council to grant permission increasing loading on an already overloaded WWTP.

(c) The existing County Development Plan fully supports the EU Water Framework Directive, it provides a number of objectives and development standards with respect to the Council's

- obligations to protect habitats generally from developments that might involve alterations to the ground and surface water regime and it is intended that the new plan will contain similar provisions.
- (d) With respect to the inclusion of the 'spoil sites' at the Avoca Mines on the record of protected structures, please see the response to the same issue raised by the Department of Communications, Energy and Natural Resources on p72 of this report.
3. (a) The existing County Development Plan fully supports the EU Water Framework Directive, it provides a number of objectives and development standards with respect to aquatic habitat protection and it is intended that the new plan will contain similar provisions.
- (b) The potential negative impact of development on fisheries when not policy driven or environmentally managed is noted, however the existing County Development Plan provides a number of objectives and development standards with respect to the protection of fisheries and it is intended that the new plan will contain similar provisions.
- (c) The existing County Development Plan provides a number of objectives and development standards with respect to riparian buffers and it is intended that the new plan will contain similar provisions.
- (d) Fisheries Ireland is a statutory consultee where applicable in the development management process.
- (e) The issue of development on floodplains is noted, the existing County Development Plan provides a number of objectives and development standards with respect to such development and it is important to note that the new plan and all zonings within the plan will be subject to full Strategic Flood Risk Assessment being carried out during the drafting of the plan.
4. (a) The issue of the provision of policies/objectives for river crossing structures will be considered in the drafting of the new plan. Fisheries Ireland is a statutory consultee where applicable in the development management process.
- (b) The issue of 'The Wicklow Bridge' initiative is noted and the current CDP supports the Water Framework Directive and the new CDP will continue to do so, during the review of the existing plan consideration may be given to the inclusion of such policies/objectives to facilitate this initiative. It is important to note that the CDP is a land use plan and can not commit to carrying out actions such as the Wicklow Bridge Initiative.
5. The existing County Development Plan provides a number of objectives and development standards with respect to SUDS and it is intended that as part of this review process, these provisions shall be reviewed and updated where required.
6. (a) The existing County Development Plan provides a number of objectives and development standards with respect to river management policies and it is intended that as part of this review process, these provisions shall be reviewed and updated where required.
- (b) The existing County Development Plan provides a number of objectives and development standards with respect to the maintenance and preservation of all watercourses and associated riparian habitats and it is intended that as part of this review process, these provisions shall be reviewed and updated where required.
- (c) The existing County Development Plan provides a number of objectives and development standards with respect to policy framework for sustainable development, be consistent with River Basin Management Plan(s) and comply with the requirements of the EU Water Framework Directive (WFD) (2000/60/EC), while promoting the integration and improvement of natural

watercourses in urban renewal and development proposals and it is intended that as part of this review process, these provisions shall be reviewed and updated where required.

Recommendations of Chief Executive

The new County Development Plan shall include appropriate strategies, policies and objectives to ensure the ongoing protection and enhancement of the natural environment, including water systems, and regard will be taken of best practice and the guidelines / advice issued from the Department of the Environment and Fisheries Ireland.

Submission No. 15
Name: Irish Aviation Authority (IAA)

Issues raised

The IAA is not planning any major new infrastructure in County Wicklow in the next 8 years. The IAA will comment on the draft County Development Plan before its adoption.

Response of Chief Executive

Noted.

Recommendations of Chief Executive

No recommendation

Submission No. 16
Name: Irish Water (IW)**Issues raised**

1. IW welcomes the opportunity to make a submission.

Vision and Core Strategy

2. IW note that the County Development Plan has to comply with current national and regional planning documents. IW welcome the Council's plan to develop realistic population targets for the county and various towns having regard to more recent population change patterns and current population projections from the CSO. This would facilitate IW's forward planning of their water and wastewater services to meet the needs of realistic growth where and when it occurs.

Land Zoning

3. IW suggest that the feasibility of providing sustainable infrastructure services to lands and the availability of capacity in existing infrastructure should be considered when determining landuse zoning both in terms of location and quantity. IW would also suggest that "phasing" of the development of zoned land should be identified in order to ensure that infrastructure can be provided in a timely and cost effective manner to service zoned land.

Housing

4. With regard to the location of new housing, IW would encourage the adoption of a compact spatial strategy with the use of brownfield sites, to ensure that existing services can be utilized and new services can be provided in a cost effective manner. With housing in the countryside, IW would generally not be in favour of the proliferation of housing in rural areas in terms of both the cost of providing services to these houses and the potential risk to water resources from inadequate wastewater treatment where these houses are not connected to a public collection network.

Enterprise and Employment

5. IW would suggest that greenfield land should only be zoned for new industrial estates/business parks where there is a realistic expectation that industrial development will take place. Where land is zoned for this purpose there should be a method identified for financing objectives for the area.

Rural Development

6. With respect to strategies for rural development, we refer to our observations above on rural housing and the need to protect water resources in the Wicklow Uplands.

Built and Natural Heritage

7. Within Wicklow County there are a number of River Catchments which are of importance from drinking water point of view. Some are of local importance within the county and others are of regional importance as they form part of the supply to the greater Dublin area. The development plan should ensure that suitable source protection measures are in place in all cases to protect water supply sources including both surface and ground water sources. IW will work with WCC in the preparation of Water Safety plans for water supply sources in the county and for the protection of these sources through appropriate zoning and development management methods. It is IW's objective to manage our water services facilities to facilitate

WCC to achieve the quality objectives for water bodies in the county as identified in the Water Framework Directive.

Infrastructure

8. A number of towns in the county have been identified in the Issues Booklet as having either a current or a potential future water service infrastructure deficiency, namely Aughrim, Avoca, Baltinglass, Dunlavin, Roundwood and Newcastle. IW will need to make an assessment of the water services infrastructure in these locations in order to determine what the deficiencies are and to put plans in place to alleviate the deficiencies. The phasing of development in these areas may be appropriate to allow for the required infrastructural upgrades to take place. Early warning/notification to IW of potential development, particularly large developments would be of benefit in ensuring that identified deficiencies in the infrastructure can be alleviated in a timely manner.

Response of Chief Executive

1. Noted.
2. This issue has been noted. The new County Development Plan will contain a Core Strategy as required by legislation, which will address consistency of the County Development Plan with high level strategies and Government policies. With regard to population targets, a 'population paper' has been prepared, and is appended to this report, which sets out suggested methodology for determining County population targets for use in the new plan. A 'Core Strategy' table, which will set out the population targets for all settlements / areas, the resulting housing requirements in each location and the associated land zoning needs will be provided in the new County Development Plan. The methodology applied in calculating how much land to zone will be clearly set out in the draft plan.
3. The issues of the provision of infrastructure and the capacity of existing infrastructure when zoning land is noted. However, the settlement strategy for the County, with the associated zonings, has been drawn up to be consistent with the NSS and RPGs and taking account of proper planning and sustainable development. Irish Water's role is to provide the services to the lands that have been designated for development by the elected members consistent with national and regional strategies. Planning in Ireland is not dictated by the capacity of existing services but sustainable spatial planning principles, and the service providers are tasked to deliver the services to areas where they are required, to service existing population and planned growth. The service providers, such as Irish Water, ESB, Department of Education etc cannot be allowed to be the bodies that determine where growth will occur, as their priorities cannot be expected to align. They must follow the lead of planning and the Core Strategy for any County, which will be drafted to accord with the principles of regional and national spatial plans.
4. & 6. The issues of the location of new housing in urban and rural areas are noted. It is important that residential development in rural and urban areas is appropriately managed to ensure cost effectiveness of services and that no adverse impacts on water results. The existing County Development Plan provides a number of objectives and development standards with respect to infrastructure and housing, namely objectives RH2, RH3, WS1 and WW1, and it is intended that as part of this review process, these provisions shall be reviewed and updated where required. Housing polices should encourage compact settlements and reuse of brownfield sites in favour of un-serviced greenfield sites. The existing County Development Plan provides a number of objectives and development standards with respect to compact settlements and brownfield development, namely sections 5.4.1 and 5.4.2, and it is intended that as part of this review process, these provisions shall be reviewed and updated where required.
5. The issues of zoning greenfield land for industrial development is noted. The draft plan shall address the issues of the location of industrial development and any relevant policies and

objectives will be crafted in line with the relevant legislation, guidance documents and in line with sustainable development practices and proper planning. The issue of financing objectives is not an issue for consideration in the draft development plan and it is understood however, that IW will address contributions towards infrastructure as part of their connections policy.

7. The issues of the river catchments, suitable source protection within the county and the preparation of Water Safety Plans are noted. The issue of catchment protection areas are a matter for the Water Services authority, but as IW are statutory consultees, they can continue to interact with the Development Management system to ensure the protection of this vital asset.
8. It is noted that IW will need to make an assessment of the water services infrastructure in the settlements within the settlement strategy of the CDP in order to determine what the deficiencies are and to put plans in place to alleviate the deficiencies. It is also noted that the phasing of development in these areas may be appropriate to allow for the required infrastructural upgrades to take place. It is noted that IW seek early notification of potential development, including large developments to ensure infrastructure deficiencies can be alleviated.

Recommendations of Chief Executive

No recommendation

Submission No. 17
Name: Meath County Council

Issues raised

Noted. No comment/observations.

Response of Chief Executive

Noted.

Recommendations of Chief Executive

No recommendation

Submission No. 18**Name: National Roads Authority****Issues raised**

1. NRA welcomes the opportunity to make a submission.

Managing Exchequer investment and Statutory Guidance

2. The TEN-T (Trans-European Transport Network), a planned set of transport networks across Europe, target a gradual development of the transport network with the core network a priority by 2013 and the remaining comprehensive networks by 2050. It is an objective to increase the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe. In Ireland the core network is the route from Northern Ireland via Dublin to Cork and Limerick. The N/M11/M25 Dublin to Rosslare route is identified as part of the TEN-T Comprehensive Network. The M/N11 is a highly important national road which provides the dominant means of access to the south east of the country, in addition to providing access to international markets for freight and tourist traffic through Rosslare Europort and via the M50 through Dublin Port and Airport. The N81, national secondary road, is an important inter-regional link through the County. It also serves substantial commuter traffic into Dublin City, Naas and Carlow. Policies or objectives in the County Development Plan should be drafted which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's economic comprehensiveness by providing faster, more efficient and safer access to and from major ports, airports, cities and large towns. There is a critical need to manage these assets in accordance with national policy as outlined in Smarter Travel (DTTAS, 2009) and the provision of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoELG, 2012)
3. The following studies are considered highly relevant to the review of the County Development Plan:
 - M50/M11/ N11 Corridor Study (January 2012) The additional road capacity on strategically important routes still remains under threat despite the economic slowdown and a continued growth in monthly traffic volumes will likely continue as the economy returns to growth.
 - M11/N11 Merging Study and M11/N11 Traffic Management Measures –Killarney Road and Fassaroe Interchange Improvements Part V111 Report (2010)
 - N11 Corridor Review Fassaroe Junction to Kilmacanogue
 - M50 Demand Management Study (April 2004)
 - Proposed Motorway Declarations (completed N11 upgrades)

Vision and Core Strategy

4. The NRA seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national road in County Wicklow are protected and that the relevant policies/objectives included in the County Development Plan are developed to reflect this.
 - The NRA request the Council consider the implications of land use polices for all the strategic national road network in the area as a criteria in determining the future land use zoning strategy to be outlined in any settlement plans to be contained in the Draft County Development Plan and the respective Core Strategy.
 - Although a requirement has been identified for the development of lands in a number of settlements have been identified for growth which adjoin/are in close proximity to/are reliant for access from the N/M11/N81, this local demand cannot be developed to the

detriment of the investments in national infrastructure, by eroding or undermining that investment, which is required to services the County's major inter-urban and inter-regional transport requirements that underpin Ireland's competitiveness.

- The County Development Plan should include policies/objectives for identified settlement and growth areas so as to avoid undermining the strategic transport function of national roads, by measures intended to cater for the needs of local traffic and local development related traffic, which should more appropriately be addressed within the framework of providing an adequate local transportation infrastructure.
- The NRA supports Government policy where practices are aimed at concentrating development in established urban areas and designated development centres subject to development being framed within a coherent integrated land use and transportation strategy. In addition to the review of the extent and location of residential lands in accordance with core strategy requirements, the Council may consider it appropriate to review the extend and location of industry, employment and other commercial type land uses to prepare a co-ordinated and integrated land use pattern.
- The NRA recommends that residential, retail and employment objectives especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. And integrated approach to the design of development area should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car so that the variety of enterprise zones can be easily accessible by all modes of transport and all sections of society.
- Where planning authorities proposed large scale development in urban areas and or areas adjoining national roads is utilized appropriately and that such roads can continue to perform their intended function in to the future by:
 - Protecting undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements,
 - Ensure that capacity enhancements and or traffic management measures will be put in place to facilitate new development, and
 - Improving operational efficiency of the regional and local road and transportation infrastructure.
- The NRA also advise the council that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising to the national roads network to accommodate local development proposals will be borne by the local authority and will not be funded by the NRA and thus should be integrated within future local development contribution schemes.
- The RPG's include the objectives that plans and policies should identify and protect strategic road corridors and their principal function as arterial routes, long term junction capacity and carrying capacity should not be adversely affected and that plans and polices need to be cognisant of the challenges and needs where such roads bisect urban areas identified for growth and the need for strong connectivity within the urban fabric.
- The DoECLG Guidelines advise that development plans should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from all new development, including one off rural housing, or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply. Planning authorities should also avoid a proliferation of accesses to national roads subject to a 60kph speed limit. There is also, therefore, a requirement to co-ordinate a proposed zoning designations and/or access strategies in settlement plans within speed limits on national roads in the Draft Plan.
- Where it is proposed to exercise a less restrictive approach to the control of development accessing national roads, this should be plan lead, in agreement with the NRA.

Development at national road junctions

5. It will be important to exercise particular care in assessment and management of development proposals in the County Development Plan relating to the zoning of locations at or close to junctions on the national road network (existing and planned) where such developments could

generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users. Special attention should be given to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres. The NRA recommends that traffic and transport assessments be carried out for individual planning applications as part of the development management process, this is not a substitute for a prior overall transport assessment of areas where the planning authority is determining fundamental issues of land use and transportation. Leaving the traffic assessment to individual applicants at the development management stage is considered inappropriate and would lead to piecemeal and unsustainable approach to development. The NRA recommend that consideration should be given to undertaking appropriate Strategic Transport Assessment (STA) to support the preparation of the draft County Development Plan particularly in relation to areas of planned development which have an interface with the national roads network.

National and Local Roads Schemes

6. The NRA is developing/progressing the following road schemes and improvements:-

- N81 Tallaght to Hollywood (including bypass of Blessington)
- N81 Knockroe Bends
- N11 Kilmacanogue Junction
- N11 Wilford, Fassaroe, Killarney Junctions
- N11 Arklow/Rathnew (Under Construction)

Details of which should be considered for incorporation into the County Development Plan. Any policies/objectives including land zonings should not compromise the road planning and route option/road planning that is underway. Any proposals should also not have the effect of altering the function of these routes or increase the cost of land to be acquired or land under consideration.

The Council may also consider it appropriate to identify any local improvements to the national roads planned by the Council over the term of the County Development Plan that may be incorporated into the adopted plan. The NRA advises that while any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of the NRA. The NRA request the inclusion of policies and objectives in the County Development Plan that provide the following:-

- objectives providing for development of the relevant national road schemes
- a policy to protect routes of national road schemes free from adverse development that may compromise the development of route options or the construction of preferred route, or add to the overall costs associated with proposed schemes.

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

Other Specific Policies and Objectives

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

7. The NRA recommend that planning applications for significant development proposals would be accompanied with TTA and RSA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring and other planned/proposed developments on the road network. The County Development Plan should reference the NRA Traffic & Transport Assessment Guidelines (2014) and their recommended TTA threshold requirements.

Service Areas

8. The DoECLG Spatial Planning and National Roads Guidelines indicate the requirements for a forward planning approach to the provision of off-line motorway service areas at national road junctions. The NRA would welcome the provision of the NRA's Service Area Policy, as published in the NRA Policy on Service Areas (August 2014), being reflected in the County Development Plan. Section 1.4 of the Policy outlines the role of the planning authority in relation to the provision of service areas including the required provision of a service area on the M11.

Signage

9. The DoECLG Spatial Planning and National Roads Guidelines indicate a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. The NRA would welcome the provision into the County Development Plan of the NRA's Policy on the Provision of Tourist & Leisure Signage on National Road (March 2011).

Noise

10. The NRA requests the Council to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations, that development proposals identify and implement noise mitigation measures, where warranted.
11. The NRA recommends that the development objectives that may be included in the draft plan would reflect the provisions of the DoECLG Spatial Planning and National Roads Guidelines which indicates the importance of developing an evidence based approach at development plan stage for proposals with implications for the on-going safe and efficient operation of national roads. The NRA advises the planning authority to ensure in the review of the County Development Plan the following:-
 - The protection of the safety, carrying capacity and efficiency of the existing and future national roads network is maintained
 - An integrated approach to land use and transportation solutions throughout the County should be undertaken such that local traffic generated by developments is catered for primarily within the framework of the local road network.

Response of Chief Executive

1. Noted.
2. The existing County Development Plan provides a number of objectives and development standards with respect to ensuring maximum sustainable efficiency from the existing road infrastructure within the plan area, namely section 11.4, and it is intended that the new plan will contain similar provisions.
3. Noted.
4. The existing County Development Plan provides a number of objectives and development standards with respect to ensuring that the carrying capacity, operational efficiency, safety and significant national investment made in national road in County Wicklow are protected, namely section 11.4.1 and objectives NR1 – NR7, within the plan area and it is intended that the new plan will contain similar provisions.

It important that the NRA acknowledges and will factor in the requirements of the NSS and the RPGs for the GDA of the increased population Wicklow County Council is obliged to cater for with respect to designating land, inter alia, for their housing and employment needs, so as to *“allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's economic comprehensiveness by providing faster, more efficient and safer access to and from major ports, airports, cities and large towns”*.

5. The existing County Development Plan provides a number of objectives and development standards with respect development at national road junctions, namely NR7, within the plan area and it is intended that the new plan will contain similar provisions. It is important to note that where settlements are directly adjoining or straddling national routes, such a simplistic approach is not feasible. However, land in these settlements (Bray, Newtownmountkennedy, Wicklow/Rathnew, Arklow, Blessington, Baltinglass, Kilmacanogue, Ashford) has already been designated for development, and it is intended that the new plan will not change the current approach.
6. Noted. It is important to note at this stage however that the matter of not 'adding to the overall costs associated with proposed schemes' vis-à-vis County Development Plan policies may be *ultra vires*. Each policy must be on the basis of proper planning and sustainable development, and cannot be influenced by saving money for state bodies.
7. This issue of TTAs and RSAs are noted.
8. This issue of service areas is noted.
9. The existing County Development Plan provides a number of objectives and development standards with respect to signage and it is intended that the new plan will contain similar provisions.
10. The existing County Development Plan provides a number of objectives and development standards with respect to noise mitigation measures and it is intended that the new plan will contain similar provisions.
11. The DoECLG Spatial Planning and National Roads Guidelines are noted. The existing County Development Plan provides a number of objectives and development standards that reflect the provisions of the DoECLG Spatial Planning and National Roads Guidelines and it is intended that the new plan will contain similar provisions.

Recommendations of Chief Executive

To review and update where necessary the roads policies and objectives of the current County Development Plan to ensure they have regard to the relevant DoE and NRA guidelines.

Submission No. 19**Name: Southern & Eastern Regional Assembly****Issues raised****General**

1. The Regional Planning Guidelines (RPGs) 2010-2022, which continue to have effect during this time of transition, aim to direct the future growth of the Greater Dublin Area up to 2022 by implementing the strategic planning framework set out in the National Spatial Strategy (NSS). The RPGs provide a framework for, and policy guidance to, local authorities in the areas of settlement patterns, population and housing targets, economic development, infrastructure, rural development, flood risk, heritage and the environment and social infrastructure.

From the 1st January 2015 Wicklow is under the jurisdiction of the new Eastern and Midlands Regional Assembly (EMRA). The Assemblies functions are the formulation, adoption and implementation of Regional Spatial and Economic Strategies (RSES) (which will replace the existing Regional Planning Guidelines RPG's), management of EU Operation Programs, EU project participation, implementation of national economic policy, and additional functions through working with the new National Oversight and Audit Commission.

With regard to the RSES, its objective shall be to support the implementation of the NSS and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region for which the strategies are prepared which shall be consistent with the NSS and the economic policies or objectives of the Government.

It is accepted that given the significant level of transition required in Regional Governance in Ireland post June 2014 and in the context of an upcoming review of the NSS (National Planning Framework) by the DoECLG, which in itself will contain new spatial planning policy, the possible timeframe for commencement of the RSES will not coincide with the Development Plan Review process for Wicklow County Council.

2. Under the Planning Act, as amended, the EMRA, is obliged to prepare submissions / observations to be submitted to the relevant planning authority and copied to the Minister for the Environment, Community and Local Government. The Act details that a submission shall contain a report on matters that, in the opinion of the regional assembly, require consideration by the planning authority concerned in making the development plan. The report shall include, but not be limited to, polices or objectives in relation to national and regional population targets, the distribution of residential and employment development, and it shall promote consistency between the objectives in a development plan and its core strategy and the regional planning guidelines.

Vision and Core Strategy

3. The core strategy is a key component to inform necessary future planning requirements and to ensure consistency of policies and objectives with higher tier plans. The RPGs state under Strategic Policy 1 the delivery of new housing should support the NSS, Smarter Travel and Guidelines on Sustainable Residential Development, while the RPGs encourages new housing development on consolidation within the existing built footprint – with particular focus on the metropolitan area; supporting the achievement of sustainable towns and national investment on public transport to achieve the integration of land use and high quality transport services and build up of economies of scale for services.

It is recommended that the growth scenario, settlement strategy and settlement hierarchy for County Wicklow supports the key elements of the Regional Planning Guidelines settlement

strategy and is informed by the regional population and housing targets established within the RPGs, whilst incorporating current data, in a holistic approach to produce an evidence based core strategy. It is also suggested that an integrated approach is taken to settlement, employment and transport policy, as advocated throughout the Regional Planning Guidelines⁷.

RPG Population and Housing Targets for County Wicklow

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

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

Table 8 of the Regional Planning Guidelines sets out the Settlement Hierarchy for the Greater Dublin Area, the following is taken from this table and is relevant for the Wicklow County Development Plan.

Hierarchy	Description	Location
Metropolitan Consolidation Towns	Strong active urban places within metropolitan area with strong transport links	Bray, inc. Bray environs and surrounding areas of Fassaroe and Old Conna.
Large Growth Towns I	Key destinations, economically active towns supporting surrounding areas, located on Multi Modal Corridor in metropolitan hinterland.	Wicklow
Large Growth Towns II	Smaller in scale but strong active growth towns, economically vibrant with high quality transport links to larger towns/city	Greystones, Arklow
Moderate Sustainable Growth Towns	In Hinterland areas, 10k from large town on public transport corridor, serve rural hinterland as market town	Newtownmountkennedy, Blessington
Small Towns	Good bus or rail links; 10k from large growth towns.	To be defined by Development Plans
Villages		To be defined by Development Plans

It is understood that the County has not met the population and housing policy targets as set out in the RPGs and that one of the significant challenges of the new County Development Plan will be to meet the current market demand for housing supply and the Planning Authority's requirement in the core strategy to align with the Regional Planning Guidelines and the National Spatial Strategy. An evidence based core strategy in accordance with the provisions of the Planning and Development Act, as amended, complemented by an analysis of current data trends in particular the CSO Regional projections, and the housing strategy for the County, could address this challenge. It should cover aspects of demographic changes and projections, housing mix, infrastructure delivery, implementation and residential densities, whilst retaining the principles of settlement hierarchy and growth in the region that underpin the Regional Planning Guidelines settlement strategy, and include the Council's share of that growth.

⁷ This approach is essential to deliver the vision of the RPGs as advocated at section 2.2 and is supported by a number of policies and recommendation in the Plan, such as ER3 and PIR1.

Housing

4. Strategic Recommendation SR1 of the RPGs indicates that each Council should address through the Core Strategy and associated tables and text how the development plan meets the housing requirements described in the RPGs while Strategic Recommendation SR2 indicates that future expansion in towns should follow a clear sequential approach in accordance with the Development Plan Guidelines and the Guidelines for Sustainable Residential Development in Urban Areas.

The methodology applied to calculating how much land is to be zoned for residential development in each settlement has been applied to previously prepared and adopted plans in the County. Given the nature of the population targets, as commented above, the additional flexibility applied to this methodology by way of "headroom" and monitoring by the Planning Authority may lead to a dilution of the settlement hierarchy as expressed in the RPGs and the Core Strategy of the County Development Plan.

Enterprise and Employment

5. The Regional Planning Guidelines examines the key principles for the direction of economic growth in the Greater Dublin Area. Themes within the regional economic strategy include enterprise dynamics, growth areas, sectoral convergence, clustering, retailing, connectivity infrastructures and a spatial dimension to support economic principles. The RPGs identify a number of strategic employment centres within the County. Wicklow / Arklow is a Core Economic Area with Wicklow being the primary centre effecting also the settlements of Rathnew, Ashford and Rathdrum. The other designated area being Bray / Cherrywood / Greystones with Bray including Fassaroe being the primary town. These centres are considered strategic employment centres, well located on transport nodes for sustained international and regional economic development and growth, and should be considered focal points for economic development.

The Local Community and Economic Plans introduced in the Local Government Reform Act 2014 are a central component of the local authority's role in economic development. The Regional Assembly has a statutory function in the preparation of these plans to ensure consistency in the first instance with the RPGs and subsequently with their successor, the Regional Spatial and Economic Strategies. In performing this function the Regional Assembly will establish Regional Economic Fora and will consult with the local authority during the preparation, consultation and development of the LECs.

Tourism

6. The Regional Planning Guidelines supports regionally balanced tourism and recognizes that Dublin city can be considered as a gateway to attracting increased tourism to other parts of the Greater Dublin Area.

Retail

7. It is considered important that retail policies and retail development within the county support the policies and recommendations of the Retail Strategy for the Greater Dublin Area and economic growth areas as identified within the RPGs, and follow the Retail Planning Guidelines for Planning Authorities 2012. In particular this applies to the Retail Hierarchy in the RPGs and the Retail Strategy for the GDA which is clear on the Level 1 – Metropolitan Centre, Level 2 – Major Town Centres Bray and Wicklow, and Level 3 – District Centres Greystones, which apply to the County.

Rural Development

8. Strategic Recommendations RP1 and RP2 of the RPGs indicates that each Council should apply appropriate Development Plan polices to support the continuing viability of agriculture, horticulture and other rural based enterprise within rural areas. Also to protect and support rural villages and the countryside whilst responding to the urban demand for rural resources.

Social, Community and Cultural Development

9. Population growth, the delivery of new housing and the needs of existing communities should be supported by the necessary community infrastructure and recreational facilities to serve these communities, for example adequate capacity in terms of education, health care and housing accommodation, access to services and support networks and leisure. Local Authorities, through co-operation and co-ordination with other agencies and groups can assist in meeting these needs through the planning process. Policies and measures within the Development Plan, which advocate these issues, should therefore be considered

Built and Natural Heritage, including Landscape

10. The RPGs recognize the range of built heritage, natural heritage and landscape within County Wicklow. Section 7.2, details strategic policy with adjunct commentary on the protection, enhancement and integration into new development of the built heritage. Section 7.3 details strategic policy on the natural environment in particular designated sites and extended ecological sites to protect and conserve the natural environment. And section 7.4 includes strategic policy on landscape classification and landscape character assessments, in this aspect regard should be had to the draft National Landscape Strategy 2014.

Infrastructure

11. The RPGs promote regional sustainable growth and recognize that this growth can only be achieved through the provision of high quality infrastructure by the alignment of land use planning with transport planning, water services, energy supply and waste management.

With regard to infrastructure investment Strategic Policy PIP1 of the RPGs sets out the proposed strategic transport investment for the GDA, subsequent to this has been the publication of the NTA Integrated Implementation Plan 2013-2018 which sets out an overall investment plan for Transport in the Dublin Region. This is endorsed in the RPGs, with the need to implement land use policies that support and protect national investments made in public transport and to optimize that investment. Polices such as promoting higher densities for employment and residential uses around public transport, should be considered in the CDP. There should be a consistency between transport planning, spatial planning and land use management to aid reduced travel demand, reduced distances and encourage a sustainable change in mode share.

The development of a strategy for green infrastructure within County Wicklow is welcomed and has the potential to raise awareness of issues such as biodiversity and the way green spaces are used, developed and managed. Section 7.7 of the RPGs details classifications and actions for Green Infrastructure throughout the Region.

Chapter 6 of the RPGs contains strategic polices that support investment in energy and communications to allow economic and community needs to be met, and to facilitate sustainable development and growth to achieve a strong and successful international GDA gateway. This is supported by Government Policy in the National Renewable Energy Action Plan 2010 and the National Energy Efficiency Action Plan 2013.

Strategic Environmental Assessment, Appropriate Assessment & Flood Risk Assessment

12. It is important that all relevant plans and infrastructure projects, which have the potential to impact on Natura 2000 sites either individually or in combination with other plans and projects are subject to relevant environmental assessment under the provisions of the Habitats Assessment Directive. The SEA process is also considered important with regard to the plan making process and subsequent plan aims and policies. The review document makes reference to range of environmental policy areas and identifying the main environmental issues facing the county. It is suggested that Development Plan policies to deliver the vision for the county should be informed, and where necessary, shaped by environmental directives and take into consideration issues of flood risk and flood risk management plans, climate change, river basin management plans, impacts on water quality, and landscape assessment.

With regard to flood risk the first round of the Catchment Flood Risk Assessment and Management Studies have been completed and stage two the preparation of Flood Risk Management Plans has commenced

Local Plans

13. Local Area Plans (LAPs) should be prepared for settlements of a population of 5,000 or more in accordance with the requirements of the Planning and Development Act 2000 as amended. In this regard Rathdrum should be considered as a 'town plan' in the CDP given its location on the settlement hierarchy and population. These lower order local area plans should align with the overarching policies and objectives of the CDP, in particular those set out in the core strategy which will provide a clear framework for the nature, location, and scale of land to be zoned.

It is recognized that three town plans will have to be replaced by LAP's and in this regard consideration should be had to a timetable of delivery for these plans to ensure alignment with the core strategy of the new CDP and consistency of timeframes for plans.

Town Plans

14. The 'town plans' in the CDP should follow a clear policy hierarchy from RPG's to the core strategy of the CDP, to the nature, location and scale of zoned lands in each settlement. The application of the spatial distribution of zoning objectives in these plans should be consistent throughout the County and align with the overall objectives of the core strategy.

Response of Chief Executive

1. The general information provided in point 1 of this submission, regarding the role of the RPGs and their future replacement with Regional Economic and Spatial Plans (RESPs) is noted. It is also noted that the timeframe for the review of the existing regional plan will not coincide with the review of the Wicklow County Development Plan; at this stage it seem likely that the new plan will be adopted or be close to adoption when the new RESP is made and therefore the new Wicklow County Development Plan may require review / amendment almost as soon as it is adopted. This is a very regrettable situation and Wicklow County Council Executive has previously made representations to the Department of the Environment that all county plans should be deferred until after the making of region plan. However, no change in the legislation has been forthcoming in this regard.
2. Point 2 appears to be suggesting that the remainder of the submission will be restricted to certain 'high level' issues, such as national and regional population targets, distribution of residential and employment development and consistency between the objectives in the development plan and its core strategy and the regional planning guidelines. The purpose of this point is not clear, as the submission to follow makes reference to a whole range of other

subjects. However, if it is to emphasise the point that particular focus should be on matter relating to the core strategy, consistency with higher level strategies etc, then the position of the Chief Executive is thus – the new County Development Plan as crafted will, as required by legislation, be as consistent with the prevailing NSS and RPGs as possible, taking into account that both documents are outdated and do not provide guidance beyond the period 2022, while this County Development Plan is being crated with a 2028 outlook.

3. The new County Development Plan will contain a Core Strategy as required by legislation, which will address consistency of the County Development Plan with high level strategies and Government policies.

The new County Development Plan crafted will insofar as is possible and logical, comply with the existing population and housing targets as set out in the current RPGs, but as set out in the submission, shall take into account any population new data of relevance. In particular, the new plan should take into account both the 2011 Census and the new regional population projections prepared by the CSO up to 2031, published in December 2013. In this regard, a 'population paper' has been prepared, and is appended to this report, which sets out suggested methodology for determining County population targets for use in the new plan.

With regard to the 'distribution' of the targeted growth around the settlements in the County, the new County Development Plan will have regard to the distributional breakdown provided in the existing RPGs.

It is recommended that the new County Development Plan continues to remain consistent with the settlement hierarchy as set out in the current RPGs, as set out in this submission.

4. The new County Development Plan will provide a 'Core Strategy' table, which will set out the population targets for all settlements / areas, the resulting housing requirements in each location and the associated land zoning needs. The methodology applied in calculating how much land to zone will be clearly set out and will be open to scrutiny.

This point raises the concept of '*headroom between towns*' that was utilised in the previous development plan.

The current RPGs required that 42% of the total growth allocated to County Wicklow be allocated to the Metropolitan Area settlements and that the 'majority' of the remainder to allocated to the Growth Towns, weighted towards the Large Growth towns in the settlement hierarchy and also particularly towards towns with rail based public transport i.e. c. 70% of total population growth to be directed towards the 'growth towns'.

As in the previous County Development Plan, rigid adherence to these distribution requirements has lead to difficulties – once the allocation for the metropolitan and other growth towns is distributed, and natural rural growth is taken into account, there is very little growth left to allocate to the 15 other towns in the County (Levels 5 and 6 in the hierarchy). The majority of these towns have capacity for growth, and to severely restrict development due to strict adherence to these population distribution requirements was considered a retrograde step, considering especially the investment in infrastructure that has been undertaken in these towns.

Furthermore, it is never possible to manage growth in any particular settlement to come in at an exact population figure at a set time, which is 2022 for the purposes of the current County Development Plan. As development in 3 of the 6 growth towns, representing towards 35% of the projected county growth, is reliant on the cooperation and financing of the National Roads Authority and the Railway Procurement Agency (as is the case in Bray), or Irish Water (as is the case in Arklow and Blessington), it is not possible to predict this with any accuracy whatsoever. The town population allocations in the current County Development Plan therefore incorporated compensatory headroom of 23% to accommodate this uncertainty and to ensure

that there will be sufficient capacity in other settlements if some growth towns are unable to deliver the necessary infrastructure to service their projected populations.

It appears that the Regional Authority is requesting that this extra 'headroom' be eliminated in the new plan. This appears to contradict the statement in their Point 3 *"that one of the significant challenges of the new County Development Plan will be to meet the current market demand for housing supply and the Planning Authority's requirement in the core strategy to align with the Regional Planning Guidelines and the National Spatial Strategy"*. If development is constrained in a number of the key settlements due to infrastructure deficits, it will not be possible to meet this "significant challenge" to address our housing requirements, especially in the light of the fact that historically *"the County has not met the population and housing policy targets as set out in the Regional Planning Guidelines"*.

In this regard, it is the recommendation of the Chief Executive that this headroom to reduced but not eliminated altogether, for the same reasons as set out above. It is recommended that headroom for 2028 be reduced to 15%.

Appendix 2 of this plan sets out a population and housing distribution analysis and recommendations in this regard.

5. In the crafting of new County Development Plan and the forthcoming LECP, due regard shall be taken of the economic and employment objectives of the existing Regional Planning Guidelines, as required by legislation.
6. It is intended that the new County Development Plan will continue to address the promotion and facilitation of the tourism sector, as one element of an overall enterprise and employment strategy. However, it is not the role of the County Development Plan to provide an overarching strategy for tourism in the County. The County Development Plan is not a 'tourism' plan – it is a 'land use' plan. The tourism strategy for the County is provided by the tourism agencies at work in the County, namely Failte Ireland, Wicklow County / Bray Tourism and the Economic Development Division of the Council. The role of the County Development Plan is to underpin the land use and development aspects on any strategies / objectives that these bodies adopt for the County. The new development plan will take into consideration the emerging 'Local Economic and Community Plan' which is being separately prepared in 2015, and any objectives it includes with regard to the tourist sector.
7. The current County Development Plan, including the County Retail Strategy, was drawn up to be consistent with the Regional Retail Strategy and all other higher level retail strategies and guidelines. It is intended that the new County Development Plan will be similarly drafted.
8. The current County Development Plan includes objectives to promote the rural economy and vitality of rural areas and it is intended that the new plan will similarly address these issues.
9. The current County Development Plan includes objectives with regard to community infrastructure and it is intended that the new plan will similarly address these issues. However, it should be noted that while a land-use plan can certainly advocate cooperation and coordination being the various agencies involved in community development, it is not an operational plan, but a land-use plan. In this sense, it is its role to provide a land use and development framework for the delivery of community projects and infrastructure.
10. The current County Development Plan includes objectives to with respect to built and natural heritage, including landscape. It is intended that the new plan will similarly address these issues.
11. The County Development Plan will be accompanied by and be shaped the various assessments and studies required by statute and Ministerial guidelines, including Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. It is also intended

that the new plan will address climate change, landscape character assessment, green infrastructure and a range of other new areas, not previously addressed in the County Development Plan, all with the goal of further integrating environmental considerations into the plan making process.

12. It is intended that LAPs will be provided for the 6 towns at the top of the hierarchy, as well as for Kilcoole (in combination with Greystones – Delgany). With respect to Rathdrum, this town has historically had its own stand alone local plan and its is considered that it is slightly higher in standing than the other towns in Level 5 (other than Kilcoole and Baltinglass, with all three being specifically mentioned in the RPGs as being more significant in the ‘small town’ category in terms of their function and potential). Therefore it is recommended that Rathdrum retains a LAP.

With respect to the intended timetable for the adoption of the Laps after the making of the County Development Plan, it is intended that they will be prepared in the following order:

Start 2016: Bray, Arklow

Start 2017: Newtownmountkennedy, Rathdrum

Start 2018: Wicklow – Rathnew, Greystones – Delgany – Kilcoole, Blessington

13. Plans below the County Development Plan in the hierarchy of plans will align with the Core Strategy and the objectives of the County Development Plan. Zoning principles will be clearly set out in the County Development Plan and shall be followed through in each local plan.

Recommendations of Chief Executive

The new County Development Plan shall be crafted to be consistent with the current regional plan, insofar as is practical, as required by Section 9 (6) of the Planning Act.

Submission No. 93**Name: National Transport Authority****Issues raised****1. General**

Section 31B(1) of the Planning and Development Act 2000 assigns the Authority certain functions in the preparation of a development plan. Where a notice is received by the Authority under section 11(2) it is required to prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority in the review of its existing development plan and the preparation of a new development plan.

Among other issues, such reports should address the following:

- a) *the transport investment priorities for the period of the development plan;*
- b) *the scope, if any, to maximise the performance of the transport system by effective land use planning, and*
- c) *recommendations on the matters to be addressed in the development plan to ensure the effective integration of transport and land use planning.*

2. Transport Investment Priorities

The Authority's Integrated Implementation Plan sets out an infrastructure investment programme which identifies the key regional objectives and outputs to be pursued by the Authority from 2013-2018, while the ongoing work between the Authority and Wicklow County Council on the Sustainable Transport Measures Grants Programme comprises the implementation of these objectives on a local scale on an annual basis. The next Government Capital Investment Programme and Greater Dublin Area Transport Strategy will also frame investment in Wicklow County over the period of the Development Plan. Certainty as to the content of these documents is not likely to emerge until later in 2015.

In advance of the next capital programme and transport strategy, and based on the plans which are currently in place, the Authority requests that the new Wicklow County Development Plan 2016-2022 facilitates the priorities and objectives of the Authority which are set out in the remainder of this report.

2 (a) GDA Cycle Network

The Greater Dublin Area Cycle Network Plan was published in April 2014. The planned network consists of primary, secondary and greenway routes (through parks, along waterways etc.), and comprises a mix of cycle tracks and lanes, cycleways and infrastructure-free cycle routes in low traffic environments. This plan will inform the next decade of NTA investment in cycling across seven local authority areas in the region.

The Authority requests that those elements of the GDA Cycle Network Plan which apply to Wicklow are reflected in the new County Development Plan, with particular reference to the primary routes and the proposed greenways as follows:

- East Coast Trail Greenway, in particular those sections within Bray, Greystones and Wicklow Town;
- Route B1/W4/G1 from Dún Laoghaire Rathdown County through Bray town centre into Greystones;
- The primary network and greenways within Bray, Greystones/Delgany/Kilcoole, Wicklow and Arklow; and
- Routes W13 and W16 – the Arklow to Shillelagh greenway and spur to Avoca.

2 (b) Public Transport Infrastructure

The Authority is not currently pursuing any major public transport infrastructure proposals in County Wicklow. Long-term proposals may emerge in the making of the next transport strategy in 2015.

3. General Land Use Recommendations

This section deals with the scope to maximise the performance of the transport system by effective land use planning on a county-wide basis, and the Authority's recommendations on matters to be addressed in the Development Plan to ensure the effective integration of transport and land use planning.

The Integrated Implementation Plan outlines the key principles for the integration of land use and transport and the Authority requests that these principles are reflected in the objectives of the Development Plan, as amended as follows:

- High volume, trip intensive developments, such as offices and retail, should primarily be focused into Bray, Wicklow Town, Arklow and Greystones;
- The role and function of town centres and villages should be supported and promoted in order to exploit the levels of accessibility offered by public transport, walking and cycling at these locations;
- All non-residential development proposals should be subject to maximum parking standards and should vary spatially on the basis of centrality and the level of public transport provision;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be considered;
- For all major employment developments and all new and extended schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with NTA guidance documents – "Toolkit for School Travel" and "Workplace Travel Plans – A Guide for Implementers". The Development Plan should contain a clear policy reflecting this requirement;
- Residential development located proximate to high capacity existing public transport, such as commuter rail at Bray and Greystones, should be prioritised over development in less accessible locations;
- To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport - including infill and brownfield sites - are prioritised;
- New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods. Where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips. This would give a competitive advantage to these modes and encourage their use as an alternative to the private car; and
- To the extent practicable, proposals for right of way extinguishments should only be considered where these do not result in more circuitous walking and cycling trips for local residents accessing public transport, or local destinations.

4. Vision and Core Strategy

The Authority acknowledges the concerns expressed in relation to the derivation of population targets for the County. It is strongly recommended, therefore, that in the preparation of the Draft Development Plan – and subsequent local area plans – that a clear and unambiguous policy of prioritisation of residential development land and phasing of growth is introduced. In this manner, the absence of targets which the Council feels are appropriate, or the requirement to revise them, is of less importance as development can proceed in a properly planned and coherent manner. This prioritisation and phasing should be carried out in accordance with the principles set out above.

5. Enterprise and Employment

The Authority recommends that a clear policy is inserted into the plan which states that zoning for employment uses will be done in a manner which protects investment in the national road network, in accordance with Chapter 2 of the Department of Environment, Community and Local Governments guidelines on 'Spatial Planning and National Roads', and seeks to prevent inappropriate levels of commuter traffic from using such routes in the County.

The N/M11 is a vital economic corridor for the east coast and should not be used to facilitate the development of employment which would be more appropriately developed close to existing public transport services in the existing urban areas of Bray, Greystones, Arklow and Wicklow, or in Dublin. In particular, development to the west of the M11 should not proceed until it can be clearly demonstrated that the potential for such growth does not exist elsewhere in the region, and that it will not have a significant impact on the carrying capacity of the M11, specifically the M11 / M50 junction to the north of Bray. This should be considered in the context of ongoing uncertainty as to the nature of potential future public transport alternatives in this location and the likelihood of such proceeding in the long term.

6. Sustainable Transportation

The Authority welcomes the transportation commitments outlined in the Issues paper and look forward to seeing how these are given expression via policies and objectives in the Draft Development Plan. The Authority will continue to work with Wicklow County Council in the implementation of schemes which will enhance the public transport, walking and cycling environment across the county, with particular emphasis on the largest urban areas.

The Authority would also like to emphasise the critical role of the rural transport programme in Wicklow and will continue to seek ongoing improvements to the efficiency and effectiveness of services in the county, within the prevailing constraints.

Response of Chief Executive

1. Noted
2. It is intended that the new County Development Plan will include appropriate policies and objectives that facilitate the priorities and objectives of the NTA, in particular the cycle and green way projects listed
3. It is intended that the land use principles set out in the submission will be reflected in the policies and objectives of the new County Development Plan
4. The NTA's comments with respect to the derivation of appropriate population / zoning targets in the absence of updated targets from the RPGs are noted. It is agreed that local zoning plans should set out a clear principles regarding the sequence for new development, in order to 'future proof' each local plan against the possibility of reduction in population targets and to ensure that unsustainable development does not occur on the periphery of settlements.
5. It is intended that the new County Development Plan will clearly articulate the zoning principles for employment land to be utilised in local plans, that reflects the principles set out in 'Spatial Planning and National Roads'.

With respect to the recommendation that no development occur to the west of the M11 until it can clearly be demonstrated that the potential for such growth does not exist elsewhere in the region, with particular reference to the area around Bray, this suggestion conflicts with the RPG vision for Bray, that identifies Bray as Metropolitan Growth Town, where significant levels of housing and employment development must be facilitated if 42% of the growth of the County is to take place in the metropolitan area of the County, and Bray is to fulfil its designation under the RPGs. Bray is constrained on the north, east and south sides, and therefore the only available expansion area for the town is to the west of the M11.

In any event the rational impact of employment development at this point is to prevent traffic from continuing on towards Dublin, and thus reducing the load on the M11/M50 merge, that is already not fit for purpose.

6. Noted

Recommendations of Chief Executive

1. The new County Development Plan shall include appropriate policies and objectives that facilitate the priorities and objectives of the NTA, in particular identified cycle and greenway projects
2. The new County Development Plan shall have the integration of land use and transport planning are a key overriding principle
3. The new County Development Plan shall clearly articulate a development strategy centred around phased and sequential development of settlements, from the centre out, with a clear preference for new development at locations that are well connected (in terms of walking, cycling and public transport services, if available) to the town centre and to other important locations such as schools, community facilities and employment locations.
4. The new County Development Plan shall integrate the principles set out in various ministerial guidelines and strategies wherever feasible, including 'Spatial Planning and National Roads'.

Part 4.3 Public group submissions**Submission No. 20****Name: Age Friendly Ireland****Issues Raised**

It is proposed by Age Friendly Ireland that the following 2 policies be included in the County Development Plan:

- 1. To support the goals and actions that will be contained within the Wicklow County Age Friendly Strategy, work on which will be commencing in early 2015*
- 2. To plan, develop, encourage and implement initiatives to improve the lives of older people in line with the themes under the WHO Age-friendly Cities and Communities Programme in specific reference to the built environment and outdoor spaces, transport, staying in their own homes and communities, being truly valued and respected, to participate in social, economic and public life, to have the information to lead fuller lives, to learn develop and work, to lead healthier, active lives for longer and to stay safe at home and out and about.*

Response of Chief Executive

Wicklow County Council, as a signatory of Dublin Declaration on Age Friendly Communities, is unequivocal in its support of initiatives that improve the lives of older people.

The existing County Development Plan sets out in Goal 8 "*To promote and facilitate the development of sustainable communities through land use planning, by providing for land uses capable of accommodating community, leisure, recreational and cultural facilities, accessible to and meeting the needs of all individuals and local community groups, in tandem with the delivery of residential and physical infrastructure in order to create a quality built environment in which to live*".

Furthermore, Chapter 15 of the existing County Development Plan (Community and Social Infrastructure) sets out numerous objectives with regard to promoting and facilitating the needs of all in the community, including older people.

It is intended that the new plan will maintain and strengthen these existing goals and objectives, and will support and facilitate achievement of the goals and actions of the Wicklow Age Friendly Strategy (which has not yet been prepared) and any other strategies or initiatives aimed at improving the lives of older people in County Wicklow.

The matters raised might be more appropriately addressed through the new Local Economic and Community plan, which is currently in preparation and this submission will be forwarded to the LECP team.

Recommendations of the Chief Executive

The new County Development Plan shall include appropriate goals and objectives, with a land use remit, that support and facilitate a high quality of life and access to services for all in society.

Submission No. 21**Name: Bray Head Residents Association****Issues Raised**

The effective management and appropriate enhancement of the Bray Head area is raised where the following measures are considered to be imperative for its protection:

1. The development and enhancement of the Bray Head area should be strictly in accordance with the provisions of the SAAO requirements.
2. A comprehensive management plan should be developed for the area and include the following:
 - A. Improvement and maintenance of footpaths and bridleways, signage notice and maps.
 - B. A way marked trail system should be developed with routes provided for the mobility impaired.
 - C. Presentation of existing areas of heathland, maritime grassland and woodland areas.
 - D. The preservation and protection of the archaeological heritage of the area particular Raheen a Cluig.
3. That the above measures be integrated into plans for Bray and Greystones with further plans for the enhancement of the natural landscape and coastal amenities throughout the County.

Response of Chief Executive

1. Objective AW6 of the existing County Development Plan aims "*To implement the measures set out in the Bray Head SAAO (Special Amenity Area Order) and investigate the possibility of the designation of further SAAOs in the County*". This objective aims to ensure that any future development or works to this area are strictly in accordance with the provisions of the existing SAAO. It is intended that the new plan will maintain and strengthen this objective.
2. The main purpose of implementing a Special Amenity Area Order is to ensure the protection of an area of local and national importance. Another effect of a SAAO is that it brings certain exempted developments within planning control. It provides more detailed information to potential development as to what is acceptable/unacceptable by stating in advance the special amenity value of the area and the clear policy of the Council with regard to the area.

The SAAO for Bray Head includes objectives as set out in schedule 1 '*Objectives in relation to the Preservation or Enhancement of the Character or Special Features of the Area*'. In addition to the above it should be noted that the development of a management plan is an implementation rather than policy matter, and therefore not a matter for the County Development Plan but an operational matter that is subject to funding, either through the annual budget or outside funders.

3. The existing Bray Town Development Plan and Rathdown No. 2 plan both include objectives aimed at implementing the SAAO for Bray Head. The recently adopted Greystones-Delgany and Kilcoole Local Area Plan does not make reference to this area as the plan boundary is separated from the SAAO area by the Rathdown No.2 Plan. It is intended that the new updated plan for Bray (due to commence after the adoption of the new County Development) will contain similar provisions.

Chapter 18 'Coastal Zone Management' of the existing County Development Plan sets out criteria aimed at protecting and enhancing the counties coastline. This chapter divides the coastline of the County into cells setting out specific objectives for each individual zone. It is intended that the new plan will include similar objectives.

Recommendations of the Chief Executive

The new County Development Plan shall maintain and strengthen the following:

- Objective AW6 which aims to protect and enhance Bray Head in accordance with the provisions of the Bray Head SAO
- The objectives set out in chapter 18 Coastal Zone Management.

Submission No. 22

Name: Delgany Community Council

Note: Please also see public submissions with respect to Delgany under Section 4.4. Topic 1 'Vision and Core Strategy' and Topic 10 'LAP settlements'.

Issues Raised

The community council make reference to the topic of sustainable development with particular emphasis on the areas of Greystones, Delgany and Kilcoole and the provision of infrastructure. In this regard the following issues are highlighted:

1. The need for step change on the provision of public transport prior to any further development taking place in the area;
2. The need for the Regional Authority to recognise the limitations of the public transport system serving the Greystones - Delgany - Kilcoole area and remove this area from the metropolitan area to the hinterland area;
3. The County Development Plan should be clear that just because land is zoned for development, it does not mean that it should automatically be developed to meet the maximum amount of development specific in the relevant zoning – zoning should be treated as a theoretical maximum amount. Many areas in Greystones – Delgany have issues with transportation, drainage, water supply, ground conditions, hydrology and underground water which mean that the 'theoretical maximum' development of these lands cannot be achieved.
4. The submission makes further reference to degradation of Delgany village and the level and type of development that should be allowable in recognition of the ACA designation in the area;
5. It is further stated that Delgany Community Council is seeking Heritage Status and also developing a Village Design Statement and believes the extent of the current ACA should be extended in order to preserve its identity, history and heritage and its potential to become a heritage village.

Response of Chief Executive

1. The current County Development Plan recognises that good transport linkages within Wicklow and from Wicklow to the Dublin region and fundamental to the future development and prosperity of the County and that land use and transport planning must be tightly linked to create sustainable development. It is intended that the new County Development Plan will maintain and enhance such goals and objectives.
2. The Regional Planning Guidelines define the Metropolitan Area as '*Dublin City Centre, its immediate suburbs and the built-up areas outside of Dublin City centre, including a number of proximate major existing towns which are strongly integrated and connected with the built up area of Dublin.*

The policy emphasis for the Metropolitan area is to gain maximum benefit from existing infrastructure such as public transport, social, infrastructural assets through the continuation of consolidation and increasing densities within the exiting built footprint of designated growth towns such as Greystones. In deisgnated such towns, the regional plan is fully cognissant of

the public transport facilities available in any area, and / or the ability to provide new or improve existing services.

It is noted that while the core area of Greystones has good transport links, being serviced by mainline rail, DART and bus services, more peripheral parts of the area, including Delgany and Kilcoole do not have the same level of service. However, it is not clear how 'downgrading' the status of this settlement from 'metropolitan' to 'hinterland' would do anything to improve such services for the existing population and might in fact have the impact of reducing investment as it is diverted away to other 'growth towns'.

3. The density assigned to any parcel of zoned land is considered very carefully in the local development plan process and takes into account a range of factors including the availability of infrastructure and the character of any area. Consideration must also be given to maximising the use of suitable lands, in the interests of minimising urban sprawl and further erosion of the countryside. The density limits set out are expressed as 'maximums' on the basis of a typical house of 125sqm and therefore where smaller units are proposed, the overall number of units may sometime be higher than the zoning suggests. The existing County Development Plan contains a number of objectives restricting development where adequate infrastructure is not available or planned for the immediate future. It is intended that the new County Development Plan will include similar objectives.
4. Objective HER12 of the Greystones, Delgany and Kilcoole Local Area Plan 2013-2019 sets out a number of objectives in relation the designation of Architectural Conservation Areas within the area while Appendix B (section 3) provides specific details on the ACA designation for Delgany Village. The designation of the village as an ACA aims to preserve the character of the village and its historical buildings and features. This objective is further supported within the existing County Development Plan. It is intended that new County Development Plan will include similar objectives. With respect to the extent of the existing ACA, it is considered that the current boundaries include all areas that are compatible with ACA designation and includes all of the historical fabric of the village. It should also be noted that the ACA designation is part of the Local Area Plan, and is not open for amendment through the County Development Plan review process.
5. In regard to the Community Council's intention to seek heritage status for Delgany it should be noted that there is no such planning or statutory designation as 'Heritage Status'. Buildings can certainly be included in the Record of Protected Structures, towns / areas can be designated 'Architectural Conservation Areas' and National Monuments can be designated by the National Monuments Service. All of this has been done in Delgany. However, there is no planning tool available to designate a town a 'Heritage Town'. (Note: In 1994 Bord Failte initiated a scheme whereby towns could be designated as 'heritage towns' for the purposes of tourism literature and marketing, subject to them fulfilling certain criteria, but this did not confer any sort of legal or statutory heritage status on the town).

Recommendations of the Chief Executive

To update and strengthen where appropriate the existing the County Development Plan objectives relating to:

- Sustainable land use and transportation
- Water and wastewater infrastructure
- Built heritage and Architectural Conservation Areas

Submission No. 23**Name: Disability Action Greystones Together****Issues Raised**

The submission refers solely to the issue of accessibility for all with a particular emphasis on the groups working within the Greystones area.

1. The group seeks support from Wicklow County Council in the Greystones Gold Star Awards
2. The group requests that the Council adopt a key access system for public accessible toilets for the public
3. The group requests that the Council adopt a policy of having at least one item of accessible play equipment in all playgrounds throughout the County.
4. The group requests that the Council, in the formulation of objectives, include an objective promoting accessible tourism.
5. A further request is made to review all accessibility audits carried out by the Council including an assessment of the location, number and accessibility of all public disabled parking spaces within the County.

Response of Chief Executive

Response to issues 1 – 2: While there are mechanisms within local authorities and other bodies associated with local authorities to support such worthwhile initiatives unfortunately this is not a function of the County Development Plan. This matter will however be passed on to the LECP team and the Accessibility Unit.

3. In regard to the provision of accessible play equipment in all playgrounds throughout the County it should be noted that the County Development Plan currently states under section 15.5.1 that community facilities must be accessible to all members of society, including those with disabilities. The actual delivery and design of such playgrounds and associated equipment types is a function of the Community, Cultural and Social Development department of the Local Authority. Given the County Development Plan is not the appropriate mechanism for the design and delivery of playgrounds this issue shall be passed on to the LECP team and the Accessibility Unit for further consideration.

4. While the existing plan contains accessibility objectives relating to community facilities and building design, the specific term 'accessible tourism' whereby tourist destinations, products and services are accessible to all people, regardless of their physical limitations, is not included in the existing County Development Plan. In this regard it is considered that the inclusion of such an objective within the strategic objectives for tourism would be worthwhile.

5. The review of accessibility audits is a function of the Accessibility Unit of Wicklow County Council but outside the remit of the County Development Plan. This matter will be passed on to this unit.

Recommendations of the Chief Executive

The new County Development Plan shall strengthen and enhance all objectives relating to the issues of accessibility for all including the issue of accessible tourism in so far as a land use plan can influence the provision of such facilities.

Submission No. 24**Name: Enniskerry Forum**

Note: Please also see public submissions with respect to Enniskerry under Section 4.4, Topic 11 - 'Level 5 settlements' of this report

Issues Raised

The following issues were raised in relation to the review of the plan for Enniskerry:

1. Population and settlement hierarchy
The population projections for the area are considered to be excessive, while the area's position within the settlement hierarchy is out of context with the character of the area.
2. Infrastructure
The area lacks the capacity to absorb the level of development currently envisaged in the County Development Plan's settlement hierarchy, while poor traffic management and parking impact on the visitor experience to the area.
3. Views
The view from Kilmolin/Parknasilloogue north east towards the sea and Carrickgallon should be included as view to be protected.
4. Community
The area lacks basic amenities such as a playground for children. This issue should be addressed in the new plan.
5. Heritage
The existing streetscape of the village centre should be afforded increased planning protection with greater controls on shop front design.

Response of Chief Executive

1. Enniskerry is designated a Level 5 'Small Growth Town' in the existing County Development Plan and this is considered an appropriate designation for a town of this size and function, in accordance with the RPGs:

"The classification of Small Growth Towns is largely synonymous with the centres identified by the NSS as yielding a population of between 1,500 and 5,000 persons. It is envisaged that major employment-generating investment companies will seek to locate in Large Growth or possibly Moderate Growth Towns, and not necessarily in these locations. Relatively small and locally financed businesses are expected to locate in Small Growth Towns; however, other economic investment could be supported where sustainable and in keeping with the size and services of the town. Retail is likely to be mainly in the convenience category, with a small supermarket and possibly local centres serving only the town and its local catchment area. Small Growth Towns would likely contain facilities such as a primary and sometimes a secondary school, as well as a health clinic".

The RPGs set out that within this category of settlement are a range of types, with local commuter type towns located close to other larger centres and small commercial towns, remote from core commuter areas and having strong trading tradition serving a large rural hinterland. Enniskerry is considered to fall within the first category, having regard to its location vis-à-vis Dublin and the larger Wicklow settlements of Bray and Greystones, and its dependence on these metropolitan areas for employment and higher order services.

It is not clear what would be achieved if Enniskerry were to be moved down the hierarchy to Level 6, other than perhaps reduction in the amount of housing that might be developed there. There current population target for Enniskerry for 2022 is 3,000. There appears to be general sentiment from submissions from Enniskerry residents that new housing development should

be severely curtailed in the town. However, the reality is that new housing growth needs to be accommodated throughout the County, and Enniskerry has to absorb its appropriate share. The town is serviced by water and roads infrastructure, there are primary schools in the town, there is a wide range of community and retail services and there are suitable land banks close to the town centre. It is considered appropriate that a suitable level of new housing growth is accommodated.

Nevertheless, as part of the review of the existing core strategy and population targets it is considered that the target of 3,000 is unrealistic for Enniskerry, and it is recommended that this be reduced to 2,500 for 2028.

2. In the crafting of the updated local plan for Enniskerry, existing objectives with regard to traffic management and car parking etc will be reviewed and improved if necessary. The role of a land use plan is to put in place a framework for future development, while the delivery of such improvements is an operational and budgetary matter.
3. It is intended that the existing schedule of listed views within the plan will be reviewed and updated as deemed appropriate.
4. As part of the review process for the Enniskerry Town Plan the issue of community facilities in the area will be addressed through appropriate objectives. The actual delivery of such facilities is an operational matter and a matter for the annual budgetary process.
5. The existing County Development Plan designates the entire core area of Enniskerry as an Architectural Conservation Area which, alongside the list of protected buildings in the area, aims to provide protection to the character of the area. The extent of the ACA and the list of protected structures will be reviewed during the development of a town plan for Enniskerry. The existing County Development Plan in Chapter 10 (Section 10.6) contains a number of objectives specifically relating to shop front design. The review of the Enniskerry Town Plan shall enhance and strengthen these existing objectives where deemed necessary in Enniskerry.

Recommendations of Chief Executive

1. To revise the population target for Enniskerry, as set out in the proposed 'Core Strategy'
2. To strengthen and enhance as appropriate all objectives of the existing Enniskerry Town Plan, particularly those relating to heritage including views, traffic and transportation and community development.

Submission No. 25**Name: Glendalough and District Development Association****Issues Raised**

1. It is requested that the review of the plan for Laragh and Glendalough make provision for a playground.
2. It is also requested that the council take in charge the road from Ballard to Trooperstown as the residents currently maintain this roadway.

Response of Chief Executive

1. As part of the review process for the Laragh – Glendalough Plan the issue of community facilities in the area will be assessed and appropriate objectives put in place to facilitate and promote the delivery of such infrastructure. The actual delivery of such facilities is a function of the Community, Cultural and Social Development Department of the Council and subject to funding.
2. The taking in charge of private roads is not a function of the development plan.

Recommendations of Chief Executive

To strengthen and enhance as appropriate all objectives of the Laragh – Glendalough Plan.

Submission No. 26**Name: Greystones Tidy Towns**

Note: Please also see public submissions with respect to amenity routes under Section 4.4, Topic 9 - 'Natural Heritage' of this report

Issues Raised

It is proposed that Wicklow County Council and the LECP facilitate and promote the sustainable development of a river walk along the Three Trout Stream in Greystones. The submission includes details of how it is proposed to provide this walkway in a sustainable manner recognising the environmental assets along this route.

Response of Chief Executive

In Chapter 11 of the existing County Development Plan objective CW3 aims to facilitate the development of walkways such as that proposed by Greystones Tidy Towns. In addition the existing Greystones-Delgany and Kilcoole Local Area Plan (GDK LAP) provides on Map B 'Heritage' a number of indicative green routes with potential to develop walkways. This includes a green route that runs the length of the Three Trout Stream as envisaged by Greystones Tidy Towns.

It is the function of a land use plan to include objectives for the future development of an area, and in this regard, both the existing County Development Plan and the GDK LAP make provision for the development of amenity routes. While the GDK LAP is not open to amendment as part of this process it is intended that the new County Development Plan will include similar objectives to those currently in place and enhance provisions with regard to amenity routes. The actual delivery of such a route is however an operational and funding matter, which may be more appropriately, addressed through the forthcoming LECP or the County Heritage Plan.

Recommendations of Chief Executive

It is an objective of the existing County Development Plan to facilitate the development of walkways, and it is recommended that such objectives are maintained and strengthened in the next County Development Plan.

Submission No. 27**Name: Irish Heart Foundation****Issues Raised**

The Irish Heart Foundation submission is broken into the following two sections with a strong focus on how the County Development Plan could be used to improve the public health of people in Wicklow.

1. Public Health and the Wicklow Development Plan

- A. The IHF request that Wicklow County Council place health at the centre of the Development Plan to give new generations the best start in life and to help make Wicklow the healthiest County in Ireland.
- B. Reference is made to the Government document Healthy Ireland 2013-2025 in particular action 1.9 (future proposals for the role of local authorities in the area of health and well-being) and action 2.3 (the development and provision of integrated social impact assessments).
- C. The submission further makes reference to Local Area Plans - Guidelines for Planning Authorities which places an onus on local authorities to incorporate a focus on active and healthy living in their communities and details the contents of page 32 of these guidelines.
- D. The IHF consider that the Development Plan should include objectives that any new plans for towns and villages include walking and cycling routes to schools in the area while also promoting additional healthy walkways throughout plan areas.
- E. This section of the submission concludes by requesting that Health be included as one of the strategic goals of the plan preferably within one of the first strategic goals while also being included as an objective within the Core Strategy.
- F. A further objective is also proposed within the plan relating to the requirement for Health Impact Assessments (HIA).

2. Creating Healthy School Environments

- A. Part two of the IHF submission relates to the provision of schools and the creation of healthy environments by restricting fast food outlets locating within close proximity to schools and restricting a proliferation of these service providers adjacent to schools. In this regard specific reference is made to the McDonalds application at Blacklion in Greystones and its proximity to a three school complex.
The IHF suggests that an audit of local authority licensing and catering arrangements in Wicklow be undertaken with the intention of developing formal recommendations on reducing the proximity of fast food outlets to schools and other places where children congregate.
- B. Reference is also made to the Town and Country Planning Associations 'Healthy Weight Environments' guidance on how planning authorities can support healthy-weight environments through movement and access; open spaces, recreation and play; food; neighbourhood spaces; building design; and local economy.
- C. The submission concludes by requesting that Wicklow County Council commit to the provision of allotments for food growing as a healthy source of living.

Response of Chief Executive

1.
 - (a) The current County Development Plan and local plans that flow from it aim, insofar as a land use plan can, to address the issues of health and wellbeing, for example through appropriate objectives that:
 - regulate development,
 - promote and facilitate the development of public open spaces, sports facilities, playgrounds, walking and cycling routes,

- identify of opportunity sites that increase connectivity between new developments and town centre facilities for both pedestrians and cyclists and
- promote recreational amenities throughout the County.

It is considered that through these measures the plan already facilitates and promotes healthy living within the County. It is intended goals and objectives aimed at creating a healthy environment in which to live and work will be strengthened and carried forward in the new plan.

- (b) The actions of Healthy Ireland 2013-2025 are noted. While the consideration of issues relating to health are not explicitly set out as mandatory objectives that a County Development Plan must include, the plan currently contains a number of goals and objectives which, when combined, aim to create a sustainable and healthy environment in which to live, work and visit. It is considered these goals and objectives promote healthy living from a land use perspective and it is intended the new County Development Plan will aim to strengthen these goals and objectives where possible.
- (c) The contents of the guidelines are noted. All current plans prepared by Wicklow County Council at present contain objectives for the provision of open space areas both active and passive, promote and designate indicative walking and or cycling routes, aim to create pedestrian friendly links between a town/village core and new development and promote public transport over car based trips where possible. These provisions are guided by the objectives of the current County Development Plan in particular chapters 5, 7, 11 and 15. It is intended that such objectives are maintained and strengthened in the next County Development Plan.
- (d) As per (c) above.
- (e) As set out in a) above the existing County Development Plan contains a number of goals and objectives which when combined aim to create a sustainable and thus healthy environment in which to live, work and visit. It is considered these goals and objectives already promote healthy living from a land use perspective and it is intended the new County Development Plan will aim to strengthen these goals where possible.
- (f) While the plan may not explicitly make reference to the term public health, the overall goals and objectives of the plan in determining the shape and direction of the built and natural environment play a key role in influencing determinants of health. In the absence of specific guidance on the issue of public health and the introduction of health impact assessments it is intended that in formulating goals and objectives for the new plan that the issue of public health will be implicitly linked to the overarching goals of the plan.

2. With respect to fast food or similar outlets near areas where children are educated or congregate, Ministerial guidelines on Local Area Plans published in June 2013, state that:

"Regardless of the physical or locational context for local area plans, planning also has an important role to play in promoting and facilitating active and healthy living patterns for local communities. For example, the local area plan can promote active and healthier lifestyles by ensuring that:

- *future development prioritises the need for people to be physically active as a routine part of their daily lives;*
- *pedestrians, cyclists and users of other modes of transport that involve physical activity are given the highest priority in transport and mobility strategies, policies, and objectives;*
- *public open spaces are located and delivered in a way that ensures they are capable of being easily reached on foot or bicycle by routes that are secure and of a high standard and that take biodiversity issues into account in their design;*
- *any new workplaces are linked to walking and cycling networks;*
- *play areas are designed to encourage varied and physically active play; and*
- *exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced such as the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks.*

The Chief Executive would have a number of concerns about carrying out an audit of or the inclusion of an objective with regard to the location of fast food chains vis-à-vis schools, parks etc for the following reasons:

- There is no further guidance from the Government on this issue, in particular what 'careful consideration' might mean, how 'appropriateness' might be assessed and what 'in the vicinity' might mean. In the absence of clear guidelines or what the Minister is suggesting, it is not known if any objectives adopted by individual Local Authorities would be legal and not discriminatory or contrary to EU laws in any way.
- While the focus of the Ministerial guidelines above is to reduce the exposure of young people to foods that are high in fat, salt and sugar, it singles-out only 'fast food' outlets in this regard, and does not mention other types of food outlets that sell such food types (i.e. hot food for immediate consumption, often fried), such as convenience stores, supermarkets and 'traditional' cafes and restaurants.
- The guidelines single out a food type that is potentially harmful to young people yet do not mention controlling outlets selling other products that are potentially bad for young people's health in the vicinity of schools, parks etc such as confectionary, chocolate bars, ice-cream, crisps and sugary drinks, or indeed alcohol (many school going children are over 18). For example, a 'Mars Bar' has 4 times as much sugar as a 'Big Mac'.
- As it is not clear what kind of controls are being suggested by the guidelines, it is not clear what 'exemptions' or 'conditions' might be appropriate. For example, were 'exclusion zones' around schools, parks etc to be applied, as are used in some locations in the UK, should similar 'exemptions' to those used in the UK be applied? In the UK where such zones are implemented, town and neighbourhood centres are generally excluded from the restricted zone, as these are the places designated for mixed use development, where one expects to find a range of products and services for sale. Indeed, it is a tenet of current thinking on 'sustainable planning' that mixed use centres be provided at the heart of communities, where residents can avail of a wide range of services, including retail, restaurants, community and education uses etc in one location, thereby reducing vehicle trips, allowing for more efficient development of public transport and allowing for improved social connectivity.

It is not recommended therefore that an audit or objective be included in the new County Development Plan with respect to fast food outlets, unless

- the same restriction is to be applied on all outlets selling potentially health harming products
- in the application of any 'exclusion zone', designated town and neighbourhood centres, as well as 'core retail areas' would be exempted from the zone.

B. As set out above all current plans prepared by Wicklow County Council contain objectives for the provision of open space areas both active and passive, promote and designate indicative walking and or cycling routes, aim to create pedestrian friendly links between core areas and new development and promote public transport over car based trips where possible. These provisions are guided by the objectives of the current County Development Plan in particular chapters 5, 7, 11 and 15. It is intended that such objectives are maintained and strengthened in the next County Development Plan.

C. Objective OS4 of the existing County Development Plan facilitates the development of allotments subject to certain planning criteria. It is intended that this objective will be maintained and strengthened in the new County Development Plan.

Recommendations of Chief Executive

1. It is intended that objectives relating to the provision of sustainable mode of transport will be maintained and strengthened in the new County Development Plan.
2. In the formulation of the goals and objectives for the new plan, an overarching goal will be to ensure a safe and healthy environment for all in society, and one that promotes and facilitates healthy lifestyles.

Submission No. 28**Name: Keep Ireland Open****Issues Raised**

A request is made that the 2016-2022 plan include a full index as recommended in the Development Plan Guidelines.

The contents of this submission provide a detailed analysis of the existing County Development Plan 2010 – 2016 section by section with proposed recommendations being made where it is considered improvements/updates can be made.

Section A – Chapter 1

1. Under section 1.2 it is recommended that a complete list of the mandatory objectives required by the Planning and Development Act 2000 (as amended) be provided under section 1.2.
2. It is proposed that the wording under section 1.4 of the existing plan 'Enforcement' be replaced with the following - *The council has extensive powers under the Planning and Development Act 2000 to take enforcement action where unauthorised development has occurred, is occurring or, where permitted, development has not, or is not being carried out, in compliance with the planning permission granted or any conditions. Planning legislation will be enforced to ensure that the environment is not jeopardised by inappropriate and environmentally damaging development and ensure that the policies and objectives of the Plan are implemented and adhered to. Ensure that the integrity of the Planning System is maintained and that it operates for the benefit of the whole community and that the environment is not jeopardised by inappropriate and environmentally damaging development and ensure that the policies and objectives of the Plan are implemented and adhered to. Take enforcement action in cases of unauthorised development, where it is appropriate to do so, consistent with the provisions of Part VIII of the Planning and Development Act, 2000. Under planning legislation any development which requires permission and does not have that permission is unauthorised development, as is development which has been or is being carried out in breach of conditions specified in a planning permission. In carrying out its enforcement functions, the Council will:*
 - A. *Issue Warning Letters, in relation to any non-minor unauthorised development of which it becomes aware, within 6 weeks;*
 - B. *Carry out an investigation into alleged unauthorised development, after the issuing of a Warning Letter;*
 - C. *Make a decision, as expeditiously as possible, as to whether or not to issue an Enforcement Notice. This decision to be made within 12 weeks of the issue of a Warning Letter;*
 - D. *Enter any decision to issue an Enforcement Notice, including the reasons for it, in the Planning Register;*
 - E. *Notify complainant(s) regarding the decision to issue an Enforcement Notice. Where the decision is not to issue an Enforcement Notice the developer and the complainant will be informed of the reason for this decision.*
 - F. *May carry out periodic site visits in order to ascertain compliance. Proceedings for non-compliance with and Enforcement Notice will be taken in the District Court in most cases. However, where appropriate, injunctions will be sought in the Circuit Court or High Court. In all cases involving legal proceedings the Council will seek to recover its costs, in addition to any fines imposed by the courts.*
3. It is proposed that an additional paragraph be included under section 1.5 'Ministerial Guidelines' stating "*This Plan has been drawn up to be, as far as practicable, consistent with the DoECLG Guidelines and relevant strategies, guidelines, plans, policies and objectives of other Ministers. Development proposals shall be subject to National guidance and policy*".

This section of the plan should also include additional sub sections stating that the plan has been drawn up to be consistent with the National Spatial Strategy and takes into account plans of adjoining counties.

Specific reference should also be made regarding the 2 year review required by section 15 (2) of the Planning and Development Act 2000 (as amended)

It is further proposed that 'riders' added to some objectives 'subject to the availability of financial resources' be deleted.

4. It is also contended that the plan should include a statement in accordance with Sec 28 of the Planning & Development Act (as amended by Sec 20 of the 2010 Act) as to how the Plan has implemented or not implemented the policies and objectives of the Minister.

Chapter 2 Context:

1. Section 2.2.1 – Additional text proposed stating that the plan has been drawn up to be consistent with the Regional Planning Guidelines.
2. Additional text proposed under section 2.3.5 Local Plans and other Studies
The current Heritage Plan should be reviewed prior to its expiry and the new Plan be set within the context of the National Heritage Plan and that in preparing the Plan it will be an objective to ensure a balance between protection of heritage and the implementation of other, often competing, policies in the Development Plan.
It is proposed that the main objectives of the heritage plan should be mentioned.
Implement, promote and support, in partnership with all relevant stakeholders (including the Co Heritage Forum, the Heritage Council, community groups and the wide public) the aims, objectives and actions contained in the Plan and any revision thereof and take cognisance, in assessing planning applications and preparing development plans, the provisions of the Plan.

Section C

1. Chapter 8 the Rural Economy section 8.2 Agriculture – This section should be repositioned to section 8.3.2 – and Forestry be repositioned to section 8.3.3
2. Under the 3rd paragraph 3rd pt it is submitted this should be replaced by: *Encourage, promote, provide, facilitate and protect access to forestry and woodlands, including private forestry, in co-operation with Coillte, the Forest Service and other agencies, for walking routes (including long distance and looped walks), mountain trails, nature trails, mountain bike trails, bridle paths, hiking, orienteering and other non-noise generating recreational activities for the benefit of local people and tourists and take into account the Forest Service 2006 publication "Forest Recreation Guide for Owners and Managers". The council will support the development of purpose built trails and cycle tracks. Regulate development to maximise recreational amenity and community uses.*
3. It is also proposed that the heading 'Extractive' be repositioned to 8.4.5 and that section 8.3.2 Agriculture include the following text:
 - A. *Recognising the increasing demand for recreational space, provision should be made for the recreational use of agricultural land, particularly commonage and other rough grazing land which shall be regarded primarily as a recreational resource.*
 - B. *Farmers will be encouraged to see themselves as custodians of the countryside and the rural landscape which are valuable to present and future generations.*
 - C. *Agriculture is an integral part of the management of large parts of the rural environment and landscape and provides an amenity for enjoyment of the general population.*
4. Replace the 2nd part of objective AGR1 after the word development on the 3rd line with - *ensuring that rural amenities, important archaeological and heritage features, visual amenities, eco-systems, conservation areas, landscape and scenic views are protected from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that they are appropriate in nature and scale, and ensure it does not have an undue negative impact on the visual/scenic amenity of the countryside. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines.*

5. Include an objective – *promoting the adoption of a Land Use Strategy*
6. Under section 8.3.3 Forestry include the following text –
 - A. *Recognise the recreational and tourism potential of forestry.*
 - B. *The Council would welcome a revision of the planning regulations that would bring forestry plantations under the control of the planning system as nothing alters a landscape more than large scale forestation, yet such planting is largely outside the control of Councils .*
 - C. *Coillte's "open forest" policy allows the visitor to access and enjoy woodland areas.*
 - D. *The council has a role both in planning for initial forestation and expansion; planning permission is required where an EIA is required. Applications to the forest service for planting are referred to the council for its observations.*
7. It is submitted that a table and maps of recreational/amenity forests within the County be included in the plan.
8. Replace objective FTY2 with the following wording "*Forestry will not be permitted on ridge lines and should be monitored in elevated landscapes and being conscious of the potentially negative visual impact of forestry development on landscape quality and on the surrounding area in terms of its nature and scale (including clear-felling activity) protect from injury scenic and exposed/elevated landscapes, scenic routes, views, prospects and vistas(including to water and valley approaches to the hills), in SPAs, SACs, NHAs, Geological sites and in Primary and Secondary Amenity Areas, archaeological sites, historic monuments/sites and heritage features and geological sites. Ensure that exclusion zones are applied to sites of archaeological importance. The Council will seek to have such planting and felling conducted in a manner which takes into account best practice in forestry planting and felling in the context of landscape design*".
9. Omit the wording 'Timber Production' on the fourth line of objective FTY3 as there is little evidence that timber production is unduly inconvenienced by recreational users. We submit that the inclusion of timber production might well give an excuse to forestry operators to close off entire forests for recreational use.
10. Propose that the following objectives be included in the plan:
 - A. *Retain existing rights of way and identify them and established walking routes before planting commences and maintain them as Rights of Way/Walking Routes.*
 - B. *Promote, encourage and support Neighbourhood Schemes by identifying suitable areas and support other initiatives that aim to establish and enhance woodlands for recreational purposes in partnership with local communities.*
 - C. *Engage with Coillte in developing off-road cycling trails at (local) in accordance with Coillte' Off-road Cycling Strategy(2012).*
 - D. *Seek to identify areas of forestry that could be developed or protected as amenity areas.*
 - E. *Forestry shall not obstruct existing public rights of way, traditional walking routes or recreational and tourism amenities and facilities.*
 - F. *Protect access routes to upland walks and rights of way.*
 - G. *On steep slopes above the 300 metre line planting will be strongly discouraged especially where the land slopes to a water body or where the land contains deep peaty soil.*
 - H. *Discourage new forestry development, except for broadleaf, in proposed/candidate and adopted NHAs,SACs and SPAs in designated Sensitive Rural Landscapes and Visually Vulnerable Areas, along designated Scenic Routes(Broadleaf forestry will be open to consideration in these areas).*
 - I. *Adhere to(or comply with or be in accord with)the relevant guidelines published by the Forest Service.*
 - J. *Forestation will only be considered in areas identified as suitable for such development in the Landscape Character Assessment.*
 - K. *Where cumulative limits of 50ha is reached the Council will request an EIS.*

11. Extractive Industry - *Reposition section 8.3.5 Extractive Industry to section 8.4.5*
12. Add the following wording to objective EX1 - *Applications for new development, including associated processes, shall identify existing public rights of way and established walking routes which may be impacted on are adjacent to the development site. They shall be kept free from development as Rights of Way/Walking Routes.*
13. Replace objective Ex4 with: *The following National Guidelines (as may be superseded and/or updated) should be complied with:*
- A. *Environmental Management (EPA 2006);*
 - B. *Quarries and Ancillary Activities: DOECLG Guidelines 2004);*
 - C. *Environmental Code (ICF 2006);*
 - D. *Geological Heritage Guidelines(ICF & GSI 2008);*
 - E. *Archaeological Code of Practice (ICF & DOECLG 2009).*
14. 8.4.6 Extractive Industry – *Propose that a table of guidelines be included in the plan and the first bullet point in this section be replaced with the following:*

Development will not be permitted in SACs, SPAs, NHA.s, High Amenity Areas (including buffer zones), in the vicinity of recorded monuments, World Heritage Sites and zones of archaeological potential. In other areas development will be permitted only when it is carefully sited and designed and when the environment and the character of the landscape, particularly sensitive landscapes, natural heritage and archaeological heritage, areas of geological or geomorphological interest, areas of ecological importance, national monuments, listed views and prospects, lakes, river corridors and associated wetlands and places of natural beauty or interest are safeguarded, preserved, conserved and protected to the greatest possible extent and that development does not adversely affect amenities for local people and visitors. Applicants for new or extensions to existing quarries shall submit a detailed landscape and visual assessment which shall identify the area of visual influence and include details of impacts on designated amenity areas and indicate the use of hills and existing trees or other screening to be retained or removed and any proposed screening, grassing or planting of trees or scrubs and proposals for their maintenance, must be carried out and used to determine the extent of the area of visual influence and this screening whether by natural or by alternative means must be retained for the life of the planning permission. The Planning Authority will place the onus on the developer to prove that the proposed development can be accommodated in the landscape without detracting from its character and will impose strict conditions on planning permissions relating to the avoidance or mitigation of visual and other environmental impacts operations should not have a detrimental environmental effect on designated or proposed conservation sites and do not adversely affect European Conservation Sites. The Council will have regard to landscape sensitivity ratings.

Under the section 'conditions attached to permission' it is proposed that the following objectives be included:

- A. *Positively engage inter-alia with lobby groups, local amenity groups, other local authorities, National Park and Wildlife Service and ensure that state bodies in on-going development and review of the Council's management and control.*
- B. *Advice from the relevant statutory body will be sought and considered.*
- C. *The visual impact of a quarry or a mine is likely to extend beyond the boundaries of the primary visual unit within which the development lies. A detailed landscape and visual assessment must be carried out and used to determine the extent of the area of visual influence and submitted with any planning application and permission will not be granted if it adversely affects the amenity value of adjoining and neighbouring land.*
- D. *An EIS will be required as part of a planning application where the thresholds outlined in Schedule 5 of the Planning and Development Regulations 2000 are met. The Planning Authority will also exercise its powers under Article 103-subsection (1) to require an EIS for sub-threshold development where it is considered that the development would be likely to have significant* effects on the environment or heritage. Appropriate mitigation measures and details of re-instatement after use must be included.*

- E. *Consideration must be given to the EU guidance on "Undertaking on Non Energy Extractive Activities in accordance with Natura 2000 Requirements July 2010.*
- F. *Permit the manufacture of aggregate products(including the processing and delivery concrete and tarmac) provided that the activity will not have an adverse environmental impact and has due regard for visual amenities.*
- G. *Minimise the impact of extraction through rigorous application of licensing, development management and enforcement requirements for quarries and other developments affecting visual impacts, impacts on amenities and the phasing, re-instatement and landscaping of worked sites.*
- H. *The Archaeological Code of Practice(DoECLG/ ICF 2009) Guidelines will be used in the archaeological assessment of extractive development application, with best practice adopted.*
- I. *Refer applications for development to GSI for mineral extraction, quarrying developments/extensions and any developments involving excavations greater than 50,000m or one ha in area.*
- J. *Where a development proposal is likely to have a significant effect on a European site, an Appropriate Assessment will be required. Appropriate mitigation measures and details of re-instatement after use must be provided.*

15. It is submitted that section 8.4.5 Forestry be repositioned in 8.3.3

16. Chapter 9 Tourism & Recreation

9.1 Introduction, second paragraph – include the following wording '*Recreation is an important component of modern living and has a valuable social role in modern society.*'

Section 9.3.1 General Objectives – it is proposed that objectives TR1 AND TR2 be merged and rewritten as "*As environmental heritage is an important amenity upon which tourism depends, and it has intrinsic values which outweigh its value as a tourist asset so that it can be enjoyed and cherished by future generations and that developments are appropriate in scale, are sited, designed to a high standard, maintained and landscaped so that they do not have an undue negative impact on natural and archaeological heritage features, appearance and character of landscapes, sites of nature conservation importance, environmentally sensitive areas, scenic amenities or degrade or alter the natural environment. Developments should be appropriate in scale and appropriate to the character of the area, be clustered to form a distinct and unified feature in the landscape, utilise suitable materials and colours, and be readily absorbed in its surroundings by taking advantage of existing vegetation and/or topography, and be satisfactorily assimilated into the landscape. Facilitate infrastructure for water-related activities providing that it is consistent with natural and recreational values of the water body and any heritage designations*".

Integrated Tourism Complexes: Include an additional bullet point to objective ITLR3 to read - *An overall Master plan will be required which will include proposals for the preservation/conservation of natural amenities e.g. woodlands, watercourses/waterbodies, designated sites, national monuments and other structures of historic merit. It should be of a high architectural standard of layout, design and landscaping should retain the open nature and rural character of open countryside, of key views and prospects and should ensure that rights of way or walking routes are not impinged.*

Section 9.3.6 Themes and Products – propose additional text to include - *The growth of rural tourism (including agri-tourism) is critical to the local economy and is directly and positively linked to its economic, social and natural resources. There is strong potential for eco-tourism. This approach promotes enhanced awareness and positive appreciation of local resources, traditions, ways of life and opportunities to optimise the use of amenities and share the benefits throughout the area. Rural tourism can play an important role in supporting and diversifying the economy of rural communities and is based on local amenities and natural heritage.*

It is proposed that objectives TTP1 AND TTP2 be merged and rewritten to read - *Encourage, support, facilitate and promote the development and expansion of rural tourism including agri-tourism,*

farmhouse accommodation, open-, pet-farms, horse trekking centres, walking, cycling, bird watching and eco-, geo- & green-tourism.

Reposition TTP3 in section 11.3 and replace the first part of this paragraph with the following wording – *'Recognising the importance and potential of walking and cycling from a local as well as a tourism perspective, create, provide, promote, improve, develop, sustain, support, enhance, encourage and facilitate the creation of dedicated network of cycling/walking routes and tourist trails (including looped walks, local walks, community walks and medium/long distance walks) and public/rural footpaths, in rural areas (including suitable linear lands along cutaway bogs, established rights of way, strategic green corridors and other off-road routes). Ensure that these routes are convenient and provide a pleasant environment by maintaining and enhancing existing facilities. Enhance and extend existing routes, by utilising links from residential areas through parks and open spaces to facilitate a secure green network and linking with Sli na Slainte and existing or new public rights of way, to provide access to scenic, coastal, mountain, lakeshore and river features and views of special interest, particularly where these have a historical association and to open up diverse landscape. Create more people friendly places, walking/cycling routes should be designed to incorporate current thinking and best practice from experience in other locations. Off-road walkways can be established by informal, formal agreements with landowners or by acquisition'.*

And replace the second part with - *Support, promote and encourage the development of new and existing, walking and cycling routes including facilities ancillary to trails and including medium and long distance routes and cycle touring routes, in conjunction with the Irish Sports Council, IW and Failte Ireland, to provide and develop linkages with trails, particularly those with a historical associations and in areas of high amenities, from Wicklow to adjoining counties, including cross border counties, in partnership with their councils, the state, private and voluntary sectors.*

Additional Objectives Proposed: It is proposed that the following objectives be included under section 9.

- A. *Ensure that all built elements of agri-tourism are appropriately designed and satisfactorily assimilated into the landscape, conserve natural heritage, protect the environment and do not have an undue negative impact on the visual/scenic amenity of the countryside. Ensure that buildings/works shall be designed, located and screened will not take away from the rural character and appearance of the area. Buildings in visually sensitive areas must address the surroundings.*
- B. *Preserve, improve and extend recreational amenities and explore the potential for rural recreational tourism in conjunction with Tourism bodies, WI, FI and NPWS.*
- C. *Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation.*
- D. *Ensure that golf course development does not impinge on existing public rights of way or walking routes by identifying them prior to development.*

It is proposed that a further sub-section be included in the plan relating to Public Rights of Way with the following wording:

- A. *Public Rights of Way constitute an important recreational amenity for local people and visitors. They enable the enjoyment of high quality landscape and cultural heritage and provide a valuable link to natural assets such as lakes bogs and forests. A public right of way is a person's right of passage along a road or path, even if the route is not in public ownership.*
- B. *The preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan.*

Include the following objectives relating to Public Rights of Way:

- A. *Create additional rights of way and extend existing ones, by undertaking a review of walking and cycling routes and bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way particularly in areas of high amenity to areas of high amenity, the coast, uplands, lake shores, river banks, forests, heritage sites, areas of historic or archaeological*

importance, National Monuments, to create a meaningful network. Promote their greater use and designate traditional walking routes to the coast as public rights of way. Provide linkages from built up areas to the countryside and to link with public rights of way in adjoining counties.

- B. *Provide adequate signposting and waymarking on rights of way.*
- C. *Protect and promote Greenways and consider designating them as public rights of way.*
- D. *Identify and map on an ongoing basis public right of way and incorporate them in the Plan by way of a Variation.*
- E. *Ensure that development does not impinge on public walking routes and existing public rights of way and keep them free from obstruction by prohibiting development. Enforce, by legal action, if necessary, any unauthorised attempt to inhibit access.*
- F. *Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way.*
- G. *Existing Public Rights of Way and established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments and any other development capable of affecting the respective right of way.*
- H. *Development will not be permitted where a public right of way will be affected unless the level of amenity is maintained by:*
 - (i) the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;*
 - (ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.*
- I. *Recognizing the importance of maintaining established public rights, specially in tourist areas and to encourage cycling and walking, protect, preserve, conserve, enhance and improve, for the common good, public rights of way, and ensure that they are effectively maintained by controlling undergrowth, trees and <text missing>*

SECTION D

Chapter 11 Roads & transportation

Sub-divide section 11.3 into the following three sections A. Cycling only, B. Walking only and C. Walking & Cycling.

1. Cycling – include the following wording:

- A. *The National Cycle Policy Framework (Department of Transport, 2009) aims to create a strong cycling culture which would provide health benefits, a more friendly environment for cycling and improved quality of life. One of its aims is to provide designated high quality rural cycle networks, including inter-urban routes, to encourage cycling for leisure and recreation for both visitors and local people by ensuring that the needs of cyclists should be articulated in county development plans.*
- B. *FI's Strategy for the Development of Irish Cycling Tourism (2007) recommends the designation of a cycling network around the country and the improvement of existing routes with better sign posting, road surfaces and greater safety for the cyclist. The National Cycle Policy Framework (DOT 2009) includes a policy to construct this National Cycle Network and to expand it to include rural recreational routes, paying special attention to the opportunities of using the extensive disused rail networks as cycling / walking routes. The development and expansion of the network will be implemented by various Government bodies including local authorities.*
- C. *There is a need for to identify more dedicated cycle routes across the country which can compete with other European Routes such as "the Danube Cycle Path" in Austria and "C2C Cycle Route" in Britain.*
- D. *Failte Ireland notes that cycle tourism represents a growing and valuable market for rural areas as it offers opportunities for the development of cycle hire and cycling holiday operations. Cyclists stay longer in an area, and since they cannot carry much provisions, they need to shop locally.*

Propose that the following objective be included in the plan:

Cycling Objective:

As visitors and local people are not being provided with safe and traffic-free cycle routes, promote, facilitate, safeguard and encourage the development and expansion of safe cycling facilities and cycle

routes (including adjoining counties). Support and implement FI's Strategy for the Development of Irish Cycle Tourism(2009) and liaise with the Sports Council, the NTA and other bodies in the development of cycling touring routes particularly in tourist areas and areas of high amenity, implement the relevant policies of the DoTT's National Cycle Policy Framework(2009), support the development of the National Cycle Network and enhance and maintain these routes with better sign posting, lighting and road surfaces, including signing/lining and the use of coloured surfaces, separation from vehicular traffic, the provision of cycling maps and the promotion of looped routes. Investigate the possibility of developing linear cycle routes utilizing existing natural or manmade corridors such as riversides and abandoned road and rail infrastructure. Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Improve driver education and driving standards so that there is a greater appreciation for the safety of cyclists and improve enforcement of traffic laws. Routes should, where possible, follow off-road tracks and quiet country roads.

It is proposed that the plan include a list of the objectives of the NCPF in particular:

- Provide designated rural cycleways especially for visitors and recreational users.
- Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit.
- Ensure that all cycling networks are sign posted to an agreed standard.
- Improve driver education and driving standards so that there is a greater appreciation for the safety of cyclists.
- Improve enforcement of traffic laws to enhance cycling safety and respect for cyclists.

It is also proposed that the council assign an officer at appropriate senior level as a 'cycling office' and support the implementation of the DTO cycle policy and the strategy for the development of Irish Cycle Tourism – East Coast Midlands

2. Walking

It is proposed to include the following objectives:

- Support, develop, enhance and promote the Irish Trails Strategy and the Walks Scheme in conjunction with the Irish Sports Council (National Waymarked Ways Committee) and other national programmes, designate and seek to protect medium and long distance walking routes and local waymarked Ways in partnership and local/regional tourism interests, adjoining local councils and the DoTT because of their recreational and tourism potential.
- Support and promote the holding of a Walking Festival to attract visitors and celebrate the diverse landscape and heritage of the county.
- Employ a Walks Officer at an appropriate senior level.
- Promote walking by continually upgrading the condition of existing footpaths in all areas and provide controlled and uncontrolled crossings, where warranted, at all major crossings.

3. Cycling & Walking

It is proposed that text be included in the plan that encourages walking and cycling in order to enable individuals to incorporate more physical activity into their lives.

Reference to the aims and actions of the DoTT's Smarter Travel should be included in the text of the plan.

The plan should encourage the development of cycle and walking tourism as they present a particular opportunity to bring the economic benefits of tourism to rural areas as it considered that this area has the potential to grow considerably.

It is also proposed that a database of walking and cycle trails (including Sli na Slainte routes) be produced in the plan.

In this regard the following objectives are also proposed:

Merge existing objective CW1-3 to read as follows:

- A. *Walking and Cycling will be promoted by maintaining and enhancing existing facilities securing the development of a network of quality cycle routes and footpaths on existing roads and on new road improvement schemes and on routes reserved exclusively for pedestrians and cyclists. Provide, improve and extend the network of cycle lanes and pedestrian routes on existing roads, on all new regional, local distributor and local collector roads and on roads being up-graded, to create a safer, more convenient, pleasant and more user-friendly environment. Road safety will be improved by lower speed limits and priority over motorized transport. Ensure that the needs of walkers and cyclists are given full consideration in proposals to upgrade public roads. Provide/ extend lighting on footpaths on the outskirts of towns and villages(including, where appropriate, off-road routes and along public rights of way) in accordance with the best international*

- standards. Continually upgrade the condition of footpaths, and provide controlled and uncontrolled crossings, where warranted, at all major crossing points, advise other road users on the need for safe behaviour near pedestrians and cyclists.*
- B. *Encourage and promote walking and cycling as a recreational activity to facilitate healthy lifestyles and well-being, create a healthier population, promote more active lifestyles and increase participation levels across all ages and different levels of fitness by providing quality green space for walking and cycling. Support awareness campaigns promoting walking and cycling. Support, upgrade and expand Sli na Sláinte routes in consultation with community groups, local/regional tourism interests and the DOTT.*
 - C. *Signpost and waymark Walking and Cycle Routes.*
 - D. *Promote existing historic and other themed trails(including pilgrim paths) (named) and protect them from inappropriate development.*
 - E. *For the benefit of local people and visitors, support and encourage cycling and walking groups to work in co-operation with the Regional Tourism Authority, Inland Waterways and community groups in the development, expansion and enhancement of routes(including Sli na Slainte) to provide a network of walking routes and rural footpaths and improved access for mountaineering and hill walking.*
 - F. *Develop and promote walking trails and cycle/greenways utilising existing disused transport links including abandoned road infrastructure.*
 - G. *Develop an overall Walking and Cycling Policy/Strategy within two years of the adoption of the Plan, working in partnership with state, private and voluntary sector, walking clubs and community groups. The Strategy should list National Trails Network, Sli na Slainte, Pilgrim Paths and other defined walking trails and walking routes, disused roads, canals, river banks, railways, and undertake to carry out a feasibility study to investigate the recreational use of these routes and the potential of establishing walking and cycling routes, maps showing walking and cycling routes.*
 - H. *Provide car parking and/or lay-by for cyclists, walkers and mountain climbers and walkers at (from your local knowledge name important locations) and other appropriate points to access amenities and scenic areas.*
 - I. *Establish new Walkways and cycle routes on a legal and permanent basis.*
 - J. *Encourage and promote the provision bicycle renting, guided walks and walking/cycling tours in partnership with state, private and voluntary sectors.*
 - K. *Investigate funding opportunities, including Leader, and the imposition of a development levy, for the development of walking/cycling trails, including off-road trails, inter-county waymarked walking and cycle routes(mentions names of routes).*
 - L. *Prepare and implement on a progressive basis the development of bridle paths that are attractive and traffic free.*
 - M. *Maintain National Waymarked Ways, trails which have historic associations, public footpaths and walking and cycling routes in co-operation with representative bodies and encourage walking and cycling by ensuring that a network of maintained walking routes, cycle ways and footpaths are provided in tourist areas.*
 - N. *Protect and promote Greenways and provide linear parks to facilitate the spread of rural landscape into urban areas.*
 - O. *Maintain a register of walking and cycling routes(including waymarked ways), keep it updated and promote their greater use.*
 - P. *Preserve, support and protect existing or potential walking routes(including local walks, long-distance walks, waymarked Ways) and cycleways and keep them free from development by prohibiting the intrusion of development along these routes particularly those in scenic areas)and take appropriate action to prevent attempts to close them off and take into account the impact of proposed development when considering applications for permission for developments in their vicinity. Protect listed walks from developments that create or have the potential to create disamenities.*

17. Chapter 14 Energy & telecommunications

Wind Energy – The plan should include the following additional objectives in relation to wind energy

- A. Identify existing public rights of way and walking routes and prohibit development which would interfere with them and with access to the countryside and carry out an Environment Impact Assessment when required by regulations.
- B. Planning applications shall comply with the DECLG Guidelines(2006) or any future guidelines.
- Hydro Energy – Include the following additional objective
Have regard to the impacts of Hydro Energy Schemes on public rights of way and walking routes.
- Mast & Telecommunications – Include the following objectives
- A. *Existing Rights of Way and established walking routes will be identified prior to any new developments which will be prohibited if they impinge thereon or on recreational and environmental amenities or public access to the countryside.*
 - B. *Not to permit satellite dishes in areas which would cause unacceptable harm to visual amenities or would materially harm the character of rural areas. The design and visual appearance of masts, antennae of satellite dishes and their associated equipment shall be as unobtrusive as possible. Cumulative effect of dishes in the area should be considered.*
 - C. *Where masts are located in areas of high amenity, landscapes of exceptional or high value or international or national importance and high sensitivity as indicated in the Landscape Character Assessment, there shall be a presumption to provide a "Landscape Impact Report" to allow proper assessment of the visual impact.*
 - D. *Strive to reduce the number of telecommunication structures by ensuring that ComReg's Code of Conduct is implemented.*
 - E. *When the owner of a site disposes of it they will be required to inform the Council so that they will be in a position to enforce any continuing conditions.*
 - F. *Council require a justification for the height of the mast.*
 - G. *Demonstrate the significance of the proposed development as part of a national communications network.*
 - H. *Discourage the development of individual telecommunications support structures and antennae for private use.*
 - I. *Seek the establishment of an appropriate body at regional or national level to monitor installations regarding proliferation, co-location and the use of the best available technology to prevent negative environmental impacts.*
 - J. *Set up and maintain a register of approved telecommunication structures to provide a useful input in the assessment of future developments and to maximise the potential for future mast sharing and co-location.*

18. SECTION E

- A. Amend the heading for chapter 16 built heritage to include the wording – Including archaeology and Architectural Heritage
- B. Proposed that the following additional text be included under section 16.3 Archaeology:
- *The DoAHG publication "Framework and Principles for the Protection of Archaeological Heritage" states that archaeological considerations need to take full account of the development process.*
 - *Our archaeological heritage consists of known and as yet unidentified sites, monuments, round towers, high crosses, burial sites, ringforts, towers houses, Fulacht Fia, raths, court tombs, portal tombs, wedge tombs, cairns, earthworks, abbey souterrains.*
 - *Categories of monuments under the National Monuments Acts:*
 - *A monument can be defined as a man-made structure or group of structures or a natural structure altered by man. Taken from Cavan 7.5.1.*
 - *National Monuments in the ownership or guardianship of the Minister or a county council which are subject to preservation orders.*
 - *Historic monuments or archaeological areas recorded in the Register of historic monuments.*
 - *Monuments recorded in the RMP.*
 - We submit that you should include tables of the above:
- It is also proposed that tables detailing Historic Graveyards, Preservation Orders on Monuments and Areas of Special Archaeological Interest be included in the plan.*

It is proposed that the following objectives be included in the plan:

- c. Merge and replace objectives AR1 and AR3 of the existing plan with –
Protect, support, conserve, enhance, preserve, maintain and safeguard for present and future generations, in co-operation with the Department of Arts Heritage & the Gaeltacht, archaeological heritage including the intrinsic value, character, amenity, integrity, settings of and views from National/Recorded Monuments or newly-discovered archaeological sites and/or sub-surface archaeological remains, of known and unknown archaeological areas (including areas or zones of archaeological potential and areas of special archaeological interest), sites (and their settings and landscapes and either above or below ground), in the ownership or guardianship of the State or the Council, including those identified in the RMP, battlefields, castles, monuments and features of historic interest National Monuments that are the subject to Preservation Orders, by prohibiting development which might be detrimental to the character of the site and its settings by reason of its location, scale, bulk or detailing. In general, developments within or adjacent to sites or which might affect them and in particular those within a 20m radius of National Monuments included in the RMP and Zones of Archaeological Potential will not be permitted and proposed development within 75m discouraged. Ensure that development is sensitively sited and designed appropriately and extend this protection to cover additions or alterations that may arise during after the adoption of this Plan and impose conditions on development that might impact on sites of archaeological potential to ensure that appropriate measures are taken to mitigate impacts. Developments which would injure, destroy, alter or damage monuments or archaeological sites or cause inappropriate change to their settings and character will be prohibited or which is seriously injurious to its cultural or educational value. All planning applications for new development (including redevelopment, any ground works, refurbishment and restoration) within areas of archaeological potential and within close proximity of recorded monuments will take account of the archaeological heritage of the area and the need for mitigation. Protect and safeguard historic landscapes, which would unduly sever or disrupt their relationship, connectivity and/or inter-visibility between sites. Require applicants to take into consideration the impacts of development on the landscape and demonstrate that their proposal has been designed to take account of the heritage resource of the landscape. Ensure that provision is made through the development control process for the protection of previously unknown archaeological sites and features.
- d. Replace objective AR2 with the following text –
Require an Archaeological Assessment to be carried out, by a suitably qualified/licensed archaeologist, prior to the commencement of any activity, in respect of development in areas in or adjacent to (minimum of 30m) a Recorded Monument in State care or other archaeological heritage or within a zone of archaeological potential, that may, from its size, location, bulk, detailing or nature, have a significant effect on the surrounding landscape, upstanding structures, buried structures and deposits, those that are extensive in terms of areas (ground disturbance of ½ ha or more) or length (1km or more) and developments that require an EIA or an EIS. If permission is granted, a suitably qualified archaeologist must carry any necessary archaeological work. The Council, as a condition on such developments, may also consider the preservation of all or part of the archaeological remains in the area covered by the permission. Each planning application for development within the Zone of Archaeological Potential or importance and within close proximity to recorded archaeological sites shall be assessed on its own merits. An archaeological assessment shall establish the extent of archaeological material associated with the monument or site and shall ensure that the development can be designed so as to avoid or minimise any potential effects on archaeological heritage. If a monument or site included in the RMP is incorporated into a development the monument and attendant buffer area shall be ceded to Local Authority Ownership once the development and associated landscaping works are complete so that the future protection of the monument can be assured. Development taking place either above or below ground which is within or adjacent to or might affect sites and features of historic and archaeological interest shall respect the character of the site and its settings and designed with care for their character. Development will only be permitted where the Council, in consultation with the DoAHG, considers it acceptable as per the assessment and subject to any mitigation measures proposed to prevent adverse impact on the monument and/or its settings. Strictly control development proposals on unzoned lands which may be detrimental to any area, site, structure or monument or detract from its setting. An assessment will be required – to be carried out by a licensed archaeologist – of developments which may impact on a national

or recorded monument, the designated zone of archaeological importance surrounding any monument or other site of archaeological significance. The Council will use planning conditions and agreements to enable an archaeological assessment, on site monitoring testing and/or excavations by a licenced ecologist.

- e. *Replace objective AR4 with the following text – Recognising the importance of archaeology and National Monuments as part of our heritage and inheritance, provide, promote, enhance, facilitate, encourage, support, and protect public access to archaeological sites National monuments, battlefields historic burial grounds and graveyards and sites of historic interest, in direct ownership, guardianship or control of the Council and/or the State or private ownership. Appropriate signage will be put in place. Information on access to sites will be made be available on the Council's web-site. (Insert address).*
- f. *In addition to the above it is proposed that the following additional objectives be included in the plan –*
- *Protect, preserve, improve and maintain existing public rights of way to archaeological sites and designate traditional walking routes as public rights of way and in other cases, routes will be acquired by agreement with landowners or by way of compulsory powers.*
 - *Promote and support the concept of Archaeological Landscapes, protect them from inappropriate development and seek to designate them within two years of the adoption of the Plan, particularly landscapes containing several Recorded Monuments or very important sites (including the complex of hill forts in West Wicklow), in consultation with the DOECLG, other Government Bodies and State agencies as part of the updated Landscape Character Assessment to be prepared following publication of the National Landscape Strategy/National Landscape Character Assessment.*
 - *Promote archaeological heritage as a tourism resource in partnership with the Regional Tourism Authority.*
 - *Conserve, protect, preserve, rehabilitate and maintain historic graveyards and historic burial grounds (including those which are recorded monuments) in co-operation with the Heritage Service and continue to encourage, support, promote and assist communities in the care, maintenance, rehabilitation, management and conservation of these graveyards in accordance with conservation principles and best practice guidelines and through the Historic Graveyards Grants Scheme. Development may be restricted or conditions imposed requiring substantial excavation in and adjacent to them. Provide public access. Maintain all burial grounds in the Council's charge in good condition.*
 - *The Content of Archaeological Impact Assessment and Method Statement will be required to establish the extent of archaeological material associated with the monument or site. This assessment shall also define the buffer area or area contiguous with the monument which will preserve the setting and visual amenity of the site, clarify the significance of the site (in accordance with Sec 3.6 of the*
 - *Government's "Framework and Principles of Archaeological Heritage), address measures that will be taken to protect the significance of the site and identify the likely impact of the proposed development on both upstanding and buried structures and any archaeological fabric and suggested mitigation measures to address these impacts. The area of the monument and buffer shall not be included as part of the open space requirement demanded of a specific development but shall be additional to the required open space. If a monument or place included in the RMP lies within the open space requirement of a development, a conservation plan for that monument is required as part of the landscape plan for that proposed open space. If a monument or site included in the RMP be incorporated into a development the monument and attendant buffer area shall be ceded to Local Authority Ownership once the development and associated landscaping works are complete so that the future protection of the monument can be assured.*
 - *Any proposed new development, redevelopment (including any ground works, refurbishment, restoration works) which may impact on the integrity and/or setting of any monument, site feature or area of archaeological, historical or heritage importance, within areas of archaeological potential and within close proximity to sites under the protection of this Plan, on sites not yet included in the RMP or where an archaeological assessment is required, shall*

be submitted to the DoAHG, An Taisce, the Heritage Council and/or the National Museum, accompanied by a comprehensive report by a licensed archaeologist, and to prescribed bodies(as set out in the Planning and Development Act 2000), two months before commencing work, for their observations/comments prior to a planning decision being made. Any proposal development which may impact on the integrity and/or setting of any monument, site or area of archaeological, historical or heritage importance under the protection of this Plan and/or the DOCELG shall be referred to this department for observation/comment prior to a decision on any planning decision being made. Require that proposals for linear development over 1km in length or proposals involving extensive ground clearance must be referred to the relevant Prescribed Bodies. Comply with their observations, recommendations, advice and guidance, as to whether or not to grant Planning Permission or of any condition(s) to be imposed

- *and take into account the views of other interested bodies.*
- *Have regard to and consider archaeological concerns when considering proposed public service schemes/infrastructure (including transport, electricity, sewerage, telecommunications and water supply and road works) located in or close to Recorded Monuments and Places and to the zones of archaeological potential.*
- *Where it is proposed to undertake ground works within an area of archaeological potential the Council will require the preparation of an archaeological field evaluation by a licensed archaeologist which will comprise details of the archaeological and historic background of the site, an evaluation of the its nature, importance, extent and location and of the likely impacts of the development proposals, where there is evidence that archaeological remains are present particularly if the proposed development is in or adjacent to a zone of archaeological potential.*
- *Development applications shall be assessed against Archaeological & Development Guidelines for Good practice for Developers and the DoECLG/ICF Archaeological Code of Practice (2009).*
- *Where a development would result in ground disturbance within a Zone of Archaeological Potential and in sites on or abutting Monuments identified in the RMP, or a previously unknown archaeological feature the retention of a licensed archaeologist will be required and if he/she deems that development threatens the site, work must be immediately suspended and the appropriate Government Agency informed and planning conditions may be applied If the site works proceed a licensed archaeologist should be employed to supervise and monitor the development.*
- *In areas of archaeological interest listed in the RPM, developers shall consult with the Council at the earliest possible stage prior to development works, including the digging of trenches and foundations.*
- *In cases where permitted works will impinge on known archaeological sites and monuments, their settings and archaeological remains, the developer will be required to employ a suitably qualified/licenced archaeologist, at the applicants expense, to carry out trial excavations and surveys and submit a report in advance of development or where permission is granted for development that requires mitigation of impacts on archaeological heritage. Where necessary, the Council may impose conditions that will affect sites of archaeological potential to ensure that adequate measures are taken to identify and mitigate the impact of development, by requiring professional supervision and encouraging the supplying of an archaeological assessment and method statement outlining the construction procedures. Ensure that a suitably qualified archaeologist carries all archaeological works that require mitigation of impacts.*
- *Appropriate signage will be put in place.*
- *Cognisance will be taken of the "Code of Practice between ESB National Grid and the Minister for the Environment in relation to Archaeological Heritage.*
- *Have regard to Historic Landscape Character Assessments in assessing planning applications.*
- *Encourage and promote management and maintenance of archaeological heritage in accordance with conservation principles and best practice guidelines.*
- *When considering development proposals, within areas of Archaeological Potential and on, or in close proximity to, sites of known archaeological significance, regard will be had to Sec 12 of the National Monuments(Amendment) Act, 1994 or as may be amended.*

- *Within areas of Special Archaeological Interest and other sites of archaeological potential, the council will require applicants, as part of their planning application to include an assessment of the likely archaeological potential and may require that an on site assessment is carried out by trial works.*

19. Historic & Cultural heritage

Add the following to the text of objective HC3 - *Arklow to Shillelagh and Tullow to Dunlavin in relation to the protection of former railway lines.*

It is also proposed that objective HC3 should be repositioned to be within section 11.3 'Cycling and Walking' and expanded to include the following wording:

"Actively encourage the development of disused railways including related signage and waymarking, as long-distance walking and cycling routes in cooperation with CIE, FI and the National Waymarked Ways Committee without compromising their possible re-opening. Protect, safeguard and preserve them from development by prohibiting development which would affect their integrity, and where part of the route has been compromised development on adjacent land which could be used to bypass the obstruction shall not be permitted. Ensure that landscape impacts are minimised by designs and materials. The project will be subject to Appropriate Assessment.

Where feasible, provide separate trails for walkers and cyclists in the interests of safety and convenience with appropriate surfaces for each type of user".

20. Chapter 17 Natural heritage

It is proposed that the following text and tables be included in the plan under chapter 17.

Section 17.5 Water systems - *Inland waterways, which include lakes, rivers and streams, contribute significantly to the character and amenity of the county and support tourism, recreation and quality of life for local people and visitors.*

1. The main rivers,
2. The main lakes,
3. Existing or potential riverside and lakeside walks/cycle routes,
4. Main Lakeside and Riverside Amenity Areas.

It is also proposed that the following objectives be included:

Add the following text to the beginning of Objective WT5 page 244 of the plan. In partnership with NPWS, WI, community groups and other relevant stakeholders, provide, preserve, promote, support, encourage, develop, facilitate and increase the provision of land-based recreational activities, including walking, cycling, mountain biking, horse riding, wildlife/bird watching and other non-noise generating activities to and around lakes, rivers and other navigational and non-navigational waterways. Reserve land adjacent to rivers and lakeshores to facilitate these activities.

Additional Objectives Proposed:

- A. *In partnership with NPWS, local Wildlife Rangers, WI, community groups and other relevant stakeholders, provide, preserve, promote, support, encourage, develop, facilitate, increase and improve public access to and around lake and navigational and non-navigational waterway corridors (together with wetlands, rivers and streams and valleys) to provide amenities and recreational facilities for visitors and locals and focusing on linear features such as river banks and walking paths. Reserve land adjacent to river and canal banks and lakeshores to act as buffer zones between new developments and river corridors and other water bodies.*
- B. *Protect, enhance and improve existing public rights of way, where appropriate, and investigate the provision of additional rights of way to inland lakes and waterways to facilitate the creation or expansion of walking/cycling routes.*
- C. *A minimum 30m riparian corridor shall be reserved along all riverbanks outside urban centres along main rivers.*
- D. *In respect of both navigable and non-navigable waterways, maintain, preserve, protect, conserve, enhance waterway corridors, including floodplains and valleys of rivers, streams, lakes and other watercourses (including shorelines, in immediate adjoining area and skyline development on surrounding hill crests) and keep them free from inappropriate development and incompatible use, including clearance and storage of materials taking place within a minimum distance of 10-15m from each bank of any river, stream or watercourse, to ensure that public use is not prejudiced by incompatible use, such as facilities for noise-generating sports and interference with public walking and cycling routes and public rights of way. Protect, maintain and enhance*

their natural heritage and landscape character and archaeological heritage and avoid adverse visual impacts so as to maintain their ecological, amenity and tourism and recreational values. Create and maintain buffer zones and riparian corridors and keep them in an open state and discourage culverting or realignment. Prohibit developments which are likely to have significant adverse visual impacts, either individually or cumulatively, on the character of River Valleys and where there is no overriding need for the development to be in that particular location. Ensure that, where an overriding need is demonstrated for a particular development in the River Valleys, careful consideration is given to site selection. The development should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Take into account any landscape, nature or archaeological designations. Locate new development in water corridor landscape character areas towards existing structures and mature vegetation. Seek during redevelopment the creation of a riparian buffer strip, where practicable. Promote the natural amenities of (name rivers) for the benefit of recreation and tourism. Development must not adversely affect the river's function as a green infrastructure corridor. Protect existing wetlands from destruction, infilling, fragmentation and degradation. Adopt a regional approach in the protection of watercourses by co-operating with neighbouring counties.

- E. *Require that developments along rivers and watercourses provide for set aside land for walking/cycling routes to provide linear parks and to form an interconnecting network of green open spaces and corridors by linking existing fragmented green spaces to towns and other settlements in their vicinity, to link with existing parks and open spaces and extend to adjoining counties forming inter-county tourism links, in cooperation with their planning authorities.*
- F. *Improvements to access will be taken into account when considering development proposals that increase, secure, improve and enhance public access, including the development of walking/cycle routes to inland waterways, including regional/linear parks and river valley landscapes provided that developments are appropriate in scale and are sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape.*
- G. *As Water sports cover a wide range of activities from tranquil uses such as angling, sailing, canoeing, rowing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying uses and may introduce bye-laws restricting or prohibiting jet-skiing and water skiing.*
- H. *Development proposals adjacent to waterways and inland lakes will only be permitted when all the following criteria are met:*
 - *Facilities are compatible with existing use of the water, including non-recreational uses*
 - *Will not result in damage to sites of nature conservation importance or features of archaeological heritage*
 - *Development can be satisfactory into the landscape*
 - *Will not have an unacceptable impact on visual impact especially in areas of high amenity or other scenic areas*
 - *Development will not in over intensification leading to excessive noise and nuisance.*
- I. *Consult with WI, NPWS, DoECLG, IW and local communities on development proposals that may affect inland waterways, rivers, lakes or water courses.*

17.6 Geology

Propose additional text objective SG2 "Identify sites of geological interest and preserve, enhance, maintain, manage and conserve the character and integrity of these sites for their amenity, scientific and historic values(including County Geological Sites and sites that may become designated) and areas of geomorphological, by restricting incompatible development. Proposals should be accompanied by a detailed report from a competent person setting out their potential impact. Where significant harm is deemed likely, permission will not be granted unless there are overriding considerations of public importance. Assess all proposed developments with respect to Geology (individually or in combination with other proposals) which are likely to impact on CGSs that become designated during the lifetime of the Plan. Further enhance geodiversity by additional measures to conserve geosites".

Replace Objective SG3 with the following objective – *"Avoid inappropriate development though consultation with the GSI in advance of proposals which are likely to impact on sites particularly those involving major developments entailing significant ground excavation, such as quarrying, road excavations, tunnels, major drainage works and foundations for major buildings"*.

Replace Objective SG4 with the following wording – "Encourage, promote, facilitate and support access and public rights of way to geological and geo-morphological features of heritage value, rock trail and co-ordinate the continuing development of strategic walking routes, trails and other recreational activities."

It also proposed that the following additional objectives be included in under section 17.6 Geology:

- A. Encourage and facilitate the development of geo-tourism by conserve and managing geological resources.*
- B. Have regard to the Guidelines for Geological Heritage, GSI/ICF.*

17.8 Recreational use of natural resources

Propose the following additional wording under section 17.8: *cycling, off-road biking, nature, wildlife, heritage and maritime trails, bird/ deer watching, whale/seal/ dolphin watching, painting, photography, field studies, back-packing, orienteering, para- and hang- gliding, canoeing, kayaking and rafting, caving, hill walking, mountaineering, rock climbing, adventure sports, swimming in waterways, wild camping, pony trekking, boating, archaeological guided walks and that these activities be coordinated, where appropriate, with adjoining counties.*

Replace Objective AW4 with the following text: Preserve, maintain and protect the amenity value, visual integrity and rural character of open/unfenced landscape of the uplands, areas of rough grazing and commonage, particularly areas above 350 meters, and secure access thereto. Discourage inappropriate development in open countryside and prohibit developments which are likely to have significant adverse visual impacts, either individually or cumulatively, on the character of the uplands, unless there is no overriding need for the development to be in that particular location. Where an overriding need is demonstrated ensure that it is appropriate in bulk and scale and is sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Ensure that development will not significantly interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts(including site selection and design) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have regard to the potential for screening vegetation when evaluating proposals.

Propose that objective AW5 be repositioned in Chapter 9 under the heading Coastal.

It is proposed that a table listing the main beaches in the County be included in the plan.

- A. Promote, facilitate and support, in conjunction with adjoining counties and the National Trails Advisory Committee, the development and use of a waymarked coastal path along the entire coastline, as a tourist and recreational amenity, as a casual walk and as a link between coastal areas, including where feasible, use by cyclists and will improve and upgrade it the with the status of a public right of way. In furtherance of this objective a study group will be set-up within one year of the adoption of Plan.*
- B. Provide, support, actively promote, maintain, protect and improve access to the coast, seashore by identifying existing and/or potential coastal routes which can be developed as tourism attractions and as local amenities, in co-operation with statutory and relevant organisations for recreational activities including walking, cycling, pony trekking, whale/dolphin watching and bird-watching, and these routes will ideally be permanent, of high quality and adequately managed and should allow for further expansion and provide links to other activities and facilities and designate traditional walking routes thereto as public rights of way.*
- C. Exclude motor vehicles from beaches except for parking and develop green parking areas in appropriate locations, i.e soft areas that can be left in their natural state during the off season and used to provide over-flow facilities during peak periods and exclude land- and marine-based*

- sporting activities from beaches and support the implementation of the Council Bye-laws which should be expanded to include all beaches.
- D. Prohibit development on or adjacent to beaches where such development would interfere with public access and the coast or would cause damage to or degradation of beaches or sand dunes and its recreational and amenity values both for visitors and local people, will not be visually obtrusive by impacting on skylines and where it allows the character, quality and distinctiveness of seascapes to be conserved, and in particular would not overlook or intrude on unspoilt coastline protect views of special amenity Ensure adequate protection of the coastal zone as areas of natural heritage, amenity value, recreational use or alter the character of boreens which lead to the foreshore. Prohibit developments which are likely to have significant adverse visual impacts, either individually or cumulatively, on the character of coastal landscape or and where there is no overriding need for the development to be in that particular location. Ensure that, where an overriding need is demonstrated for a particular development in an Coastal landscape careful consideration is given to site selection and the development should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Promote the retention of features of coastal heritage where these contribute to the character of the area.
 - E. Consider appropriate rural recreational and tourism related developments which would facilitate public access to Coastal Landscapes. Developments should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape.
 - F. Ensure that beaches, sand dunes, wetlands and estuaries are not compromised by inappropriate coastal protection works or development.

Replace the first part of Objective AW6 with the following wording: Protect and enhance the amenity of the Bray Head SAAO in accordance with the Order and implement the Management Plan in consultation with all relevant stakeholders.

Additional Objective proposed to be included in the plan:

Recognizing the role played by natural amenities and landscape, as part of our heritage and as a major resource both for visitors and local people, provide, support, maintain, promote, encourage, protect, preserve, improve, safeguard, facilitate and enhance public access to our natural heritage including mountains, commonage and other hill land, moorlands, forests, rivers, lakes, valleys, 2000 Natura sites, nature reserves, other natural amenities and to the countryside generally by creating a meaningful network of access routes as the opportunity or need arises. Consider appropriate rural recreational and tourism related developments which would facilitate public access to sensitive landscapes. This will be done in co-operation with state agencies, other interested bodies and local community groups.

17.9.1 Landscape Characterisation

Propose the following additional text to be included in the plan:

Landscape Character Assessment sets out guidance and recommendations to assist the development of planning policies and strategies.

The enjoyment of landscapes, particularly rivers and the uplands, as they are highly scenic and of significant visual amenity value contribute to a high quality of life for both local people and a positive experience for visitors. Landscape is an important part of people's giving individuals and the local community and bestowing a sense of place in their surroundings. The key to a successful landscape policy is the ability to manage change in a way that respects of the natural environment and rural areas.

New Objectives Proposed:

- A. *Review the Landscape Character Assessment and the Landscape objectives in the Plan, after the publication of the National Landscape Strategy and future guidelines issued by a Minister of the Government with respect to landscapes.*
- B. *Recognizing the diverse and unique landscape character of the county and in accordance with Sec 204 of the 2000 Planning and Development Act, designate/zone Landscape Conservation Areas (mention local areas) in partnership with DoECLG and the Heritage Council, within two years of the adoption of the Plan, in order to achieve its objective of protecting and enhancing*

the landscape. Physical development shall not adversely impact on areas designated as visually important/sensitive.

- C. Preserve, maintain and protect the amenity value, visual integrity and rural character of open/unfenced landscape of the uplands, areas of rough grazing and commonage, particularly areas above 350 meters, and secure access thereto. Discourage inappropriate development in open countryside and prohibit developments which are likely to have significant adverse visual impacts, either individually or cumulatively, on the character of the uplands, unless there is no overriding need for the development to be in that particular location. Where an overriding need is demonstrated ensure that it is appropriate in bulk and scale and is sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Ensure that development will not significantly interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts (including site selection and design) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have regard to the potential for screening vegetation when evaluating proposals.*
- D. Safeguard and protect skylines and ridgelines from development by resisting development which do so.*
- E. Ensure that the visual impact of developments on steep slopes (i.e. >10%) or elevated sites (e.g. reservoirs or telecommunication structures) are minimized or mitigated and will not be conspicuous or have a disproportionate or dominating visual impact (due to excessive bulk, scale or siting) on the environment as seen from public areas, scenic routes, viewpoints or settlements and that there may difficulties in establishing and maintaining screening vegetation.*
- F. Protect, sustain, conserve, preserve, manage, promote and enhance the diversity, distinctiveness, scale, character, appearance, sensitivity and visual and scenic quality, amenity value and beauty of the landscapes and the natural environment in accordance with relevant government policy and guidelines, by ensuring that they meet high standards of siting and design and are holistic and in the interest of the common good for current and future generations for the benefit of both local people and our visitors and a major economic asset. Applicants shall satisfactorily demonstrate that new development can be adequately absorbed into its surroundings without significant adverse visual impacts to its overall landscape value, nature conservation and archaeology and that they are appropriate in scale and sited, designed and landscaped having regard to their settings in the landscape so as to ensure that any potential adverse visual impacts are minimised, where there is no overriding need for the development to be in that particular location. Encourage appropriate development which would enhance an existing degraded landscape and/or which would enhance and introduce views to or from a Landscape of Greater Sensitivity from public viewpoints. Developments which fails to appropriately integrate into the landscape with due regard to visual impact shall be resisted. Adopt a regional approach in the protection of the environment, co-operating with neighbouring counties in the protection of the landscape.*
- G. Protect, conserve and enhance the visual integrity, distinctiveness, character, scenic and recreational values and visual quality of areas of the sensitive and outstanding landscapes, scenic areas, areas of natural beauty or interest, High Amenity Areas and the environs of geological and geomorphological, archaeological or historic sites from intrusive and/or unsympathetic developments by prohibiting development where it would be injurious or detract from natural and tourism amenities. Resist development such as houses, forestry, masts, extractive operations, landfill, caravan parks and large agricultural/horticultural units which would interfere with the character of highly sensitive areas. Ensure that, where an overriding need is demonstrated for a particular development in the vicinity of sensitive landscape careful consideration is given to site selection. The development should be appropriate in scale and be sited, designed and assimilated into the landscape in a manner which minimises potential adverse impacts on the landscape. Proposed developments, where located within or adjacent to sensitive landscapes, may be required to provide a landscape report detailing how the proposal will impact on the landscape and mitigation measures to be taken. Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from its scenic value. New development will not be permitted if it causes unacceptable visual harm, or introduces incongruous landscape elements. Support efforts*

- to identify and designate vulnerable landscapes and maintain their <Text Missing from submission>*
- H. Support and implement the provisions of the National Landscape Strategy and provide for sustainable management of landscapes including archaeological, coastal and upland landscapes.*
 - I. Ensure the preservation and protection of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of the landscape when determining planning applications. Have regard to the Landscape Sensitivity Classification in considering any significant development proposal. Ensure that development reflects and, where possible, reinforce the distinctiveness and sense of place of the landscape character types by taking into account elements such as geology scenic quality, historic heritage and tranquility. Ensure that proposed developments would not conflict with the policies and objectives set out in the Landscape Character Assessment and associated map.*
 - J. Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of the landscape when determining planning applications. Protect character of the landscape the landscape by ensuring that proposed developments would not conflict with the policies and objectives set out in the Landscape and Landscape Assessment Guidelines for Planning Authorities (2000) and any updated versions of these guidelines published during the lifetime of the Plan.*
 - K. Consider appropriate rural recreational and tourism related developments which would facilitate public access to landscapes particularly Upland Landscapes and should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape.*
 - L. Applicants for development, particularly in areas of landscape vulnerability or sensitivity and in uplands and river valleys, will be required to prepare a visual impact assessment to include photomontages, on-site height poles and Landscape/Visual impact statements setting out alternative sites that were considered and proposals to mitigate negative impacts.*
 - M. Provide for recreational use by local communities and for natural resource tourism in High Amenity Areas.*
 - N. Co-operate with councils to support the co-ordinated designation of sensitive landscape particularly where transboundary vulnerabilities are identified.*

17.9.2 Views & prospects

Propose the following additional text to be included in the plan:

Add the following wording to the first paragraph under section 17.9.2 - Outstanding views and prospects are an important tourism resource. They are not restricted to public roads.

Replace Objective VP1 with the following wording – *“Protect, preserve, safeguard, improve, enhance and conserve the character and quality of views and prospects, designated Scenic Routes, from the public realm and particularly from adjoining public roads (although not restricted thereto) and river valleys, to or from the sea, lakes, lakeshores, rivers, unspoilt mountains, uplands, coastal landscape, views of historic significance, of high or special amenity value or interest by prohibiting intrusive development that would interfere with the character and visual amenity of the landscape or adversely affect tourism and enhance them by removing derelict sites under the provisions of the Derelict Sites Act 1990 and structures and eyesores and by ensuring that structures or other developments do not seriously obstruct these views Applicants must specify materials to be used demonstrate that proposed development does not negatively impact on the character of a scenic route and that the views towards visually vulnerable or sensitive areas are not obstructed or degraded. Protect scenic amenity routes from insensitive and excessive levels of roadside development by integrating them into landscape areas. Curtail development along river banks that could cumulatively affect the quality of a designated view. Applicants in the environs of a scenic route and/or an area with important views and prospects must demonstrate that there be no adverse obstruction or degradation of views of views towards and from vulnerable landscape features and that the design, site layout and landscape of the proposed development must be appropriate, along with mitigation measures, to prevent significant alterations to the appearance and character of the area. Due regard will be paid in assessing applications to the span and scope of the view/prospect and the location of the development within that view and prospect. Encourage appropriate landscape and screen planting for developments along scenic routes and ornamental landscaping may be*

required. Ensure that developments in river valleys will not adversely effect or detract from protected views (especially from bridges) or distinctive linear sections of river valleys (including floodplains when viewed from settlements”.

It is proposed that Chapter 17 include the following sub sections:

A Green Infrastructure

Green Infrastructure is a strategically planned and interconnected network of green space that conserves natural ecosystems including rivers, inland waterways, floodplains, wetlands, the coast and natural conservation areas. It should provide a better quality of life with positive economic and health benefits, should protect the rural environment and should provide safe and attractive routes for walking and cycling.

New Objectives:

- A.** *Design, conserve, facilitate and manage green infrastructure, including natural heritage, landscape and environment in recognition of its importance as a non-renewable resource, to encourage, promote, develop, enhance and facilitate physical activity and improved health and well-being by providing green spaces for walking, cycling and other active recreational activities and by providing attractive and safe routes linking key green space through parks, woodlands, open spaces and heritage and landscape features, where feasible and appropriate.*
- B.** *Develop and implement a comprehensive Green Infrastructure Strategy, during the lifetime of the Plan in consultation with key stakeholders and the public, ensure that it protects existing green infrastructure and ensures that it integrates existing communities through appropriate planning, ongoing management and governance.*
- C.** *Resist development that would damage, degrade, fragment, or prejudice the green infrastructure network.*

Require that all Land Use Plans protect, manage and provide, where possible, green infrastructure in an integrated and coherent manner.

B National Parks

The Wicklow Mountains National Park should be named.

Proposed additional Objectives:

Promote the extension of the Wicklow Mountains National Park and cooperate with relevant bodies.

Ensure that the character of the Wicklow Mountains National Park is protected and enhanced and prohibit any development which would impair its character.

C Natural Heritage & Amenities

The county has a rich and diverse heritage that includes the countryside, rivers, lakes, woodlands, seas, geology, and islands and special elements on our landscape and is a core component of green infrastructure. Protection of our heritage not only has environmental benefits and benefits for the health, well-being and quality of life for local people, but it also brings economic benefits for visitors to enjoy.

Protect, conserve, preserve, manage, enhance and safeguard the quality of the environment and natural amenity assets and natural heritage features for current and future generations and in particular proposed SACs & proposed NHAs, while maximising their recreational, amenity and tourism potential for the present generation by resisting development that may have a negative impact. Avoid unnecessary harm and reduce the effect of harm where it cannot be avoided.

D Peatlands

It is proposed that the plan include a table listing significant bogs.

New Objective "Recognising that boglands are important natural, amenity, heritage, landscape, tourism resource, ecological archaeological resources, protect and conserve them free from inappropriate development in conjunction with the Bord na Mona, NPWS, Coillte and other bodies. Ensure that peatland areas which are designated under international and national legislation are conserved and managed. Seek hydrological reports for significant developments within or close to peatlands to assess potential impacts on the integrity of the peatland ecosystem”.

Response of Chief Executive

This submission provides a lengthy and detailed analysis of a significant number of the existing objectives and topics contained in the 2010-2016 County Development Plan. In this regard it should be noted that while a review of the detailed policies, objectives (including zoning provisions) and

development standards contained in the plan shall occur as part of the plan making process, and due consideration will be given to all of the suggestions made, this stage of the plan review process is more 'Strategic' in nature, and the development of specific objectives will follow once the overall strategy and key aims of the plan area agreed.

The submission proposes a number of additions and amendments to the plan relating generally to the following themes:

- Compliance with the mandatory objectives required by the Planning and Development Act 2000 (as amended) and amendments to descriptions of planning terminology used in the plan
- Protection of the environment
- The rural economy
- Provision of walking and cycling facilities
- Identification of existing and preservation of public rights of way
- The extractive industry
- Heritage including railway heritage
- Tourism and the promotion of eco-tourism
- Energy and telecommunications
- The protection of heritage and archaeology
- Sustainable recreation
- Landscape character assessment
- Views and prospects
- Green Infrastructure
- National parks and boglands
- The inclusion of comprehensive tables and maps detailing specific areas of the plan including rights of way, tourism assets, walking and cycling routes, recreational trails etc.

The existing County Development Plan contains objectives which relate to the vast majority of these themes. It is intended that the new County Development Plan will update and strengthen these existing objectives taking the contents of this submission into consideration during this process.

Recommendations of Chief Executive

1. To update and strengthen the objectives of the existing County Development Plan. In this regard consideration shall be given, as appropriate, to the suggestions/amendments proposed in this submission in relation to the wording of policies/objectives and development standards where applicable to a County Development Plan.

2. As part of the plan preparation process, it is intended to investigate key public rights of way and amenity walking routes, in order that they can be identified on the plan maps and objectives include with respect to same.

Submission No. 29**Name: Roundwood and District Community Council**

Note: Please also see public submission with respect to Roundwood under Section 4.4, Topic 12 - 'Level 6 settlements' of this report

Issues Raised

Roundwood and District Community Council (RDCC) make the following proposals specifically relating to any future plans for the Roundwood area:

1. Any proposed future plans for the area should be agreed with the RDCC.
2. Contend that the population projections for the area are unrealistic given the infrastructural difficulties.
3. Housing – Future housing development in the area should be of a relatively low density with small clustered development favoured out from the village core. All new development should provide a mix of private, social and affordable housing alongside recreational facilities. It is also contended that no further development should take place in the Ashwood/Vartry Heights development until recreational facilities are provided.
4. Re-zoning – decisions on rezoning are critical in the area in particular the village core where future development proposals should protect and enhance the existing character. The provision of a central park area within the village should be considered in this regard.
5. Planning restrictions – There is a need for flexibility in planning guidelines to allow young people to settle in the area.
6. Industry/employment – The plan should make provision for employment/industry in the area.
7. Infrastructure – Any future plan for the area should address the issues of parking, traffic calming, water and wastewater infrastructure, road improvements, telecommunications and recycling facilities.
8. Develop Local Resources, Tourism and Recreation – In order to develop these areas it is considered that the future plan for the area should provide adequate protection to historical buildings, identify potential visitor/interpretive centre type developments, provide adequate lands for recreational purposes, provide for a playground, further develop walks around the Vartry Reservoir, improve footpaths, provide a public car park.

Response of Chief Executive

1. The review of the existing Roundwood Town Plan will follow the normal statutory process for the adoption of a Town Plan (which forms part of the County Development Plan) including public consultation prior to the crafting of any new plan, upon the publication of a draft plan and following publication of any material amendments to the draft plan, where submissions from the public will be invited and considered. It is considered that this process affords the general public and groups in the area adequate opportunity to input into the development of a plan which is capable of addressing relevant issues in a particular area. Furthermore, it is not appropriate, or provided for in law to designate any particular individual or group to have a 'final say' on any plans affecting a whole community.

2. A review of the population targets for all settlements in the County has been undertaken in the preparation of the draft 'Core Strategy' included at the start of this report. With respect to Roundwood, the current population target for 2022 is 1,300 (from 571 in 2006 i.e. an average annual growth rate of 46 persons between 2006 and 2022) and it is now proposed to slightly reduce this to 1,200 for the target year of 2028 – i.e. a slightly lower target, over a longer period of time. The current (2011) population of Roundwood is 780, and growth to 1,200 would therefore entail an average growth rate of 25 persons per annum over the period 2011 to 2028, which is considered more reasonable and sustainable than the previous target. With respect to infrastructural difficulties, development will not be allowed ahead of adequate infrastructure, but infrastructure service providers can use these population targets to inform their investment plans.

3. The type/density and format for new housing will be reviewed as part of the new town plan for the area with appropriate Roundwood specific objectives put in place to meet the requirements of the area.

4. It is intended that all towns in Level 6 in the settlement hierarchy will provided plans of a similar format, namely that format already utilised in recent plans for Avoca, Donard and Kilmacanogue, also in Level 6. These plans only have 3 'zones' i.e. a 'primary' or 'town centre' zone, where mixed uses are promoted, a secondary zone which will normally comprise housing areas and other employment and community facilities, and a tertiary zone, which is the area between the built up parts of the town and the countryside, when normally only rural compatible development will be considered. With this new format, the existing centre of Roundwood would be designated 'Zone 1', which would promote commercial and community uses, including the development of a town park, which can be included as a specific objective in the new plan.

5. The existing County Development Plan designates Roundwood as a 'Level 6' settlement where 50% of all new houses can only be sold to persons that have been permanently living and / or working in the County for 3 years (there are no restrictions on the remaining 50%). The development of single houses is similar restricted to those with the 3 year connection to the County. It is considered that these current provisions ensure that local people can access new housing.

6 & 7. This is noted and will be taken into consideration in drafting the updated town plan for Roundwood.

8. The review of the Roundwood Town Plan will involve an assessment of all existing social infrastructure within the plan area including the identification of appropriate lands for the development of community and recreation related development. The protection of historical buildings is currently carried out through local objectives and the entry of such buildings onto the record of protected structures as listed in Volume 2 of the existing County Development Plan. It should be noted that the review of the existing Roundwood Town Plan can only deal specifically with lands located within the plan boundary therefore the inclusion of specific objectives relating to the development of walks around the River Vartry reservoir will not be included in the town plan itself. It is intended however that the provisions of chapter 11 relating to the development of off-road walks and cycleways will be updated and strengthened in the new County Development Plan and that the plan will address amenity routes.

Recommendations of Chief Executive

1. To update and strengthen the objectives of the existing plan relating to the development of design standards for new housing, community infrastructure, tourism, employment, recreation and walking and cycle routes.

Submission No. 30**Name: Vale of Avoca Development Committee****Issues Raised**

It is proposed that Avoca Courthouse and the People's Park in Avoca be listed on the Record of Protected Structures for the County.

Response of Chief Executive

Noted. The review of the County Development Plan shall involve an assessment of whether or not these two items should be added to the Record of Protected Structures.

Recommendations of Chief Executive

To carry out a review of the existing Record of Protected Structures and add/remove buildings as appropriate.

Submission No. 31**Name: Wicklow Town and District Chamber of Commerce****Issues Raised**

The submission of the Wicklow Town and District Chamber of Commerce places a strong focus on the area of Employment within the County and Wicklow Town. The following sets out the general issues raised in the submission:

1. The plan from the outset needs to provide strong incentives to encourage new business to set up in the County and for existing business to grow.
2. A clear focus of the plan should be the provision of deliverable targets with realistic timeframes and a clear direction of how and when these measures will be implemented.
3. Wicklow Town has failed to grow to the level envisaged by its designation as a level 2 Large Growth Town 1 in the County Development Plan or Regional Planning Guidelines despite significant investment in local infrastructure. It is contended that the growth target for the town when compared to Arklow does not reflect the overarching objectives of the Regional Planning Guidelines. A stronger focus on Wicklow Town's growth and role should be set out in the plan.
4. Retail – A Wicklow Boot camp for entrepreneurs should be set up for the County in conjunction with the Wicklow Enterprise Park and the LEO.
5. Employment and Telecommunications – The broadband provision within the County needs to be significantly improved in order for business to develop.
6. Employment and Planning – Greater accessibility to planners and other departments in order to discuss potential employment generating projects.
7. The plan should encourage the provision of satellite offices in the County capable of being used by people who reside within the County but work elsewhere.
8. Clermont College needs to be further expanded and developed with clear defined goals and funding provision.
9. Live/work units – The plan should facilitate and encourage the development of live work units within residential areas.
10. Wicklow needs to focus on existing assets in order to stimulate employment within the County such as its ports and maritime activities. In this regard it is proposed that a study be carried out on Wicklow's ports in order to identify feasibility and potential scale of projects.
11. The Murrough – A study is urgently needed on the Murrough in order to ensure its protection into the future.

12. Tourism: Accessibility to Wicklow's Tourism assets and links to and between towns and villages needs to be improved significantly including public transport, walking and cycling routes.
13. Social Community and Cultural Development:
 - (a) The plan should encourage the dual usage of school facilities by community groups outside of school hours.
 - (b) Increased public transport links are required within the County in particular it is suggested that the Dart service should be extended to Wicklow
 - (c) Increased accessibility to and improved mobile phone networks are required throughout the County.
14. Built and Natural Heritage:
 - (a) Wicklow Town Specific: The Chamber are generally supportive of the ACA designation however any further additions should be in consultation with owners of properties
 - (b) A policy is required to facilitate the bringing of oil and gas ashore
 - (c) The plan should facilitate the development of an interconnector to bring energy from off shore wind farms ashore or to the UK.
 - (d) The plan should include an objective to carry out a study of Wicklow's natural resources in order to ascertain whether or not there is potential for renewable energy production from these resources.
 - (e) It is the chambers view that national building standards are sufficient and no additional requirements hindering development should be included in the plan.

Response of Chief Executive

1. A land use plan has a somewhat limited role in encouraging potential employers to locate within the County however planning can play a major role in creating the right environment which attracts potential employers. Such measures include the following:

- Identifying appropriate lands to be zoned in close proximity to existing urban centres and transport links
- Promoting and facilitating the expansion of existing businesses in the County
- Setting appropriate growth targets for areas that will influence the delivery of key infrastructure capable of accommodating new development
- Creating attractive environments in which to live and work within the County
- Promoting and facilitating the development of educational institutions within the County
- Promoting existing and new enterprises within the County through appropriate zoning and policies

While the above may provide some incentive to potential employers to locate within the County the Enterprise Department of the Local Authority have a more specific role in attracting potential employers into the County. With the inception of the new LEOs and the development of the forthcoming Local Economic and Community Plan, there will be ongoing activity in this area. The objectives of the new County Development Plan will underpin and facilitate these initiatives.

2. The Wicklow County Development Plan is put in place to set out a strategic spatial framework for the proper planning and sustainable development of the County over a 6 year horizon. Development Plans focus on 'big picture' planning issues. The plan is not a 'spending plan', however it sets a framework within which developments can be undertaken, in the event that the public or private sector are in a position to develop such projects. A development plan does not 'deliver' new infrastructure, but puts in place a framework that allows for such infrastructure to be developed by either public or private agencies. The delivery of such new infrastructure may involve the acquisition of land / property and the sourcing of funding. The delivery of such projects within specific timeframes is considered to be more a matter for consideration in the operational programmes such as the Roads Programme, the forthcoming Local Economic and Community Plan and in the annual budget process. Submissions made to the County Development Plan process which appear to cross over into the LECP will be forwarded onto the team preparing the LECP.

The plan team will not have the resources to undertake a fulsome audit of all actions of the Local Authority, other public bodies and the private sector with regard to fulfilling the strategic goals of the existing plan. However, it should be noted that all strategies, policies and objectives that flow from these high level goals are implemented on an ongoing basis through the development management process and in the investment / works plans by other departments of the Council. The Council also has an input into the investment plans of outside agencies, such as the NTA, NRA and Irish Water, such bodies at all times being informed of the goals of the County Development Plan. It should however be noted that the severe lack of development since 2010 in the County will make it somewhat difficult to determine if existing goals and objectives are having the desired outcomes.

3. With respect to the settlement hierarchy, this is for the most part (certainly for the larger settlements) set at a State and regional level, and is not open for debate through this county plan process. Wicklow Town was designated as 'growth town' higher in the hierarchy than Arklow by the elected members of the regional authority, due to it being the County town, on a rail line, with potential to be a significant development pole in eastern Wicklow, away from the draw / influence of the Metropolitan area.

Given the level of investment in key infrastructure in Wicklow over recent years it is envisaged that the town's role as a Large Growth Town 1 will begin to come to fruition over the lifetime of the new County Development Plan without the need to place an even stronger focus on the town's growth and role within the County.

4. This point would be more appropriately dealt with through the LEO and the LECP Team.

5. The need for improved broadband is acknowledged in both Strategic Goal 2 and Chapter 14 of the existing County Development Plan. It is recommended that these goals and objectives will be carried forward and strengthened in the new plan.

6. This is not a County Development Plan issue however it is worth noting that the existing procedure for providing pre-planning guidance on potential enterprise and employment development proposals is quite comprehensive with a quick turnaround in issuing responses to queries. The new LECP and the Local Enterprise Office also act as additional sources of information for any potential employment generating projects within the County.

7. The existing County Development Plan sets out a number of objectives within Chapter 7 relating to the development of employment within the County. While the provision of 'satellite offices' are not specifically mentioned in the plan itself the provision of such facilities where demand exists would be permissible on lands zoned employment within all settlements in levels 1-8. The delivery of such facilities is considered to be more a matter for consideration in the forthcoming LECP.

8. As set out above, the County Development Plan is not a spending plan; however it can set out a framework within which developments could be undertaken, in the event that the public or private sector are in a position to develop such projects. The provisions of objective ED5 of the existing County Development Plan alongside the provisions of Wicklow Town – Rathnew Development Plan 2013 – 2019 Action Area are considered sufficient to provide clear guidance for the future development of the Clermont college campus from a land use perspective.

9. Objective EMP 7 of the existing County Development Plan promotes the integration of employment uses with other land uses, including residential, at locations which comply with sustainable transportation objectives. It is recommended that these objectives will be continued in the new plan.

10. This is not a planning matter and would appear to be more a matter for consideration in the forthcoming Local Economic and Community Plan and in the annual budget process, and any submissions made to the County Development Plan process which appear to cross over into the LECP will be forwarded onto the team preparing the LECP.

11. The Plan includes a number of objectives relating to the protection of coastal areas and designated sites such as the Murrough in Chapters 17 and 18. This area is designated a Natura 2000

site under the EU Habitats Directive 1992 and the development of a management plan is therefore the responsibility of the National Park and Wildlife Service.

12. This is noted. The existing County Development Plan contains a number of objectives aimed at promoting tourism and links to and between towns. It is recommended that these objectives will be continued in the new plan.

13

- (a) Objective ED7 of the existing County Development Plan promotes the after school usage of school facilities by community groups. It is recommended that this objective will be continued in the new plan.
- (b) The new County Development Plan shall include as an objective the improvement of transport linkages from Wicklow to the Greater Dublin Area, with a particular emphasis on improvement to public transport and addressing national route capacity issues. While the inclusion of an objective may be worthwhile this is unlikely to be funded within the lifetime of this plan and would most likely take away from other more achievable objectives.
- (c) Objective ICT1 of the existing County Development Plan facilitates the development and expansion of communication, information and broadcasting networks, including mobile phone networks, broadband and other digital services. It is recommended that this objective will be strengthened and continued in the new plan.

14.

- (a) This relates specifically to the ACA designation which forms part of the Wicklow Town - Rathnew Development Plan and is outside the remit of this plan. It should be noted however, the process for amending ACAs includes public consultation, whereby property owners can have their views taken into account.
- (b) Chapter 14 of the existing County Development Plan sets out the strategy for the development of Energy and Telecommunications. This chapter focuses on the exploitation of renewable sources of energy in the County over non-renewable resources as they form a more sustainable form of energy production. It should be noted however that as part of the strategy for enterprise and employment that the plan will support and facilitate to the highest degree possible (subject to environmental and other relevant planning consideration) all forms of employment generation within the County. It is considered that strengthening and carrying forward this objective into the new plan would adequately facilitate the potential for this form of development.
- (c) Objective EG3 of the existing County Development Plan facilitates the development and expansion of communication information and broadcasting networks, including mobile phone networks, broadband and other digital services. It is recommended that this objective will be continued in the new plan.
- (d) While the County Development Plan does not provide funding for any objectives, it must be conscious of the likelihood of any of its objectives ultimately being funded by Wicklow County Council. As this is really a matter for SEAI, and it is most unlikely that Wicklow County Council will ever fund such a study, having this as an objective would be misleading.
- (e) This is noted. The existing plan contains objectives which require compliance with the national building regulation standards. It is recommended that this objective will be continued in the new plan.

Recommendations of Chief Executive

1. The new County Development Plan shall include objectives that facilitate and support:
 - Enterprise and Employment
 - Telecommunications Infrastructure
 - The after school use of existing educational buildings for community use
 - Coastal Zone Management
 - Tourism
 - Heritage
 - Renewable Energy

- Improved public transport links to Dublin and within the County itself
- Sustainable building forms in accordance with relevant building regulations

Submission No. 32**Name: Wicklow Uplands Council****Issues Raised**

1. The uplands council would like to see their strategic priorities as listed below included in the new County Development Plan:

- To encourage rural employment
- To support the retention of the rural population
- To promote the Wicklow Uplands by collectively promoting towns and villages which act as 'gateways' to the area
- To continue to develop opportunities for sustainable recreation
- To encourage best management of our natural heritage, habitats and landscapes

2. The importance of involving local communities in the development and decision making processes of the County Development Plan is highlighted.

3. A number of strategic recommendations under plan specific headings are set out as follows:

A. Population – A policy revision of the Development Plan population and settlement strategy is necessary to facilitate population growth in remote areas within the context of the next National Spatial Strategy.

B. Rural Housing/Standards

- There is a strong need for Wicklow to produce a Wicklow Design Guide.
- The plan should encourage rural cluster housing
- A sensible approach to the interpretation of the new building regulations including energy efficiency and sustainability should be taken.
- There is a need for the upgrade and maintenance of unsealed roads servicing areas to be taken over by Wicklow County Council

C. Tourism, Recreation and Wicklow's Economy and Health

- The development and maintenance of outdoor recreation facilities in Wicklow should be prioritised in the new plan
- The plan should take the opportunity to help Wicklow develop as the adventure capital of Ireland
- A co-ordinated approach is required to develop and manage the existing trail network
- Future funding is required to develop the trail network in the County
- The plan should prioritise trail development projects that link directly with the counties towns and villages
- The plan should facilitate longer distance off-road cycle routes in Wicklow
- The provision of trail hubs (with clear interpretation signage, car parking and toilet facilities) leading to a number of alternative walking routes should be encouraged.
- The plan should support pedestrian links from the Wicklow Way to towns and villages
- Outdoor recreation events and festivals should be supported and encouraged

D. The County Wicklow Retail Strategy – The retail strategy should support the survival of retail outlets and other services in more rural towns and villages.

E. Rural Development Best Management of upland habitats through farming – The plan should recognise the key recommendations of the 'Study to identify Best Management of Upland Habitats in County Wicklow'.

F. Farm diversification/Rural Enterprise – The County Development Plan must take a pro-active approach to the development of rural enterprise including on farm food processing.

G. Wicklow's Forestry Strategy – In line with the Irish Forestry Programme 2014 the plan should:

- Support private forest holders in Wicklow to actively manage their plantations the majority of which are now yielding first and second thinning.
- Optimise the environmental and social benefits of new and existing forests.
- Encourage the renewal of Wicklow's native woodlands.

H. Community Facilities and Open Space – There is a need for the Plan to provide a more evidence based approach to the provision of Community Facilities and Open Space while also ensuring green spaces and connectivity between developments are mandatory for new business and housing developments.

I. Built and Natural Heritage including landscape – Work on-going regarding the National Landscape Strategy for Ireland should be acknowledge in the plan while the requirement to interpret such strategies at a local level to assist planners in assessing applications for wind and pylon developments for example should be recognised.

J. Protecting Upland and Rural Environments – The plan should be supportive of the PURE project in helping to create a clean green image for the County.

K. Deer Management Strategy – The plan should support the Deer Management Strategy.

L. Renewable Energy - The plan should support the development of small scale renewable energy production in business and in homes throughout Wicklow.

M. Communications – The plan should have a strong focus on the provision and maintenance of an efficient broadband service.

Response of Chief Executive

1. The strategic priorities of the Uplands Council are noted. The existing County Development Plan addresses all of these areas by:

- Facilitating the development rural enterprise set out in Chapter 8 of the plan
- Promoting the retention of the rural population through the provisions set out in Chapter 7
- Promoting the development of plans for towns and villages acting as gateways to upland areas (Volume 3 Town and Village Plans)
- Promoting the development of tourism and recreation as set out in Chapter 9
- Protecting natural heritage, habitats and landscapes as set out in Chapter 17.

It is recommended that these objectives will be strengthened where applicable and continued in the new plan.

2. Noted. The provisions of the Planning and Development Act 2000 (as amended) set out statutory guidance and minimum timeframes for consultation with the public in the development of the county development, local area and town plans.

3.

A. In accordance with the provisions of the existing National Spatial Strategy it is a goal of the existing County Development Plan to attract growth in rural settlements to both support local economies and to accommodate rural housing. It is intended that the new County Development Plan will similarly be consistent with the rural development goals of the NSS and any revisions thereto.

B. It is intended that the existing County Development Plan will include:

- A Wicklow Rural Design Guide.
- Design standards encouraging rural clusters

- An objective as currently set out in the existing County Development Plan stating that all new buildings must be constructed in accordance with the provisions of the buildings regulations, (although this is required by law anyway and including same in a development plan does not make the law any more applicable)

In regard to taking in charge and sealing of roads it should be noted that this is not an issue for the County Development Plan and is more operational issue for the roads section of Wicklow County Council.

C. While it is intended that the new County Development Plan will include objectives promoting and facilitating the further development of outdoor recreation facilities including walking and cycling routes and outdoor recreational events / festivals throughout the County it should be noted that it is not the role of the County Development Plan to provide an overarching strategy for tourism or recreation in the County. The role of the County Development Plan is to underpin the land use and development aspects of any strategies / objectives that tourism/recreational bodies adopt for the County. The new development plan will take into consideration the emerging 'Local Economic and Community Plan' which is being separately prepared in 2015, and any objectives it includes with regard to recreational activities and the tourist sector.

D. The existing objectives of the County Development Plan as set out in sections 10.4.8 and 10.4.9 promote and support retail services within villages and rural areas. It is intended that the new County Development Plan will also include such objectives.

E. The existing County Development Plan aims to ensure that appropriate conservation and management of the natural environment including upland areas is a central element in the long term economic and social development of the County. It is intended that this aim will be carried forward into the new County Development Plan.

F & G. Chapter 8 of the existing County Development Plan set out a number of objectives relating to the development of rural enterprise/farm diversification and forestry activities. It is intended that the new County Development Plan will also include such objectives.

H. While the existing County Development Plan contains a number of objectives relating to the provision of community facilities and open space areas as set out in Chapter 12 Social and Community Infrastructure the Community, Cultural and Social Development section of the Council maintain records of community facilities, carry out assessments of needs and have an operational programme for the delivery of required new community infrastructure. The role of the land use plan is to ensure that appropriate land use zoning provisions and development objectives are in place to ensure the delivery of this programme.

With regard to connectivity between developments it should be noted that as part of the review process of the County Development Plan it is intended to include a new section under the heading of 'Green Infrastructure' aimed at promoting connectivity both within towns and villages themselves and links between these areas and surrounding settlements.

I. It is intended that the new plan will have regard to the National Landscape Strategy for Ireland while also carrying out an analysis of the appropriateness of the existing landscape categories set out in the existing County Development Plan.

J. The existing County Development aims to promote and facilitate developments and projects which protect the existing natural rural environment within the County, such as the PURE programme. It is intended that the new County Development Plan will carry forward such policies with the aim of maintaining the County's green image.

K. While specific objectives relating to a Deer Management Strategy would be outside the remit of a County Development Plan the existing Plan does include a number of objectives with the overall aim being the protection of the existing natural environment within the County. It is intended that these

objectives will be updated/strengthened and carried forward into the new plan which will in turn facilitate the implementation of the Deer Management Strategy Wicklow.

L. The strategy set out in Chapter 14 of the existing plan encourages and facilitates the exploitation of renewable sources of energy including small scale renewable energy production. It is intended that these objectives will be updated/strengthened and carried forward into the new plan.

M. The need for improved broadband is acknowledged in both Strategic Goal 2 and Chapter 14 of the existing County Development Plan. It is recommended that these objectives will be continued in the new plan.

Recommendations of Chief Executive

1. To produce a Wicklow Rural Design Guide as part of the new Wicklow County Development Plan.
2. The new County Development Plan shall include objectives that facilitate and support:
 - Rural Enterprise
 - Growth in rural settlements
 - Plans for towns and villages
 - Tourism and recreation in the County
 - The protection of natural heritage and habitats
 - Retail services in rural settlements and villages
 - The appropriate conservation and management of uplands areas within the County
 - The protection of the landscape
 - The development of renewable energy technologies
 - The delivery of improved broadband technology and services
 - Green Infrastructure

Submission No. 94

Name: Wicklow County Tourism

Issues raised

1. Actions to promote tourism

• Develop Heritage and Culture offering in Wicklow

The theme around the new Failte Ireland's East Coast Destination is Heritage & Culture. Most of the marketing efforts will be around that theme. Wicklow's Heritage has a tremendous wealth of heritage sites. Our main objective is to make sure we develop, interpret and maintain such offering. Wicklow needs to work on the maintenance, signage and accessibility of those sites. We must be able to "tell the story". Wicklow must work along with the Heritage Council, OPW and local tourism board to make the most of our amazing heritage.

• N/M11 to become major artery for Southern Access to New Failte Ireland's destinations

The development of the new Failte Ireland's destination will put major focus on the various locations South of Dublin: Kilkenny, Wexford, Waterford & Cork. Wicklow must work at developing the N/M11 as the preferred route to access the Southern destinations (rather than currently the M9 or M7). Strong tourism signage & tourism information points along the M11 should be then put in place to secure proper exposure to traffic heading south.

• Increase access and promotion to Heritage Sites along the N81

West Wicklow is steeped in Heritage. There are some amazing sites along the N81 that are not properly signed or accessible. For example, Seefin and other burial monuments are difficult to access; there is no proper parking at the "Piper Stones"; the Baltinglass Abbey offers no access. The

"Heritage Corridor" along the N81 has the potential to be developed as a major tourist trail that would perfectly fit within Failte Ireland's East Coast destination.

- **Blessington Lakes Greenway as major project for West Wicklow**

West Wicklow is to become the centre of the Kildare-Wicklow destination. The completion of the Blessington Greenway has the potential to be a major development for the region and the promotion of the new destination. Every effort should be made to secure the necessary funds to complete that project. Efforts must come from both Counties working in partnership. Benefits from such development would be a tremendous investment in the tourism future of the area with tremendous economical benefits for both counties.

- **Support for the development of outdoor activities infrastructures (walking, Cycling and Angling)**

Most trails in Wicklow are located along the East Coast. West Wicklow is widely used for Outdoor activities, yet there are very little marked trails and no mountain bike trail. There also must be an objective to develop "outdoor activities connections" between East and West. Currently, St Kevin's way is the only "connection". Wicklow needs to work at developing a network of linear and circular walking routes and cycling trails.

There is also great potential in rivers, lakes and sea angling and fishing in Wicklow. Locations like the Blessington Lakes, Vartry, Lough Dan, Irish Sea offer attractive and challenging opportunities to attract visitors.

- **Public transport to link East Coast, West Wicklow and Kildare**

The vast majority of overseas visitors to Ireland do not rent a car. With no public transport in place, there is very little opportunity for tourists to roam around the Kildare-Wicklow destination. Both Counties have to come up with a public transport infrastructure solution.

- **Destination Signage**

The Kildare-Wicklow destination has to be branded as such, and signage put in place around the destination. Signs must be erected at major attractions and locations around the two counties. Signs have to be put in place along the major "arteries" servicing both Counties: M11, N81, M9, M7 & M4.

2. Protection of Wicklow's tourism assets

- **Support from local Planning authority**

A dedicated and intelligent Planning Authority which understands the necessity for developing an integrated Tourism industry in Co Wicklow; and who can work in an open way with the industry. Tourism Providers invest huge resources in their developments in co. Wicklow; they are the first to understand and protect the natural and built environment of the county, any negative interference with this free and natural resource would impact first and foremost on their own business

- **Manage visitors from over-crowded areas**

Glendalough is regularly over stretched. Brittas Bay as well can be extremely busy on a hot summer's day. At the same time, Wicklow has some great other locations where visitors could be diverted to. Wicklow has to put in place a proper traffic management system to deal with over-flow issues, but also to help divert some of that traffic to other destinations within Wicklow. This would involve stronger signage along the main roads; for example along the N11 at Kilmacanogue, Arklow or Ashford. Warnings on local tourism website should also play a strong role, with suggestions on different routes and locations around the county.

- **Blessington Greenway as new major development**

The development of the Blessington Greenway would represent another major attraction for outdoor activity users. The Glendalough area is often used as the default destination for visitors engaging in outdoor activities. The completion of the trail around the Blessington Lakes would create a very attractive destination for visitors looking for outdoor facilities. With proper signage in place, this would become a viable diversion when Wicklow's main attractions are over-stretched.

- **Improve Public Transport or “park and ride” system**

Wicklow's various destinations are difficult or impossible to access by public transport. Wicklow should develop an east to west public transport that would regularly service some of Wicklow's top attractions and activities destinations. It would be interesting to think of a Park and Ride system where people could be brought to various specific destinations. For example, the Greystones Park & Ride, could be used to bring visitors to key walks up the Wicklow Mountains. The Murrrough in Wicklow Town, could be used to bring visitors to Brittas Bay. This would be quite easy to set up, but would require extensive promotional activities.

- **Secure off road parking**

Following from the previous point, a lot of areas in Wicklow could do with better, off-road secure parking. Locations like Lough Tay, Roundwood and various locations along the Wicklow Way are regularly clustered with cars, often dangerously parked. These locations are also easy targets for anti-social behaviours. Private land owners should be given the opportunity to open their lands and offer safe parking. Such locations can offer further services like food & drink, park & ride or tourist information centres and often in locations that badly need it. There is also the need to enhance existing parking and access to local attractions and other points of interest. For example, The WW1 Park opened in Woodenbridge is accessible from the Woodenbridge Hotel car park, but a large numbers of often elderly people crossing the road complain about the speed at which car drive by the site, and no safe crossing for pedestrians. Other example with the Piper's Stone in West Wicklow where there is little and unsafe parking to access this amazing Pre-Christian site.

- **Manage day visitors coming to Wicklow:**

There are tremendous issues with day-trippers to Wicklow, where they spend only a fraction of overnight guests yet draw on the counties resources. Many of the tours leaving from Dublin don't even have a lunch stop, but bring picnics. Wicklow County Council should look at options to introduce some sort of coach parking charge, with the proceeds then ring fenced for protecting the counties natural assets and perhaps marketing the county? Could a scheme then be introduced that accommodation providers could give free parking passes to their guests/tours that overnight?

3. Tourism products

- **Blessington Lakes Greenway**

Wicklow has so much to gain from the development of the Blessington Greenway that all efforts should be made to see the completion of such project. The trail around the Blessington Lakes would also provide a strong infrastructure from which smaller domestic / agricultural tourism products could be developed. Such development could also help revive some of the smaller communities and their local projects in locations such as Lackan, Ballyknockan or Vallemount. This could also revive the St Kevin's Way and the link from East to West.

The Greenway not only would become a major attraction but also an infrastructure that will service and support many local community and help to the development of local businesses. In order to achieve this, we must chase any available funding opportunity at local, national and European level. The Blessington Greenway would offer extensive return to the local economy with limited to no ecological impact. This project could turn out to be a tremendous investment for our County.

- **Walking/Cycling trails and greenways network around the County**

In recent years, a lot of efforts from local communities have been put at developing local trails. Wicklow should be looking at opportunities to link up the various trails around the County. Developments such as Tinahely Walker's welcome or work on connecting Glendalough and Rathdrum are to be welcomed and encouraged. No other county in Ireland offers such an amount of marked trails.

- **Support local communities and local projects**

Following from the previous point, rural communities around Wicklow have proven to be highly efficient in delivering and managing local tourism projects: Tinahely with the development of Walker's Welcome initiative, Avoca with the recent launch of a loop walk, Blessington with the

Greenway are just a few examples. Such projects take advantage of existing assets and are extremely good for the local economy.

- **Promote existing tourism infrastructure**

Wicklow is blessed with some of Ireland's best cultural and historic sites. It has also spent a considerable amount of time and resources to develop some of the best outdoor infrastructures in the Country. Unfortunately, we haven't been able to promote those assets, and the majority of visitors still go to the same areas. Now is the time to start shouting about Wicklow! Resources should be made available to market Wicklow as a destination Wicklow and its assets. Wicklow County Council needs to be more aggressive and proactive about fighting for its share of the tourism market.

4. Amenity routes / trails

- **Wicklow Way as the backbone of walks in Wicklow**

The Wicklow Way is a fantastic amenity that goes through the length of our County. Local communities along the Wicklow Way should be encouraged and given support to develop routes that connect with the Wicklow Way and extend its network. The Wicklow Way's network should reach all the way to Bray, Greystones, Wicklow Town, Arklow, Blessington, Carnew or Baltinglass. Wicklow should offer various routes where visitors can start or finish. Connecting with towns and villages will entice visitors to stay longer and spend locally.

- **Stronger Tourism awareness and promotion along the N/M11**

Wicklow is one of Ireland's most beautiful counties. Our tourism offering is second to none. Yet driving down the N/M11, very little "noise" is made about this. We have "accepted" that Glendalough is the main attraction, and very little has been done to promote other destinations within the County. The thousands of vehicles driving along the N/M11 should regularly be reminded of the "destination" they are driving through. Various tourism information points should also be put in place along the route (partner with gas stations?)

- **West Wicklow Heritage Trail**

West Wicklow finds itself at the centre of the new Kildare / Wicklow destination. The N81, along with the N/M11 has the potential to become one of the main arteries linking Dublin to southern destinations along the East & South Destination being developed by Failte Ireland. West Wicklow hides amazing archaeological treasures, some older than the pyramids in Egypt: Early Celtic settlements, Pre-Christian holy sites, Early Christian monasteries, rebellious past locations. West Wicklow offers an amazing journey through Irish History.

This project could be developed in partnership with the local Heritage Council, OPW, Local tourism board and the local communities along the N81. Define the main heritage sites, develop access and interpretation.

- **Walking & Cycling network around Wicklow**

Wicklow has the potential to become the Outdoor Capital of Ireland. Wicklow must support and coordinate the various local initiatives to develop local walks and cycling trails with the ambition to create a network of trail connecting the various town and villages and the main walking routes & hubs (Wicklow Way, Glendalough, Blessington Lakes, Tinahely). This could be supervised by the local Outdoor Recreation Office in partnership with local communities, with the support of the Tourism Board, Local Sports Partnership, Coillte and the National Parks.

- **The Avoca Valley**

From Glendalough to Avondale and the value of Avoca is truly stunning, yet can't be covered safely without a car. Avondale to Woodenbridge is like the history of the home rule movement, from Parnell and the rise of home rule to its eventual demise with Redmond's speech at Woodenbridge. Yet this major part of Ireland's history isn't highlighted. As a poignant aside, John Redmond's brother William took up his brother's call to arms, died during the war and is now one of the names listed on the memorial park. From a tourism perspective this is marketing gold and should be capitalised on.

5. Wicklow's advantages

• Wicklow's Great Outdoors

No other location along the East Coast, and potentially Ireland offers such an array of activities in such a stunning landscape. The main message that will be developed by Failte Ireland will be around the Heritage and Culture. Wicklow has the assets to compete with other areas within the larger destination. But Wicklow has no real competition when it comes to Outdoor Activities. There is a tremendous opportunity to bring our product to a global audience and attract visitors to Wicklow not only on the back of our fantastic heritage, but also for our amazing outdoors.

• Heritage and Culture

As mentioned earlier, Failte Ireland is developing a new "great" destination along the East Coast of Ireland. The theme of such destination will be around Heritage and Culture. Wicklow must embrace its rich heritage. We must make it accessible and get ready to package our tremendous heritage. Wicklow offers a snap-shot of Ireland's rich and turbulent history.

• Film industry

Wicklow is the Hollywood of Europe. With two film studios, fantastic film locations and many features shot in the County, Wicklow needs to find a way to capitalise on the tremendous exposure we are getting all over the world. Wicklow needs also to facilitate the local expansion of that industry. The development of a visitors centre should be considered. We must bring the studios together and come up with an initial plan to establish Wicklow as the Film destination in Ireland. The Hollywood boulevard in Los Angeles has its "Walk of Fame". Wicklow could have something very similar in Ashford, Bray, Wicklow Town, Arklow or Hollywood. We could also have stars or information signs around the County at specific locations.

• Access to Dublin

It is both an advantage and a disadvantage. In recent years increasing numbers of visitors to Wicklow are doing it as part of a day trip. There should be a carrot and stick approach to this, as stated previously some kind of charge for coach parking, while similarly providing activities that can't be covered in a day, such as longer cycling and walking routes, which are professionally signposted and safe. The short haul visitor to Dublin needs to be encouraged to see more of Ireland, yet be encouraged by the fact that they only have to travel an hour south. East Wicklow is also now well served with busses to and from the airport.

Response of Chief Executive

This is a very comprehensive and detailed submission, and those aspects of it that have a 'land use' dimension, will be considered in the crafting of the new plan. The existing County Development Plan is unequivocal in its support for tourism projects, subject to best practice and protection of the environment. However, it is not the role of the County Development Plan to provide an overarching strategy for tourism in the County. The tourism strategy for the County is provided by the tourism agencies at work in the County, namely Failte Ireland, Wicklow County Tourism, Bray Tourism and the Economic Development Division of the Council. The role of the County Development Plan is to underpin the land use and development aspects of any strategies / objectives that these bodies adopt for the County. The new development plan will take into consideration the emerging 'Local Economic and Community Plan' which is being separately prepared in 2015, and any objectives it includes with regard to the tourist sector.

With respect to the issues that are relevant to the County Development Plan:

- a. The current County Development Plan contains numerous objectives with the aim of promoting and facilitating tourism related development. It is intended that the new plan will contain similar and enhanced (if necessary) provisions.
- b. The current County Development Plan contains numerous objectives with the aim of protecting and enhancing our built and natural heritage and promoting the sustainable and sympatric

- exploitation of same for tourism and recreational uses. It is intended that the new plan will contain similar and enhanced (if necessary) provisions.
- c. The current County Development Plan supports the development of walking and cycling trails / routes and other outdoors activities, including the Blessington greenway project, and it is intended that the new plan will contain similar and enhanced provisions.
 - d. It is agreed that improve public transport link are vital to the tourist industry in Wicklow and it is intended that the new plan in its policies and objectives will support and facilitate new transport initiatives.
 - e. The NRA has strict policies with regard to tourism signage on the N/M11, with a view to keeping the roads free of unnecessary distractions in the interests of driver safety. It is agreed that it *should* be possible to provide for more interesting and informative signage than is allowed at present to draw attention to the assets / qualities of towns along the route, as are used in lots of other European countries, without compromising traffic safety. This is however more a matter for national NRA policy, rather the County Development Plan.
 - f. With respect to traffic management issues and car parking, the Roads Department of Wicklow County Council is continuously working on this issue with the various transport agencies/ authorities and key road users, and endeavouring to put in place measures to address issues around the movement of visitors to our key attractions.

Recommendations of Chief Executive

The new County Development Plan will include policies and objectives that:

- (a) promote sustainable tourism and tourist related infrastructure
- (b) protect the County's built and natural assets, while allowing for appropriate and sensitive exploitation
- (c) promote and facilitate the development of existing and new walking / cycling trails, amenity routes and transport connections

Part 4.3 Public submissions**TOPIC 1: VISION & CORE STRATEGY****(a) Vision & Strategic Goals**

Name	Issue raised
Ashford Studios	<p>Goal 7 of the existing County Development Plan is the most important overall as improvements in transport and communications are essential in order to encourage the growth of employment, enterprise and economic activity in the County.</p> <p>Goals 4 and 5 also significant as housing and servicing retail and amenities will be needed to cater for the increased number of residents in Ashford and surrounding areas due to the film sector.</p>
Mary Rose Craig	<p>The Vision and Core Strategy needs to refer to the role Wicklow, in particular the Wicklow Mountains and coastal areas, plays in meeting the leisure, sports and access to the wilderness needs of the residents of Dublin and the greater Dublin area, and of tourists to Ireland e.g. Goal 6 just refers to the recreational needs of rural population.</p>
Cunnane Stratton Reynolds	<p>Economic investment and regeneration should be the key objective of the development plan.</p>
Lailli de Buitlear	<p>With respect to Goal 1, that is, adherence to the Regional Planning Guidelines for the Greater Dublin Area, no parts of County Wicklow should be included in the metropolitan area and the entire County should be consolidated as 'hinterland' for the following reasons:</p> <ul style="list-style-type: none"> - there should not be any new housing development in Bray in the sensitive area between Bray Head and the Sugarloaf mountains - there is only one main road south of Bray, east of the N11 - there is only a single track railway line, which cannot be expanded and involves a high pro-rata fare than the rest of the DART service - there are constant requests for better public transport service to Delgany to little avail - if and when the LUAS extends to Bray, it is not scheduled to cross the Dublin County boundary - both Bray and Greystones have lost their town councils and therefore they do not warrant Level 1 and Level 3 in the settlement hierarchy respectively
Clodagh O'Brien	<p>The Vision and Core Strategy needs to refer to the role Wicklow, in particular the Wicklow Mountains and coastal areas, plays in meeting the leisure, sports and access to the wilderness needs of the residents of Dublin and the greater Dublin area, and of tourists to Ireland e.g. Goal 6 just refers to the recreational needs of rural population.</p>
Gerard Roe	<ul style="list-style-type: none"> - The vision is still very relevant, due in no small part to the failure to date to provide many of the vision aspects listed. - The goals cover areas appropriate to improving the quality of life for residents of the Wicklow county area. They are meaningful in terms of being appropriately aspirational, however one would have to question the benefit of seriously considering these goals in the absence of any commitments regarding funding provision. Is this entire consultation process a futile exercise intended to give the impression that Wicklow residents can influence community development, while lack of funding and commitment will determine otherwise? - The current goal list is very appropriate and it would be a welcome surprise if any of the goals listed could actually be delivered (see

	previous funding and commitment comment). I would be reluctant to add any more to what already seems to be a very worthy, but ultimately unattainable goal list.
David Walsh	<p>1. With respect to Goal 1, that is, adherence to the Regional Planning Guidelines for the Greater Dublin Area, no parts of County Wicklow should be included in the metropolitan area and the entire County consolidated as 'hinterland' for the following reasons:</p> <ul style="list-style-type: none"> - there should not be any new housing development in Bray in the sensitive area between Bray Head and the Sugarloaf mountains - Greystones / Delgany is not in a transport corridor and is unlikely to be so in the foreseeable future. There is only a single track railway line, which cannot be expanded and involves a high pro-rata fare than the rest of the DART service; there is only one road south of Bray east of the N11; the extended LUAS line and proposed orbital route will be of no advantage to Delgany. if and when the LUAS extends to Bray, it is not scheduled to cross the Dublin County boundary; there are constant requests for better public transport service to Delgany to little avail and recent indications that it is being curtailed even more by Dublin Bus. - both Bray and Greystones have lost their town councils and therefore they do not warrant Level 1 and Level 3 in the settlement hierarchy respectively. <p>2. The RPGs should be amended after the NSS is updated in time to feed into the new Development Plan. In that review, Bray and Greystones should be classed as hinterland within the Greater Dublin Area dropping to Levels 3 and 4 respectively. Delgany should be classed a Rural Town (Level 6).</p>

Response of Chief Executive

Vision

In light of these submissions, and submissions already addressed in this report, it is considered that the 'Vision' for the County, as set out in the existing County Development Plan, is still appropriate and relevant.

For County Wicklow to be a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected; where opportunities abound to live and work in a safe atmosphere, allowing people to enjoy the benefits of well paid jobs, a variety of housing choices, excellent public services, ample cultural and leisure opportunities, and a healthy environment.

Strategic Goals

1. With respect to the suggestion that none of County Wicklow should be included in the 'Metropolitan Area' as defined by the Regional Planning Guidelines for the Greater Dublin Area, this would not be a matter for this County Development Plan review, but for the review of the regional plan, which is due to commence this year. However, this will not happen in time to feed into this plan – the new Regional Economic and Spatial Plan is not likely to be adopted until 2016, whereas the draft County Development Plan requires to be published in Oct/Nov 2015 and the bulk of the plan, other than amendments, is due to be adopted by mid 2016. It is unclear what such a move could achieve however, other than moving investment in infrastructure and services in Wicklow down the priority list for national and regional agencies. Should the new Regional Planning Guidelines redesignate the status of these towns, the County Development Plan will have to be varied, however we cannot

- suspend the review of the County Development Plan in the interim, as the law does not allow for this.
2. It is agreed that economic development should be a key objective of the County Development Plan, particularly in light of Government policy that County Development Plan should become more than just land use 'frameworks'⁸.
 3. It is agreed that the strategic goals should be enhanced to address the tourism, leisure and recreation function of the County in the wider region.
 4. It is agreed that existing goals and objectives with regard to transport and communications infrastructure, housing and retail should be maintained and enhanced in the new plan.

Implementation

With respect to the delivery of these high level goals, the 'implementation' of the goals and objectives of the County Development Plan occurs through:

- the delivery of certain programmes and projects by the Local Authority and other State agencies, subject to the availability of public sources of funding;
- the delivery of certain programmes and projects by private groups / individuals, which will be dependent on market factors and the availability of private funds;
- the development management process, which applies the provisions of the development plan in the assessment of applications for permission, on an ongoing basis, for the purpose of achieving high quality developments, that are in the interests of the common good and the achievement of the objectives of the plan.

It is a common misunderstanding the County Development Plan is a 'delivery' plan for projects and programmes in the County; the reality is that it is a land use 'framework' which gives 'spatial expression' to the economic, social and cultural needs of the community, in terms of influencing how and where new development takes place, enhancing valued amenities, and protecting the environment and heritage and setting the 'rules' within which new developments may occur. The focus of development plans is on physical development and land use and how this can serve wider economic social and environmental objectives.

For example, the County Development Plan is not a 'tourism' or an 'employment' plan, which are drawn up by other specialist agencies in these areas (such as *Faillte Ireland* or *Wicklow County Tourism* in the case of tourism, or the *Economic Development Unit* of the Local Authority / *Local Economic and Community Plan* team in the case of employment) but it underpins and facilitates any aspects of these plans that have a land use element.

Similarly, with regard to the environment, the County Development Plan does not in itself protect and enhance say, ground water quality, but it will set out the requirements for new developments, whether carried out by public and private agencies, to ensure that new developments don't result in pollution or damage to ground water. In this regard, it will set out the standards that that must be upheld, with regard to the obligations of the Local Authority with respect to various water protection laws and programmes, such as the Water Framework Directive and the River Basin Management Plans. However, the development standards of the County Development Plan can only be applied where consent is being sought for new development. It cannot enforce improved standards on pre-existing developments. It is through monitoring and enforcement actions by both the Local Authority's Environment Section and the other agencies such as the EPA, that ground water quality is more fully and appropriately managed.

⁸ As set out in 3.3.8 of 'Putting People First' - *It is proposed that, as a minimum in the case of cities and counties containing NSS gateways and hubs, and merging authorities, the range of local authority economic development functions will be brought together and underpinned in an economic development plan in conjunction with the spatial planning function, as a component of the City/County Development Plan, in effect, forming a local "Spatial and Economic Development Plan".*

Recommendations of Chief Executive

With respect to the 'Strategic Goals', it is recommended that the new plan shall:

- (a) Highlight economic development as a core goal of the plan
- (b) Emphasise the need for the delivery of significant infrastructural improvements in the County, with particular respect to transport and communications services
- (c) Identify and promote Wicklow's role in tourism, leisure and recreation

With respect to implementation, it is recommended that it is clearly set out in the plan what the role of the County Development Plan is and how the goals / objectives are to be fulfilled.

(b) Settlement hierarchy

Name	Issue raised
Ashford Property Services	New 'rural settlements' should be designated at the traditional rural settlements of Nun's Cross, Cronroe / Ballylusk, Killoughter and Coyne's cross
Ashford Studios	Ashford should be given a higher status in the settlement hierarchy. The status of the town should be based on infrastructure that will be needed to support and service the business brought about by the expansion of Ashford studios.
Elizabeth Battye	<p>Ballycoogue:</p> <ul style="list-style-type: none"> - The occupancy restrictions for developments in small villages are too restrictive and are compromising growth. - Ballycoogue is served by a new underutilised sewage treatment plant and an upgraded water supply. - Restrictions on housing in Ballycoogue should be relaxed by moving it up a level in the hierarchy to large village status. - Supporting growth in Ballycoogue is in line with Goal 6.
Blackditch Ltd	Newcastle is currently designated a Level 6 rural town. Having regard to the current target (of 1,750 persons in excess of that for Tinahely) and the RPG designation for Newcastle as a 'small growth town', combined with the existing critical mass and potential of the town that Newcastle should be re-designated as a 'Level 5 Small Growth Town' in the new plan.
Bluetone Properties Ltd.	Enniskerry: Enniskerry should retain its role as a Level 5 small growth town.
Eamonn Coleman	Enniskerry: The settlement strategy and designation of Enniskerry as a 'small growth town' is supported. Is the town a small commercial town remote from core commuting areas or a local commuter type town?
Rose Mary Craig	<p>Enniskerry: The existing 'Level 5' designation given to Enniskerry is inappropriate and damaging to Enniskerry. Its 'heritage village' status should be returned to it in the new County Development Plan and it should be redesignated 'Level 6'. The designation as Level 5 'small growth town' seems designed to enable planners to zone more land for further urbanisation in areas unconnected to the village itself.</p> <p>The settlement hierarchy definitions are unclear – why are different designations given to village – Avoca is classified as a 'village' but Enniskerry, which is also a village is classified as a 'small town'. Further Roundwood which is much larger in size is only designated Level 6 whereas Enniskerry is Level 5 – this clearly means that planners are to be allowed to zone more land for housing in Enniskerry than Roundwood which has greater flat land for expansion than Enniskerry.</p> <p>The settlement hierarchy should be based on other important issues such as environmental considerations, landscape designations and future climate change impacts.</p>
Laili de Buitlear	Delgany should not be included in the Metropolitan Area of the Regional Plan. Little has been achieved in Delgany from this designation, except more housing, but nothing by way of transport or infrastructure to support it.
Raymond Gaffney	<p>Barndarrig should be increased in status in the settlement hierarchy and a higher level of housing allowed in the settlement. The village is suitable for increased levels of housing for the following reasons:</p> <ul style="list-style-type: none"> - village is served by roads, street lighting, church, school, shops, post office, filling station licensed premises and transport bus stop - the wastewater treatment plant has recently been upgraded - there is ample water supply in the village for 200 houses - the local school has increased in size but is running on 2/3 capacity - Barndarrig is 7 miles from Wicklow town and 38 miles from Dublin - When the N11 upgraded is completed, the old N11 will be free of the volume of traffic that it currently has

John Kinsella	Upgrade Glenealy Village's status from a Level 7 large village to a higher level settlement, similar to that of Ashford Village (Level 5), in order to facilitate a higher level of growth.
Knockree Developments Ltd.	This is a very detailed submission that addresses a number of issues, but with respect to the settlement hierarchy, it sums up by requesting that the County Development Plan should reflect the fact that Kilcoole is part of the Level 3 settlement of Greystones-Delgany-Kilcoole and any reference to the town as a stand alone, small growth town should be eliminated.
Clodagh O'Brien	<p>The settlement hierarchy definitions are unclear – why are different designations given to villages – Avoca is classified as a 'village' but Enniskerry, which is also a village is classified as a 'small town'. Further Roundwood which is much larger in size is only designated Level 6 whereas Enniskerry is Level 5 – this clearly means that planners are to be allowed to zone more land for housing in Enniskerry than Roundwood which has greater flat land for expansion than Enniskerry.</p> <p>The settlement hierarchy should be based on other important issues such as environmental considerations, landscape designations and future climate change impacts.</p> <p>Enniskerry: Enniskerry should be given lower status as village in Level 6.</p>
Gerard Roe	<ul style="list-style-type: none"> - For fiscal reasons and to ensure efficient use of infrastructural resources and services, it would appear to make most sense to ensure that growth is concentrated in the towns and settlements where these limited resources currently exist and where they are capable of being upgraded to service planned and controlled development (based on secured funding for any necessary upgrades) - Bray, Greystones-Delgany, Wicklow, Arklow, Blessington and Newtown should be designated for significant new housing growth but only in conjunction within planned objectives and with appropriate infrastructure and social resources provided to improve quality of life for all residents. - The priority for investment in infrastructure should be Bray, Greystones-Delgany, Wicklow, Arklow, Blessington, and Newtown first. - While the current approach may be appropriate for towns as they exist at present, there must be some recognition of the fact that smaller towns may be listed further down the development scale as a direct result of previous lack of investment and planning priority. The council must be careful to ensure that the current system does not turn out to be a self fulfilling prophesy where the towns that have historically benefited from investment and planning input continue to do so, to the detriment of smaller towns that have been starved of investment and planning priority. - In areas where there is limited scope for new development, priority should be given to young people from the area trying to build or purchase in their own neighbourhoods. - Newtownmountkenedy has suffered badly from lack of investment in waste water treatment provision in particular. Its current designation has resulted in lack of investment, development and an associated lack of services. It should therefore be given a higher status. It would be prudent to provide appropriate services for the current population first and then look to see what future development could/should be undertaken. This argument could well also apply to other small towns in the county Wicklow area.
Patricia Walker	Enniskerry should be a level 6 as a key village and exploited for tourism, heritage and quality of life potential.
David Walsh	Delgany should not be included in the Metropolitan Area. Little has been gained in Delgany from this designation, except more housing, but nothing by way of transport or infrastructure to support it.

Response of Chief Executive

General

In accordance with the Regional Planning Guidelines for the Greater Dublin Area, which the County Development Plan must be consistent with, the existing County Development Plan designates Bray, Greystones, Wicklow, Arklow, Blessington and Newtownmountkennedy for significant growth and it is intended that this objective will be continued into the new plan, unless a change is made to the regional plan. It is agreed that new development in these towns must go hand in hand with the delivery of new / enhanced infrastructure where necessary, and Wicklow County Council works closely with various infrastructure providers, such as Irish Water, the National Transport Authority, the Department of Education etc to ensure that service delivery will match the development strategies set out in the County Development Plan and associated local plans.

With regard to settlements below these, a more moderate level of growth is targeted in the current plan and it is intended that similar principles will apply in the new plan. With regard to the suggestion that any growth that might be facilitated in these towns should be limited to young people trying to stay in their own areas, the County Development Plan has for some time had some restrictions on who could built in these settlements, in order to ensure that local people had opportunities to get onto the housing ladder. For example in Level 5 towns, the current objectives require 50% of new houses to be sold to persons that have been living and / or working in the County for one year. It is intended to review these restrictions to determine if they are appropriate to maintain in the new plan.

The majority of submissions with regard to the settlement hierarchy relate to the position or designation of specific towns, so each will be addressed separately:

Ashford: Ashford is designated in the current County Development Plan as a 'Level 5' settlement. This is the 'highest' designation available for Ashford, given that it is not identified in the Regional Planning Guidelines for the Greater Dublin Area as a 'growth town' (Levels 1-4 in the hierarchy). It is considered that this designation accurately reflects its role and function in the settlement strategy, which is set out in the existing County Development Plan as:

"The classification of Small Growth Towns is largely synonymous with the centres identified by the NSS as yielding a population of between 1,500 and 5,000 persons. It is envisaged that major employment-generating investment companies will seek to locate in Large Growth or possibly Moderate Growth Towns, and not necessarily in these locations. Relatively small and locally financed businesses are expected to locate in Small Growth Towns; however, other economic investment could be supported where sustainable and in keeping with the size and services of the town. Retail is likely to be mainly in the convenience category, with a small supermarket and possibly local centres serving only the town and its local catchment area. Small Growth Towns would likely contain facilities such as a primary and sometimes a secondary school, as well as a health clinic.

Within this category of settlement, the Regional Planning Guidelines identify a range of small town 'types' including small commercial towns, remote from core commuter areas and having a strong trading tradition serving a large rural hinterland; in particular, Baltinglass is identified as such a town. Such economically active independent towns, with less dependence on commuting for population growth, are recognised in the RPGs for their key local importance and should be supported in this role. It is important that the investment in social infrastructure in such locally significant towns is at a higher level, equivalent to larger size centres in recognition of their role as key centres for a very large rural hinterland and for surrounding smaller villages and towns".

Ballycoog: Ballycoog is currently designated a Level 8 'small village'. Small villages are described as villages that are small scale settlements with limited infrastructure, which generally have a population less than 100 and have limited facilities including perhaps a public house, primary school and a church. Within the current settlement boundary of Ballycoog are approximately 14 residential units, a church, a community hall and a school. Regard should also be paid to the rural context of the settlement, with relatively poor access to the R747. The characteristics of the village are considered

to be akin to those of a 'small village', and Ballycoog is not generally of the same order of magnitude as villages in the current level 7 group.

The current development plan allows for a maximum of 20 additional units to be developed in the village up to 2016. It is acknowledged that the waste water treatment infrastructure could provide for growth beyond these 20 units. However, having regard to the current size of the village, its limited amount of services and its rural context, it is not desirable to target high levels of growth. The targeting of significantly high levels of growth would be detrimental to the character and well being of the village. As such, it is recommended to retain Ballycoog within level 8 of the settlement hierarchy.

Barndarrig: It is requested that Barndarrig be 'improved' in designation from 'Level 7' – Large Village in order to facilitate higher level of housing growth than currently allowed. The existing plan allows for a growth in housing by 40 units between 2006-2016, which has been substantially achieved. There are approximately 90 dwellings now in this village and therefore a population of c. 250 people.

It is not considered given Barndarrig's size, its lack of a definable town centre, the limited retail, community and infrastructure available, its role in the County or its physical characteristics (highly elevated and open to views over a wide area, along the principal tourist route in the County, the N11), that it warrants a higher status or significant additional growth.

However, in accordance with the proposed new Core Strategy, the new plan will make allowance for growth in Large Villages in the order of 300 units, and an appropriate proportion, based on the capacity of village to absorb new development, will be allocated to Barndarrig.

Delgany: It is suggested in a number of submissions that Delgany should not be designated as part of the Metropolitan Area – it is assumed what is being suggested is that it should be uncoupled from Greystones, which is identified in the Regional Planning Guidelines for the Greater Dublin Area as Large Growth Town 2 in the Metropolitan Area (see issue raised previously regarding removing all of the County from the Metro area). Delgany has been historically associated with Greystones, in a planning policy perspective, for some time, since the first Greystones-Delgany Development Plan in the 1970s, and the two settlements are strongly linked both physically (sharing a boundary, depending on where it is drawn of 2-3 km) and in terms of shared services (water services, roads, schools, telecoms, higher order shops, etc) and communities. In light of this long standing connection, the 'settlement' of 'Greystones' as identified in the Regional Planning Guidelines for the Greater Dublin Area as a metropolitan area town, is considered to include both Delgany and all other areas located within the boundary of the Greystones - Delgany Local Area Plan (such as Killincarrig, Blacklion and Charlesland). It is not clear from the submission if what is being sought is a separate local plan for Delgany, and / or its 'separation' from the wider settlement of Greystones in terms of population targets, planning policy etc but what is clear is the suggestion that it be redesignated a 'Level 7' village. However, if this is the case, it is not clear what this might achieve. It is considered that Delgany has much better prospects for improvements in services being identified as part of a growth town in the RPGs, as national and regional investment priorities flow directly from the development hierarchy and priorities set out in the NSS and RPGs. Furthermore, the existing LAP clearly recognises the entity of Delgany as a distinct part of the wider settlement and includes numerous Delgany specific policies and objectives. It is considered therefore that Delgany is adequately serviced by existing designation and development objectives.

There is a strong emotional connection to the word 'village' as it is probably considered to convey a historical, quaint and small settlement, the type that does not have industrial estates or supermarkets, but small local businesses run and by and serving local people. It also adds to the tourism image of the settlement, as well as the perception of the type and value of housing in the settlement. All of this is noted, and the designations in the County Development Plan are not intended to demean Delgany in some way, but to simply categorise towns in relation to the overall spatial composition of the County.

Enniskerry: Enniskerry is designated a Level 5 'Small Growth Town' in the existing County Development Plan (not a village) and this is considered an appropriate designation for a town of this size and function (see the function of Level 5 settlement set out above under 'Ashford').

The RPGs set out that within this category of settlement are a range of types, with local commuter type towns located close to other larger centres and small commercial towns, remote from core commuter areas and having strong trading tradition serving a large rural hinterland. Enniskerry is considered to fall within the first category, having regard to its location vis-à-vis Dublin and the larger Wicklow settlements of Bray and Greystones, and its dependence on these metropolitan areas for employment and higher order services.

The position of **Roundwood** in the hierarchy is raised to contrast with the position of Enniskerry. It is put forward that Roundwood is large in size and function, yet is in Level 6, while Enniskerry is small in size and role, yet is designated Level 5. It is suggested that Enniskerry should therefore be also designated Level 6.

This is not quite correct, in that Roundwood had a population of 780 in the 2011, while the population of Enniskerry was 1,940 – almost 2 ½ times bigger. While Roundwood might have a larger 'hinterland' that it services compared to Enniskerry (given Enniskerry's proximity to Dublin and Bray), its function is more a match with that of a 'Rural Town' as described in the County Development Plan while Enniskerry's is better matched to the 'Small Growth town' role.

Rural towns: These are strong rural towns, with a good range of infrastructural services and are suited to accommodating a significant element of urban generated housing demand, with necessary controls in place to ensure that local demand can also be met. These towns are differentiated in this plan from Small Growth Towns having regard to their more rural character and the rural nature of their catchments. Such rural centres 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 organisations.

Furthermore, it is not agreed fully that Enniskerry is *more* environmentally sensitive than Roundwood, when one considers the environmental vulnerabilities of Roundwood including its location in the Wicklow Mountains, its proximity to the Vartry Reservoir, the principal water source for north Wicklow and south Dublin, and environmental designations surrounding the town including the Vartry Reservoir NHA and the Wicklow Mountains SAC and SPA.

It is not clear what would be achieved if Enniskerry were to be moved down the hierarchy to Level 6, other than perhaps reduction in the amount of housing that might be developed there. The current population target for Enniskerry for 2022 is 3,000. There appears to be general sentiment from submissions from Enniskerry residents that new housing development should be severely curtailed in the town. However, the reality is that new housing growth needs to be accommodated throughout the County, and Enniskerry has to absorb its appropriate share. The town is serviced by water and roads infrastructure, there are primary schools in the town, there is a wide range of community and retail services and there are suitable land banks close to the town centre. It is considered appropriate that a suitable level of new housing growth is accommodated.

Nevertheless, as part of the review of the existing core strategy and population targets it is considered that the target of 3,000 is unrealistic for Enniskerry, and it is recommended that this be reduced to 2,500 for 2028.

The designation of **Avoca** is also raised in response to a submission with regard to the position of Enniskerry. It is put forward that Avoca is designated a 'village' while Enniskerry is designated a 'small town' when it is in fact a village. Again, this is not quite correct, in that Avoca is not designated a 'village' but a 'rural town'. It is not clear what definition the submitter is using when they say Enniskerry is in fact a 'village', but it certainly is not in accordance with the definitions utilised in either the County Development Plan or higher level planning documents such as the Regional Planning Guidelines for the Greater Dublin Area, or indeed the Census, which identified 'towns' as having over 1,500 in population. As set out above with respect to Delgany, the emotional connection

to the word 'village' is strong it seems with Enniskerry residents but the designations in the County Development Plan are to simply categorise towns in relation to their populations and overall spatial composition of the County.

Just to further clarify, Enniskerry has never been designated a 'heritage village' in the County settlement hierarchy and therefore it is not appropriate to request that this designation be 'returned' to the settlement. There is no such designation in the settlement hierarchy as 'heritage village'. The submitter may be getting confused with the Bord Fáilte administered a scheme initiated in the 1990s but now discontinued, whereby towns could be designated as 'heritage towns' for the purposes of tourism literature and marketing, subject to them fulfilling certain criteria, but this did not confer any sort of legal or statutory heritage status on the town. Furthermore, Enniskerry was not in designated as a 'heritage town' through this scheme.

With respect to the hierarchy failing to take into account environmental issues, protection of outstanding areas of natural beauty and tourism considerations, it is considered that the modest growth levels now being proposed for Enniskerry, reflect the consideration that has been given to these factors. It proposed to reduce the growth target from 3,000 in 2022 to 2,500 in 2028, which will mean that very limited additional land will require to be zoned, if any, to meet the target, thereby safeguarding the environment from further 'suburbanisation'.

Glenealy: It is requested that Glenealy be 'improved' in designation from 'Level 7' – Large Village to 'Level 5' – Small Growth Town. This request came accompanied by a proposals for a new 'village centre' development, which could in reality only be facilitated if the designation and housing target for Glenealy were increased (the current County Development Plan allows for the development of 30 additional houses in Glenealy between 2010 and 2016).

However, the RPG description of 'Small Town', generally towns with an existing / planned population in the 1,500 – 5,000 range would not be appropriate for Glenealy, that has an existing population of approximately 600 and would therefore be most suited to the 'key village' designation⁹. Furthermore, Glenealy is not considered suited for substantial new mixed use and housing development as is proposed in this submission, given its proximity to a number of existing large towns, such as Wicklow – Rathnew, Rathdrum and Ashford, which are the designated drivers for growth in this area of the County; substantial development in a location like Glenealy would be likely to draw development and investment in public services away from the designated growth towns. It should also be noted that there is a lack of water services in the area, including a lack of assimilative capacity in the watercourse running through the town, which has presented a barrier to development in the past.

Kilcoole: While a combined LAP was prepared for the settlements of Greystones – Delany and Kilcoole, there is absolutely no suggestion that Kilcoole forms part of Greystones – Delgany and that it should be 'redesignated' as part of this Level 3 settlement. In fact one of the reasons why a joint Local Area Plan was proposed was to protect the green belt between the towns. Kilcoole has its own identity and should not somehow be considered a 'suburb' of Greystones. Kilcoole is clearly identified in the Regional Planning Guidelines for the Greater Dublin Area as a stand alone 'small growth town', separate from Greystones – Delgany, and in order to ensure consistency with the RPGs, it is recommended that no changes are made to this designation.

Newcastle: It is requested that Newcastle be elevated to Level 5 in the hierarchy. Newcastle is designated a Level 6 'Rural Town' in the existing County Development Plan having regard to its size and function, which is considered to be more akin to the other towns in this category, rather than the settlements in Level 5 above. Newcastle had a 2011 population of 817, similar to Avoca (717), Dunlavin (793), Kilmacanogue (799) and Roundwood (780), which are all in Level 6. In contrast, the settlements in Level 5 for the most part have over 1,000 in population with many significantly above this.

⁹ It is accepted that towns with a smaller existing population are designated as 'Rural Towns' in Level 6, such as Donard and Shillelagh. However, these settlements are considered to warrant a 'Level 6' designation as opposed to 'Level 7' given their catchment and function.

The role of Level 6 settlements in the current County Development Plan is described as follows, and Newcastle is considered to match this description:

These are strong rural towns, with a good range of infrastructural services and are suited to accommodating a significant element of urban generated housing demand, with necessary controls in place to ensure that local demand can also be met. These towns are differentiated in this plan from Small Growth Towns having regard to their more rural character and the rural nature of their catchments. Such rural centres 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 organisations.

While it is noted that a number of town designated as Level 6 – ‘Rural Towns’ in the existing County Development Plan have been identified as ‘small growth towns’ (i.e. Level 5) in the existing Regional Planning Guidelines for the Greater Dublin Area, it was deemed through the adoption of the current County Development Plan that the category ‘Rural Town’ was needed to differentiate between the different types of ‘small towns’, as not all of the RPG identified ‘small towns’ were similar in size, character and function. An evaluation of each town was carried out which looked at the existing population, the services available, the catchment of the town etc in order to determine which towns should be more appropriately placed in Level 5 and which in Level 6. Newcastle was considered to be in the lower category, having regard in particular to its existing population, its lack of retail services and its small catchment given its proximity to Newtownmountkennedy, Kilcoole and Rathnew; indeed, apart from its population, stronger arguments could be made to redesignate Newcastle as a Level 7, rather than a Level 5 settlement.

Newtownmountkennedy: It is suggested that Newtownmountkennedy should be increased in priority in the settlement hierarchy, as this will draw needed additional investment in services into the town. However, the position of the Newtownmountkennedy in the County settlement hierarchy is dictated by the Regional Planning Guidelines for the Greater Dublin Area, which designate it a ‘moderate growth town’ along with Blessington. It is considered that its current position in Level 4 is appropriate, and is sufficient in priority to attract appropriate investment.

New rural settlements:

- Nun’s Cross is already part of the wider Ashford settlement and is included within the boundary of the Ashford Town Plan
- There is no historic settlement at Cronroe / Ballylusk and the majority of houses in that area have been built in the last 20 years; this area is very close to both Ashford and Glenealy where there are ample opportunities for new housing development and therefore it is considered unnecessary to designate a new settlement within which ‘non-locals’ would be eligible to build
- Notwithstanding the fact there was once a school and a church at Killoughter, this is not a definable settlement, with very few dwellings, spaced well apart. This area is also served by the regional road, which carries high volumes of traffic and is poorly aligned, lacks pedestrian and cycling facilities and is therefore not suitable for additional residential entrances. This area is very close to both Ashford, Rathnew and Newcastle where there are ample opportunities for new housing development and therefore it is considered unnecessary to designate a new settlement within which ‘non-locals’ would be eligible to build
- Coyne’s cross is not a traditional settlement, and the area is characterised by one-off rural houses built in the late 20th century. There is no definable settlement centre and no services in the area. It is considered that there is already an excessive concentration of houses in this area and it is not considered appropriate to designate it for more, non-necessary dwellings.

Recommendations of Chief Executive

In light of these submissions, the submissions already considered in previous parts of this report, and a detailed analysis of the existing Core Strategy carried out as part of the plan review, a new Core Strategy is proposed.

The only change recommended with respect to the settlement hierarchy is to elevate Dunlavin from Level 6 to Level 5. This is in recognition of the important role it plays as development pole in the west of the County, the wide range of services available in the town, the significant investment in infrastructure that has taken place recently and the existing population target of 2,500, which is more akin to the settlements in Level 5.

(c) Population

Name	Issue raised
Blackditch Ltd	Newcastle: The current growth target of 1,750 people by 2022 is reasonable. An appropriate target for the period up to 2028 would be 2,500 people.
Bluetone Properties Ltd.	Enniskerry: Despite its designation, the town has experienced little development over the plan period. The population targets set out in the current core strategy are appropriate and will allow for expansion.
Eamonn Coleman	Enniskerry: Population figures do not correspond with CSO data – these should be reconsidered. Current population targets are unrealistic given CSO population of 1,811 in 2011.
Mark Colley	Enniskerry: Growth planned for Enniskerry is small in the context of its destination for large numbers of tourists visiting Powerscourt and for recreational outdoor activities. Overall population growth of the village should be limited. Large scale housing development puts strain on infrastructure including traffic, water services etc. and will compromise the heritage value of the village centre
Rose Mary Craig	Enniskerry: The population figures proposed for Enniskerry (1,900) in 2011 are puzzling when compared to Roundwood (780) a village which is already much larger in size than Enniskerry. This appears to mean that a much larger area of the rural hinterland is being counter as population for Enniskerry, which appears to not be the case for Roundwood. With regard to the population figures, using the 2006 census is unrealistic; the 2011 census results should be used to be more realistic. Population catchment areas should not include rural zones, this appears to be the case in Enniskerry but it does not appear to have been included in Roundwood's figures e.g. Roundwood's population (790 in 2011) seems to be low compared to that of Enniskerry (1900 in 2011) given it also has housing estates.
Tom Redmond	Newcastle: Population growth target to 1,750 by 2022 is conservative. A higher target should be built into the new plan in order to support local business and community activities.
Brian Stokes	A target population of 227,710 should be adopted for County Wicklow in 2028, of which there would be a projected increase of 21,972 in the urban population amongst the various urban settlements in County Wicklow. Of this c. 22,000 increase, the Council is requested to direct at least 1,000 of this projected increase to Ashford and thus set a target population of 4,000 for Ashford in 2028. Analysis of targeted population figures: Based on growth patterns identified in the Issues Booklet, the projected population for County Wicklow in 2022 should be 207,752. There is an error in the County Total figure as $164,750 + 43,002 = 207,752$ and not 176,800 as stated in the table. The error is repeated from the current CDP. Applying the 1.2% growth rate for the Mid East region from the CSO December 2013 projections, the population target for County Wicklow in 2028 would be 227,710. Apply an urban-rural split of 82%/18%, consistent with change between 2011-2022. Accounting for 1.2% growth rate, the urban population target would be 186,722 between 2022-2028 and rural target of 40,988.
Julia Strickland	Enniskerry: Projected growth by one third to 2022 is too much and will overload village and be detrimental to the character and amenity of the village.
Knockree Developments Ltd.	This is a very detailed submission and sets out complex and detailed population calculation and projections. However, its purpose is to make the case that there is a need for additional zoned land in Kilcoole , given the existing population target and request that the core strategy table in the new plan should reflect this. It is requested that this lack of adequate zoned land should be addressed with an immediate review of the Kilcoole LAP. With respect to the population targets, it requests that the target for Kilcoole be increased, reflecting its

	current size and propensity to grow.
Sean McGiollapadraig	Enniskerry: Further housing development in Enniskerry should be curtailed as the settlement does not have the infrastructure to accommodate further development and it is already well served by housing.
Clodagh O'Brien	With regard to the population figures, using the 2006 census is unrealistic; the most recent census figures should have been used. Future figures should be more realistically based. Enniskerry: The catchment areas for Enniskerry village appears to include major rural zones, which does not appear to be the case for other villages e.g. Roundwood's population (790 in 2011) seems low compared to that of Enniskerry (1,900 in 2011) given it also has housing estates.
Patricia Walker	With regard to population projections, Enniskerry's population should not be bound by a population number but rather a quality indicator for the resident population and visitors.

Response of Chief Executive

General:

The issue raised about the difficulty in setting population targets without knowing what services will be provided is noted; however, the reality is that planning in Ireland is not dictated by the capacity of existing services but sustainable spatial planning principles, and the service providers are required to deliver the services to area where they are required, to service existing population and planned growth. The service providers, such as Irish Water, ESB, Department of Education etc cannot be allowed to be the bodies that determine where growth will occur, as their priorities cannot be expected to align. They must follow the lead of planning and the Core Strategy for any County, which will be drafted to accord with the principles of regional and national spatial plan.

With regard to the submission that the County population figures are miscalculated, the submitter has fundamentally erred in the interpretation of the existing County Development Plan figures. The current population target for the County for 2022 is 176,800, as set by the Regional Planning Guidelines for the Greater Dublin Area. The existing table in the County Development Plan, along with supporting text, sets out that of this 176,800 population, 43,022 is targeted to be located in the rural area (large / small villages, clusters, open countryside). The remainder (133,798) is targeted to be located in the 21 towns in the County. However, when one totals the individual population targets for these 21 towns, the result is 164,750. The difference between this figure and 133,798 is the 'headroom between towns' i.e. an extra factor that has been added to make allowance for the fact that some towns will not grow as envisaged in the plan period, and allows growth in other towns to make up for this deficiency. The submitter has erroneously assumed that the total growth allowed in the towns for 2022 is 164,750, added this to the 'rural growth' and determined that the current county population target for 2022 is 207,752 – this is not correct.

As set out in the Appendices to this Report, a new County population figure for 2022 has been derived, based on updated Census data and CSO predictions. It is recommended that the new County population target for 2028 be 176,000. It is also recommended that the 'headroom' between towns is reduced, as there has been extra infrastructure provided in the County since the last Plan, and thus there are less constraints to development in these towns, and less of a need for compensating headroom between towns.

Based on this new County target, new targets for each of the towns / area have been derived and are set out in the recommended Core Strategy provided at the start of this report. With respect to Ashford specifically, it is recommended that a population target of 2,675 be utilised for 2022, growing to 3,250 in 2028.

With regard to the use of 2006 Census figures and not 2011 figures, all of the new calculations set out in the Appendices attached to his report and the recommended Core Strategy, are based on the more recent figures. However, targets used in the current Regional Planning Guidelines for the Greater Dublin Area are based on 2006 Census figures. There is an acknowledgement by the Regional authority that these figures and targets are outdated at this time, and therefore new targets have had to be derived.

The majority of the submissions with regard to the settlement hierarchy relate to the position or designation of specific towns, so each will be addressed separately:

Enniskerry: As set out in the preceding section, a review of all population targets has been carried out as part of this plan review process, taking into account new population data available, new targets for 2022 and 2028, and the capacity of various settlements to expand.

As already set out in this report, there appears to be general sentiment from submissions from Enniskerry residents that new housing development / population growth should be severely curtailed in the town. However, the reality is that new housing growth needs to be accommodated throughout the County, and Enniskerry has to absorb its appropriate share. The town is serviced by water and roads infrastructure, there are primary schools in the town, there is a wide range of community and retail services and there are suitable land banks close to the town centre. It is considered appropriate that a suitable level of new housing growth is accommodated.

This review of the existing population / housing targets has led to the recommendation that the existing target for Enniskerry of 3,000 is unrealistic, and it is recommended that this be reduced to 2,500 for 2028. If this recommendation is accepted, the existing parcels of zoned land in the town would be likely to accommodate all of the growth required up to 2022, but a small amount of additional zoning may be required just to ensure 'headroom' in zoning (to accommodate the scenario where zoned lands aren't released to the market).

With respect to suggested errors in the population data used, the CSO population figures for Enniskerry were 1,881 in 2006 and 1,811 in 2011 i.e. a decline in population. However, the boundaries that CSO use for Enniskerry do not match the 'town' boundaries as utilised in the development plan and using small area statistics and other sources of information, the Forward Planning Unit has determined the real population within the plan boundary as 1,940 for 2011. Therefore the population figures from 2006 cannot accurately be compared to the new 2011 figure, as they describe a different sized settlement. Therefore it is unclear if population grew or fell between 2006 and 2011 in Enniskerry, although data from the GeoDirectory recorded 47 new residential addresses being created between 2006 and 2011.

The population figure for Enniskerry utilised of 1,940 in 2011 is deemed to be correct and has been cross checked with both the Census result for 2011 (1,811), the small area statistics for this area and the GeoDirectory. In contrast Roundwood has been determined to have a 2011 population of 780, which again has been checked against various data sources. In 2011, there were 650 residential properties recorded by An Post in Enniskerry, compared to 347 in Roundwood. Clearly the perception that Roundwood is 'bigger' than Enniskerry is erroneous.

Kilcoole: Based on the new population targets that have been prepared for the County as set out in Appendices 1 and 2 to this report and the recommended Core Strategy, it is recommended that the existing target of 5,000 population for Kilcoole is maintained, for the target year of 2028.

As set out in the recommended Core Strategy, based on the new population figures, there will be a need for additional zoning in Kilcoole in due course, not due to increased population target, but due to falling household size and in particular to address the fact that an artificially high household size figure was employed in the 2013 Kilcoole LAP which resulted in less land being zoned than required. These matters will be addressed in more detail after the adoption of the new County Development Plan, upon review of the existing Kilcoole LAP, which does not expire until 2019.

Newcastle: With regard to the existing population target for Newcastle (1,750 in 2022 - more than doubling of the current population in a period of 7 years), this is considered unrealistic and unsustainable, and would adversely impact the residential, visual and environmental amenities of the town. Furthermore, while the Local Authority is committed to the development strategy for any town not being dictated by the availability of water services, it must be taken into consideration that the existing wastewater treatment plant in Newcastle does not have the capacity to cater for this level of growth and investment to upgrade this system is unlikely to be available in the short term. Furthermore, the existing social / community facilities, such as schools, would not be adequate to cater for this level of expansion.

In these circumstances, it is considered that the population target for Newcastle should be reviewed to a more reasonable growth rate and certainly not increased to 2,500 as is suggested¹⁰. It is recommended that the target for Newcastle in 2028 should be 1,200 persons.

While the existing town plan for Newcastle, provides a surfeit of zoned land to cater for the recommended new target, it is recommended that the form of the town plan be amended such that it is a 'settlement plan' in the same format as other towns in this category (Avoca, Donard, Kilmacanogue) which will obviate the need to 'down zone' land.

Recommendations of Chief Executive

In light of these submissions, the submissions already considered in previous parts of this report, and the detailed analysis of the existing population targets carried out as part of the plan review, new population targets are proposed as set out in Part 2 of this report.

¹⁰ A population target of 2,500 in 2028 would entail a tripling of the number of houses in the town over a period of 12 years, or an average rate of housing completions of 70 per annum. This contrasts sharply to the number of existing houses in the town – c. 300

(d) Development and zoning principles

Name	Issue raised
Ashford Studios	The lack of housing in Ashford presents an issue for those working in the film industry. There is a need for land therefore to be zoned for housing.
Rose Mary Craig	Geographical and climate change constraints must be taken into account in the zoning of land e.g. housing should not be built along river valleys or their banks or hillsides. All zoning should include a statement on flood control, road and traffic implications for inhabitants.
James Doyle	<p>1. Policy SS4 says that development centres should, where possible, "<i>be self sufficient, incorporating employment activities, sufficient retail services, and social and community facilities.</i>" The policy stipulates that "<i>Residential development will only be permitted if sufficient progress is made in providing employment, retail, social and community facilities within the settlement</i>". This makes sense - it's an intelligent policy idea. What's lacking is a plan to make it work. Suggestions:</p> <ul style="list-style-type: none"> - For employment and retail progress: Introduce reduced commercial rates for businesses with premises inside these Development Centres (consider raising rates elsewhere to compensate); explore ways to incentivize employment of people living locally (Local Enterprise Offices and Revenue). - For social supports and community facilities: Council administration to actively monitor, evaluate and report (to Council in advance of budget setting process) on which development centres need which social/community services most in order to harness retail and employment progress and in justify residential development. This obligation to monitor, evaluate and report should be carried out objectively and with minimal room for political lobbying. In this way projects (e.g. the long identified Youth Centre for Kilcoole) would be prioritised on the basis of transparent assessment not political brinkmanship. <p>2. Suggested new objectives:</p> <p>New Policy SS4: To ensure, by means of leveraging the Council's resources (financial and administrative), that all Primary and Secondary Local Growth Centres develop in a manner that is both sustainable and self-sufficient such that residential development will only be permitted if sufficient progress is made in providing employment, retail, social and community facilities within the settlement. Responsibility for promoting sufficient progress incorporating employment activities, sufficient retail services and social and community facilities is accepted by the County Council. Execution of this responsibility will comprise the leveraging of financial (where feasible) and administration resources of the Council in SS4(A), SS4(B) and SS4(C).</p> <p>New Policy SS4(A): To promote and realise the potential for sustainable living in Local Growth Centres and self-sufficiency both in terms of adequate residential development and acceptable employment, retail, social and community services by the adjustment of commercial rates throughout the County to stimulate employment and retail opportunities within Local Growth Centres.</p> <p>New Policy SS4(B): To promote and realise the potential for sustainable living in Local Growth Centres and self-sufficiency both in terms of adequate residential development and acceptable employment, retail, social and community services by undertaking an analysis of economic and social realities in each Local Growth Centre in each budget cycle, targeted at realising this self-</p>

	<p>sufficiency balance and reporting to the County Council with a County-wide report in advance of budget decisions commencing with a breakdown of which Local Growth Centres need which type of investment (whether it employment, retail, social or community based) and which third parties can be incentivised/utilised to assist. All relevant state agencies will be consulted with for the production of this annual report and the formulation of potential partnership solutions (e.g. Skills training facilitated by Wicklow LEO for outdoor activity centre start-up).</p> <p>New Policy SS4(C): To promote and realise the potential for sustainable living in Local Growth Centres and self-sufficiency both in terms of adequate residential development and acceptable employment, retail, social and community services by means of allocating a certain fixed % portion of the investment aspect of the annual budget to be allocated to Local Growth Centres. The decision as to how and where the money will be invested will be made by Councillors on full notice of the Council staff's report setting out the priority investment areas therein and any vote of the Councillors that either introduces a new proposed investment or removes a recommended investment in the report (or significantly adjusts it (by an increase or decrease of more than 25% of the figure recommended for investment in the report) will require a special meeting of the Planning SPC and a 75% majority of its membership to be approved.</p>
Gerard Roe	<ul style="list-style-type: none"> - Infrastructure / resources provision, plus consideration of environmental issues should determine the amount of land to be zoned. - The location of new housing should be determined having regard to the amount and type required, e.g. apartments in town centre, housing estates on greenfield sites. Also, location to have regard to availability of current infrastructure and social services. - Make contact with estate agents to determine type of housing required. - Lack of information provided in order for public to make determination on appropriate density for housing. - There is too little land zoned in the Newtown area due to lack of planning and provision of required infrastructure, particularly waste water treatment. Lack of investment and focus over many years has hindered local housing and the development of commercial / employment activities.
Clodagh O'Brien	<p>Geographical and climate change constraints must be taken into account in the zoning of land e.g. housing should not be built along river valleys or their banks or hillsides. All zoning should include a statement on flood control, road and traffic implications for inhabitants.</p>

Response of Chief Executive

Settlement objectives

With respect to Objective SS4 quoted, this objective is in fact in the 2004 County Development Plan and not in the current, 2010 County Development Plan. The current plan does however contain a similar objective 'SS2 - *To ensure that the designated large growth towns will insofar as is practical, be self sufficient, incorporating necessary employment, retail, social and services infrastructure*'.

It is intended that a similar provision will be included in the new plan. However, the issue of how this can be implemented is a more challenging question. As with many of the objectives of the County Development Plan, it will take a number of agencies and instruments to achieve the desired outcomes. With respect to the suggestions made:

- Setting rates policies is outside the remit of a County Development Plan, and is an operational and budgetary issue. In addition there is no legal basis for different levels of rates in different parts of the county. This can only be achieved by giving grants to certain classes of properties which is a matter for the annual budget.
- The Community, Cultural and Social Development Department of Council continuously audits and monitors the availability of social / community services in the County, and either takes steps itself or supports steps by other agencies, to delivery new or enhanced infrastructure where deficits are identified. Again, actions in this regard are dictated by operational and budgetary constraints.

With regard to the new objectives suggested, these will all be considered in detail in the crafting of the objectives of the new plan, but for the most part these are matters for the annual budget rather than the County Development Plan. Care must be taken in committing Council resources to the achievement of certain objectives, if it is not clear whether those resources (staff and funding) will be available. The County Development Plan is not after all and operational or spending plan, but a land use framework within which development can occur.

Zoning and phasing

With respect to zoning, it is intended that the new County Development Plan will clearly articulate the zoning principles that are being used for the plans that form part of the County Development Plan, and are to be used in the Local Area Plans for the larger towns that will follow the adoption of the new County Development Plan. The amount of land zoned will be based on the population target for each settlement, taking into account the predicted future occupancy rate and the rate of vacancy, as well as an assessment of the appropriate density for any settlement / location in a settlement.

Where a need for additional zoned land is identified, all parcels of available land that are contiguous to the existing built up part of a settlement will be considered first for zoning, taking into account the availability of services to each area, the environmental sensitivities of each piece of land (including risk of flooding), and the desired overall spatial structure of the settlement. A key consideration will be ensuring that new housing areas do not damage the environment and are environmentally sustainable, are proximate to services, in particular social, employment and retail facilities, in order to encourage the development of compact settlements where walking and cycling, in lieu of car use, can be facilitated. Where necessary, plans shall include a phasing programme, to insure the most suitable development land is prioritised first for development, in advance of less suitable or more peripheral areas.

With respect to smaller settlements, that is, settlements at Level 6 and below, which will either have 'settlement plans' and 'settlement boundaries' only and are therefore less rigid in defining the precise location of new development, in order to ensure that new housing development occurs in a sequential and balanced manner, it is recommended that the new County Development Plan includes the following provisions:

- (1) No single development shall be allowed to absorb more than 25% of the total housing growth allowed by the County Development Plan in that settlement
- (2) The development of land should generally be phased in accordance with the sequential approach:
 - Development should extend outwards from the town / village centre with undeveloped land closest to the centre and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted;
 - A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and
 - Areas to be developed should be contiguous to existing developed areas.

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances.

With respect to the lack of housing in Ashford for employees of film productions, this is not connected to the lack of zoned land in Ashford – it is simply related to the lack of housing development in the town due to either lack of water services (which have now been resolved), economic conditions and lack of release of zoned land to the market (there is currently enough zoned land in Ashford to accommodate the delivery of over 850 housing units).

With respect to the amount of land zoned in Newtownmountkennedy, there is at present enough zoned land to accommodate the development of over 1,700 additional houses. This is considered substantial, given that the total number of existing houses in the town is around 1,000. Development has commenced recently on the first phase of a new development that is permitted to extend to c. 800 units. There was considerable investment in water services in Newtownmountkennedy in order to allow such development to proceed.

House types

With regard to the types of houses that will be required in any area, the current County Development Plan requires a mix of house types to be delivered in any development, but it will be the market that dictates the exact balance between house sizes, and house types, based on demand in the area.

Recommendations of Chief Executive

1. The new County Development Plan will clearly articulate the zoning principles that are being used for the plans that form part of the County Development Plan, and are to be used in the Local Area Plans for the larger towns that will follow the adoption of the new County Development Plan.

2. The new County Development Plan shall clearly articulate the settlement and sustainable development principles to be applied during the lifetime of the new plan.

3. With respect to Level 6-9 settlements it is recommended that the new County Development Plan includes the following provisions:

- (1) No single development shall be allowed to absorb more than 25% of the total housing growth allowed by the County Development Plan in that settlement
- (2) The development of land should generally be phased in accordance with the sequential approach:
 - Development should extend outwards from the town / village centre with undeveloped land closest to the centre and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted;
 - A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and
 - Areas to be developed should be contiguous to existing developed areas.

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances.

4. To include objectives with regard to house type and mix to ensure all demands are addressed.

TOPIC 2: HOUSING

(a) General, including Housing Strategy

Name	Issue raised
Alphaplan Design	<ul style="list-style-type: none"> - Apartments should not be developed in villages. Within towns, apartments should only be permitted in town centre locations. - Current CDP supports the use of adaptable attic space – this is supported. - Shared parking separated from dwelling is impracticable and should not be supported. - Plan should have regard to localised demands for dwelling type.
Pegasus Life	<p>Pegasus life is a business which develops housing specifically designed for older people, providing independent living accommodation in a supported and managed environment with services and facilities on site.</p> <p>It is requested that the plan should put in place specific policy initiatives to promote the private provision of purpose built accommodation for those in later life ('empty nesters') to downsize from larger homes to free up existing housing stock in established areas as an alternative to meeting the demand for housing through the widespread rezoning of greenfield lands.</p> <p>In particular, it is requested that the housing with care concept is acknowledged in the 'use' classes provided in the County Development Plan and in the Housing Strategy</p>
Clodagh O'Brien	<p>With regard to Development and Design Standards, large sprawling bungalows are inefficient and wasteful of resources. More compact housing in keeping with traditional models but modernised with regard to light and heat should be encouraged. This should be included in regulations. Wicklow is a zone of outstanding natural beauty and efforts should continue, to ensure dwellings in the countryside are controlled, to ensure this is still there for future generations.</p>
Sean Owens	<p>The housing policy/objectives should give special consideration for persons who are affected by affordability issues and stuck in negative equity in a property but are seeking to move for different reasons.</p>
Eamonn Prenter	<p>Development management standards for urban areas to be relaxed, particularly for town centre areas – flexibility required in car parking, open space and density standards.</p>
Gerard Roe	<ul style="list-style-type: none"> - Houses nationally are not being designed to make maximum use of scarce natural resources. There should be mandatory use of renewable energy resources incorporated into housing design. Can WCC be a model county for sustainable housing design? - House design standards should be included in the CDP. These standards should go further than the current inadequate design requirements, in order to protect the environment and natural resources. - WCC should engage direct market research by surveying currently active home buyers and estate agents. Make contact with estate agents to determine type of housing required. - The following sectors have difficulty accessing housing – young people, families on low-middle incomes or social welfare, homeless people, people in rental accommodation. - There is a need for special housing types to meet needs of elderly, special needs etc. - There are affordability issues in Newtown area. - Developers should provide social/ affordable housing.

	<ul style="list-style-type: none"> - Give priority for housing to young people from the area trying to build or purchase in their own neighbourhoods. - The location of new housing should be determined having regard to the amount and type required, e.g. apartments in town centre, housing estates on Greenfield sites. Also, location to have regard to availability of current infrastructure and social services. - Lack of information provided in order for public to make determination on appropriate density for housing.
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Response of Chief Executive

Design standards for housing developments within urban areas

The national 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (DoEHLG, 2009) includes guidelines for the creation of high quality and sustainable homes and neighbourhoods, including guidelines on appropriate residential density standards and principles of good urban design. The objectives of the current development plan have been prepared in accordance with the principles set out in the national guidelines. These objectives relate to a range of issues including quantitative and qualitative standards for residential housing on matters such as density, car parking, open space etc. All objectives and standards will be reviewed and updated as appropriate.

It is submitted that apartments should be restricted to certain locations. In response, it is considered that apartments are suitable for all types of settlements including towns and villages, however it is agreed that within these settlements, apartments are generally best located within town / village centre locations. An objective should be included in the development plan with a view to ensuring that apartments are restricted to being located only at suitable locations within settlements – refer Chief Executive's recommendations.

It is submitted that the objective that allows shared parking arrangements in residential schemes should not be supported in the new plan. In response, the following should be noted:

- The national 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (DoEHLG, 2009) includes guidelines on the provision of car parking for housing in urban areas. These guidelines indicate that planning authorities should adopt a car parking policy that is realistic, practical and flexible, taking into account matters such as the provision of public transport, quality of design, density, opportunities for sharing of spaces between mixed uses etc. The guidelines indicate that parking can be provided in an on-curtilage arrangement or in a grouped format depending on the type and layout proposed.
- The current development plan includes standards on the provision of car parking in residential schemes – refer '5.4.5.4: Car parking, Chapter 5: Urban Housing'. The standards indicate that while different parking arrangements will be considered depending on the design and layout proposed, in all cases parking is required to be located proximate to a dwelling. This is in accordance with national guidelines and a similar approach to parking will be included in the new plan.

One submission indicated support for the objective in the current plan that supports the use of adaptable attic space. This is noted.

It is submitted the plan should address house design and climate change issues. The development plan includes objectives that generally address climate change, including objectives and standards for improved energy efficiency in buildings (refer Chapter 14: Energy and Telecommunications). These will be reviewed and updated in the new plan. In addition, 'Building Regulations Part L: Conservation of Fuel and Energy – Dwellings' (DoECLG, 2011) requires dwellings to be designed and constructed in

compliance with energy performance standards. The implementation of the Building Regulations is not a matter to be addressed in a development plan.

Housing strategy

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

- estimate the existing and likely future need for housing in the area, and ensure that sufficient zoned and serviced land is made available to meet such needs;
- ensure that housing is available for persons who have different levels of income;
- ensure that a mixture of house types and sizes is developed to reasonably match the requirements of the different categories of households, including the special requirements of elderly persons and persons with disabilities;
- counteract undue segregation between persons of different social backgrounds; and
- provide that as a general policy a specific % (not exceeding 20%) of the land zoned in the Development Plan for residential use, or for a mixture of residential and other uses, shall be reserved for those in need of social or affordable housing in the area. Thus the Housing Strategy encompasses both the role of the Authority as the provider of social and special housing and its broader land use planning responsibilities. Note- this legal requirement is currently under review under the Planning and Development (No.1) Bill 2014.

Having regard to the above, it is considered that the issues raised in the submissions will be addressed in the forthcoming Housing Strategy. The objectives of the development plan will be reviewed and updated on the basis of the findings of the housing strategy.

In addition, in circumstances where there is a severe shortage of a particular dwelling type, the local plan for the area may include objectives that identify the dwelling type needs of that area with a view to ensuring that localised demands are met in future residential developments.

The current plan includes objectives for residential and day care facilities – refer 'Section 15.3.2.2 Residential and Day Care, Chapter 15 Social Infrastructure'. These objectives will be reviewed and updated, as necessary, in the new plan.

Recommendations of Chief Executive

Include an objective in the development plan with a view to ensuring that apartments are located only on suitable lands within settlements, including for example, lands within town / village/ neighbourhood centres, mixed use lands (that are suitable for residential uses as part of the mix component) and lands within a reasonable walking distance of public transport / central areas.

(b) Rural Housing

Name	Issue raised
Alphaplan Design	<ul style="list-style-type: none"> - RH14 is acceptable however more clarification required on types of documents required to satisfy qualification. - Propose 5.5m floor to ridge height restriction of a rural dwelling should be removed to allow for future attic living accommodation. In the long term this is more sustainable than extension of footprint.
Ashford Property Services	<ul style="list-style-type: none"> - The county's rural towns and villages accommodate only approximately 5,200 of the 35,000 rural population. It should be a goal to attract growth into these rural settlements. <i>Suggested strategic objective: To support appropriate and sustainable development in rural areas and to direct new development into existing rural settlements, while recognising the social and economic needs of those living outside of settlements.</i> - Development standards for villages and clusters should consider in particular the set back required in central areas from public road. It is particularly difficult to determine the appropriate set back in centres that do not have an established built form, e .g. Moneystown. - Proposed amendment to RH14: Family farm – Where a family member is entitled to build a home on the family farm and the farm is relocated that his entitlement is transferred to the new farm.
Rose Mary Craig	<ul style="list-style-type: none"> - One off housing clusters in the countryside should not be allowed in sensitive scenic areas and where they 'suburbanise' the rural landscape. - Discourage large sprawling bungalows.
Francis Donnelly	<ul style="list-style-type: none"> - Objective RH14, which caters for rural housing for perceived local and excludes outsiders, does not cater for the needs of Wicklow's residents as whole as it creates a deliberate 'exception' to the fundamentally sound rule that no new one-off houses should be built in areas not planned for settlement - Wicklow is blighted by one-off houses particularly in and around the area of the national park, for example around the Glendalough Valley. Consideration should be given to prevent the construction of new 'exceptional' houses in totally suitable locations while still allowing for genuine local needs though the operation of the free market in existing second hand houses. - The restricting of rural housing to local needs only is a form of localism / clientelism exception to good planning (local politicians looking after local voters on an individual rather than collective basis). Besides the questionable basis, fundamentally the idea that any activity (be it building a house or whatever) would be illegal for some citizens but not illegal for others is pretty horrifying on a public policy perspective. - The objective can be spun as a special benefit or exception rather than as an exclusion but there's really no place for that sort of blatant inequality before the law in an efficient and modern planning system or any public system for that matter and furthermore it might not survive a constitutional challenge if a Plaintiff could be found. It's certainly regressive in application, xenophobic, may lead to ghettoisation in the towns and could even open the council to accusations of racism.
Gerrard Hynes	<p>With respect to Category 13 of Objective RH14, "<i>A permanent native resident who has to dispose of their dwelling, following divorce or a legal separation</i>", this should be amended to allow a permanent native resident, who has disposed of their house OR has had to transfer their dwelling to their partner following divorce or legal separation, to be eligible for rural housing.</p>
Clodagh O'Brien	<ul style="list-style-type: none"> - One-off or housing clusters in the countryside should not be allowed in sensitive scenic areas and where they 'suburbanise' a rural landscape. Large

	<p>bungalows on high platforms without any planting around them remains the norm in Ireland and are a blight on the landscape.</p> <ul style="list-style-type: none"> - More stringent planning requirements to site new building/dwellings lower into hillside sites with strict planting regimes could alleviate some of the blight. - With regard to design standards, large sprawling bungalows are inefficient and wasteful of resources. More compact housing in keeping with traditional models but modernised with regard to light and heat should be encouraged. This should be included in regulations. Wicklow is a zone of outstanding natural beauty and efforts should continue, to ensure dwellings in the countryside are controlled, to ensure this is still there for future generations.
Ann Owens	<p>The 2004 and 2010 CDPs made provision in both in rural housing objectives (SS9) for those whose marriages have broken down and divorced or legally separated and who have as a result a housing need. The CDP needs to be amended to reflect further changes in society, where group of individuals who have been forced to sell their homes due to financial difficulties, loss of jobs, retirement and other circumstances, they may have access to land or may be involved in agriculture and may wish to build a modest home, all subject to proper planning criteria.</p> <p>The Meath CDP (10.4. Rural Development) objective has been shown as an example for possible inclusion in the new plan: <i>'Where an applicant for a one off house in the countryside can demonstrate, by the submission of documentary evidence, that their original dwelling was sold due to unavoidable financial circumstances, such applications will be considered on their individual merits where the applicant satisfies local housing need. Meath County Council will facilitated a preplanning consultation in such circumstances '</i></p>
Sean Owens	<p>Consideration should be given to providing rural housing policy/ objectives to applicants applying to build a house in a rural area. Where an applicant is wishing to build on his/her family owned land and has a need to live in the area, having lived a substantial part of their lives in the area.</p> <p>Prior to 2010 planning applicants in Wicklow would qualify to build within a 8km radius of the family home. Currently in Wicklow the qualification is 'Immediate vicinity of family home' with no definable distance explained in clear terms and the definition of what is considered 'local'. In the Kildare CDP "local" is defined as 5km. Please reinstate a reasonable distance for clarification.</p>
Gerard Roe	<p>Agree that there should be restrictions on the development of houses in the open countryside. House type and quantity restrictions should be considered to control development, particularly in areas where investment is scarce.</p>

Response of Chief Executive

Strategic goals relating to development of the rural area

In accordance with national and regional guidelines, the goals of the development plan are framed to support the appropriate sustainable development of the rural area – refer Goal No's. 1, 5 and 6. These goals will be reviewed and updated in the new plan.

Occupancy restrictions in Level 6 (rural towns), 7 (large villages) and 8 (small villages)

It is agreed that growth in some of the county's weaker rural towns and villages needs to be stimulated. The concentration of housing within rural settlements can allow for the viable provision of public water services infrastructure, footpaths, lighting, community facilities and services. The

provision of housing within rural villages and towns can provide a sustainable alternative to one off housing in the countryside. In order to promote growth in certain level 6, 7 and 8 settlements, it is recommended that the current occupancy restrictions might be loosened in order to encourage an increase in housing development and population growth in these settlements.

Design standards for rural settlements

The current development plan includes design standards for development in small villages and rural clusters – 'Section 6.4.2: Small Villages/Rural Clusters'. These standards set out guidance on a variety of issues, including how best to address an appropriate set back from the public road. All rural development standards will be reviewed and updated as appropriate during the preparation of the new plan.

Design standards for houses in the open countryside

A number of submissions raised concerns regarding standards for the appropriate siting and design of houses in the open countryside and have indicated that housing should be controlled particularly in scenic areas. The current plan includes design standards that place an emphasis on the need for sensitive development in the rural area. Design standards provide essential assistance to potential applicants for one off dwellings as they provide clarity and transparency on the decisions of the planning authority pertaining to the design of dwellings. The current standards will be reviewed and updated, with a view to further enhancing their quality and to improve clarity for the public.

It is requested that the 5.5m floor to ridge height restriction of a rural dwelling should be omitted. In response, it should be noted that the current plan does not include an objective restricting the height of rural dwellings to 5.5m. The plan does include objectives that require the height of a dwelling to be appropriate to the context of the site. These objectives are appropriate and will be carried forward in the next plan.

RH14 – Single rural houses

On a general point, it is submitted that the current plan allows new housing in the rural area, contrary to the planning strategy which requires all new housing to be concentrated within settlements. In response, it should be noted that the rural housing objectives included in the current development plan have been drafted in compliance with national and regional guidelines, including the Sustainable Rural Housing Guidelines for Planning Authorities (DoEHLG, 2005) and Government Circular SP5/08¹¹. In general, the objectives aim to prevent urban sprawl in the countryside and to limit housing to people who are part of and contribute to the rural community, subject to rules in relation to good planning. In compliance with national and regional requirements, the Council will continue to apply these objectives with respect to the development of new housing in the open countryside.

A number of submissions raised issues relating to Objective RH14 of the current plan, which sets out the circumstances under which residential development will be considered in the rural area of County Wicklow. The issues raised are considered below:

- (1) It is submitted that further clarification is required on the types of documentation required to satisfy qualification.
Response of Chief Executive: The planning authority has published 'Pre-Planning Guide 1: Single Rural Houses'. This guide includes a list of the documentation that should be submitted to support a planning application. The issues raised in the submission are currently addressed.
- (2) It is submitted that RH14 should be amended to allow for a new dwelling in a circumstance where a family member is entitled to build a home on the family farm, however the farm is relocated - the entitlement to build should be transferred to the new farm.

¹¹Circular SP5/08: Rural Housing Policies and Local Need Criteria in Development Plans: Conformity with Articles 43 and 56 (Freedom of Establishment and Free Movement of Capital) of the European Community Treaty

Response of Chief Executive: The current RH14 objective currently includes 16 categories that will be considered for the development of a necessary dwelling in the rural area. It is considered that it covers a wide range of circumstances that might arise, bearing in mind the overriding objective that the new dwelling must be shown to be a necessary dwelling in that rural area, for an applicant with a genuine need to live in that area. It is not desirable to list every single possible circumstance in which consideration will be given for a dwelling – this results in a cumbersome, rigid and complicated policy. No policy changes are recommended.

- (3) It is submitted that RH14 should allow for people to build a house on family owned land and has a need to live in the area, having lived a substantial part of their lives in the area.

Response of Chief Executive: The current RH14 objective allows for the development of a house in this circumstance. The issues raised in the submission are currently addressed. No policy changes are recommended.

- (4) It is submitted that the plan should define what is considered to be the *'immediate vicinity'* of a family home. An 8km distance was indicated in previous plans.

Response of Chief Executive: The Wicklow County Development Plan 2004-2010 did not include an '8km distance rule' to define the distance from a family home within which an applicant can be considered for the development of a new house. The current plan states that a permanent native resident shall be a person who was either born and reared in the family home in the *immediate vicinity* of the proposed site. This wording is not prescriptive and allows sufficient flexibility to enable the planning authority to determine an applicant's connections to a particular area. No policy changes are recommended.

- (5) It is submitted that RH14 should be amended to reflect circumstances where an applicant has been forced to sell a home due to unavoidable financial difficulties, loss of jobs, retirement and other circumstances.

Response of Chief Executive: It is considered that the existing objective RH14 is in compliance with national policy that aims to prevent the 'urbanisation' of the countryside and limit new housing to people that have a 'bona-fide' necessity for a new dwelling in a particular rural area. The term 'necessary dwelling' is not defined in the current County Development Plan, and purposely so, so that all circumstances can be considered on their own merits. It does not necessarily preclude those that previously owned a dwelling in the area. However, the circumstances in which they have had to dispose of any existing house would have to be considered very carefully in the assessment of any application for a new house, to ensure that speculative applications are not allowed. It is not desirable to list every single possible circumstance in which consideration will be given for a dwelling – this results in a cumbersome, rigid and complicated policy. No policy changes are recommended.

- (6) It is submitted that Category 13 of RH14 should be amended to allow a permanent native resident, who has disposed of their house OR has had to transfer their dwelling to their partner following divorce or legal separation to be eligible for rural housing.

Response of Chief Executive: Agreed. An amendment should be made to Category 13 to allow for a circumstance outlined by the submitter – refer to recommendations.

Recommendations of Chief Executive

1. Review and update the design standards for single rural houses in the open countryside with a view to improving the quality of the current standards so that greater clarity is provided to the general public on acceptable designs for dwellings in the rural area.
2. Amend Category 13 of Objective RH14 as follows: "A permanent native resident who has to dispose of, or transfer, on foot of a court order, their dwelling, following divorce or a legal separation".

3. Review objectives relating to new housing in those settlements in Levels 6, 7 and 8 that are experiencing decline / loss of services due to lack of development *where it is considered the settlement can absorb additional growth*. It is recommended that this change is however limited to settlements that are not under strong urban influence.

TOPIC 3: ECONOMIC DEVELOPMENT & EMPLOYMENT

Name	Issue raised
Alphaplan Design	The following uses should be open for consideration in employment zones – enterprise, business park, office and even residential – not just industry. This would allow for much high numbers of persons to be employed on zoned lands.
Ashford Studios	<ul style="list-style-type: none"> - There is no employment hub in County Wicklow - adverse effect on business and retail as people travel outside the county for work. - The development of fibre broadband infrastructure is important for the promotion of industry. - The Studios have developed to enable commercial and other uses co-exist in a rural context.
Blackditch Ltd	The plan should allow for the flexible use of employment zoned lands to allow a broad range of uses and provide measures to address infrastructural or site access constraints.
Eamonn Prenter	Key objective required for economic investment and economic regeneration.
Padraig O'Duill	Wicklow County Council should ensure that adequate provision is made for small and medium enterprise parks to expand.
Gerard Roe	<p>The following measures will ensure that Wicklow is viewed as a more attractive employment –</p> <ul style="list-style-type: none"> - Better infrastructure and facilities – roads, transport links (bus and rail), waste water treatment provision, broadband, social facilities for employees (shops, entertainment). Provision of national and local enterprise focused incentives, reasonable and pro-active approach to rates charges, ensure additional housing is available to provide for local workforce options. - 'Clean industries' is an area that would stimulate employment and enterprise within the county. - Reduce dependence on tourism sector activities. - Modern options for work practices should be facilitated – e.g. working from home, live-work units etc. - Given the investment required to bring required infrastructure and facilities up to a standard that encourages industrial development, it would seem to make most sense to concentrate resources and efforts only in larger towns for the time being. - Smaller enterprises targeting a direct sustainable market within the located town and village.
Sean Owens	With regard to 'Organic Food Farm Production' the CDP should have consideration of the growing interest in 'Local Organic Food Production' to ensure the CDP assists those setting up business in this sector.
Alun Owens	Wicklow has a large active community of organic producers and particular reference should be made to support this industry with clearly identified potential in the county
David Walsh	The plan should aim to attract appropriate industry to aid local employment with a particular emphasis on maximising the tourism potential of the County through clearer heritage objectives.

Response of Chief Executive

1. Employment Zonings and Permissible uses

The existing County Development Plan sets out a number of goals and objectives relating to the promotion and enhancement of employment and enterprise within the County. The zoning objectives within all Local Area/Town and Village Plans facilitate a range of uses within the 'EMP' zoning and are considered to be adequately flexible to meet the employments needs of each area including the provision of live-work units etc.

In regard to the 'openness' of employment zonings to alternative uses, such as residential, it should be noted that during the plan making process a number of calculations are made regarding the required amount of land to provide for residential and employment within each area. In this regard it is not considered appropriate that employment lands would be open to be used for residential use in addition to already zoned residential lands as this would potentially lead to an over zoning of residential lands. Furthermore, allowing non employment uses on employment zoned land would erode the potential in any area for new employment generation and would render the employment strategy and associated land use framework provided meaningless.

In regard to the topic of home working/home based industries it should be noted that the existing County Development Plan as set out under objective EMP20 encourages the development of this form of employment subject to certain criteria. It is intended that this objective will be carried forward and strengthened in the new plan.

2. Strategy for the expansion of enterprise and employment

The forthcoming 'Local Economic and Community Plan' is due to provide a detailed economic and employment strategy for the County. It will be the role of the County Development Plan to underpin any land use and development objectives included in the LECP. It is envisaged such measures will include promoting and facilitating the delivery of infrastructure capable of meeting future demand, in particular broadband services.

In regard to the issue of rates it should be noted that this issue is outside the remit of a County Development Plan.

3. Industrial Development

As set out above, the LECP is due to provide a detailed economic and employment strategy for the County which will be underpinned by the goals and objectives of the County Development Plan. It is envisaged that this process will build upon and strengthen the goals and objectives of the existing County Development Plan in regard to start up businesses, niche market industry, tourism and small and medium enterprises.

Recommendations of Chief Executive

1. The new County Development Plan will support and complement/underpin any land use and development objectives included in the LECP.
2. The new County Development Plan shall include as an objective the improvement of communications infrastructure, in particular broadband services.
3. The new county development shall clearly articulate what uses are open for consideration on employment zoned land, and shall ensure that such uses afford adequate flexibility to be suited to a wide range of employment types
4. The new County Development Plan shall encourage home working
5. To build upon and strengthen the goals and objectives of the existing County Development Plan in regard to start up businesses, niche market industry, tourism and small and medium enterprises.

TOPIC 4: TOURISM & RECREATION

Name	Issue raised
Ashford Studios	Encourage film based tourism. Improve accessibility/ transport to tourist attractions.
Karen Cowan	Need for grill pit / bbq areas at public amenity sites. Need for areas with picnic tables, e.g. Greystones south beach, Glen of the Downs, Kindlestown Forest Need tourist office in Greystones
Padraig O'Duill	Tourism in Wicklow town area is under capitalised, e.g. St. Kevin's tourist buses do not stop at Wicklow Gaol and Mount Usher
Gerard Roe	The current focus of developing the tourist industry as a priority sector, is a mistake. The focus should be switched from tourism to sustainable industrial activities in larger town areas that would have greater potential for generating employment opportunities. The tourism industry is in decline.
Paul & Senan Sexton	Glen of the Downs site has potential to be tourist attraction – potential for links to Glen of the Downs nature reserve.
Charles & Collette Kavanagh & Family	The tourist industry needs to be safeguarded with rural tourism protected from pressures of developments like wind farms that undermine rural tourism's potential. South Wicklow is a scenic location with the tourism industry just starting to recover in the area.
David Walsh	Wicklow could further advance its tourism potential and thus create more local employment by having a clearer heritage status.

Response of Chief Executive**Improving, promoting and developing tourism**

The existing County Development Plan includes a chapter on tourism and sets out detailed objectives and development standards for a wide variety of tourism types and is unequivocal in its support for tourism projects, subject to proper planning, best practice and protection of the environment. However, it is not the role of the County Development Plan to provide an overarching strategy for tourism in the County, but to develop land use policies to support and nurture this industry.

It is a common misunderstanding the County Development Plan is a 'delivery' plan for projects and programmes in the County; the reality is that it is a land use 'framework' which gives 'spatial expression' to the economic, social and cultural needs of the community, in terms of influencing how and where new development takes place, enhancing valued amenities, and protecting the environment and heritage and setting the 'rules' within which new developments may occur. The focus of development plans is on physical development and land use and how this can serve wider economic social and environmental objectives.

The tourism strategy for the County is provided by both the tourism agencies at work in the County, such as Fáilte Ireland, Wicklow County Tourism and Bray Tourism and the Economic Development Division of the Council, for example through the forthcoming Local Economic and Community Plan. The role of the County Development Plan is to underpin the land use and development aspects on any strategies / objectives that these bodies adopt for the County. The new development plan will take into consideration the emerging 'Local Economic and Community Plan' which is being separately prepared in 2015, and any objectives it includes with regard to the tourist sector.

With respect to some of the more specific issues raised:

Film based tourism

The current County Development Plan supports film based tourism projects, with Section 9.3 providing objectives to facilitate the development of tourism projects in general in the County subject to best practice, proper planning and protection of the environment. Outside of the County Development Plan, the County Wicklow Film Commission of Wicklow County Council plays an important role in the film industry in Wicklow and play an important role in film tourism along with other public bodies like Failte Ireland, Wicklow County Tourism and Bray Tourism. An example of the Wicklow Film Commission's film based tourism projects are the 'Wicklow Film Drives' and the 'County Wicklow – the Hollywood of Europe' initiative.

Transport/access to attractions

The existing County Development Plan has a number of objectives in relation to tourism and recreation infrastructure, including objectives regarding proposals for developments that place a particular emphasis on improving traffic flow, sign posting, car parking facilities, service/rest facilities at tourist attractions. It is intended that the new plan will contain similar provisions. The bus routes and location of bus stops are a matter for the provider of the bus service however the development plan fully facilitates a linked up and an increased access approach subject to proper planning and sustainable development. The provision of certain infrastructure at public locations, under the ownership of WCC, is a matter for the Transportation and Roads Section and this matter will be referred on to this section for their information.

Walking / cycling routes for tourists

It is acknowledged that there is potential for the development of walking / cycling routes for tourists in certain areas of the county. The Development Plan fully supports such projects with section 9.3 providing objectives to facilitate the development of tourism projects in the County subject to best practice, proper planning and protection of the environment. The provision of cycling and walking routes is further supported in section 11.3 of the existing plan with objectives for cycling and walking infrastructure and section 17.8 with objectives for recreation use of natural resources. The provision of walking and cycling routes at specific locations is a matter for the Transportation and Roads Section and this matter will be referred on to this section for their information. Wicklow Tourism also plays a main role in promoting walking/cycling /hiking routes throughout the County.

Facilities at public amenity sites

With regard to the different facilities sought to be provided at different public amenity site, the County Development Plan facilitates the provision of such facilities subject to proper planning and protection of the environment. The funding and provision of such facilities at public locations, under the ownership of WCC, is a matter for the Transportation and Roads Section and/or the Community, Cultural and Social Section of the Council. This matter will be referred on to both of these sections for their information.

Provision of tourist office

The objectives of both the existing County Development Plan and the Greystones - Delgany Local Area Plan would facilitate the provision of a tourist office in Greystones. The delivery of such a service would be a matter for Wicklow County Tourism and/or Bord Failte.

Potential of tourism in different areas of the County

It is acknowledged that the County must continue to provide for the positive sustainable development of tourism and the County Development Plan sets out a land use framework to ensure the potential of tourism projects/facilities are managed in a sustainable manner so as to protect against any potential detrimental impacts on the environment and local communities. The tourism potential of Enniskerry, Powerscourt, Wicklow Town, Mount Usher, Glen of the Downs and South Wicklow are all noted and it is considered that the current plan provides numerous objectives to facilitate the tourism potential in these areas having regard to proper planning and sustainable development. Wicklow Tourism has a number of initiatives to promote the development of tourism in these areas for example promotion of the attractions in over 30 of the towns and villages in the County.

Wind farms

Objective WE1 of the existing County Development Plan aims to encourage the development of Wind Energy in accordance with the provisions of the Wicklow Wind Strategy and places a particular emphasis on the sensitive location of such development subject to consideration of visual and recreational amenity impacts.

While the obvious concerns regarding the provision of wind energy development and the impact a visually obtrusive development may have on the tourism industry within the County are acknowledged, the objectives of the plan, alongside the provisions of the Wind Energy Development Guidelines aim to ensure that such developments can only be developed where they are sensitively located and do not cause a significant visual impact on the surrounding area. It is considered that the implementation of these measures is quite evident from the limited number of wind energy developments currently constructed/granted within the County and the level of assessment carried out during the planning process for each of these applications.

On the flip side of the potential negative impacts of wind energy development on tourism and in the absence of any Irish specific analysis on this topic a study carried out in 2008 on "The Impact of Wind Farms on Scottish tourism" should be noted. This study found that a few large wind farms are better than a large number of small farms and that a number of medium size farms dispersed in a relatively small area so that they become contiguous, is also not desirable.

It also noted that the potential for a wind energy development to be constructed and actively promoted as a tourism asset has been successful in the case of the largest wind farm development in the UK at Whitelee where more than 130km of trails accessible by foot, bicycle or by horse are provided alongside a free educational visitor centre which caters for school trips amongst other visitors. While the scale of this development is quite significant in comparison to the potential of what Wicklow can offer from a 'Wind powered tourism perspective' it is considered that the potential for walks and cycleways forming part of an overall wind energy development proposal when sensitively located would have the potential to positively impact on tourism.

Recommendations of the Chief Executive

To review and update where necessary all tourism objectives of the existing County Development Plan in light of the LECP.

TOPIC 5: RETAIL

Name	Issue raised
Ashford Studios	There is a need for more retail services in the county.
Blackditch Ltd	Newcastle: Under the current Retail Strategy, Newcastle is designated a Level 4 Local Centre – Small Town. Newcastle should be included as a Level 3-Tier 2 centre.
Lidl Ireland GmbH	<p>The new County Development Plan needs to highlight the importance of retailing and the need for appropriate policies and objectives regarding same with a focus on discount foodstores and retail policy affecting their potential development throughout the county, particularly in the interests of economic development and employment generation.</p> <p>With regard to convenience leakage, 18% leakage is considerable and the Development Plan and Retail Strategy should encourage the reduction of same to below 10% and to encourage convenience floor space expansion at all levels of the hierarchy accordingly.</p> <p>With regard to allocation of floorspace capacity, Lidl welcome the confirmation in the Development Plan that assessments of additional floorspace need are not treated as caps or limits on the provision of additional floorspace. With regard to 'extant' permissions whilst appropriately making some provision for extant permissions in the allocation calculations, one should not assume that all such permissions would be implemented as in many cases such permissions would not necessarily be constructed.</p> <p>Discount foodstores development is somewhat restricted by various policies/objectives of the Development Plan and furthermore the Development Plan is not fully contemporary in its consideration of Discount Foodstores having regard to the more recent Retail Planning Guidelines, 2012.</p> <p>With regard to the Sequential Approach in order not to undermine local / neighbourhood centres a minor alteration to policy RT5 is sought: RT5 <i>The 'sequential approach' to the location of new retail development will be applied i.e. having assessed the size, availability, accessibility, and feasibility of developing both new sites and existing premises, firstly within an town appropriate retail centre (e.g. town/district/neighbourhood/local, etc. depending on the scale / catchment of the development) and secondly on the edge of a town retail centre, alternative out of centre sites should be considered only where it can be demonstrated that there are no town retail centre or edge of centre sites which are suitable, viable and available.</i></p> <p>With regard to Section 10.4.4 of the current Development Plan 'large foodstores', as per the Retail Planning Guidelines, 2012, Discount Foodstores are now included within the 'large convenience goods stores' category, therefore Lidl seeks that there should be explicit reference to Discount Foodstores in this section of the new Development Plan: LF1 <i>Large foodstores shall be required to be located on suitably zoned lands in appropriate retail town centres or on the edge of the centre where public transport provision can be made available for shoppers.</i></p> <p>With regard to the policy on Neighbourhood Centres in Section 10.4.5 and Policy NC1, it is considered that this is quite restrictive and it is noted that Table 10.3 of the Development Plan highlights that Supermarkets are</p>

	<p>acceptable in Level 4 centres which include Neighbourhood Centres. The following alterations to NC1 is sought:</p> <p>NC1 <i>New / expanded neighbourhood centres shall generally only be considered in areas of significant residential development / expansion on the edges of settlements in Levels 2 and 3 of the retail hierarchy. At such locations, the applicant will be required to show that:</i></p> <ul style="list-style-type: none"> - <i>the scale of the existing/new residential development is such to sustain a neighbourhood centre;</i> - <i>the retail development is located and sized to meet the needs of the existing/new development catchment area without impacting on the viability of the existing town centre (total retail floorspace in excess of 500sqm shall not generally be considered outside of the growth centres of Bray, Greystones, Wicklow and Arklow);</i> - <i>the location of the development is sufficiently separated from the core retail area of the settlement as to warrant new retail facilities;</i> - <i>the range of retail and non-retail services to be provided is appropriate to the needs of the area;</i> - <i>all efforts have been made to integrate the neighbourhood centre with any existing / new community facilities due to be provided as part of the scheme e.g. schools, childcare facilities, sports fields etc.</i> <p>With regard to Section 10.4.11 of the Development Plan 'Discount Foodstores', as per the <i>Retail Planning Guidelines, 2012</i>, Discount Foodstores are now included within the 'large convenience goods stores' category, therefore Lidl seek that there should be explicit reference to Discount Foodstores in this section of the Development Plan. The following replacement text is proposed to be included in the new Development Plan:</p> <p>"10.4.11 Discount Foodstores <i>Discount Foodstore are an important, and growing component of the convenience retail market, and constitute a 'Supermarket' (as defined by the Retail Planning Guidelines, 2012) normally with a net retail sales area not exceeding (but not limited to) 1,500 sqm, selling a limited range of goods at competitive prices, with easily accessible car parking.</i></p> <p><i>DF1 Discount foodstores shall be required to locate on suitably zoned lands and shall only be considered in settlements in Levels 2, 3 and 4 in the County retail hierarchy. Where no such zoned lands are provided and a need can be shown for this form of retailing, the applicant must show through the application of the sequential approach that the site selected is suitable and optimal. To prevent any adverse impact on town centres, the proportion of comparison goods floorspace shall be limited to a maximum of 20% of retail floor area."</i></p> <p>It is considered that the above replacement text is far more reflective of the role of Discount Foodstores, and their national classification in the <i>Retail Planning Guidelines</i>. Finally submit that restricting Discount Foodstores from Level 4 centres (where Supermarkets are permissible) is entirely inappropriate.</p> <p>The Development Plan policy should also streamline the process of application for smaller scale supermarkets / Discount Foodstores, e.g. by specifying a threshold under which detailed Retail Impact / Sequential Assessment's would not be required. The following amendments are sought to reflect this:</p> <p>TR6 <i>Where new retail development is considered 'large scale' (i.e. as per the thresholds in Section 10.5 of the Development Plan) in relation to the existing town centre, the onus is on the applicant to demonstrate compliance with the development plan and that there will not be a material adverse impact on the vitality and viability of any existing town centre. In submitting</i></p>
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	<p><i>evidence in relation to retail impact the applicant shall address the following criteria and demonstrate whether or not the proposal would:</i></p> <ul style="list-style-type: none"> - support the overall strategy for town centres as set out in the development plan and not materially diminish the prospect of attracting private sector investment into one or more town centres; - cause an adverse impact on one or more town centres, either singly or cumulatively with recent developments or other outstanding planning permissions, sufficient to undermine the quality of the centre or its role in the economic and social life of the community; - diminish the range of activities and services that a town centre can support; - cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term; - ensure a high standard of access both by public transport, foot and private car so that the proposal is easily accessible by all sections of society; - link effectively with an existing town centre so that there is likely to be commercial synergy. <p>TR7 <i>Where an application for new retail development is made within the defined core retail area of a major town or County town centre, or suitably zoned in a neighbourhood or small town centre, it will not always be necessary to demonstrate the quantitative need for retail proposals in assessing such proposed developments. In setting out the retail impact of the development the report should focus on how the scheme will add/detract from the quality of the town centre - both in relation to improving retail, urban design, integration with the built fabric and quality of life in the town/centre.</i></p> <p>The existing retail hierarchy should be refined somewhat in terms of allowing greater scope for development in the different level centres, e.g. we consider that Level 4 centres could accommodate a greater scale of development than currently provided for. The restriction / discrimination on Discount Foodstores in level 4 centres is entirely inappropriate and should be removed accordingly. As per the Retail Planning Guidelines, 2012, Discount Foodstores should no longer be separately distinguished but rather they fall within the 'large convenience goods stores' / supermarket categories.</p> <p>All references to floor area thresholds, should explicitly state that the area refers to the net retail sales area, to avoid inappropriate reference to gross floor area. With regard to Level 4 centres, as per the <i>Retail Planning Guidelines, 2012</i>, small/medium scale supermarkets should be facilitated, hence it is sought to revise the current threshold of 1,000 sqm to 1,500 sqm net retail sales area and the 'secondary' thresholds should be:</p> <p>Level 2: 2,500 sqm net retail sales area Level 3: 1,500 sqm net retail sales area Level 4: 1,000 sqm net retail sales area</p>
<p>Tesco Ireland Ltd.</p>	<ul style="list-style-type: none"> - Historic and fine grain town centres are more suitable for higher order comparison retailers, and smaller, more specialised retailers. Large scale convenience retailing is more suitable at edge of centre locations. - The existing 20% cap on comparison goods within large foodstores should be omitted from the new plan as it is contrary to national retail policies. - Retail policies must have regard to the operational requirements of modern retailers. - Development plan policies must recognise that the design of modern retail formats are dictated by retailer's requirements, current Building Regulations, Fire Safety and Disability Access requirements. - A convenience retail store has different characteristics to other retail

	<p>developments including higher order comparison and retail service outlets and it is requested that the development plan include a specific food retail car parking standard.</p> <ul style="list-style-type: none"> - Convenience goods stores need to be located at accessible locations that have sufficient car parking provision (1:14 i.e. 1 space per 14 sqm floor area). A retail store has different characteristics to other retail developments. The Draft NTA 2030 Vision document (section 8.5: Parking Supply) separates food and non-food land uses with a maximum standard of 1:14 being applied to 'food retail' and 1:20 being applied to 'non-food retail', thereby recognising the different trip generation rates of these two forms of retail. - Need to support retail provision in County Wicklow to avoid trade leakage to Dublin in particular through flexibility for existing/planned centres, e.g. Bray, Wicklow, Greystones.
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Response of Chief Executive

The Chief Executive agrees that there is a shortfall of retail space, particularly comparison space, within the county. The problem of the leakage of retail spend from the county has been recognised for many years and is an issue that has been raised in several development plans and retail strategies. The new development plan will include an updated County Wicklow Retail Strategy for the period 2016-2022 and beyond. This will be prepared in accordance with the 'Retail Planning Guidelines for planning authorities' (DoECLG, 2012) and in accordance with the core principles of the 'Retail Strategy for the Greater Dublin Area 2008-2016'. The strategy will aim to create the appropriate conditions necessary to foster a healthy and vibrant retail environment in the county. Amongst other considerations, it will set appropriate targets for the reduction of retail leakage out of the county and will address the issue raised in the submissions pertaining to extant permissions.

The strategy will include an updated retail hierarchy. With regard to the issue raised in relation to Newcastle's role as a potential Level 3 centre, regard should be paid to the characteristics and role of centres across the county, described in the current plan as follows:

- Level 3 centres, e.g. Blessington and Rathdrum generally have a large catchment and tend to be relatively isolated from larger centres, and will include at least one supermarket, a good range of comparison outlets, retail services including banks etc, leisure and cultural facilities and range of cafes, restaurants etc.
- Level 4 centres, e.g. Kilmacanogue, Shillelagh generally provide for a local catchment and can include one supermarket and a limited range of shops and retail services.
- Level 5 centres, e.g. Glenealy, provide for the basic day to day needs of the immediate local catchment with one to two small convenience stores and basic services.

Clearly, Newcastle (currently a Level 4 centre) does not have the characteristics of a Level 3 centre and in fact, more likely to have the characteristics of a Level 5 centre. In designating a centre, regard is also paid to the status of Newcastle as a 'small growth town' in the Regional Planning Guidelines for the GDA 2010-2016 and its status as a 'rural town' under the Wicklow Settlement Hierarchy (status to be retained under the current proposed core strategy). On this basis it is considered appropriate that Newcastle retains its position as a Level 4 centre within the Retail Hierarchy.

All objectives in the plan will be reviewed and updated in light of the 2012 retail guidelines and the findings of the updated retail strategy. The review will consider all issues raised by Tesco Ireland Ltd. and Lidl Ireland GmbH. In response to the key issues identified by these submitters, the Chief Executive considers that the following points are of relevance:

- The sequential development approach specifically aims to promote greater vitality in **town centres**, rather than all forms of **centres** generally.
- The 2012 guidelines indicate that the distinction between 'discount stores' and other convenience goods stores will no longer apply. This will be reflected in the updated plan.
- The guidelines set out new convenience retail floorspace caps (a cap of 3,000m² net for convenience retail floorspace is suggested for County Wicklow). The guidelines indicate that there is no cap on the amount of non-grocery or comparison space delineated for a store. This will be reflected in the updated plan.
- The plan will include objectives that account for the siting and design requirements of large convenience retailers.
- The car parking standards set out 'Greater Dublin Area Draft Transport Strategy 2011-2030' (NTA) are noted. The Strategy sets out proposed maximum car parking standards for 'food retail' (1 space per 14m²) and 'non-food retail' (1 space per 20m²) uses. The application of **maximum** standards is of greatest relevance to the metropolitan area of the GDA where there is less of a need for car parking due to the predominance of a high quality public transport network. While the core principles of the NTA strategy are accepted, regard needs to be paid to the particular characteristics of Wicklow, where there is by and large, a necessity for use of a private car for convenience shopping. It is considered that the current policy of the CDP provides the flexibility needed to allow for the determination on the appropriateness of applying a **maximum** or a **minimum** parking standard on a case by case basis (refer PP1, Chapter 11 and TR4, Chapter 10). The standards set out in the current plan require a provision of 1 space per 25m² (town / village / district / neighbourhood centre large / discount foodstore). The current standards will be reviewed in light of the NTA standards pertaining to the amount of spaces required for 'retail' and 'non retail' uses within stores.
- The current plan includes criteria for the submission of a Retail Impact Assessment (RIA) (Section 10.5, Chapter 10). This includes details on the thresholds beyond which a RIA is required. These will be reviewed during the preparation of the new plan. The new plan will include greater clarity on whether the thresholds apply to net or gross floor area, though gross area is less equivocal and more enforceable.
- It is submitted that the objectives of the plan should be revised with a view to loosening restrictions on the development of large convenience outlets within neighbourhood centres. The planning authority will adopt a strategy that aims to protect the vitality and vibrancy of existing town centres across the county. The priority for large scale retail development is first and foremost within town centres and thereafter in other areas including neighbourhood centre sites. Under the retail planning guidelines a 'neighbourhood centre' is considered to comprise a small group of shops, typically a newsagent, **small supermarket**/general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population. The objectives of the plan will continue to distinguish between town and neighbourhood centres and will include guidance on the scale of convenience space that will be permitted in each centre, in accordance with national guidelines. The role and function of all centres will be reconsidered during the preparation of the updated county retail strategy.

Recommendations of Chief Executive

Include an updated County Retail Strategy for the period 2016-2022 and beyond, and update all policies and objectives in light of the findings of the strategy.

Review and update all objectives in light of guidance set out in 'Retail Planning Guidelines for planning authorities' (DoECLG, 2012)

Review and update car parking standards in light of guidance set out in 'Greater Dublin Area Draft Transport Strategy 2011-2030' (NTA), particularly with regard to giving consideration to setting out distinct standards for 'food' versus 'non-food' uses within stores, and to have regard to the quantity of spaces required.

Review and update the criteria for the submission of a retail impact assessment.

TOPIC 6: INFRASTRUCTURE

While a number of submitters make reference to infrastructure in their submission, the majority of such submissions relate to specific **local** service issues. These submissions and local issues are addressed in the part of this report addressing specific towns. This submission addressed here are those that reference to wider, County-wide issues.

Name	Issue raised
Ashford Studios	Roads infrastructure in the County needs improvement, particularly if economic activity is to be facilitated.
Blackditch Ltd	The plan has a role to play in the strategic planning of regional infrastructure provision by Irish Water and the associated allocation of funding and timing of development.
Clodagh O'Brien	Roads infrastructure to locations like the Wicklow Mountains, Glencree Valley, Glencullen Valley from important starting points like Enniskerry Village require improvements, particular safety improvements for cyclist and walkers.
Heather Darker	Roadside signage: The erection of temporary signage for local events being run by community groups should be facilitated, but in a more structured manner e.g. by the designation of certain locations for such signage and for sign to be of standard templates. This would discourage illegal signage and decrease workload of litter wardens and would also help to make event more successful, build community spirit and show Council support. The road junction at Glendalough should be redesigned so that people can equally consider turning left (to Glendalough) or right (to west Wicklow) as this would encourage tourists to visit west Wicklow
Joan Campbell	Congestion on the N11 should be addressed. Roads improvements required in Delgany including pedestrian crossings and traffic calming.
Julie Strickland	Off road footpaths should be provided, particular through new developments, to amenity areas. Such routes should be provided even if they don't immediately join up to existing complete routes, in order to prepare for further connections.
Karen Cowen	There is a need for enhanced cycling infrastructure in the County, including bike parking beside all public parks / green areas and cycle lanes to and from such locations
Michael Carey	Improvements are required to cycling infrastructure, particularly along the coastal route from Greystones to Wicklow, through Newcastle, to ensure safety of cyclists, pedestrians and other road users.
Mary Rose Craig	Roads infrastructure to locations like the Wicklow Mountains, Glencree Valley, Glencullen Valley from important starting points like Enniskerry Village require improvements, particular safety improvements for cyclist and walkers.
Padraig O'Duill	There is a lack of public transport serving settlements outside of the major towns, which are dependant on taxis and Bus Eireann, which can be a difficult particularly for older people, who are forced to keep their cars on the road. Wicklow County Council should promote and subsidise a local bus service.

Response of Chief Executive

1. Transport Goals and Objectives

In regard to the provision of public transport it should be noted that while Wicklow County Council is not itself a public transport provider, and cannot force providers to deliver services in any particular area, the existing County Development Plan puts in place the necessary policy framework to encourage and facilitate the improvement of public transport. It is intended the new plan will carry forward such a policy framework.

While the issue of traffic congestion along the N11 falls within the remit of the National Roads Authority and is outside the control of the County Development Plan, the existing plan does include a number of objectives relating to the improvement of the carrying capacity and operational efficiency of National Roads. It is intended that these objectives will be strengthened where necessary and carried forward into the new plan.

Objective CW5 of the existing County Development Plan facilitates the development of a coastal walking and cycling route. In regard to the need for increased cycling and walking routes between gateway towns/villages to key tourism areas objective CW1 should be noted which aims to "improve existing or provide new foot and cycleways on existing public roads, as funding allows". It is intended that both objective CW1 and CW5 will be strengthened and carried forward into the new County Development Plan. In particular it is considered that an expansion on objective CW1 to include wording prioritising walking and cycling routes connecting gateway towns and villages to key tourism assets should be provided.

Section 5.4.4 'Accessibility' of the existing County Development Plan places a clear emphasis on the need for permeability and legibility between new developments to local destinations such as amenity areas. It is intended that the provisions of this section of the plan will be enhanced and carried forward in the new plan.

2. Signage

The issues relating to signage and standards are noted. Chapter 11.8 of the existing County Development Plan contains a number of objectives and standards relating to the issue of signage. It is intended that these objectives will be strengthened and carried forward in the new plan.

3. Water Infrastructure

The necessity for the plan to facilitate Irish Water in the provision and expansion of water services infrastructure in the County is recognised. It is intended that an objective will be included in the new plan to facilitate Irish Water in the provision and expansion of the water services infrastructure.

Recommendations of Chief Executive

1. The new County Development Plan shall put in place the necessary policy framework to encourage and facilitate the improvement of public transport.
2. It is intended that the existing objectives set out in the County Development Plan in relation to the N11, signage and the provision of walking and cycling routes will be strengthened where necessary and carried forward into the new plan.
3. It is intended that an objective will be included in the new plan to facilitate Irish Water in the provision and expansion of the water services infrastructure required to support the social and economic growth of County Wicklow, including targeted demographic growth and economic development as identified in the Core Strategy of the plan.

TOPIC 7: ENERGY & COMMUNICATIONS

Name	Issue raised
Ashford Studios	Communications: Broadband infrastructure enhancement is vital to economic development required across the county.
Frank and Catherine Clune	Wind Energy: The impact of concrete used during the construction of wind turbines, especially in relation to domestic water supplies, be assessed in the same way as environmental and safety issues are assessed.
Niall Stephenson	Wind Energy: Do not allow the development of wind turbines in orange zoned areas such as Ballymanus. Retain the scenic quality of the area.
June Stephenson and Sean Doyle	Wind Energy: No changes should be made to Strategy, in particular to not upgrade current red zones to orange, or current orange zones to green.
Charles and Collette Kavanagh and Family	<p>Renewable energy.</p> <ul style="list-style-type: none"> - It is acknowledged that renewable energy technologies are necessary in the future it is important that factors such as safety, public health, environmental harmony, economic viability and long term sustainability. - Other renewable energy resources should be also considered such as wave energy, solar energy and biomass energy. - The tourist industry needs to be safeguarded with rural tourism protected from pressures of development like wind farms that undermine rural tourism's potential. South Wicklow is a scenic location with the tourism industry just starting to recover in the area. - Water supply should be protected from wind-farm developments for example Arklow's water comes from the Goldmine River which rises in the slopes of Croghan Mountain. - The landscape needs to be protected from the negative visual impact of wind farms. - There are strong public concerns with the proposed windfarm at Raheenaleagh and the potential harmful effects of such developments. Any proposed extension to this windfarms should be refused under the Variation no.4 to the current CDP. - There are strong concerns with the proposed wind farm at Ballymanus. This should be refused for the issues outlined in this submission. - Vested interests of developers should not influence decision making. - The Planning Act should be further amended to increase the distance of wind turbines from residences and be amended to allow for continual assessment of noise and shadow flicker. Tall turbines should not be erected on farm, hill or ridge areas in any case.
Michael O'Keeffe	Wind Energy / Landscapes - The zoning of areas deemed 'favoured' or 'less favoured' for windfarm development needs to be changed from the present plan. The scenic beauty of the Aughrim, Annacurra and Croghan valley areas is threatened by the "less favoured" designation in the current plan. This area needs to be protected for locals and tourists. Allowing windfarms in the areas of counties close to other county boundaries may cut down on the number of available objectors but will lead to an over concentration of turbines in one area.
Frank Daly	<p>Energy Efficiency:</p> <ol style="list-style-type: none"> 1. It should be mandatory in Wicklow that all new homes have a BER of A1 and that each new home should make a net contribution of the County's renewable energy markets e.g. all new homes should have solar PV capacity over and above regulation requirements and smart metres installed so that surplus energy can be spilled into the grid 2. Social housing should be the exemplar for high energy efficiency standards 3. Wicklow should promote energy efficient design in the renovation of older

	<p>protected structures</p> <p>4. Wicklow County Council should seek funds from the SEAI or other suitable organisation to help finance energy mapping of each major town and district centres in the County. This would aid in the establishment of community owned energy cooperatives</p> <p>5. Energy efficiency measures should be mandatory in the design of new business parks e.g. district heating systems supplied by renewable or CHP heat, on site wind generation, solar PV arrays</p> <p>6. A 'Wicklow Energy Agency' should be established, which could provide advice to the Wicklow public and private organisations regarding energy consumption reduction.</p>
Francis Donnelly	<p>Pylons: The recent Kildare County Development Plan included provisions preventing consent for developments emitting radiation (e.g. pylons) where they would create a certain level of radiation within existing housing units. A similar provision should be included in the Wicklow CDP</p>
Kevin Doyle	<p>Wind Energy: The area around Ballymanus, Aughrim is identified as 'orange' in the existing Wind Energy Strategy. This area should remain so designated in light of the outstanding natural beauty of the area.</p>
Sinead Doyle	<p>Wind Energy: The area around Ballymanus, Aughrim is identified as 'orange' in the existing Wind Energy Strategy, i.e. it is a 'less favourable' area for the development of industrial wind farms. This area should remain so designated in light of the high visual quality and diverse flora and fauna of the area, in particular the following protected species that live in the area: buzzard, hen harrier, red kite, grouse, migrating woodcock, raven and bat.</p>
Irish Wind Energy Association	<p>Wind Energy</p> <p>1. Wicklow County Council is reminded that Ireland's need to support renewable energy stems from it's EU commitments, namely EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources which came into force in April 2009 and which establishes a binding target of 20% of overall EU energy consumption coming from renewable sources by 2020, as well as a binding 10% minimum target for energy from renewable resources in the share of transportation fuels. Ireland's target under the directive is for renewable resources to account for 16% of total energy consumption by 2020. Failure to meet these targets could result in EU sanctions. In line with these commitments, DCENR announced a revised target for electricity from renewable energy sources (RES-E) of 40% by 2020. The European Union is also now in the process of agreeing the framework for a further series of targets for renewable energy towards 2030, and Ireland in October 2014 agreed to new EU 2030 targets which seek a 40% reduction in Green House Gas Emissions and a binding EU target for renewable energy of "at least 27%".</p> <p>2. As the vast majority of new renewable capacity will be provided by on-shore wind, the 40% target is a significant challenge for the Irish wind industry as a whole. An approximate doubling of wind capacity will need to be installed on-shore in Ireland within the coming years if we are to meet our 2020 RES-E target. The expansion of the Irish wind industry will be an extremely positive economic development for Wicklow County Council and can result in greater grid security and stability, job creation, Local Authority rates and development contributions, and will bring about a reduction of GHG emissions.</p> <p>3. IWEA welcomes Wicklow County Council's recognition that the County has the potential to develop its renewable energy potential further during the period of the County Development Plan. In terms of the question regarding how can alternative forms of energy be best promoted and developed, IWEA suggests that clear and target focused objectives and policies that</p>

	<p>demonstrate the manner in which renewable forms of energy are encouraged should be included in the document. IWEA also welcome the acknowledgement of the current DoECLG Wind Energy Planning Guidelines, which should be followed in the preparation of this plan, along with any subsequent revision.</p> <p>4. IWEA wish to reiterate that when preparing the Renewable Energy Strategy, that it should be prepared in accordance with SEAI document entitled "<i>A Methodology for Local Authority Renewable Energy Strategies</i>"</p> <p>5. The inclusion of specific policies and objections in the new Plan that promote the further development of renewable energy will enable Wicklow County Council to:</p> <ul style="list-style-type: none"> ▪ Develop a sustainable, wind energy industry employing construction and professional service providers and attracting significant capital investment; ▪ Enhance the vibrancy of the county as a renewable energy leader; ▪ Support rural development in a sustainable manner; ▪ Deliver significant community benefit including the lowering of energy prices and the provision of land lease payments to local landowners annually; ▪ Contribute to the funding of the construction of an electrical grid infrastructure that would be the basis of the new renewable energy industry; and, ▪ Deliver significant commercial rates revenue to County Wicklow annually.
<p>Anthony Quinn</p>	<p>Wind Energy: This submission relates to the County Wind Energy Strategy and considers that the current strategy does not afford adequate protection to the Natura 2000 network, in particular certain bird species presents at the Poulaphuca SPA and the Wicklow Mountains SPA. In particular:</p> <ul style="list-style-type: none"> - Merlin are recorded as present in Areas 2, 5, 6, 7, 8 and 9 of the WES, which are all identified as 'Most favoured' or 'Less favoured' ¹. The fact that there were just 9 breeding pairs recorded within the SPA highlights how vulnerable the Wicklow Uplands population is. The Merlin is an Annex I species under the Birds Directive. The Wicklow Mountains is a "main breeding area" for Peregrine Falcons, which are also an Annex 1 species under the Birds Directive. In accordance with the Birds Directive: it "shall be the subject of special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution". The "population" in the Wicklow Uplands has to therefore be protected from injury or from disturbance / damage to their breeding or resting places wherever they occur, even if they are not within the bounds of a designated nature conservation site. Turbines kill raptors. - The local population of Greylag Geese is a "feature of interest" and is of "international importance", according to the Natura 2000 site synopsis for Poulaphuca Reservoir. The Greylag Goose is recorded as present in the National Biodiversity Centre Database in current wind farm strategically "favoured" Areas 2, 7 and 9. Whooper Swans are also to be seen in "Area 9". They are listed as present in throughout "Area 9" on the National Biodiversity Centre Database. Whooper Swans are also an Annex I species under the Birds Directive. "Area 9" is on the flight path corridor between Poulaphuca SPA and the documented feeding site: these Greylag Geese are commonly seen during wintertime in "Area 9". <p>An additional issue her is the collision risk for geese and swans presented by extra power lines that would be necessary to connect any turbines with wind strategy areas 2, 7, 8 and 9 to the national grid.</p>

	<p>The existing areas identified as 'most favoured' and 'less favoured' should be reconsidered as part of the County Development Plan review.</p> <p>Note: this submission makes reference throughout to the existing WES, however, it is referring to the WES adopted in 2010, not the current WES which was amended in 2014.</p>
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Response of Chief Executive

The following responses divide these issues into 5 specific headings and are followed by a number of recommendations.

1. Telecommunications Infrastructure

The forthcoming 'Local Economic and Community Plan' is due to provide a detailed economic and employment strategy for the County. It will be the role of the County Development Plan to underpin any land use and development objectives included in the LECP. It is envisaged such measures will include promoting and facilitating the delivery of infrastructure capable of meeting future demand, in particular broadband services. A strong commitment to supporting the enhancement of such services is intended to be included in the new County Development Plan.

2. Energy Efficiency

In regard to the issues raised in relation energy ratings and building energy efficiency it should be noted that the existing County Development Plan under objective ED1 requires that all new buildings during the design process incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations 2006. It should also be noted that this policy is also applicable to the provision of social housing.

The issue raised in relation to the application of energy efficiency requirements for the refurbishment of protected/listed buildings is noted; however SI no. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations 2006 specifically states that the provisions of these Regulations shall not apply to a protected structure or proposed protected structure within the meaning of the Planning and Development Acts 2000 to 2006.

While there may be merit in such measures as the production of energy mapping for towns and villages and the establishment of an Energy Agency these are issues which would be outside the remit of a County Development Plan. In this regard it should be noted however that chapter 14 of the existing County Development contains an extensive number of objectives relating to energy efficiency and design standards for buildings with the overall objective being the reduction in demand for energy and fossil fuels. It is envisaged that the new plan will strengthen, expand upon where necessary and carry forward such objectives

The issues raised with regard to varying forms of renewable technologies and the impacts on public health, safety etc are noted. Chapter 14 of the existing County Development Plan contains a number of objectives in relation to the development of these alternative technologies. It is intended that these objectives will be strengthened where necessary and carried forward into the new plan.

3. Electricity Transmission and Distribution

Having regard to the issues raised regarding the effects of radiation and proximity to residential areas it should be noted that all applications for such electricity generating projects must be assessed having regard to the guidelines issued by the DECLG pursuant to section 28 of the Planning and Development Act 2000 (as amended) including the contents of the review by the expert group on "Health effects of Electromagnetic Fields" published in 2007 by the Department of Communication,

Energy and Natural Resources. The new plan will seek to enhance and strengthen the existing objectives of the plan in this regard.

4. Wind Energy

A. Environmental considerations during the construction process

The current national Wind Energy Development Guidelines (DoEHLG 2006) are currently undergoing an extensive review process; however the existing guidelines do require that all applications for the development of Wind Energy must submit details in relation to the impacts of development on groundwater during the construction process.

While this is noted, concerns in relation to possible health impacts in respect of wind energy infrastructure are not matters which fall within the remit of the Wind Energy Development Guidelines as they are deemed to be more appropriately dealt with by health professionals. It is noted that during the consultation process for the new guidelines the Department of Health has been made aware of the on-going review of the wind guidelines and any perspectives that they may have, relevant to the planning process, will be taken into account in finalising the revisions to the guidelines.

B. Impact of wind turbines on tourism

Objective WE1 of the existing County Development Plan aims to encourage the development of Wind Energy in accordance with the provisions of the Wicklow Wind Strategy and places a particular emphasis on the sensitive location of such development subject to consideration of visual and recreational amenity impacts.

While the obvious concerns regarding the provision of wind energy development and the impact a visually obtrusive development may have on the tourism industry within the County are acknowledged, the objectives of the plan, alongside the provisions of the Wind Energy Development Guidelines aim to ensure that such developments can only be developed where they are sensitively located and do not cause a significant visual impact on the surrounding area. It is considered that the implementation of these measures is quite evident from the limited number of wind energy developments currently constructed/granted within the County and the level of assessment carried out during the planning process for each of these applications.

On the flip side of the potential negative impacts of wind energy development on tourism and in the absence of any Irish specific analysis on this topic a study carried out in 2008 on "The Impact of Wind Farms on Scottish tourism" should be noted. This study found that a few large wind farms are better than a large number of small farms and that a number of medium size farms dispersed in a relatively small area so that they become contiguous, is also not desirable.

It also noted that the potential for a wind energy development to be constructed and actively promoted as a tourism asset has been successful in the case of the largest wind farm development in the UK at Whitelee where more than 130km of trails accessible by foot, bicycle or by horse are provided alongside a free educational visitor centre which caters for school trips amongst other visitors. While the scale of this development is quite significant in comparison to the potential of what Wicklow can offer from a 'Wind powered Tourism perspective' it is considered that the potential for walks and cycleways forming part of an overall wind energy development proposal when sensitively located would have the potential to positively impact on tourism.

C. Impacts on the landscape and visual impacts

Adopted Variation No. 4 to the Wicklow County Development Plans 'Wind Energy Strategy' varied the original strategy adopted for the County in 2010 to increase the level of emphasis on the landscape categories for the County. This varied strategy places all lands located within the Area of Outstanding

Natural Beauty within the 'not favoured category'; all lands within the Area of Special Amenity within the 'less favoured category' with all other lands being located within the 'most favoured category'.

This adopted variation includes objectives which require a detailed assessment of the impact of any proposed wind turbine development on the landscape including an assessment of visual impacts perceived. This assessment shall generally be carried out in accordance with best practice guidance available, including that set out by the EPA in "Advice notes of current practice in the preparation of EIS" and by the DoEHLG in "Wind Energy Development Guidelines for Planning Authorities".

It is intended to carry out an analysis of the adequacy of the existing landscape categories for the County during the review process which will further inform and strengthen the objectives of the Wind Energy Strategy for the County from a landscape and visual perspective.

5. The existing Wind Energy Strategy for Wicklow (WES)

The request not to alter the existing wind strategy for Wicklow (adopted variation no. 4) is noted however it is intended that an analysis of the adequacy of the existing landscape categories for the County will be carried out during the review process which will further inform and strengthen the objectives of the Wind Energy Strategy for the County from a landscape and visual perspective.

In respect to the decision making process for wind energy developments it should be noted that as with all planning applications submitted to Wicklow County Council a strict assessment of each application is carried out in accordance with the proper planning and sustainable development of the area in question, having regard to the goals and objectives of the County Development Plan and relevant guidelines.

The issues raised by the IWEA are noted. It is intended during the review process to strengthen and carry forward the objectives of the existing County Development Plan in regard to Wind Energy Development.

6. Specific wind farm areas

In regard to the proposed Wind Farm at Raheenaleagh/Ballymanus – this application will be assessed in accordance with objectives of the County Development Plan, the existing Wind Energy Strategy, and the wind energy guidelines in order to ensure the proper planning and sustainable development of this area.

Aughrim, Annacurra and Croghan valley – the contention that these areas are threatened by the "less favoured" designation is noted however the less favoured designation within the existing Wind Energy Strategy for the County states:

These areas form a natural buffer between the 'Most Favoured' areas and the 'Not Favoured' areas. The 'Less Favoured' areas generally comprise of lands designated 'Areas of Special Amenity' in accordance with the landscape designation of the County Development Plan and locations where more challenges to wind energy exploitation are present such as listed views and prospects, and natural and built heritage assets. However, a number of locations within this area do exhibit good wind speeds and there are clearly substantial pockets within this area that face fewer constraints and may be open to exploitation.

It is considered the description of this area in itself provides an indication that any application within these zones will require a comprehensive analysis and site selection where it can be demonstrated that a proposed development will not have a significant impact on the existing assets of the area. All applications submitted for wind energy developments must undergo a detailed assessment process and comply with the objectives of the Wicklow County Development Plan, the Wicklow Wind Strategy and the provisions set out in the guidelines for Wind Energy Developments as prepared and currently under revision by the Department of Environment, Community and Local Government.

7. Wind Energy and impacts on flora and fauna

It is considered that existing objectives WE1, BD3 and BD7 of the current County Development Plan address concerns raised about the impacts of wind farms on flora and fauna, and it is intended that similar and enhanced, if necessary, provisions will be included in the new plan:

WE1 *To encourage the development of wind energy in accordance with the County Wicklow Wind Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:*

- *consideration of any designated nature conservation areas (SACs, NHAs, SPAs etc) and any associated buffers*
- *impacts on visual, residential and recreational amenity*
- *impacts on 'material assets' such as towns, infrastructure and heritage sites*
- *consideration of land cover and land uses on or adjacent to the site*
- *consideration of grid connection issues*
- *best practice in the design and siting of wind turbines, and all ancillary works including access roads and overhead cables.*

BD3 *To maintain the favourable conservation status of existing and future Natura 2000 sites (SACs and SPAs) and Annex I - Habitats and Annex II - Animal and Plant species in the County.*

BD7 *To protect non-designated sites from inappropriate development, where it is considered that such development would unduly impact on locally important natural habitats or wildlife corridors.*

Protected species will be addressed in the SEA and AA and will be integrated into SEA/AA recommendations for insertion into the Plan. Protected species include:

- Annex IV (Habitats Directive) species of flora and fauna, and their key habitats (i.e. breeding sites and resting places), which are strictly protected wherever they occur, whether inside or outside the above sites, e.g. otter and bats;
- Other species of flora and fauna and their key habitats which are protected under the Wildlife Acts, 1976-2000, wherever they occur; and
- 'Protected species and natural habitats' as defined in the European Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008, including: Birds Directive – Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur) and Habitats Directive – Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur).

Recommendations of Chief Executive

1. It is intended that the new County Development Plan shall include as an objective the improvement of communications infrastructure, in particular broadband services.

2. It is intended that the new County Development Plan will:

- Carry forward and strengthen the existing objectives of the plan in relation to compliance with the building regulations and energy efficiency and energy efficient design standards and alternative renewable forms of energy production
- Investigate potential for specific objectives in relation to the assessment process for developments with the potential to emit electromagnetic fields.

3. It is intended that the new County Development Plan will review, enhance and carry forward objectives relating to the provision of Wind Energy Developments in County Wicklow.

4. To carry out a review of the existing landscape categories for the County and use this analysis to strengthen and enhance the objectives of the existing Wind Energy Strategy.

5. Carry forward and strengthen objectives to protect and conserve sites or parts of sites that are important for the maintenance of protected habitats and species, in accordance with Article 10 of the Habitats Directive. These sites may include sites that are outside designated sites and may include sites that are unrelated to the Natura 2000 network and as such fall outside the provisions of Appropriate Assessment. All other objectives should be reviewed and where appropriate include particular reference to Article 10 protection of species and habitats, e.g. otter habitat vis-à-vis 10m from watercourse, bat habitat in woodlands/trees, objectives for the recreational use of natural resources etc.

TOPIC 8: COMMUNITY & OPEN SPACE

Name	Issue Raised
Alphaplan Design	The current objectives with regard to the development of open space in new housing areas is well thought out and acceptable and it ensures that open space provided is useable and not banks or inaccessible areas.
Ashford Property Services	Nursing home sites should be considered for development within a 5km radius of existing settlements. The preferred option of the HSE is for a rural setting.
Michael Baynes	An objective should be included stating that it is an objective to preserve the open space or amenity areas in housing estates to ensure that the space cannot be subsequently built on or developed.
Karen Cowan	Need for outdoor gym on Greystones sea front. Need for play parks with hills and open football areas. Need for bike parking beside all public parks and cycle routes. Public art murals should be encouraged on boarded up buildings. There is a need for a school in Charlesland, Greystones.
Denis and Catriona Daly	Suggested additional text to OS3, Chapter 15 (shown in <i>italics</i>): Prohibit non-community uses on areas of lands permitted or designated as public open space in existing residential developments <i>and such lands to be assigned a unique use zoning objective and delineation in the Local Area Plans at initial preparation or at the next statutory review stage.</i>
Ian McGahon	This submission is seeking for Wicklow County Council to plan for the provision of 'Changing Places' toilets in the Wicklow County Development Plan. It is seeking that a minimum of 4 are planned for. These toilets allow for a carer or family of an adult with profound or severe disabilities to attend to their toileting needs with dignity and comfort.
Bernadette Stokes	There is a need for a public dog park in County Wicklow. (Campaign for Greystones Dog Park)

Response of Chief Executive

The existing County Development Plan includes a chapter on social and community infrastructure (including open space) and sets out detailed objectives and development standards for a wide variety of social/community/open space types, including nursing home developments, development on designated open space, the provision of schools, the provision of open space and parks, and is unequivocal in its support for social/community projects, subject to best practice and protection of the environment. However, it is not the role of the County Development Plan to deliver these social/community/open space projects in the County. These issues would be more a matter for the forthcoming Local Economic and Community Plan, and the issues raised will be brought to the attention of the LECP team. The new development plan will take into consideration the emerging 'Local Economic and Community Plan' which is being separately prepared in 2015, and any objectives it includes with regard to the social, community and open space development.

With respect to some of the more specific issues raised:

Nursing homes

The existing County Development Plan provides two objectives with regard to the location of Residential & Day Care developments, which require such developments to be either within or within reasonable proximity of an existing settlement, namely Objectives NH2 and NH4 which state that such '*facilities shall in general be required to locate in existing towns or villages and shall be located close to shops and other community facilities required by the occupants and shall be easily accessible to visitors, staff and servicing traffic*' and '*Edge of centre locations (i.e. locations on unzoned lands at the edge or outside of settlements) will only be considered for residential or day care facilities where:*
-There are good vehicle and pedestrian linkages available to town facilities; - The site is within the

built 'envelope' of the settlement and would not comprise of an isolated, stand alone development; and - The design and scale of the facility is reflective of the semi rural location'.

It is considered that it is in the interests of those either residing, attending on a daily basis or visiting, that such facilities be located in proximity to existing services, such as public transport, community facilities and retail services. There may be a number of residents of nursing homes for example that may be mobile and may wish to walk into a local town to available of community and retail services. It is considered that an isolated rural nursing home would potentially have the impact of isolating residents further from their communities, instead of providing them with the care they need, within a community.

Were rural locations to be promoted, the result on the landscape and natural resources of the County could be quite substantial, given that a sizeable structure would normally be required, with plentiful surfaced car parking, an on-site effluent disposal system and well, and resulting flows of traffic of unsuitable rural roads. It is considered therefore that urban or peri-urban locations are the most suitable for nursing homes.

It is intended that the new plan will contain similar provisions.

Residential open space

The existing County Development Plan provides an objective with regard to the potential development of residential open space - objective (OS3) to *'Prohibit non-community uses on areas of lands permitted or designated as public open space in existing residential developments'*. The proposed objective *'to preserve the open space or amenity areas in housing estates to ensure that the space cannot be subsequently built on or developed'* while noted is considered too restrictive should an appropriate community use be proposed at an appropriate public open space area e.g. a playground. It is intended that the new plan will contain similar provisions to objectives OS3.

The suggestion that all open spaces in housing areas be *"assigned a unique use zoning objective and delineation in the Local Area Plans at initial preparation or at the next statutory review stage"* would not be practical to implement given the number and size of these sites of residential open space in some towns; it is considered that a written objective in the County Development Plan / local plan adequately addresses this issue.

Facilities at community and open space areas

With regard to the different facilities sought to be provided at different public amenity areas, the County Development Plan facilitates the provision of such facilities subject to proper planning and protection of the environment. The funding and provision of such facilities at public locations, under the ownership of WCC, is a matter for the Transportation and Roads Section and/or the Community, Cultural and Social Section of the Council. This matter will be referred on to both of these sections for their information.

School in Charlesland

The issue raised with regard to the need for a school in Charlesland, Greystones is noted. This is a matter to be considered under the Greystones - Delgany and Kilcoole LAP and objective SOC6 of the LAP facilitates the provision of a school in Charlesland, *'to provide for the development of a 16-classroom primary school and one post-primary secondary school on lands at Charlesland, to be provided as part of AP7: Charlesland Action Plan'*. The delivery of the school here is a matter for the Department of Education and Skills.

'Changing Places' toilets

The County Development Plan facilitates for such development subject to proper planning and sustainable development. The provision of such public toilet would be a matter for the annual budget.

Public dog park

The expressed need for a public dog park is noted and should such a proposal be forthcoming, the existing County Development Plan would facilitate such a development subject to proper planning and sustainable development. The physical provision of such a park by the Local Authority is not a role of a land use plan. This would be a matter for consideration by the Community, Cultural and Social Development Section of Wicklow County Council through the annual budgetary process.

Recommendations of the Chief Executive

To review the objectives and development standards with respect to community, cultural and social facilities for all sectors of society, e.g. recreational facilities for the elderly, provision of facilities for those with a disability and with regard to the LECP update where required.

TOPIC 9: HERITAGE**(a) Natural heritage**

Name	Issue raised
Rose Mary Craig	<ul style="list-style-type: none"> - Areas of outstanding natural beauty (AONB) and areas of special amenity must be protected. - Dargle and Glencullen valleys should be designated special areas of conservation. - There is a need for more coastal paths. - Rights of way should be preserved.
Paul and Senan Sexton	<ul style="list-style-type: none"> - The Glen of the Downs Garden Centre site should be moved from AONB to Corridor Area landscape designation. The characteristics of the site have changed in recent times with the development of roads and culverts – These changes to the landscape diminish the scenic quality of the landscape.
Charles & Collette Kavanagh & Family	<ul style="list-style-type: none"> - The landscape needs to be protected from the negative visual impact of wind farms.
Clodagh O'Brien	<ul style="list-style-type: none"> - Both the Dargle and Glencullen valleys in Enniskerry should be designated Special Areas of Amenity/Conservation and protected for future generations with a focus on the use for recreation and as greenways. - With regard to landscape, areas of outstanding natural beauty and Areas of Special amenity must be subject to strict planning laws that are non-negotiable. There is sufficient space for developers outside these areas so there should be no case made for development where an area is designated. - With regard to Rights of Way the Council can facilitate the preservation of these by officially mapping them and defending walkers rights in court rather than leaving it to individuals and walkers to try to keep them open.

Response of Chief Executive**Protection of the natural heritage**

The current development plan and local plans include a significant amount of objectives for the protection of the natural heritage, including listed views, prospects and landscape characterisation, in accordance with national planning guideline documents. The objectives set out in Chapters 16, 17 and 18 will be reviewed and updated as appropriate.

Designation of new sites

The designation of new sites is the responsibility of the Department of the Arts, Heritage and the Gaeltacht and the National Parks and Wildlife Service and is not a matter for the planning authority.

Rights of Way and Coastal paths

As part of the plan preparation process, it is intended to investigate key public rights of way and amenity walking routes, in order that they can be identified on the plan maps and objectives include with respect to same. The routes mentioned will certainly form part of the list examined.

Landscape Characterisation

The existing Landscape Character Assessment, particularly in relation to its impact on the wind energy strategy, contained in the current County Development Plan will be reviewed and improved as necessary as part of the plan review process. The locations highlighted here will form part of the areas reviewed.

Recommendations of the Chief Executive

1. To review, strengthen and enhance as appropriate all natural heritage objectives of the new County Development Plan particularly those relating to;
 - The protection of buildings of heritage value

- Listed views
- Landscape Characterisation
- The protection of trees

2. To investigate key amenity walking routes in particular those linking established amenity areas and where considered appropriate to identify them on the plan maps and include objectives in the plan with respect to same.

(b) Built heritage

Name	Issue raised
Joan Campbell	- Stylebawn House in Delgany should be purchased by the Council and developed for integrated tourism/ community/ open space uses.
Eoin Colman	- The following structures should be included on the Record of Protected Structures (RPS): <ul style="list-style-type: none"> - Dwelling house Corrella and its attendant grounds, St. Vincent Road, Greystones – an example of an Arts and Crafts house with original grounds. - With regard to the Burnaby ACA in Greystones there is an inconsistent application of the guidelines and inconsistent decision making on planning applications is compromising the objectives of the ACA.
Rose Mary Craig	- Monitor the deterioration of protected structures.
Clodagh O'Brien	- Protected structures in the County should be monitored for deterioration especially when left empty.

Response of Chief Executive

Stylebawn House, Delgany

The existing County Development Plan has Stylebawn House on the Record of Protected Structures (08-73) and the Greystones-Delgany and Kilcoole Local Area Plan sets out the zonings and objectives in relation to the lands at Stylebawn House. It should also be noted that zoning of land at Stylebawn House is part of the Greystones-Delgany and Kilcoole Local Area Plan, and is not open for review/amendment through the County Development Plan review process. The County Development Plan is not a spending plan and has no role purchasing sites or developing them, the Plan provides the framework/objectives for the protection of Stylebawn House on the RPS and it is intended that the new plan will contain similar provisions.

Additions to the Record of Protected Structures (RPS)

It is intended that as part of this review process to consider the addition of any structures requested for inclusion in the list of the Record of Protected Structures in the County Development Plan. The structure mentioned will form part of the list examined.

Deterioration of protected structures

The County Development Plan includes the Record of Protected Structures and it is the role of the plan to set out the land use framework/objectives for the protection of any structure on the record; however the County Development Plan has no role in monitoring the condition of Protected Structures. The duty of care for monitoring and arresting the deterioration of protected structures lies with the owner. Outside of the Development Plan process, the Council supports owners in this role as per the provisions of part IV of the Planning Act and through allocating grant support where relevant. In addition, where in the opinion of the planning authority, it is necessary to do so in order to prevent a protected structure from becoming endangered, the planning authority may serve a notice under Section 59 of the Planning Act requiring the owner to take certain steps / carry out certain works to prevent the structure from becoming or continuing to be endangered.

Architectural Conservation Areas

With regard to ACAs in general, the existing County Development Plan provides a number of objectives and development standards, in section 16.4.3 and it is intended that the new plan will contain similar provisions. It should also be noted that the Burnaby ACA designation is part of the Greystones-Delgany and Kilcoole Local Area Plan, and is not open for review/amendment through the County Development Plan review process. With regard to the implementation of the objectives of the ACA, the County Development Plan sets the framework/objectives for the ACA, while it is the role of the development management section to implement these objectives. In this regard, each application is assessed on its merits and using the same principles, but different outcomes are of course to be expected given different circumstances.

Recommendations of the Chief Executive

To carry out a review of the existing Record of Protected Structures and add/remove/amend buildings as appropriate.

(c) Coastal Zone Management

Name	Issue raised
Clodagh O'Brien	- Wicklow should be seeking to develop more coastal pathways for walkers as Wales has done which has immense tourist potential.

Response of Chief Executive

As part of the plan preparation process, it is intended to investigate key amenity walking routes in order that they can be identified on the plan maps and objectives include with respect to same. Coastal pathways will certainly form part of the list examined.

Recommendations of the Chief Executive

To investigate key amenity walking routes in particular those linking established amenity areas and where considered appropriate to identify them on the plan maps and include objectives in the plan with respect to same.

(d) Green Infrastructure

Name	Issue raised
Clodagh O'Brien	- Both the Dargle and Glencullen valleys in Enniskerry should be designated Special Areas of Amenity/Conservation and protected for future generations with a focus on the use for recreation and as greenways.
Joan Campbell	- Opportunity for development of greenway along Three Trouts Stream in Greystones to the sea.

Response of Chief Executive

The County Development Plan has no role in the designation of special areas of conservation, which is a function of the DoE / NPWS. It is within the Council's power however to designate Special Areas of Amenity (SAAOs). The Dargle Glen is identified in the current County Development Plan as an area to be considered for a future SAAO. This will be reviewed, along with the proposals with respect to the Glencullen Valley as part of the plan review process, taking into account the experience gained during the course of the current plan where a proposed SAAO for the Great and Little Sugarloaf Mountains was not approved by the members.

With respect to greenways, the existing County Development Plan provides a number of objectives with respect to Green Infrastructure, Section 17.7 and ecological corridors / amenity walkways. It is intended that as part of this review process, to investigate potential 'greenway' routes in order that they can be identified on the plan maps and objectives included in the plan. The greenways mentioned here will certainly form part of the list examined.

Recommendations of the Chief Executive

To investigate potential 'greenway' routes and where considered appropriate to identify them on the plan maps and include objectives in the plan with respect to same.

Topic 10: Issues relating to 'LAP' towns

Any submissions relating to the position of these towns in the settlement hierarchy or the target population for any town, are already dealt with in this report under the heading 'Vision and Core Strategy'. Similarly, issues relating to the position of these towns in the 'retail hierarchy' are dealt with under the heading 'Retail'. Any other issues raised that are local and specific to the town only are set out hereunder.

Name	Issue raised
Alphaplan Design	Rathnew: Consider possibility for train station stop at Rathnew. This area has become highly populated in recent years.
Heather Darker	Blessington <ul style="list-style-type: none"> - The new greenway requires more parking. This might be facilitated near the Avon Ri where the lands are being developed for sports uses - An adult gym should be provided in Blessington, perhaps near the old library
Joan Campbell	Delgany: Roads improvements required in Delgany including pedestrian crossings and traffic calming.
Carl Mogensen	Greystones: This submission puts forward a design strategy for Rathdown Heritage Park in Greystones. This will provide a vibrant community and heritage park while also protecting and promoting the site's historic significance and its natural environment.
Mary O'Donnell	Wicklow Town: The Murrough and South Quay, both areas of natural beauty, need to be cleaned up and made more attractive for locals and visitors. <ul style="list-style-type: none"> - The Murrough could be made into a lovely recreational area for all. There should be a nice peaceful park area for adults. An outdoor bowling area could be created. The pile of earth that was excavated for the skate park needs to be removed or it could be landscaped and finished off properly. A clean-up of the buildings on the Murrough would improve the area. The heaps of scrap should be screened from public view. There is a constant smell from the sewage treatment plant and occasionally from the factory further out. - Most of the warehouses on the Quays / Bond Street are dirty and dilapidated. They should be painted and cleaned up.
Padraig O'Duill	Wicklow Town – Rathnew: <ul style="list-style-type: none"> - Strong growth will be experienced in the Wicklow town, Rathnew, Ashford and Glenealy area. Growth should be managed so as to ensure that the social mistakes of past are not repeated, e.g. west Dublin area. - Growth from Wicklow town should be directed north towards Milltown. - Growth from Rathnew should head west to Milltown. - Growth from Ashford should be directed towards Glenealy. - Small and medium enterprises in Wicklow area should be developed westward towards Glenealy – road infrastructure available. - Industrial development at the Murrough is a continuous problem.
Sean Owens	Newtownmountkennedy: The submission refers to the home of the submitter being re-designated from 'Rural' to 'Urban' in the Newtownmountkennedy LAP and changed from Newcastle to Newtownmountkennedy, they are seeking for this to be reversed as it is of no benefit to them or their children. This was done without consultation with them directly.
Luisne Centre for Spirituality	Kilcoole: This submission is seeking that the trees inside the boundary wall along the road, (Main Street) cease being categorised as of heritage value for the following reasons <ul style="list-style-type: none"> - The trees are only 20 years old. They were planted to replace the original trees (which they do 4 or 5 fold) when Wicklow County Council made this a

	<p>condition to fell the originals when one fell across the main road.</p> <ul style="list-style-type: none"> - The boundary wall is now in danger of collapsing (a 30m section of it) due to pressure from the present trees - those which are in 2m of the wall. - A structural engineer has advised that these trees must be felled.
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Response of Chief Executive

Greystones – Heritage Park

The new development plan will only address strategic matters relating to Greystones. Matters pertaining to the future development of the Rathdown Heritage Park are addressed within the 'Greystones-Delgany and Kilcoole Local Area Plan 2013-2019'.

In this LAP, there are a number of objectives that would facilitate the proposals set out in the submission, including:

- Objective HER **14 'Rathdown Heritage Area'** - To protect the natural and built heritage of the Rathdown heritage Area and to facilitate the development of this area as a heritage park for public amenity and education purposes, in accordance with the objectives for Zone 3 of AP3: Greystones Harbour and North Beach Action Plan.
- Objectives for 'Zone 3' in the 'Greystones Harbour and North Beach Action Plan' which are '*preservation of land and natural landscape for future archaeological study*' and '*promotion by the Council of future development of a Heritage Park at the site of medieval Rathdown*'.

Delgany - road improvements

Road improvement objectives with respect to footpaths, cycleways, pedestrian safety and traffic calming in the Delgany area are set out in the Greystones – Delgany and Kilcoole Local Area Plan 2013-2019. The objectives of the LAP are not under review through the County Development Plan review process. The existing County Development Plan does however include objectives for the improvement of existing and facilitation of the development of new pedestrian and cycle ways throughout the County. It is intended that these objectives will be strengthened where necessary and carried forward in the new plan.

The implementation of such objectives would be an operational and funding matter, and the Roads Department of the Council, with NTA funding, has recently undertaken an audit of footpaths/ cycle routes / on-street car parking in Delgany with a view to drawing up options for improvements to such facilities. Design are currently being finalised with a view to consulting the public and securing consent, and thereafter the implementation of the improvements will be a matter of funding.

Blessington

The new development plan will only address strategic matters relating to Blessington. Matters pertaining to the Blessington greenway and local gyms are considered to be local specific matters which fall under the remit of the local area plan and the annual budgetary process. The 'Blessington Local Area Plan 2013-2019' was recently prepared and includes local specific objectives with respect to walking routes around the reservoir and the facilities to be provided in open spaces, particular:

Amenity routes around the reservoir - While it is recognised that there are limitations to the development of tourism centred around the use of the Poulaphuca reservoir due to its use as a water source serving the Dublin region, its designation as a Special Protection Area under the EU Habitats Directive and Proposed Natural Heritage Area status, the potential for the development of attractions such as amenity walks and cycle routes bordering the lakeshore and surrounding area is recognised. In recognition of the amenity and habitat value of the lakeshore, a 100m buffer zone has been provided along the eastern boundary of the plan area aimed at preserving the scenic and ecological value of this area. Lands within this buffer have been zoned agriculture in recognition of these

existing activities however within this zone the plan will facilitate and encourage the development of walking and cycling routes and other tourist related activities subject to such developments meeting the requirements of the EU Habitats Directive.

Links between the town and the reservoir - Where possible, new developments in the lakeshore area will be required to provide new roads / footways / cyclepaths as deemed necessary and appropriate between existing roads / built up area and the lakeshore.

The redevelopment of Action Area 4 forms a key site in opening up a significant new link between the town and the lakeshore on the northern side of the town. The planning criteria for this Action Area is detailed in Section 10 of this plan and requires the development of this land to be accompanied by a new road between the Kilbride Road (adjacent to Blessington Bridge) and the N81 and a new open space area in the form of a landscaped woodland park with car parking and pedestrian/cycle routes adjoining the Kilbride Road.

Objective CD3: To facilitate opportunities for play and sport and support the implementation of the County Council 'Play' and 'Sports & Recreation' Policies and their objectives, including the collection of development levies.

The forthcoming 'Local Economic and Community Plan' for County Wicklow will set out a framework for the delivery of community infrastructure in the county.

Wicklow Town - Rathnew

The new development plan will only address strategic matters relating to Wicklow Town - Rathnew. Matters pertaining to the Murrough area, Wicklow skate park and warehousing along the Quays and Bond Street are considered to be local specific matters which fall under the remit of the local plan for Wicklow Town. The 'Wicklow Town - Rathnew Development Plan 2013-2019' was recently prepared and includes local specific objectives.

The new development plan will set population targets for the future development of all settlements including Wicklow town, Rathnew, Ashford and Glenealy. The population targets determine the amount of land to be zoned for housing, employment, community and other uses.

In accordance with government guidelines, settlements are required to grow in a sequential manner whereby:

- development should extend outwards from centres with undeveloped land closest to the centre and public transport routes being given preference;
- a strong emphasis is placed on development of infill and underutilised lands; and
- areas to be developed are to be contiguous to existing developed areas.

The planning authority will apply this guidance in decisions made pertaining to the future growth of all settlements. Decisions on future new areas for development in the Wicklow and Rathnew area will not be made during the preparation of this plan – this matter is considered during the preparation of the local development plan.

It should be noted that the existing Wicklow Town and Rathnew Development Plan sets out the strategy for employment for Wicklow Town and Rathnew and zones lands for the future provision of employment within the area. It is outside the remit of this plan to make additions or change the strategy for employment as already set out in this plan.

It is suggested that consideration be given to the possibility of a train station stop at Rathnew. While the provision of new train stations is outside the remit of this plan, it should be noted that given the proximity of Wicklow Train Station to Rathnew and the existing pedestrian, cycle and road network linking the station to Rathnew it would not be considered necessary or realistic to include an objective to provide for an additional station.

This plan, the 'Wicklow County Development Plan 2016-2022' will include the local Ashford and Glenealy plans and decisions on new lands being identified for development will be taken during the process of preparing this plan. The issues raised in the submission will be considered in this context.

Newtownmountkennedy

The new development plan will only address strategic matters relating to Newtownmountkennedy. The matter pertaining to the extent of the settlement boundary of Newtownmountkennedy falls under the remit of matters considered during the process of preparing the local plan for the area. The current local plan for Newtownmountkennedy is the 'Newtownmountkennedy Local Area Plan 2008-2014'. This plan is likely to be reviewed after the adoption of the 'Wicklow County Development Plan 2016-2022'.

With regard to the specific issue raised, the issue appears to relate to the fact that back in 2002 and 2008, additional residential properties that were previously outside of the Newtownmountkennedy 'town boundary' (as defined by the LAP boundary) were brought within the boundary of the Newtownmountkennedy LAP and zoned 'RE'. In general terms, those from 'urban' areas, are not necessarily eligible for planning permission for a rural one-off dwelling outside of any settlement.

This issue was addressed in the 2010 County Development Plan with the following objective: *Consideration for rural housing will also be given to those persons who were permanent native residents of a rural area but due to the expansion of an adjacent town / village, the family homeplace is now located within the development boundary of the town / village. A person whose lands have been zoned or designated as development lands in the extension of the development boundary shall not benefit from such consideration in this regard. This shall relate to lands subsumed within individual development boundaries of settlements adopted in the previous 12 years.*

Kilcoole (Protection of trees)

The existing County Development Plan provides a number of objectives and development standards with respect to the protection of trees, Section 17.4, and it is intended that as part of this review process, these provisions shall be reviewed and updated where required. The specific trees mentioned here will be examined.

Recommendations of Chief Executive

To clearly articulate in the new County Development Plan the principles that will be applied in determining the amount and appropriate location of lands to be zoned for any particular use.

To review the schedule of trees to be considered for preservation.

Topic 11: Level 5 towns

Any submissions relating to the position of these towns in the settlement hierarchy or the target population for any town, are already dealt with in this report under the heading 'Vision and Core Strategy'. Similarly, issues relating to the position of these towns in the 'retail hierarchy' are dealt with under the heading 'Retail'. All other issues raised that are local and specific to the town only are set out hereunder.

(a) Ashford

Name	Issues raised
Padraig O'Duill	<ul style="list-style-type: none"> - Strong growth will be experienced in the Wicklow town, Rathnew, Ashford and Glenealy area. Growth should be managed so as to ensure that the social mistakes of past are not repeated, e.g. west Dublin area. - Growth from Wicklow town should be directed north towards Miltown. Growth from Rathnew should head west to Miltown. Growth from Ashford should be directed towards Glenealy.
Ashford Studios	<ul style="list-style-type: none"> - Ashford Studios plan to provide further infrastructure in the future to accommodate the demand for use of its studios. There is potential for significant future employment. It is hoped that this growth can be facilitated.

Response of Chief Executive

During the preparation of the Ashford Town Plan careful consideration will be given to the characteristics of all lands in order to determine which lands are most suitable to be zoned for varying uses including active open space over the lifetime of the plan.

With regard to the Film Industry it should be noted that the existing Ashford Town Plan zones c. 10ha of land as part of the plan to consolidate and facilitate the expansion of the Film Industry in this area. It is intended that this plan will be reviewed as part of the new development plan.

Recommendations of Chief Executive

To strengthen and enhance all objectives of the existing Ashford Town Plan as appropriate.

(b) Enniskerry

Name	Issue raised
Noel Barry	<ul style="list-style-type: none"> - The northern development boundary for Enniskerry should be south of Ballyman Road, having regard to proposed housing at Monastery and Country Brook - The existing protected view of the Scalp and the Scalp Valley from the Ballyman Road should be retain in the new plan
Bluetone Properties Ltd.	<p>This submission is from the development company that owns a substantial portion of land at Kilgarron / Parknasillogue, designated as AA1 in the current Local Area Plan. It is indicated that a proposal for the lands is currently being prepared for submission to the Local Authority for approval.</p> <p>Issues raised:</p> <ul style="list-style-type: none"> - Despite its designation as a small growth town under the current Enniskerry LAP, the town has experienced relatively little development over the plan period. In this regard there is adequate capacity for the town to support additional housing and development over the next plan period. The continued designation of zoned lands within the town to be developed in accordance with an AAP will ensure the planned, co-ordinated and phased development of further residential development in tandem with appropriate associated infrastructure over the next plan period. - Since the 2009 LAP a new primary school has been developed in Enniskerry. The Department of Education does not foresee the need for a further primary school in the town. This should be considered in light of the requirement set out in the current Kilgarron AAP for 1.2ha to be provided for St.Mary's and St. Gerard's national school.
Eamonn Coleman	<ul style="list-style-type: none"> - Enniskerry should be maintained as a compact settlement using vacant land opportunities for development – in support of Strategic Goal 3, 4 and 5 - The policy adopted in the previous local area plan to zone lands primarily on the outskirts of the town runs counter to the strategic goals. - New town plan should build on the uniquely attractive urban fabric and develop improved pedestrian permeability by providing new routes and links and as much as possible develop high quality new buildings including residential development in the central area, rather than at the periphery , e.g. AA1, AA2, AA4 lands.
Mark Colley	<ul style="list-style-type: none"> - The future development and population growth of Enniskerry seems to be very rarely taken from an overall perspective. Rather specific subjects are viewed in isolation and decisions taken which may not be the correct decisions / direction. The whole of Enniskerry is in a rather unique position in relation to the historic nature of the village, the largest tourist location in Leinster (Powerscourt) and the jumping off point for hundreds of thousands of tourists both national and international to the greater Wicklow area. - Has the plan considered the hundreds of thousands of visitors to the village and area for the purposes of walking, cycling, hiking and recreation of various other varieties including horse riding - Throwing additional traffic into an already congested village will cause huge health and safety issues as the local and indeed tourist traffic both vehicular and pedestrian continues to grow each year. - The village and surrounds need to be treated almost as a national heritage site, the flora , fauna , monuments and existing historical buildings need to be protected from over urbanisation or the village will lose the character which attracts so many visitors each year .

	<ul style="list-style-type: none"> - Sporadic development in the area needs to be controlled and quickly, whether one of houses or mini - medium, quick win, estates do little to enhance the touristic attractiveness of the area and detract from the numerous areas of outstanding natural beauty and amenity in the area - The key to developing Enniskerry is not in building more houses to increase the population but is to develop tourist amenities in the area such that access to the area is improved (feeder links from the Dart and Luas), car parks for additional visitor parking (which is a serious issue in the village), bicycle racks for cyclists, a tourist information centre, renovation of the historic shop fronts and in particular renovation of the many stone walls (which have fallen into disrepair) which border all roads into the village and also development of the many pedestrian walks in and around Enniskerry as an amenity to be enjoyed by the existing and future visitors - Improving access to the village, amenities in the village and the physical attractiveness of the area will increase hugely the number of visitors to the area and to the whole North Wicklow area as a result from an amenity perspective.
Rose Mary Craig	<p>This is a very long and detailed submission, and most of it is reproduced here in the interests of completeness:</p> <ul style="list-style-type: none"> - The current vision needs to recognise as significant that Enniskerry is a historic heritage village with considerable current and future tourism potential. - Enniskerry-Powerscourt has major potential for development. Enniskerry with its bus link to Dublin is a major entry point to Wicklow. Unfortunately until now there has been little linked up planning between the village and Powerscourt estate to jointly manage problems generated by increased traffic and draining by the estate of tourism revenues from the village. Joint planning could be perhaps be incentivised by the opening of discussions on possible walking /cycling routes through the estate from the village. This would have some quid pro quo for the village and the estate, which would also benefit from increased tourist numbers who are not car or bus based. Joint financial incentives would help this process. - Enniskerry is a major destination for walkers and cyclists for whom no safe pathways or walking routes out of the village to the mountains currently exist. Instead they are forced onto narrow roads with no footpaths which is dangerous and a deterrent to development of tourism. Safe walking paths and cycle tracks are needed into the Glencree and Glencullen valleys. In particular the stunning rock gorges along the Dargle should be opened up for walkers and rights-of-way brought back into more general use. The road (now closed off) that runs all the way alongside the river from the N11 to the Powerscourt Waterfall could also be a major walking and cycle access up from Bray. - The landscape around Enniskerry should be recognised as a landscape of outstanding natural beauty, in particular the Dargle and Glencullen rivers which should be both designated Special Conservation areas along their full length and protected for future generations. The focus should be on preserving natural areas, habitats, use for recreation and as greenways (currently only the Knocksink reserve provides any protection to the Glencullen river near Enniskerry). - Enniskerry should not be forced to grow beyond its natural boundaries and historic curtilage to the detriment of the quality of life of its residents, natural beauties of the area and tourism potential. Further expansion can only be on hillsides leading to further erosion, flooding and

	<p>detrimental impact on the quality of life. Therefore it would be appropriate to ensure the pace of growth takes account of these realities.</p> <ul style="list-style-type: none"> - Increased employment in recent years has been provided by expanded village retail sector, cafes, Powerscourt estate and hotel and two golf clubs in the area. Further expansion can be expected if tourism potential further developed - The retail sector has expanded and improved in Enniskerry and now covers day-to-day shopping needs and some services. The café sector has also increased. There is little need or room for further expansion as Bray is so near and also easily accessible for employment opportunities. The new art school is also a welcome addition generating visitor interest and local shoppers. - Currently Enniskerry appears to be adequately provided with sports fields and community structures; there are three buildings for community use in the village. A children's playground would be a welcome addition. - The public realm in Enniskerry is certainly deficient. For too long the village, crisscrossed by several roads, has been at the mercy of motorists, and in recent years, heavy traffic, lorries and buses, to the Powerscourt estate. Only minimal traffic calming measures have been installed and residents remain at danger from speeding cars and bicycles down the hills. Several studies have been carried out but no schemes are yet in place to give the village back to the pedestrian and help develop its full potential as an agreeable shopping/ cafe experience for residents and visitors. Historic shop-fronts need to be protected, and empty protected structures actively monitored for deterioration - More needs to be done to protect Enniskerry's built and natural heritage. Currently there are dangers posed by a major development under consideration by Wicklow County Council on a AA4 designated site along the Cookstown Road overlooking the Dargle River which poses a direct threat to the Dargle valley and views of the Sugarloaf. There should be a review of the current AA4 designated zones which are impacting on historic landscapes, particularly those on the Powerscourt Estate side of the village overlooking the Dargle river valley. Currently an application for an urban development on this sensitive site is being considered which, if granted, will further erode the loss of this stunning landscape which has been well protected up to now. - Enniskerry faces a dilemma in trying to attract more car-based tourism due to lack of parking which will always be limited by its geographic situation. Therefore more attention must be paid to walkers and cyclists which are currently the main groups that bring revenues to the village.
<p>Julia Strickland</p>	<ul style="list-style-type: none"> - Ideal location for development is at lower altitude in valleys so that views to and from higher ground are not lost or blighted. It allows people to 'look up' to nature from the town. The Eagle Valley houses built on the skyline looming over Enniskerry badly affected the approach into the village. - People using public roads should be able to see 'distance' rather than having land completely 'blocked off' for estate development. Houses should not be built too close to the existing public roads leaving room for nature strips, cycle paths and safe footpaths. There should be occasional sight lines from the main roads through the new estates ideally across green areas. This will prevent a feeling of exclusion to the public, preventing 'stealing' of views for the few living in the estate from the public at large and a feeling of being hemmed in by developments and suburbia. - Although Ireland is behind other countries in this regard it is essential we

	<p>provide for attractive new routes as part of new development permissions granted. Even if the footpath doesn't join up immediately we should plan for the future when the adjoining private land becomes available. For example if a path was planned for from Kilmolin (on the Glenree Rd from Enniskerry across farm land zoned AA1 for development) to Knocksink wood, then we would have the makings of a spectacular circular walking route (from Enniskerry village up to Kilmolin and back down through Knocksink to the village) and perhaps even join up with the Wicklow way.</p> <ul style="list-style-type: none"> - The current views in the county plan are 1) from the Summerhill House Hotel, 2) from the lands at Monastery House, 3) from Cookstown Rd to Sugarloaf. These benefit a few people. The view from Kilmolin/Parknasilloge north east towards the sea and Carrickgollogan should be included as a view to be protected as it benefits many more of the public including tour buses and cyclists. The County plan should consider what is of maximum value to everyone, not just a few lobbyists. - It is planned to incorporate 210 residential units plus school and businesses and pitches/courts/playgrounds on 16.25 hectares in Enniskerry but the only required green space will be the 'existing' GAA pitch on this land. This means all amenity space planned is for use by children and is largely concrete/asphalt there is no public park / natural area required. Please plan your amenity space to be more inclusive and to provide quality of life for all sections of society, not just children.
Sean McGiollapadraig	<ul style="list-style-type: none"> - Enniskerry Village is already well served with housing, particularly one-offs in all directions in the hills around. The village does not have the infrastructure to cater for more traffic, water supply and treatment, and sewerage treatment. - It is unique in being relatively unspoilt and has been preserved from overdevelopment. It is a lovely place to visit, stay in, walk from, eat and/or drink in, and photograph.
Clodagh O'Brien	This submission was prepared in conjunction with Mary Rose Craig (above) and addresses all of the same issues.
Patricia Walker	<ul style="list-style-type: none"> - Enniskerry has the potential to support mixed employment from local craft and outdoor pursuit to highly skilled small scale web-based enterprises. Maintaining Enniskerry character as a gateway village with easy access to the airport (via the M50) is key to this. Any land development, for shops, services and facilities must be pursued very cautiously in order not to jeopardise the town's character - To attract more tourism to the village, the role of the town can be marketed as unique upland location a short way from Dublin, accessible by public transport. All planning applications could be rigorously examined and tested against this benchmark of adding to the attraction of the town i.e. architectural concerns, materials used, aspect etc.

Response of Chief Executive

Plan zonings and boundary

The issues relating to zonings are not relevant at this stage of the plan making stage. The existing local plan boundary will be reviewed as part of the overall review of the plan. However, given that the core strategy has identified that there is a slight shortfall in the amount of zoned land required to meet the population target, unzoned land within the existing plan boundary and land contiguous to the existing boundary will be evaluated to determine if it is optimal for zoning. With respect to Ballyman Road in particular, this evaluation will include an assessment of impacts of new development on existing views and prospects and the desire to maintain as compact a settlement as possible, and limiting further extension into undeveloped areas.

Enniskerry plan format and vision

It is important to note that it is intended to integrate the current Enniskerry Local Area Plan 2009-2016 into the Wicklow County Development Plan (CDP) 2016-2022 as a 'town plan' which is considered to be more suited to its size and place in the settlement hierarchy. The issues raised regarding the vision of the Enniskerry Plan are noted. The existing plan provides a vision for the village and it is intended that as part of this review process, the vision shall be reviewed and updated.

Tourism in Enniskerry

The issues raised in relation to the tourism development potential in Enniskerry with Powerscourt, recreational outdoor activities and the historic heritage potential are noted; the existing County Development Plan and Local Area Plan for Enniskerry provides a land use framework that facilitates the development of appropriate tourism projects and infrastructure in the town and the surrounding area subject to proper planning and sustainable development. It is not the role of the County Development Plan to provide a strategy for tourism in a specific town / area or within the County. The County Development Plan is not a 'tourism' plan – it is a 'land use' plan. The tourism strategy for the County is provided by both the tourism agencies at work in the County, such as Fáilte Ireland, Wicklow County Tourism and Bray Tourism and the Economic Development Division of the Council, for example through the forthcoming Local Economic and Community Plan. The role of the County Development Plan is to underpin the land use and development aspects on any strategies / objectives that these bodies adopt for the County and the plan is unequivocal in its support for tourism projects, subject to best practice and protection of the environment.

Walking / cycling routes for tourists

It is acknowledged that there is potential for the development of walking / cycling routes for tourists in and around Enniskerry. The Development Plan fully supports such projects with section 9.3 providing objectives to facilitate the development of tourism projects in the County subject to best practice, proper planning and protection of the environment. The provision of cycling and walking routes is further supported in section 11.3 of the existing County Development Plan with objectives for cycling and walking infrastructure and section 17.8 with objectives for recreation use of natural resources. It is also an objective of the existing Enniskerry plan that Action Area 4 shall be developed with *an amenity zone shall be established along the full southern and western boundaries of the action area, which shall comprise an amenity walk area along the existing tree lined field boundaries connecting through the development to regional road R760 (Enniskerry – Kilmacanogue) and to the existing pedestrian route along the Dargle*. The actual provision of walking and cycling routes is a matter for the landowner/developer or by the Local Authority at public locations and it is a matter for the annual budget process and for the investment priorities for any area drawn up by Local Municipal District and the Transportation and Roads Section. Wicklow Tourism also plays a main role in promoting walking/cycling /hiking routes throughout the County.

Infrastructure in Enniskerry

In the crafting of the updated plan for Enniskerry, existing objectives with regard to traffic management, local roads, footpaths, cycle lanes, public realm and car parking etc will be reviewed and improved if necessary. The role of a land use plan is to put in place a framework for future development, while the delivery of such improvements is an operational and budgetary matter.

Housing in Enniskerry

The issues raised in relation to not permitting large scale housing estates and the heritage character of Enniskerry are noted. The existing County Development Plan and Local Area Plan for Enniskerry provides a number of objectives and development standards with respect to residential development and it is intended that as part of this review process and drafting of a new Town Plan for Enniskerry, these provisions shall be reviewed and updated where required.

Listed Views

It is intended that the existing schedule of listed views within the County Development Plan, including those highlighted here, will be reviewed and updated as deemed appropriate.

Community Facilities in Enniskerry

As part of the review process for the Enniskerry Plan the issue of community facilities, including the provision of a playground, in the area will be addressed through appropriate zonings and objectives. It is not the role of the County Development Plan to deliver social/community/open space projects in the County. These issues would be more a matter for the forthcoming Local Economic and Community Plan, as well as the annual budgetary process, and the issue raised will be brought to the attention of the LECP team. The new development plan and its objectives will take into consideration the LECP.

Schools in Enniskerry

During the preparation of the previous Enniskerry LAP, it was drawn to the Council's attention that St. Mary's and St. Gerard's national school was suffering severe overcrowding, with portacabins being utilised for classrooms, which were taking up the limited open play area. In light of the targeted population expansion provided in that plan, the option of either extending this school or relocating it were provided for in the plan, both which could be accommodated by lands in AA1. It is considered reasonable to maintain such a provision.

Retail in Enniskerry

Enniskerry is a Hinterland Area Tier 2, Level 4 Local Centre/Small Town in the Retail Hierarchy. Small Towns are considered to perform the equivalent role within the Hinterland as Neighbourhood centres perform in the Metropolitan Area, which typically comprise a parade of convenience stores, the occasional lower order comparison outlet and limited local services, primarily served by a 'walk-in' population and will have limited parking. The existing retail provision in the town will be reviewed in light of Enniskerry's retail function and the policy and objectives updated where necessary.

Space needed for all sectors of community in Enniskerry

The issue of the need for community facilities to be provided for all sectors of society, e.g. the elderly as well as the youth is noted. The existing County Development Plan provides a number of objectives and development standards with respect to general community facilities, and it is intended that as part of this review process, these provisions shall be reviewed

Heritage in Enniskerry

The existing County Development designates the entire core area of Enniskerry as an Architectural Conservation Area which, alongside the list of protected buildings in the area, aims to provide protection to the character of the area. The extent of the ACA and the list of protected structures will be reviewed during the development of a town plan for Enniskerry. Chapter 10 section 10.6 contains a number of objectives specifically relating to shop front design. The review of the Enniskerry Plan shall enhance and strengthen these existing objectives where deemed necessary in Enniskerry.

Landscape and designation of sites

With regard to protection of the landscape and designating certain areas in Enniskerry, these points are noted; however, the designation of new sites is the responsibility of the Department of the Arts, Heritage and the Gaeltacht and the National Parks and Wildlife Service and is not a matter for the planning authority. The existing Landscape Character Assessment, contained in the current County Development Plan will be reviewed and improved as necessary as part of the plan review process. The locations highlighted here will form part of the areas reviewed.

Employment in Enniskerry

The issues raised with the existing employment in the town centre and the potential in the town to support mixed employment from local craft and outdoor pursuit to highly skilled small scale web-based enterprises are noted. The County Development Plan and existing local plan provides a land use framework for the development of employment in the settlement subject to proper planning and sustainable development. It is intended that as part of this review process, these provisions shall be reviewed and updated where required. These issues would be more a matter for the forthcoming Local Economic and Community Plan, and the issue raised will be brought to the attention of the LECP team. The new development plan and its objectives will take into consideration the LECP.

Development principles for new plan

A number of points are raised with regard to maintaining the town as a compact settlement, build on the uniquely attractive urban fabric, control sporadic development, density of development, building lines, control development on the periphery, use of vacant land/sites and the design of new development. Sections 5.4, 6.3, 6.4 and 10.6 of the current County Development Plan contain a number of objectives specifically relating to design of housing and village centre shop front design. These sections and their objectives shall be reviewed and updated where necessary. With regard to Enniskerry specifically, the town centre is a designated architectural conservation area, with objectives in the plan detailing the design of new development in the town centre area, the plan also includes residential development objectives regarding the use of vacant sites and the design of new and infill development. The review of the plan shall enhance and strengthen the existing objectives with regard to design of development were deemed necessary.

Recommendations of Chief Executive

1. Review and update where appropriate the vision for the Enniskerry plan.
2. To strengthen and enhance as appropriate all objectives of the existing Enniskerry Town Plan, particularly those relating to; heritage including views and landscape, retail, residential development, employment, traffic and transportation and community development.

Topic 12: Level 6 towns

Any submissions relating to the position of these towns in the settlement hierarchy or the target population for any town, are already dealt with in this report under the heading 'Vision and Core Strategy'. Similarly, issues relating to the position of these towns in the 'retail hierarchy' are dealt with under the heading 'Retail'. All other issues raised that are local and specific to the town only are set out hereunder.

(a) Newcastle

Name	Issue raised
Blackditch Ltd	<ul style="list-style-type: none"> - The 'vision' for the future role and function of Newcastle should be as follows: Newcastle should be a vibrant settlement with a good critical mass capable of supporting local services, retailing, employment and a strong population base while taking advantage of the location of the settlement and heritage features of the town to promote local tourism. - The plan should include an objective to require a high standard of traditional and contemporary architecture in developments in Newcastle. - The plan should allow for the flexible use of employment zoned lands to allow a broad range of uses and provide measures to address infrastructural or site access constraints. - Under the current Retail Strategy, Newcastle is designated a Level 4 Local Centre – Small Town. Newcastle should be included as a Level 3-Tier 2 centre defined as follows: 'Level 3 centres have a good range of retail services, excluding large department stores or centres'. This is in line with the designation of other similar settlements, e.g. Rathdrum and its 2022 target of 1750 people to allow for the appropriate level of services in tandem with population growth. - The plan has a role to play in the strategic planning of regional infrastructure provision by Irish Water and the associated allocation of funding and timing of development. - The protection of heritage is key in Newcastle.
Michael Carey	<ul style="list-style-type: none"> - Footpaths and cycle lanes needed – cycle traffic from Greystones through Newcastle on weekends is substantial and causes serious threat to pedestrians and motorists. - Establish a safe walking area from village to BirdWatch (East Coast Nature Reserve) and other areas in vicinity of village. - Reconsider boundary between urban and rural – current boundary does not make sense, particularly northwest – Leabeg Middle.
Tom Redmond	<ul style="list-style-type: none"> - Extend settlement boundary along western side of regional road to south of town.

Response of Chief Executive**Plan vision**

The existing plan provides vision for the village and it is intended that as part of this review process, the vision shall be reviewed and updated where required.

Plan boundary

The core strategy has identified that there is an excess in the amount of zoned land required to meet the population target therefore the existing plan boundary will be reviewed as part of the overall review of the plan but it is considered unlikely that the plan boundary will be extended and more land zoned in these circumstances.

Development principles for new plan

Sections 5.4, 6.3, 6.4 and 10.6 of the current County Development Plan contain a number of objectives specifically relating to design of housing and village centre shop front design. These sections and their objectives shall be reviewed and updated where necessary. With regard to Newcastle specifically, the review of the Town Plan shall enhance and strengthen the existing objectives with regard to design of development were deemed necessary.

Heritage

It is acknowledged in the current plan that the Newcastle area is rich in natural and built heritage assets. The existing County Development Plan and Newcastle Town Plan provides a number of objectives and development standards with respect to the built heritage in Newcastle and it is intended that as part of this review process, these provisions shall be reviewed and updated where required.

Employment lands in Newcastle

It is the strategy of the current plan to generally require employment generating development to locate on zoned land within existing settlements, and to allow the development of appropriate rural based enterprises at appropriate locations subject to proper planning and sustainable development, where, amongst other considerations, there is a proven need to develop there. The Chief Executive is supportive of this strategy and agrees with the strategy to take advantage of the county's comparative advantages and to support the development of enterprise based on local indigenous resources. The zoning of employment lands including those set out in the Newcastle Town Plan are considered to be suitably flexible to accommodate a number of uses compatible with the overall vision for such a zoning. The forthcoming 'Local Economic and Community Plan' is due to provide a detailed economic and employment strategy for the county and it will be the role of the County Development Plan to underpin any land use and development objectives included in the LECF.

Water Infrastructure in Newcastle

With regard to Newcastle, in the crafting of the updated plan, existing objectives with regard to water infrastructure will be reviewed and updated in light of the establishment of Irish Water. The role of a land use plan is to put in place a framework for future development, while the delivery of such improvements is an operational and budgetary matter. It is important to note that the provision of water infrastructure is a matter for Irish Water. The Settlement Strategy for the County, with the associated settlement zonings, has been drawn up to be consistent with the NSS and RPGs and taking account of proper planning and sustainable development. It is IW's role to provide the services to the lands WCC have deemed appropriate for development. Where existing water and waste infrastructure services are deficient, any new development will be curtailed or phased to ensure that adequate services can be provided.

Infrastructure in Newcastle, walkways and cycleway

In the crafting of the updated plan for Newcastle, existing objectives with regard to footpaths, cycle lanes and car parking etc will be reviewed and improved if necessary. Objective CW1 of the existing plan is to "*improve existing or provide new foot and cycleways on existing public roads, as funding allows*". It is intended that this objective will be strengthened and carried forward into the new County Development Plan. In particular it is considered that an expansion on objective CW1 to include wording prioritising walking and cycling routes connecting gateway towns and villages to key tourism assets should be provided. The delivery of such works/improvements is an operational and budgetary matter of the Council.

Recommendations of Chief Executive

To review, strengthen and enhance as appropriate all objectives of the existing Newcastle Town Plan, particularly those relating to; walkways, cycleways, heritage, retail, employment transportation and infrastructure.

(b) Roundwood

Name	Issue raised
Emma Sibley	- Lack of public transport in Roundwood. Two buses a day is not enough to service a growing population.

Response of Chief Executive

The issues raised here are noted and as a 'land use framework', the County Development Plan and Town Plan both facilitate the development of public transport to Roundwood subject to proper planning and sustainable development.

With regard to the delivery of public transport in the area, it is not the role of the County Development Plan to deliver public transport in a specific town/ area or within the County. The County Development Plan is not a 'public transport delivery' plan – it is a 'land use' plan. The delivery of public transport for the County is provided by different public transport bodies at work in the County, such as Bus Eireann, Iarnrod Eireann, the NTA and the Department of Transport, Tourism and Sport. The role of the County Development Plan is to underpin the land use and development aspects on any strategies / objectives that these bodies adopt for the County and the plan is unequivocal in its support for public transport projects/routes, subject to best practice and protection of the environment.

Recommendations of Chief Executive

None

TOPIC 13: ISSUES RAISED AT PUBLIC MEETINGS**Public information days**

During the pre draft consultation stage, six public information days were held in Bray, Blessington, Wicklow Town, Arklow, Tinahely and Greystones from 2pm until 7pm mid-week. The information days were of an informal arrangement with numerous informative posters/ leaflets/ booklets at each venue for the attendees to view, with members of the development plan team present and available to answer questions and to assist in making a submission. The meetings were attended by local representatives, members of the public as well as members of different interest groups with a variety of issues discussed during the days. All of those who attended were encouraged to make a formal submission during the public consultation stage.

Summary of the main topics that arose at each information day

Bray Public Information Day

This was held in the Bray Municipal District Offices with the following issues arising:

- Bray Head SAO
- Town centre retail / reinforce the town the core of the town / restrict the retail development at the edge
- Tourism – camping accommodation in North Wicklow.

Blessington Public Information Day

This was held in the Municipal District Offices in Blessington with the following issues arising:

- recreational/tourist walks in the area
- wind strategy / how it effects the local area
- views in the area

Wicklow Public Information Day

This was held in the County Buildings, Wicklow Town with the following issues arising:

- Funding for development of Ashford GAA
- Land at Ballinalea, Ashford
- Development in Tinahely Village/ surrounds

Arklow Public Information Day

This was held in the Arklow Municipal District Offices with the following issues arising:

- Retail in Arklow
- Arklow Town's potential
- Employment in Arklow and the County

Tinahely Public Information Day

This was held in the Courthouse, Tinahely with the following issues arising:

- 'Action Area Plan' requirements stalling development
- Housing for elderly
- Rathdangan / village design / community
- Wind strategy / how it effects the local area
- Views
- Recreational/tourist walks in the area.

Greystones Public Information Day

This was held in the Greystones Municipal District Offices with the following issues arising:

- Amenity potential Three Trouts Stream
- St. Crispin's cell
- Walks to cliffs
- Luisne Centre Kilcoole
- Garden Village waste water treatment
- Residential open space

Response of Chief Executive

A variety of general planning, Development Plan (including Town Plans) and other general issues arose at the public information days. All of the County Development Plan issues that arose at the Information Days are addressed in the relevant section of this report. These issues are Tourism, Town Centre, Retail, Wind Energy Strategy, Rathdangan (Rural Housing Section), Housing for elderly (Urban Housing Section) Garden Village and Residential Open Space (Community Section).

Bray Head SAAO

Bray Head SAAO designation protects an area which is considered to be of particularly high amenity value which is sensitive to intense development pressure, and which cannot be fully protected through planning control. Part of objective AW6 of the existing County Development Plan is *to implement the measures set out in the Bray Head SAAO (Special Amenity Area Order)*, and it is intended that the new plan will contain similar provisions. Proposals relating to any development in the vicinity of, or affecting in anyway Bray Head, are required to provide sufficient information detailing the possible impacts upon the area and appropriate measures for mitigation. Policies regarding the protection and enhancement of natural wildlife habitats, natural heritage and views and prospects, like Bray Head are outlined in detail in both the County Development Plan and the Bray Town Development Plan.

Arklow

The new development plan will only address strategic matters relating to Arklow. Matters pertaining to the future development of the Arklow are addressed within the 'Arklow Town and Environs Town Development Plan 2011-2017'. The forthcoming 'Local Economic and Community Plan' for County Wicklow will set out a framework for the delivery of employment and enterprise throughout the county.

Kilcoole – trees at Luisne Centre

The existing County Development Plan provides a number of objectives and development standards with respect to the protection of trees, Section 17.4, and it is intended that as part of this review process, these provisions shall be reviewed and updated where required. The specific trees mentioned here will be examined.

Funding for development of Ashford GAA

The County Development Plan is not a spending plan, therefore it cannot allocate funding to different groups/ schemes throughout the County. The plan provides the land use framework for Ashford GAA site in the Ashford Town Plan.

'Action Area Plan' requirements stalling development

A number of Action Areas have been identified in Local Area Plans and Town Plans throughout the county. It is acknowledged that preparing and agreeing a comprehensive action area plan is an additional requirement for land owners to undertake prior to applying for planning permission however they are considered to be an essential planning tool in areas to ensure development is carried out in a comprehensive, integrated, sustainable and coherent manner. Action Area Plans are important to ensure developers provide physical and social infrastructure, and employment generating development, concurrent with new residential developments. It should be noted also that the provisions of the County Development Plan and local plans with regard to action areas allows for individual land parcel / elements of any action area to proceed in advance of agreement between landowners / approval of a comprehensive plan if it can be demonstrated that the individual project would not undermine the achievement of the objectives of the action area.

Delgany – Three Trouts Stream

The new development plan will only address strategic matters relating to Delgany. Matters pertaining to the Three Trouts Stream are addressed within the 'Greystones-Delgany and Kilcoole Local Area Plan 2013-2019'. It is an objective of the current county Development plan to (WT5) *To promote the development of riverine walks and parks, subject to the sensitivity and / or designation of the*

riverside habitat, particularly within 10m of the watercourse and it is intended that the new plan will contain similar provisions.

Greystones - St. Crispin's Cell

The new development plan will only address strategic matters relating to Greystones. Matters pertaining to St. Crispin's Cell are addressed within the 'Greystones-Delgany and Kilcoole Local Area Plan 2013-2019'.

Walks to cliffs in Greystones

There are a number of objectives in the current county development plan that relate to walks and walks in the Greystones area. The section on (9.3.6) Tourism and Recreation Themes and Products as well as the Coastal Zone Management Chapter have the following objectives

TTP3 To support the development of new and existing walking, cycling and driving trails, including facilities ancillary to trails (such as car parks) and the development of linkages between trails in Wicklow and adjoining counties.

TTP7 To promote, in co-operation with landowners, recreational users and other relevant stakeholders, on the basis of "agreed access", the more extensive use of the coastal strip for such activities as touring, sight-seeing, walking, pony trekking, etc. as a tourism and recreational resource for the residents of County Wicklow and other visitors.

Greystones Town and Greystones to Kilcoole Coastal Cells both have the following objective, '*To facilitate the development and enhancement of visitor and recreational facilities along the coastal area, particularly walking routes, car parking areas, signage and changing / toilet facilities*'

It is intended that as part of this review process, these provisions shall be reviewed and updated where required.

Garden Village waste water treatment

The new development plan will only address strategic matters relating to Newtownmountkennedy. Matters relating to the operation and maintenance of sewage treatment plants are not planning matters, but are functions of the Environment Section of Wicklow County Council, and Irish Water.

Recommendations of Chief Executive

To review the schedule of trees to be considered for preservation.

To review, strengthen and enhance where necessary the objectives in the current county development plan that relate to walks and walks in the Greystones area.

TOPIC 14: SUBMISSIONS MADE VIA ONLINE SURVEY**Online Student Survey:**

The online student survey which was issued to all schools within and bordering the County revealed the following:

The County as a place to live:

Respondents indicated that the most positive assets the County contained were its open countryside, existing retail offer, general services and proximity to Dublin. The negative aspects to living in the County were deemed to be the existing transport network, shop closures in towns, unemployment, road works.

It was indicated that there is a need for job stimulus and investment in the County.

Housing:

In regard to the location of new housing the responses submitted were unanimous in their opinion that new housing should be either located within town centres or to the edge of existing settlements. The type of housing needed was considered to be apartment type development and semi-detached housing.

The general consensus toward rural housing was that this type of development should only be permitted when grouped with other housing and that there is a need for a design guide to prevent poor design and layout.

Education:

Respondents felt that there were not enough schools in the County.

Respondents indicated that they either walk, car share or drive to school.

All respondents indicated that they intend to obtain a third level qualification while the need for a third level facility within the County was split and the preferable location for such a development would be Bray or Wicklow/Rathnew.

Recreation:

Outdoor activities were indicated as the overriding activity all respondents participated in.

Retail:

All respondents indicated that they felt there were sufficient shops within the county however these were only located in the larger towns. It was indicated that there should be a resistance towards superstores within the County.

All respondents stated that they had a preference for shopping centres while also indicating they shopped outside the County on occasion.

The Environment:

It was indicated that poor planning and fly tipping in the County were affecting the countryside.

The most valued elements of the environment within the County were indicated as being the mountains, forestry, landscape, clean air and the coastline.

Employment:

All respondents indicated that would like to work within the County when they finish their education while 66.6% of respondents indicated that they would like to work in the health and business sectors. There was a strong emphasis on the reliance on Dublin for employment by the majority of Wicklow's residents with a need for employment generating incentives to locate business in the County being a priority. In this regard the positive attributes of the County should be used as a marketing tool to attract new business.

Transport:

The need for a more frequent and expanded public transport network within the County is required. All respondents indicated that they regularly walk or cycle.

The future vision for Wicklow:

All respondents indicated that they would like Wicklow to be a nice place to live, set up a business or a place with job opportunities and readily available housing.

Response of Chief Executive

The issues raised in the survey are welcomed as part of the consultation process for the new County Development Plan. A broad range of topics were touched upon in the responses to the survey which will be taken on board in the preparation of the new plan in particular the need a Wicklow specific rural design guide.

In regard to the issues raised relating to employment it should be noted that the Local Economic and Community Plan is due to provide a detailed economic and employment strategy for the County which will be underpinned by the goals and objectives of the County Development Plan. It is envisaged that this process will build upon and strengthen the goals and objectives of the existing County Development Plan in regard to start up businesses

Recommendations of Chief Executive

1. The new County Development Plan will support and complement/underpin any land use and development objectives included in the LECP.
2. Review and update the design standards for single rural houses in the open countryside with a view to improving the quality of the current standards so that greater clarity is provided to the general public on acceptable designs/layouts for dwellings in the rural area.
3. The new County Development Plan shall enhance and carry forward all objectives relating to the housing, education, recreation, retail and transport as appropriate.

TOPIC 15: MISCELLANEOUS

Name	Issue raised
Ashford Studios	<ul style="list-style-type: none"> - Use "www.wicklow.ie" as portal page that provides links to tourism websites. - Improvements are required to improve the speed of decisions in the planning process.
Padraig O'Duill	<ul style="list-style-type: none"> - Abolition of town councils has compromised the representation of local issues. - Elected members will have to listen to the residents of the county.
Gerard Roe	<ul style="list-style-type: none"> - Generally, timeframes, targets and goals are unrealistic. Considering the failure to achieve goals set out in the current plan, why are we preparing new ones? - There is a disconnect between members and general public. - Disillusionment expressed with regard to plan preparation process, the level of interest from the public and the degree to which members will have regard to the opinions expressed.
Mary O'Donnell	<p>A number of issues are raised in relation to dog fouling:</p> <ul style="list-style-type: none"> - Dog fouling is a major problem in the town area. - Dog owners should be educated on the danger of dog foul. - More dog foul bins are needed. - Areas with a dog run could be created. - Enforcement of dog fouling is needed
Mike Walker	<ul style="list-style-type: none"> - The Issues Booklet document is a barrier as it is unclear in its language used, it contains many questions and contributing would be made easier if the booklet was available as a webpage with the facility to answer the questions as well as the pdf. The instructions for contributing / making a submission are unhelpful, unclear and convoluted with no definition of "strategic" given. - The Putting People First Action Programme for Local Government seeks to, <i>"put a strong emphasis on accountability as the bedrock of a properly functioning system of local democracy, providing for better engagement with citizens ..."</i> It is regrettable that that standard was not applied to this consultation which is of such importance to Wicklow residents.
Patricia Walker	<p>The Issues Booklet document is a barrier to those wanting to participate in the process as it is unclear in its language used, there is no supporting explanation of some of the planning and development terms used and favours those with experience in planning and such processes.</p>

Response of Chief Executive
Website

The issue that the County Councils web portal "www.wicklow.ie" should be used as a portal page that provides links to tourism websites is noted. This is not a matter for the County Development Plan however it is a matter for consideration by the Enterprise and Corporate Services Section and shall be referred to them for their attention.

Planning application process

With regard to improving the speed of decisions in the planning process, the timeframe for processing of planning applications is very clearly set out in the Planning and Development Acts and Regulations. Any changes to this are required at central government level. Wicklow County Council's Development Management Section have streamlined the planning process as much as possible with planning tools

such as pre planning meetings and online guides providing as much information to the applicant as possible to ensure the process runs as seamlessly as possible.

Elected Members

The issues with regard to the abolition of the Town Councils, the level of regard the members will have to the public opinion expressed and the relationship with the elected members and the public is herewith drawn to the members attention.

Dog Fouling

The County Development Plan as a land use framework has no role to address this issue, however the Municipal District Offices of the council have a role in the provision of dog fouling bins and scoopers, while the Environmental Education and Awareness Officer has a role in education and awareness of addressing this issue.

Issues Booklet

During the drafting of the booklet it was an objective to ensure it was in plain English and presented in an easily read and accessible manner however given the function of the County Development Plan, its role as a land use framework and the statutory requirements at this stage in the plan making process it is not possible to completely avoid the use of certain planning terminology. The development plan team are always open to new and improved ways of informing the public and getting the public involved in the process, should any proposals be made in the future.

It should be noted that many submission in fact complimented the format, presentation and thoroughness of the Issue Booklet.

Recommendations of Chief Executive

None

**PART 5: RESPONSE TO SUBMISSIONS ON
STRATEGIC ENVIRONMENTAL
ASSESSMENT AND HABITATS DIRECTIVE
(APPROPRIATE) ASSESSMENT**

PART 5 REPORT ON STRATEGIC ENVIRONMENTAL ASSESSMENT & HABITATS DIRECTIVE CONSULTATION

Ref.	Summary of Issue	Response
No. 7	An Taisce	
a	With respect to Appropriate Assessment (AA) and Strategic Environmental Assessment (SEA), the submission notes that compliance with the Planning and Development Regulations cannot be achieved without undertaking SEA and AA.	The Draft Plan is undergoing both AA and SEA. The preparation of the Plan, SEA and AA are taking place concurrently and the findings of the SEA and AA will inform the Plan.
b	The submission makes a number of recommendations for integration into the Plan under the following headings: strategic planning and zoning, fossil fuels and climate change, sustainable transport and land use patterns, economic and employment development, water, natural capital and ecosystem services, social capital and public participation, cultural and built heritage and implementation and monitoring.	The SEA and AA will assess the potential effects of implementing Plan provisions including those integrated into the Plan as a result of this submission. Recommendations relating to environmental protection/management are complementary to those which will be integrated into SEA/AA recommendations for insertion into the Plan.
No. 8	Department of Arts, Heritage and the Gaeltacht	
a	The Plan and SEA should take account of the Biodiversity Convention, the Ramsar Convention, the EC Habitats Directive (Council Directive 92/43/EEC), the EC Birds Directive (Directive 2009/147 EC), the Wildlife Acts of 1976 to 2010, and the European Communities (Natural Habitats) Regulations 2011 (SI No 477 of 2011) and its amendments.	This legislation will be integrated into SEA/AA recommendations for insertion into the Plan.
b	The Plan should include information on the full range of ecologically designated sites and zone such sites appropriately with policies and objectives devised to ensure their protection.	Ecologically designated sites will be described in the SEA and AA and will be integrated into SEA/AA recommendations for insertion into the Plan.
c	The Plan should recognise that protected species also occur outside designated sites and should take note of the National Biodiversity Plan and the need to protect the County's biodiversity.	Protected species will be addressed in the SEA and AA and will be integrated into SEA/AA recommendations for insertion into the Plan.
d	In accordance with Article 10 of the Habitats Directive, Plans should include provisions to encourage the management of features of the landscape which are of major importance to wild fauna and flora. Such features should be maintained and, where possible, enhanced.	Article 10 of the Habitats Directive and ecological networks and connectivity will be addressed in the SEA and AA and will be integrated into SEA/AA recommendations for insertion into the Plan.
e	Hedgerows should be maintained where possible. Where trees or hedgerows have to be removed there should be suitable planting of native species in mitigation. Where possible hedgerows and trees should not be removed during the nesting season (i.e. March 1st to August 31st). Birds'	Legislation – including the Wildlife Acts – will be integrated into SEA/AA recommendations for insertion into the Plan.

	nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 and 2000. Bat roosts can only be destroyed under licence under the Wildlife Acts and a derogation under the Habitats Regulations and such a licence would only be given if suitable mitigation measures were implemented.	
f	It is important that the proposed Plan should recognise the importance of wetland habitats and ensure that such sites are protected.	Wetlands will be addressed in the SEA Environmental Report and will be integrated into SEA/AA recommendations for insertion into the Plan.
g	Flood plains, if present, should be identified in the Plans and left undeveloped to allow for the protection of these valuable habitats and provide areas for flood water retention. The plan should take account of the guidelines for Planning Authorities entitled "The Planning System and Flood Risk Management".	The findings of the Strategic Flood Risk Assessment which is being undertaken alongside the preparation of the Draft Plan will inform the SEA.
h	IFI should be consulted with regard to impacts on fish species.	Inland Fisheries Ireland have made a submission which is responded to at No. 14 below.
i	Where Freshwater Pearl Mussels are present the Plan should have due regard to, and incorporate any measures from, the Freshwater Pearl Mussel sub-basin plans, as appropriate.	Ecologically designated sites and their management plans – including Freshwater Pearl Mussel catchments and their management plans – will be integrated into SEA/AA recommendations for insertion into the Plan.
j	Mitigation in relation to new road and amenity developments.	Mitigation in relation to new road and amenity developments will be integrated into SEA/AA recommendations for insertion into the Plan
k	The Plan should have a policy to protect against the accidental introduction of such species during development.	Alien invasive species will be integrated into SEA/AA recommendations for insertion into the Plan.
l	It is particularly important that the SEA process should take place in consultation with the teams working on the draft Plan and appropriate assessment, as each process can help inform the other to ensure that the objectives and policies in the draft Plan will have no significant effects on the natural heritage. The SEA should examine the effects of policies, objectives and any indicative maps or zonings, as well as cumulative impacts with other plans and projects both within and outside of the Plan area.	The preparation of the Plan, SEA and AA are taking place concurrently and the findings of the SEA and AA will inform the Plan. The full range of environmental effects will be assessed by the SEA including cumulative effects and effects beyond the Plan boundary.
m	The SEA should take account of the Biodiversity Convention, the Ramsar Convention, the Birds and Habitats Directives, the Wildlife Acts of 1976 to 2010, and the European Communities (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) and its amendments.	This legislation will be integrated into SEA/AA recommendations for insertion into the Plan.
n	With regard to the scope of baseline data, details of designated sites can be found at	These information sources will be considered

	<i>www.npws.ie</i> . Other information sources provided.	by the SEA.
o	It is recommended that the Biodiversity SEOs in the SEA cover habitats and species both within and outside of designated sites. With regard to the SEOs for Water in the SEA it is important that the needs of protected species such as freshwater pearl mussels, crayfish, salmon and lamprey species, all protected under the Wildlife Acts of 1976 to 2010 and/or listed on the annexes of the EC Habitats Directive, are considered in relation to water quality. The SEOs and targets should be also compatible with the relevant River Basin Management Plans.	Strategic Environmental Objectives (SEOs) will cover habitats and species, both within and outside of designated sites, non-designated habitats and species and ecological connectivity. SEOs for water will be largely guided by the Water Framework Directive. Protected species will be explicitly covered under biodiversity SEOs. SEOs, indicators and targets for water will be compatible with the River Basin Management Plans.
p	The impact of any water abstraction and wastewater discharge schemes that result from the Plan should be fully assessed. Impacts on surface water or groundwater should be assessed on a catchment or aquifer basis. In addition where a proposed policy would result in a development in or alongside a river or other waterway the cumulative impact on species and habitats would need to be assessed cumulatively on a catchment basis.	All Plan provisions will be fully assessed and the assessment of effects (including the assessment of cumulative effects) on surface water or groundwater will consider catchment/aquifer pathways and receptors.
q	Indicators, targets and monitoring should be realistic, measurable and achievable.	Noted. Indicators, targets and monitoring will be consistent with higher level objectives.
r	The draft Plan should be screened for appropriate assessment (AA) and if necessary a Natura Impact Report (NIR) produced. Guidance references are provided.	The Draft Plan is undergoing AA and a Natura Impact Report will be produced if necessary. The cited guidance will be referred to.
s	In order to carry out the appropriate assessment screening and/or prepare a NIR information about the relevant Natura 2000 sites including their conservation objectives will need to be collected. Details of designated sites and species and conservation objectives can be found on <i>www.npws.ie</i>	Conservation objectives will be used by the AA.
t	It is particularly important that the appropriate assessment procedure, commencing with stage 1 screening, should take place in consultation with the teams working on the draft Plan and SEA. The appropriate assessment should examine the effects of policies, objectives and any indicative maps or zonings, as well as cumulative impacts with other plans and projects both within and outside of the Plan area.	The preparation of the Plan, SEA and AA are taking place concurrently and the findings of the SEA and AA will inform the Plan. The full range of environmental effects (including cumulative effects and effects beyond the Plan boundary) will be assessed by the AA.
u	Other relevant Local Authorities should be consulted to determine if there are any projects or plans which, in combination with this proposed Plan, could impact on any Natura 2000 sites. A rule of thumb often used is to include all Natura 2000 sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are	Plans to be considered in the determination of cumulative effects include the land use plans in adjacent planning authority areas. Adjacent planning authorities have been

	hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 km away.	consulted as part of the SEA Scoping process and told that submissions on AA issues will be taken into account. It is noted that impacts may occur in excess of 15km away from source.
v	<ol style="list-style-type: none"> 1. Policies to increase employment, tourism and recreation in Wicklow must be screened for their impact on the environment. 2. Natura Sites which are under particular threat (especially if development or recreational pressure builds up again) are: Ballymaan Glen SAC (000713) – water pollution, Knocksink Wood SAC (000725) – recreational pressure and anti-social behaviour, Buckronev Fen SAC (000729) – water abstraction and groundwater issues, Kilcoole/Newcastle (The Murrrough SAC 0002249+SPA) – airport usage/expansion, recreational pressure, development of coastal walks, coastal defences for railway 3. Community Development (Open Spaces) Dog owners need to exercise their dogs and with 1 in 3 homes having at least one dog that is a considerable amount in Wicklow. There is considerable disturbance to SPA, SAC and Nature reserves near urban areas. Nature reserves such as Knocksink in Enniskerry and paths around Poulaphuca SPA are not suitable for dogs off leads. Dog owners need to be considered within the plan along with their impacts on local biodiversity. Recreational areas need to be developed where dog owners can walk their dogs and leave them off the lead without fear of harm to their dogs, members of the public and local wildlife. 	<ol style="list-style-type: none"> 1. All Plan policies will be assessed by the SEA and AA. 2. These potential pressures are noted and will be identified in the SEA and AA documents. 3. Potential disturbance to designated sites as a result of recreation will be noted in the SEA and AA documents.
No. 9	Department of Communications, Energy and Natural Resources	
a	An audit of the Geological heritage of County Wicklow will be available from the GSI early 2015.	This document will be considered by the SEA when it is published. Sites of Geological Heritage are within the scope of the SEA.
b	<ol style="list-style-type: none"> 1. The challenge of meeting potentially conflicting aspects of the current Plan's Vision is identified. 2. Challenges facing Wicklow's tourism and recreational package include protection of the natural and built environment of the county. 3. The Department identifies that until the risk of hazards identified in a Health & Safety Audit are reduced or eliminated, the Avoca mining area is unsafe for access by the public. 4. Environmental issues are identified at Avoca mines (mines are contaminated with heavy metals and arsenic that pose a risk to human health and environmental receptors through various pathways, potential for slab slides, failures and rock fall). 5. To achieve the SEA aim 'to provide a high level of protection to the environment' along with consideration of the untapped potential of Avoca mines and built heritage, it is important that the spoil piles/mine waste is made safe and as such the designation of this 	<ol style="list-style-type: none"> 1. Noted. When prepared, the new Draft Plan provisions will be assessed by the SEA and AA. More detailed Plan policies and objectives (into which environmental considerations will be integrated through the SEA and AA processes) will help to overcome this challenge. 2. Noted. See response above. 3. This issue will be identified in the SEA Environmental Report and integrated into SEA recommendations for insertion into the Plan.

	material as protected structures should be removed to facilitate the remediation of the mine waste without detriment to the heritage of the town. In addition the Minister holds monitoring data for groundwater, surface water and spoil and the health and safety of structures for the Avoca mining area and can provide it to Wicklow County Council for the preparation of the SEA.	4. This issue will be identified in the SEA Environmental Report and will be integrated into SEA recommendations for insertion into the Plan. 5. Noted. This issue will be integrated into SEA recommendations for insertion into the Plan. The Feasibility Study will be requested from the Department. Information available from the EPA on water quality and status is considered sufficient for county level SEA and AA.
No. 11	EirGrid	
a	This submission recommends certain text to be integrated into the new Draft Plan.	The need to comply with EU Directives is acknowledged and is embedded in the SEA/AA processes.
No. 12	Environmental Protection Agency	
a	A new EPA GIS based web application that will allow users to explore, interrogate and produce an indicative report on key aspects of the environment in specific geographic areas may be used to inform the SEA.	Noted. This tool will be accessed and used as part of the SEA and AA.
b	The Plan should include commitments to: <ul style="list-style-type: none"> • Protect and improve the status of water resources within the Plan area in accordance with the requirements of the Water Framework Directive. • Integrate the update to the River Basin Management Plans and associated Programme of Measures as relevant to the Plan area. • Provide the protection of surface and groundwater resources (including the Slaney, Vartry and Dargle and associated tributaries), designated bathing waters and freshwater pearl mussel sub basin catchments (the Derreen Catchment). 	Noted. These issues will be integrated into SEA/AA recommendations for insertion into the Plan.
c	Development proposals and associated population increases should be linked to the ability to provide adequate and appropriate critical service infrastructure. Several supplies are on the Agency's Remedial Action Plan List (RAL). A commitment should be included to collaborate with Irish Water in seeking to resolve these issues and to ensure the provision of adequate and appropriate critical water infrastructure to cater for future development in the Plan area.	Noted. The Remedial Action Plan (RAL) List is being considered by the SEA and is referred to in the SEA Scoping Report which has been circulated to environmental authorities. These issues will be integrated into SEA/AA recommendations for insertion into the Plan.

d	Consideration should be given to assessing the potential for cumulative effects on the environment as a result of implementing the Plan. A review of relevant adjacent County Development/Local Area Plans and relevant Plans/ Programmes and significant projects should also be undertaken and the potential for related cumulative environmental effects considered in the preparation of the SEA and Plan.	The full range of environmental effects will be assessed by the SEA, including cumulative effects. Cumulative effects are referred to in the SEA Scoping Report which has been circulated to environmental authorities. Plans to be considered in the determination of cumulative effects include the land use plans of adjacent planning authorities.
e	Mitigation measures to address significant negative environmental effects environmental sensitivities should also address relevant aspects of adjacent plans and programmes.	Noted. Mitigation measures will be informed by the likely significant effects (including cumulative effects) of implementing the Plan. Mitigation measures will be applicable to development which is granted permission under the plan.
f	In relation to monitoring related aspects required under the SEA Directive, the SEA should include information on the nature and frequency of monitoring to be carried out and organisations responsible for carrying out the monitoring. The Plan should consider the linking of SEA and Plan related monitoring to ensure that any unforeseen negative effects are identified early and appropriate mitigation measures provided.	Noted. Information on the nature and frequency of monitoring to be carried out and organisations responsible for carrying out the monitoring will be detailed in the SEA Environmental Report. It will be proposed that SEA monitoring informs any mid-term assessment of progress with regard to achieving Plan objectives.
g	The requirement for flood risk mapping and flood risk assessment to be undertaken in the context of any proposed future development should be taken into account for the Plan area. In addition, the need for flood risk to be taken into consideration for both existing and proposed new zoning within the Plan area.	The findings of the Strategic Flood Risk Assessment which is being undertaken alongside the preparation of the Draft Plan will inform the SEA.
h	The SEA should consider potential effects upon all designated sites with the Plan area and adjacent to the Plan area. In particular consideration should be given to the potential for cumulative effects associated with existing, and proposed, development associated with the Plan implementation.	Both the AA and the SEA will consider potential effects (including cumulative effects) upon ecologically designated sites.
i	Wider biodiversity outside of designated areas (including wetlands and potential effects) should be identified and measures put in place to ensure protection/replacement where appropriate. Consideration should be given to habitat mapping where relevant and to consider a review and update of the existing County Heritage Plan during the lifetime of the Plan.	Non-designated biodiversity (including wetlands and potential effects) will be addressed in the SEA Environmental Report and will be integrated into SEA recommendations for insertion into the Plan.
j	Further comment on the Plan may be provided on receipt of the Draft Environmental Report and Plan and associated documents.	Noted.

k	<p>Under the SEA Regulations (<i>S.I. No.436 of 2004</i>), as amended by <i>S.I. No. 200 of 2011</i>, notice should also be given to the following:</p> <ul style="list-style-type: none"> • The Minister for the Environment, Community & Local Government • Minister for Agriculture, Marine and Food, and the Minister for Communications Energy and Natural Resources, where it appears to the planning authority that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment • where it appears to the competent authority that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural heritage or to nature conservation, the Minister for Arts, Heritage and Gaeltacht Affairs, and • any adjoining planning authority whose area is continuous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan. 	<p>Notice has already been given to these environmental authorities as part of the SEA Scoping exercise.</p>
No. 14	Inland Fisheries Ireland	
a	<p>The Rivers Slaney, Dargle and Vartry are EU-designated salmonid system (S.I. No. 293/1988: EUROPEAN COMMUNITIES (QUALITY OF SALMONID WATERS) REGULATIONS, 1988) on the basis of outstanding fisheries value. Many main river channels and their tributaries support species listed under Annex II and V of the EU Habitats Directive.</p>	<p>Salmonid waters and species listed under Annex II and Annex V of the Habitats Directive will be identified in the SEA Environmental Report and integrated into SEA/AA recommendations for insertion into the Plan.</p>
b	<p>The Development Plan in considering the protection of the quality of the aquatic environment must address not only water quality but also include the protection of the physical environment, hydrological processes and biodiversity.</p>	<p>Water quality, morphology, hydrological processes and biodiversity will be integrated into SEA/AA recommendations for insertion into the Plan.</p>
c	<p>Sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants over the full duration of the plan in order that the ecological integrity of the ultimate receiving waters are protected. This CDP while not dealing with the zoning of lands in the latter towns in setting out population targets for these settlements should be cognisant of the existing deficiencies in the sewer network and the time scale within which these deficiencies may be rectified. While advancing policies in line with sustainable water management it is imperative that this development plan works in harmony with the Water Services Programme of Irish Water.</p>	<p>The need for new development to be accompanied by infrastructure with adequate levels of capacity will be integrated into SEA/AA recommendations for insertion into the Plan. This will include collaboration with Irish Water. The SEA Environmental Report will provide information on existing deficiencies in infrastructure across the County.</p>
d	<p>The EU Water Framework Directive (2000/60/EC) entered into force in December 2000 requires the protection of the ecological status of river catchments. It is important to address the issue of commitment to both surface and ground water quality protection. Fish-kills are a regular occurrence on the Acid Mine Drainage (AMD) affected stretch of the Avoca River under low / medium flow conditions. The CDM feasibility report on management and remediation of the mine site identifies the spoil</p>	<p>Contributions towards the achievement of the objectives of the Water Framework Directive will be integrated into SEA/AA recommendations for insertion into the Plan. Environmental problems at Avoca will be identified in the SEA Environmental Report and</p>

	<p>piles as a principal cause of AMD to the Avoca. Ongoing inclusion of these features as protected structures will prevent their remediation and this diffuse drainage will continue to contribute an unacceptable polluting load to the Avoca.</p>	<p>will be integrated into SEA recommendations for insertion into the Plan. The Feasibility Study will be requested from the Department of Communications, Energy and Natural Resources.</p>
e	<ol style="list-style-type: none"> 1. A continued policy in relation to aquatic habitat protection is essential in the Development Plan. 2. The current planning regulations do not sufficiently address issues of watercourse protection and management. 3. Developments can result in various impacts upon the aquatic environment. 4. The Council under the terms of the EU Water Framework Directive (WFD) (2000/60/EC) is legally obliged to protect the ecological status of river catchments and channels. 5. With the decline of many aquatic ecosystems due to development (both urbanisation and agricultural production), riparian buffers have become a common conservation measure aimed at improving water quality and lessening pollution impacts. The width of the riparian/buffer zone will depend on factors such as land use, land topography (e.g. slope), soil type, channel width/gradient and critical habitats to be protected. 6. IFI should be consulted in relation to any development (greenfield development or redevelopment of brownfield sites) that could potentially impact on the aquatic ecosystems and associated riparian habitat. IFI can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats. 7. The protection of habitats outside designated areas and a Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian habitats. IFI is opposed to any development on floodplain lands. 	<ol style="list-style-type: none"> 1. Aquatic habitat protection will be integrated into SEA/AA recommendations for insertion into the Plan. 2. The adequacy of these Regulations is outside the scope of the SEA/AA of the Plan. 3. The impacts of Plan provisions upon the aquatic environment will be assessed by the SEA and AA. 4. The requirements of the Water Framework Directive will be integrated into SEA/AA recommendations for insertion into the Plan. 5. Riparian buffers will be integrated into SEA/AA recommendations for insertion into the Plan. 6. Consultations will be undertaken in compliance with, inter alia, the relevant Planning Regulations. 7. Non-designated biodiversity will be addressed in the SEA Environmental Report and will be integrated into SEA recommendations for insertion into the Plan. The Strategic Flood Risk Assessment which is being undertaken alongside the preparation of the Draft Plan will consider the protection of floodplains.
f	<p>IFI recommends that the Plan should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments. An objective and commitment within the Development Plan to progress work under the Wicklow Bridge Project would be hugely beneficial for fisheries development and overall biodiversity.</p>	<p>Both the use of clear span structures, where possible, and progression of work under the Wicklow Bridge Project, where resources are available, will be integrated into SEA/AA recommendations for insertion into the Plan.</p>

		Consultations will be undertaken in compliance with, inter alia, the relevant Planning Regulations.
g	The requirement for the inclusion of SUDS for surface water disposal is a positive indicator of the Council's intention for the sustainable development of the area and should, in conjunction with good management of the site, aid in flooding and pollution management. Such a design should be included in all development design proposals.	Noted.
h	<ol style="list-style-type: none"> 1. River Management Policies should be an integral part of any development programme and all waterways within the area considered as a natural resource requiring protection and development. 2. Within the context of the Plan, a watercourse could be assessed in relation to its existing aesthetic, amenity and recreational value, its potential for improvement and protection and the requirements to achieve this potential i.e. control of further physical interference, water quality deterioration, access, community participation etc. Rivers and watercourses are assets which provide a basis for the development of visual and amenity features of the areas through which they flow. 3. IFI requests that the Development Plan provide for the maintenance and preservation of all watercourses and associated riparian habitats. 	<ol style="list-style-type: none"> 1. Provisions related to river management are included in the Eastern and South Eastern River Basin Management Plans and will be integrated into SEA/AA recommendations for insertion into the Plan. 2. In addition to aquatic biodiversity and the status of waters, landscape designations related to waterways will be considered by the SEA. 3. Provisions relating to the maintenance and preservation of watercourses and associated riparian habitats will be integrated into the SEA/AA recommendations for insertion into the Plan.
i	<p>In determining the likely significant effects of plans or programmes, regard should be given to the need for the sustainable development of the inland and marine fisheries resource (including the conservation of fish and other species of fauna and flora, aquatic habitats and the biodiversity of inland and marine water ecosystems). Consideration should be given to potential significant impacts on:</p> <ul style="list-style-type: none"> • Water quality • Aquatic and associated riparian habitats • Biological Diversity • Ecosystem structure and functioning • Fish spawning and nursery areas • Surface water hydrology • Passage of migratory fish • Areas of natural heritage importance including geological heritage sites • Sport and commercial fishing and angling 	<p>Impacts upon these aspects of the aquatic environment will be encompassed by the assessment through the consideration of overarching Strategic Environmental Objectives.</p> <p>The SEA will seek to ensure that the Plan: is consistent with the Water Framework Directive and Eastern and South Eastern River Basin Management Plans; and promotes, where possible, the integration and improvement of natural watercourses in urban renewal and development proposals.</p>

	<ul style="list-style-type: none"> • Amenity and recreational areas <p>In conclusion the CDP should create the policy framework for sustainable development, be consistent with River Basin Management Plan(s) and comply with the requirements of the EU Water Framework Directive (WFD) (2000/60/EC), while promoting the integration and improvement of natural watercourses in urban renewal and development proposals.</p>	
No. 19	Southern and Eastern Regional Assembly	
a	All relevant plans and projects should undergo Appropriate Assessment. The SEA process is also considered important with regard to the Plan process and subsequent plan aims and policies.	The Draft Plan is undergoing both AA and SEA. Requirements for lower tier AA, SEA and EIA will be integrated into the SEA/AA recommendations for insertion into the Plan.
b	<p>It is suggested that Plan policies should be informed by environmental directives, flood risk and flood risk management plans, climate change, river basin management plans, impacts on water quality and landscape assessment.</p> <p>With regard to flood risk the first round of the Catchment Flood Risk Assessment and Management Studies have been completed and stage 2 in the preparation of Flood Risk Management Plans has commenced.</p>	<p>Environmental directives, climate change, river basin management plans, impacts on water quality and landscape assessment will be integrated into the SEA/AA recommendations for insertion into the Plan.</p> <p>The Strategic Flood Risk Assessment, which is being undertaken alongside the preparation of the Draft Plan and which will inform the SEA, will be informed by information on flood risk and flood risk management plans.</p>
No. 28	Keep Ireland Open	
a	This submission includes recommendations for plan provisions with respect to undertaking Appropriate Assessment when development proposal is likely to have a significant effect on a European site.	The requirement to undertake AA on certain projects will be integrated into AA recommendations for insertion into the Plan.

APPENDICES

APPENDIX 1

POPULATION

1.0 Purpose of this paper

The new County Development Plan must, in accordance with the provisions of the Planning Act and various Ministerial guidelines, set out population targets for the County and the settlements within the County.

In the past, the target population for the County (generally using 12 years cycles) were 'handed down' to the County via the Regional Authority and the Regional Planning Guidelines for the Greater Dublin Area. Furthermore, the RPGs would also indicate how the allocated growth should be distributed throughout the County.

However, we are now in a situation where the current RPGs are due to expire in 2016, with no review as yet commenced, and no indication therefore of population targets for the GDA beyond 2022. This is in a scenario where a new County Development Plan for County Wicklow must be commenced in 2014 and must provide for medium term planning framework up until at least 2025.

Furthermore, the current population targets for 2022, on which the current RPGs and County Development Plan are based, were based on 2006 Census results and population growth and population movement patterns that were prevailing at that time. In the intervening period since 2006, population patterns have shifted considerably, rendering the existing projections and targets somewhat meaningless.

In order to allow the preparation of the new plan to move forward with some kind of population foundation, the purpose of this paper is to develop logical and reasonable population target for the County, for the plan period up to 2022 and at least another 6 years beyond up to 2028.

2.0 Current figures

Based on the 2006 Census results, the CSO in 2009 developed the following population projections for 2026 (taking the M2F1 'Traditional' model).

Regional Authority area	Population 2006	Natural increase	Internal migration	External migration	Total increase	Population 2026	Average annual increase
	Thousands						%
Border	470	81	-16	57	122	592	1.2
GDA	1,662	405	69	276	751	2,413	1.9
Dublin	1,183	258	0	217	476	1,659	1.7
Mid-East	479	147	69	59	275	754	2.3
Midland	252	50	-15	33	69	321	1.2
Mid-West	359	65	-6	32	92	450	1.1
South-East	461	79	-8	59	130	591	1.3
South-West	619	108	-21	70	157	776	1.1
West	411	74	-4	72	142	552	1.5
State	4,233	863	0	600	1,463	5,696	1.5

TABLE 1: CSO 2008 REGIONAL POPULATION PROJECTIONS 2011-2026

Following these 'projections', the DoEHLG developed population 'targets' for the State and the regions as follows:

	2008	2010	2016	2022 (low / high range)
Border	492,500	511,000	552,700	595,000 - 611,400
Dublin	1,217,800	1,256,900	1,361,200	1,464,200 - 1,504,500
Mid-east	514,500	540,000	594,600	639,700 - 657,200
Midland	266,800	275,600	297,300	317,100 - 325,800
Mid-west	371,900	383,800	427,200	462,300 - 475,000
South-east	487,800	507,900	542,200	580,500 - 596,500
South-west	644,600	667,500	737,100	795,000 - 816,900
West	426,100	442,200	484,700	521,400 - 535,700
State	4,422,000	4,584,900	4,997,000	5,375,200 - 5,523,000

TABLE 2: 2009 DoEHLG REGIONAL POPULATION TARGETS 2010, 2016 AND 2022

The distribution of the population target across the three mid-east region counties was determined in the RPGs for the GDA 2010-2022. While in the original circular on targets the DoEHLG published a 'low' and a 'high' range for 2022, for the RPGs the low range only is utilised and applied in the settlement strategy, as directed by the DoEHLG in their September 2009 'Population and Hub Targets' document.

Year	2002	2006	2016	2022
Mid-east	412,625	475,362	594,600	639,700
Wicklow	114,676	126,196	164,280	176,800
% share	27.8%	26.5%	27.6%	27.3%

TABLE 3: MID-EAST AND WICKLOW POPULATION TARGETS FROM RPGS 2010

Therefore the Mid-East regional population **target** for 2022 was 639,700. This differed from the CSO 'projection' for 2022 (extrapolated as 689,000) – the 'target' was 93% of the 'projection'.

3.0 New targets

The purpose of this section of the document is to explore possible methodology for developing new projections and targets for County Wicklow up to at least 2028. However, the CSO has recently published population 'projection' up to 2031, so this will be taken as the 'target year' for the purpose of this exercise.

As per Table 4 below, the CSO **projection** for Mid-East for 2031 is 678,000 (taking the M2F2 scenario)¹².

¹² This contrasts with the 2009 projection for 2026, which projected that the population of the mid-east region would grow to 754,000.

Table 1 Actual and projected population of Regional Authority areas¹, 2011 and 2031 (M2F2 Traditional)

Regional Authority area	Population 2011	Natural increase	Internal migration	External migration	Total increase	Population 2031	Average annual increase
	Thousands						%
Border	516	49	-22	-9	18	533	0.2
GDA	1,795	298	92	11	401	2,197	1.0
Dublin	1,262	188	47	23	257	1,519	0.9
Mid-East	534	110	45	-11	144	678	1.2
Midland	284	39	-21	7	25	309	0.4
Mid-West	378	43	-10	-1	32	410	0.4
South-East	499	58	-16	9	51	550	0.5
South-West	662	80	-18	8	71	733	0.5
West	441	31	-6	-10	15	456	0.2
State	4,575	598	0	15	613	5,188	0.6

¹Defined in Background Notes.

TABLE 4: CSO STATE AND REGION POPULATION PROJECTIONS TO 2031

3.1 Option 1

Assuming the mid-east region 'target' for 2031 would differ again from the 'projection' to the tune of 93%, mid-east 'target' would be 630,540.

Assuming Wicklow retains same share of the mid-east region population as in the 2010 RPGs i.e. 27.3%, then 2031 population 'target' is **172,137**.

Evaluation:

- Contrast this with the current 2022 population target for Wicklow which is 176,800 i.e. lower target and over a longer period.
- Given the 2011 population of Wicklow of 136,640, a target of 172,137 would entail average growth per annum of 1,775 persons.
- Current County Development Plan target envisaged average annual growth 2006-2022 of 3,163 persons. Average annual growth rate 2006-2011 in Wicklow was actually 2,089 persons (average annual growth rate 2002-2011 in Wicklow was 2,440 persons).

3.2 Option 2

Assuming the CSO mid-east *projection* as the *target*.

Assuming Wicklow has a 27.3% share in the mid-east region population, the target for Wicklow in 2031 would be **185,094**.

Evaluation:

- Compare this with the current 2022 population target for Wicklow which is 176,800 i.e. higher target, growth of an additional 8,294 persons over 9 years 2022-2031 on top of the existing 2022 target.
- Given the 2011 population of Wicklow of 136,640, a target of 185,094 in 2031 would entail average growth per annum of 2,423 persons.
- This appears compatible with longer term trends in Wicklow (as set out above)

3.3 Option 3

Assuming the CSO mid-east *projection* as the *target*.

An alternative option might be to increase Wicklow's share in the total projected population of the mid-east region from its current share of 25.7% to say 30% (instead of 27.3%). In this scenario, Meath and Kildare would assume 35% share each.

This would look like:

	Kildare	Meath	Wicklow	Region
2006	186,335	162,831	126,194	475,360
2011	210,312	184,135	136,640	531,087
2031	237,300	237,300	203,400	678,000

Evaluation:

- Compare this with the current 2022 population target for Wicklow which is 176,800 i.e. higher target, growth of an additional 26,600 persons over 9 years 2022-2031 on top of the existing 2022 target.
- Given the 2011 population of Wicklow of 136,640, a target of 203,400 in 2031 would entail average growth per annum of 3,338 persons.
- This is similar to the annual growth rates 2006-2022 targeted in the 2010 RPGs
- This would obviously entail a steep decline in growth in Kildare in particular (from 2006-2011 rate of 4,795 persons per annum to 1,349 persons per annum 2011-2031)

3.4 Option 4

Assuming the CSO mid-east *projection* as the *target*.

Another option is to assume an even **share of the mid-east growth** between the 3 counties in the region ($678,000 - 531,087 = 146,913/3 = 48,970$ each)

This would look like:

	Kildare	Meath	Wicklow
2006	186,335	162,831	126,194
2011	210,312	184,135	136,640
2031	259,282	233,105	185,610

Evaluation:

Similar outcome to Option 2.

4.0 Recommendation

For the purpose of at least commencing the plan and initiating the process of drawing up a new 'Core Strategy', it is recommended that the population target utilised be 185,000 for 2031.

On the basis of slow population growth in the County 2011-2016 and a linear growth in population up to a target of 185,000 in 2031, the following table sets out the recommended targets for the new County Development Plan.

Year	Existing	Target
2002	114,676	
2006	126,196	
2011	136,640	
2016		140,000
2017		143,000
2018		146,000
2019		149,000
2020		152,000
2021		155,000
2022		158,000
2023		161,000
2024		164,000
2025		167,000
2026		170,000
2027		173,000
2028		176,000
2029		179,000
2030		182,000
2031		185,000

TABLE 5: HISTORIC AND RECOMMENDED TARGET COUNTY POPULATION 2016-2031

As can be seen from this table, the recommended population target for 2028 is 176,000, which is consistent with the existing 2022 target for Wicklow as set out in the current RPGs. It is considered that such an approach, in the absence of updated targets from the DoE or the Regional Assembly, would render the new County Development Plan sufficiently consistent with higher level strategies and guidelines.

APPENDIX 2

POPULATION & HOUSING DISTRIBUTION

1.0 Purpose of this paper

The new County Development Plan must, in accordance with the provisions of the Planning Act and various Ministerial guidelines, set out population targets for the County and the settlements within the County.

As set out in the 'Population & Demographics' APPENDIX 1, it is intended to craft the new County Development Plan on the basis of a population target for 185,000 in 2031.

In previous Regional Planning Guidelines for the Greater Dublin Area, specific directions were given as to how allocated growth was to be distributed around the County, with a particular emphasis on the majority of growth occurring in designated growth towns. In the absence of revised RPGs, no such instructions exist for the time being for the 2016-2022 plan period.

The purpose of this paper is to develop a methodology for distributing this population growth around the County.

2.0 Current distribution

The current County Development Plan 2010-2016 provides population targets for each settlement / group of settlement types in the County up to 2022. This was developed as follows:

Step 1

The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 allocated a growth in population in County Wicklow of 50,604 persons / 32,924 housing units between the period 2006-2022.

The RPGs directed that 42% of the total growth allocated be directed to the Metropolitan Area (settlements of Bray and Greystones) and that the 'majority' of the remainder be allocated to the 'Growth Towns' (i.e. Wicklow, Arklow, Newtownmountkennedy and Blessington), weighted towards the 'Large Growth Towns and particularly towards towns with rail based public transport (in the case of County Wicklow, this mean the towns of Wicklow Town and Arklow).

Assuming the 'majority' of the remainder after the 42% was taken off the top meant at least 50% of the remainder, this would imply:

Bray + Greystones = 42% or 21,254 persons or 13,828 housing units

Wicklow + Arklow + Blessington + Newtown = 29% or 14,675 persons or 9,548 housing units

Rest of the County = 29% = 14,675 persons or 9,549 housing units

Step 2

Government policy on rural housing specifically facilitates the development of rural housing to those deemed to have a bona fide necessity to live in the rural area (i.e. anywhere outside a 'town'). Given the high number of rural dwellers in the County (35,502 in 2006), the eligibility of those brought up in the rural areas to secure permission for a new rural house and having regard to the rural growth patterns that have occurred in Wicklow since 1996, it was determined that the County Development Plan 2010 should in its population distribution, determine the 'rural' allocation i.e. the 'indigenous' growth that would occur anyway, before distributing to growth to settlements.

This was not to say that it somehow was a strategy of the plan to prioritise rural growth over urban growth, in fact the opposite is true, but it was considered that it was most realistic to assume that rural growth would continue to occur in the County, along the same patterns as in previous inter-censal periods. This rate of growth has in fact been slower than the rate of growth of the towns and therefore over the plan period, the proportion of persons living in the rural area would actually decline as proportion of the total County population from 30% in 1996 to 24% in 2022.

	2006		2022		Growth in Housing Units
	Population	Housing Units	Population	Housing Units	
Large Villages	3,135	1,220	4,635	2,150	930
Small Villages	1,059	412	1,809	839	427
Rural clusters	980	381	1,280	594	213
Open countryside	30,328	11,800	35,278	16,364	4,564
Rural Total	35,502	13,814	43,002	19,947	4,858

TABLE 1: EXISTING RURAL GROWTH DISTRIBUTION (2010 COUNTY DEVELOPMENT PLAN)

Assumptions:

- Growth in 'large villages' by 500 persons every intercensal period
i.e. development and occupation of c. 200 units, or 40 per annum, across 13 villages or 3 per village per annum
- Growth in 'small villages' by 250 persons every intercensal period
i.e. development and occupation of c. 100 units, or 20 per annum, across 19 villages or 1 per village per annum
- Growth in 'rural clusters' by 100 persons every intercensal period
i.e. development and occupation of c. 40 units, or 8 per annum, across 34 clusters or 1 per cluster every 5 years
- Growth in 'open countryside' by 1,650 persons every intercensal period
i.e. development and occupation of c. 660 units, or 130 per annum

Therefore, were the RPG allocation and distribution objectives to be rigidly adhered to, of the 9,549 units available to be allocated around the County outside of the metropolitan area and growth towns, just over 50% would require to be allocated to the rural area. This left a remainder of 4,691 units to be distributed across 15 remaining towns in the County.

Step 3

Consideration was then given to the distribution of these **4,691 units** across the 15 remaining towns. The first step was to consider the existing population and housing growth targets for these towns as provided for in the existing County Development Plan (2004-2010) and the Local Area Plans / Town Plans that had been adopted on foot of the 2004 County Development Plan targets :

Town	2006 population	2016 population targets (set out in 2004 CDP)	Growth
Ashford	1,494	3,000	1,506
Aughrim	960	2,000	1,040
Baltinglass	1,735	2,500	765
Carnew	892	1,500	608
Enniskerry	1,881	2,450	569
Kilcoole	3,252	4,500	1,248
Rathdrum	1,528	4,500	2,972
Tinahely	965	1,000	35
Avoca	622	700	78
Donard	182	240	58
Dunlavin	897	2,000	1,103
Kilmacanogue	839	934	95
Newcastle	938	1,500	562
Roundwood	571	700	129
Shillelagh	311	600	289
Total	17,067	28,124	11,057

TABLE 2: 2016 SMALL AND RURAL TOWN POPULATION TARGETS AS PER 2004 CDP

It was evident therefore that strict adherence to RPG requirements would require a significant reduction in the population and housing targets in this group of settlements (reduction by 6,366 units or 58%). This was also be coupled with a longer timeframe (up to 2022 instead of 2016) to achieve these reduced targets.

This was considered counter intuitive and contrary to the principle of sustainable planning, whereby development in established towns, where there are existing services, would be encouraged. Development in such town also plays an important role in encouraging those that desire an alternative lifestyle to 'urban' living (i.e. cities / large towns) to build / live in a smaller town and not push to develop in the rural area.

Therefore it was determined that alternative methodologies for population distribution must be considered, all the time having regard to the requirements of the RPGs.

Step 4

The total 2022 population available to be distributed to all 21 towns (including growth towns) had already been determined at 133,798 persons (i.e. total 2022 County population allocation of 176,800 less 43,002 natural rural growth).

This total population target was then considered for distribution across the 21 towns of the County, taking into account, if feasible, the requirements of the RPGs. The 2006 population of these 21 towns was 90,694 persons. Therefore total growth to be distributed – 43,104 persons.

The first stage was to determine if this level of growth could be reconciled with existing population targets for each town. The previous 2004 County Development Plan provided population targets **up to 2016 only** upon which Local Area Plans were adopted and land zoned in the majority of these towns.

Town	2006 population	2016 population targets	Growth
Bray	28,814	35,000	6,186
Wicklow / Rathnew	11,919	22,500	10,581
Arklow	11,759	21,000	9,241
Greystones/ Delgany	14,569	22,000	7,431
Blessington	4,018	6,500	2,482
Newtown	2,548	6,000	3,452
Ashford	1,494	3,000	1,506
Aughrim	960	2,000	1,040
Baltinglass	1,735	2,500	765
Carnew	892	1,500	608
Enniskerry	1,881	2,450	569
Kilcoole	3,252	4,500	1,248
Rathdrum	1,528	4,500	2,972
Tinahely	965	1,000	35
Avoca	622	700	78
Donard	182	240	58
Dunlavin	897	2,000	1,103
Kilmacanogue	839	934	95
Newcastle	938	1,500	562
Roundwood	571	700	129
Shillelagh	311	600	289
Total	90,694	141,124	50,430

TABLE 3: 2016 TOWN POPULATION TARGETS AS PER 2004 CDP

Clearly even the 2016 population targets for the towns exceeded the new 2022 population allocations from the 2010 Regional Planning Guidelines for the Greater Dublin

Area, by a factor of c. 17%. This problem would be compounded when additional growth between 2016 and 2022 was added.

In order to address this conflict, the option of reducing all or certain town population targets was considered. Again, this seemed counter intuitive and a waste of significant resources that had been spent on improving infrastructure in these towns on the basis of these 2016 population targets.

This also presented political difficulties, with elected representatives being fearful that any lowering of population targets would reduce the 'standing' of any town and the ability of that town to attract new employment development and funding for community projects.

Furthermore, it was determined that it was appropriate and generally consistent with the spirit of the RPGs to allow for an extra 'factor' in the growth of the towns. This factor was called '*headroom between towns*' and was considered to reflect the fact that some towns would be able to reach their population targets, while some would not (because of infrastructural deficiencies, or just a slower pace of development).

It was considered that the total growth in the towns, even if **in theory** was allowed to exceed 43,104 persons by 2022, would highly unlikely to do so, and the populations would be monitored on an ongoing basis to ensure that the overall total growth of 43,104 was not exceeded before 2022.

Final adopted population distribution of the 2010 County Development Plan:

Settlement type	Settlement	1996	2002	2006	2011	2016	2022
Metropolitan Consolidation	Bray	25,760	28,002	28,814	30,000	40,000	45,000
Large Growth Town 1	Wicklow / Rathnew	8,727	10,776	11,919	14,000	19,000	24,000
Large Growth Town 2	Arklow	8,557	9,993	11,759	13,000	19,000	23,000
	Greystones/ Delgany	11,296	11,913	14,569	16,000	21,000	24,000
Moderate Growth Town	Blessington	1,860	2,509	4,018	4,500	6,000	7,500
	Newtown	2,528	2,521	2,548	3,500	6,000	7,500
Small Growth Towns	Ashford	1,215	1,356	1,494	1,600	2,500	3,000
	Aughrim	745	871	960	1,200	1,500	2,000
	Baltinglass	1,127	1,260	1,735	2,000	3,000	3,500
	Carnew	795	809	892	1,200	1,500	2,000
	Enniskerry	1,275	1,904	1,881	2,000	2,500	3,000
	Kilcoole	2,694	2,826	3,252	3,750	4,500	5,000
	Rathdrum	1,234	1,387	1,528	2,000	3,000	5,000
	Tinahely	630	692	965	1,050	1,250	1,550
Rural Towns	Avoca	490	564	622	700	800	900
	Donard	162	201	182	200	300	400
	Dunlavin	693	914	897	1,000	2,000	2,500
	Kilmacanogue	818	834	839	915	1,000	1,100
	Newcastle	763	851	938	1,000	1,500	1,750
	Roundwood	446	518	571	700	1,100	1,300
	Shillelagh	324	278	311	450	600	750
Total town population		72,139	80,979	90,694	99,850	138,050	164,750
Headroom between towns						12%	23%
Large villages				3,135	3,635	4,135	4,635
Small villages				1,059	1,309	1,559	1,809
Rural clusters				980	1,080	1,180	1,280
Open countryside				30,328	31,978	33,628	35,278
Total rural				35,502	38,002	40,502	43,002
County total		102,683	114,676	126,196	138,691	164,280	176,800

TABLE 4: ADOPTED POPULATION DISTRIBUTION OF THE 2010 COUNTY DEVELOPMENT PLAN

2016

Total County population = 164,280
 Total rural = 40,502
 Remainder left for 21 towns = 123,778
 Growth allowed in 21 towns = 138,050
 Excess in towns = 11.53%

2022

Total County population = 176,800
 Total rural = 43,002
 Remainder left for 21 towns = 133,798
 Growth allowed in 21 towns = 164,750
 Excess in towns = 23.1%

3.0 New distribution for 2016-2022 County Development Plan**General assumptions:**

- The new distribution shall take a County population target of 176,000 for 2028
- The new distribution shall also take account of updated Census data (from 2011) and more recent development patterns since 2006.
- Household size¹³ shall be assumed to be:

Year	2011	2022	2025	2028
Av HH size	2.83	2.41	2.3	2.19

- Excess factor / vacancy rates etc unutilised shall be 6.5% as set out in the current RPGs
- 'Town population' figures are not necessarily the 'Census town' figures, but the population of each settlement, including its environs, is as defined by Wicklow County Council's town development plans, local area plans and other settlements plans.
- In the first instance, the existing 2022 target will be considered for suitability to be 'extended' to 2028.
- Effort will be made to reduce the 'headroom between towns' factor (although it is clearly logical to assume that not all towns will reach their target) in order to have a more simplified methodology, that is easier for the public to understand.

¹³ Ratio of enumerated population to the total number of housing units in categories A, B and C of the Census housing stock descriptions. Other categories of housing i.e. categories D, E and F are accounted for in the 6.5% 'excess factor' which includes the 'vacancy rate'.

Designation	Town	2011	2022	2025	2028
Consolidation Town	Bray	29,339	36,237	38,119	40,000
Large Growth Town I	Wicklow / Rathnew	13,468	20,283	22,141	24,000
Large Growth Town II	Arklow	13,066	19,494	21,247	23,000
Large Growth Town II	Greystones/ Delgany	17,208	21,603	22,801	24,000
Moderate Growth Town	Blessington	4,780	6,540	7,020	7,500
Moderate Growth Town	Newtown	3,073	4,967	5,483	6,000
Small Growth Town	Ashford	1,484	2,675	3,000	3,250
Small Growth Town	Aughrim	1,315	1,758	1,879	2,000
Small Growth Town	Baltinglass	1,786	2,572	2,786	3,000
Small Growth Town	Carnew	1,145	1,698	1,849	2,000
Small Growth Town	Dunlavin	793	2,134	2,500	2,750
Small Growth Town	Enniskerry	1,940	2,302	2,401	2,500
Small Growth Town	Kilcoole	4,063	4,669	4,835	5,000
Small Growth Town	Rathdrum	1,638	2,843	3,171	3,500
Small Growth Town	Tinahely	956	1,308	1,404	1,500
Small Growth Town	Avoca	717	835	868	900
Rural Town	Donard	179	257	279	300
Rural Town	Kilmacanogue	799	897	923	950
Rural Town	Newcastle	817	1,065	1,132	1,200
Rural Town	Roundwood	780	1,052	1,126	1,200
Rural Town	Shillelagh	426	571	610	650
Urban total		99,772	135,761	145,576	155,200
Compensatory headroom			15%	15%	15%
	Large Villages	3,438	3,802	3,901	4,000
	Small Villages	1,087	1,354	1,427	1,500
	Rural clusters	1,009	1,133	1,166	1,200
	Open countryside	31,334	33,376	33,933	34,490
Rural Total		36,868	39,665	40,427	41,190
County total		136,640	158,000	167,000	176,000

TABLE 5: RECOMMENDED POPULATION DISTRIBUTION FOR THE 2016-2022 COUNTY DEVELOPMENT PLAN

4.0 Housing

These are the housing unit targets for the plan period and up to 2028 based on the population recommendations above:

Year	2011	2022	2025	2028
Population	136,640	158,000	167,000	176,000
Housing Stock (existing)	54,351			
Housing Stock (required)		69,822	77,328	85,589
Increase (from 2011)		+15,471	+22,977	+31,238

TABLE 6: COUNTY WICKLOW HOUSING TARGETS 2011-2028

5.0 Evaluation

While the proposed new 2028 population target is compatible with the existing 2022 target from the RPGs of 176,000, the 'housing stock' target differs slightly due to an assumption being made about household size – it is assumed that household size will continue to fall following current trends. The RPGs in 2010 allowed for a total housing stock in Wicklow of 82,012 units in 2022 to meet this 176,800 population target – this is proposed to be increased to 85,589 for 2028.

To reach this target, it will be necessary to delivery an annual average housing completion rate of 1,838 units per annum 2011-2028.

This is reasonably consistent with the housing growth rate allowed to Wicklow in the current RPGs – 2,058 units per annum 2006-2022, taking into account the much slower rate of development that has occurred in the period 2008-2014.

6.0 Recommendations

The new County Development Plan 2016-2022 proceeds with population and housing growth targets as set out in Tables 5 and 6 of this document.

APPENDIX 3

TEXT OF PUBLIC ADVERTISEMENTS

HAVE YOUR SAY IN THE FUTURE DEVELOPMENT OF YOUR COUNTY

WICKLOW COUNTY COUNCIL

WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

Notice is hereby given that Wicklow County Council, pursuant to Part II Section 11 of the Planning & Development Act 2000 (as amended) intends to review the County Development Plan 2010-2016 and prepare a new County Development Plan for its functional area for the period 2016-2022.

In compliance with the Strategic Environmental Assessment Directive (2001/42/EC) and in accordance with Article 13B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended), the Planning Authority will carry out a Strategic Environmental Assessment (SEA) as part of the review of the existing Development Plan and preparation of a new Development Plan. For this purpose, the Planning Authority will prepare an Environmental Report of the likely significant effects on the environment of implementing the new Plan and the provisions of Articles 13C to 13J of SEA Regulations shall apply.

Pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC), a Stage One Appropriate Assessment Screening of the proposed new plan shall be carried out as part of the overall process and a Stage Two Appropriate Assessment shall be carried out, if required.

Submissions or observations regarding the review of the existing plan and the preparation of a new County Development Plan are hereby invited from the public and interested bodies. Children, or groups or associations representing the interests of children, are entitled to make submissions or observations.

While a review of the detailed policies, objectives (including zoning provisions) and development standards contained in the plan shall occur as part of the plan making process, this stage of the plan review process is 'STRATEGIC' in nature, in that it is for the purposes of developing:

- the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the County
- the 'Core Strategy' of the plan

and in this regard the Planning Authority shall take account of the statutory obligations of the local authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

Therefore submissions or observations may be made regarding the overall strategy for the proper planning and sustainable development of the County, BUT requests or proposals for zoning of particular land for any purpose shall not be considered at this stage and should not be made.

To assist this process, an 'Issues' document, which identifies the kind of planning issues that the next County Development Plan could address, has been prepared. A copy of this document can be obtained from the Wicklow County Council website www.wicklow.ie and hard copies are also available at the following locations from **Tuesday 28th October 2014** during normal opening hours:

- **Wicklow** County Buildings, Wicklow County Council, Station Road, Wicklow Town
- **Bray** Bray Municipal District Office, Civic Offices, Main Street, Bray
- **Blessington** Blessington Civic Offices, Blessington Business Park, Blessington

- **Arklow** Arklow Municipal District Office, Avoca River House, Arklow Town
- **Greystones** Greystones Municipal District Office, Mill Road, Greystones
- All Wicklow public libraries

Public information days, when staff from the Development Plan team will be available to answer questions and to assist in making a submission will be held at the following locations:

- **Bray** Bray Municipal District Office, Civic Offices, Main Street, Bray
Tuesday 4th November 2014 2pm – 7pm
- **Blessington** Blessington Civic Offices, Blessington Business Park, Blessington
Wednesday 5th November 2014 2pm – 7pm
- **Wicklow** County Buildings, Wicklow County Council, Station Road, Wicklow Town
Thursday 6th November 2014 2pm – 7pm
- **Arklow** Arklow Municipal District Office, Avoca River House, Arklow Town
Tuesday 11th November 2014 2pm – 7pm
- **Tinahely** Tinahely Courthouse, Tinahely
Wednesday 12th November 2014 2pm – 7pm
- **Greystones** Greystones Municipal District Office, Mill Road, Greystones
Thursday 13th November 2014 2pm – 7pm

Submissions may be made in one of the following ways:

1. **Write to:** Administrative Officer, Wicklow County Council, Station Road, Wicklow Town
2. **Email to:** planreview@wicklowcoco.ie
3. **Online:** Make a submission via the online submission tool on www.wicklow.ie

All submissions should include your name and a contact address, a map (where appropriate) and, where relevant, details of any organisation, community group or company etc, which you represent. Please make your submission by **one** medium only, i.e. hard copy or e-mail or online.

Written submissions or observations with respect to the preparation of the draft Wicklow County Development Plan and / or the Environmental Report received during the period Tuesday 28th October 2014 to Tuesday 23rd December 2014 will be duly considered by the Planning Authority. Late submissions will not be accepted.

APPENDIX 4
LIST OF SUBMISSIONS

Group 1: Elected Representatives

No.	Surname	Forename	Page
1	Ferris	Anne	33
2	Lawless	Nicola	46
3	Matthews	Steven	50
4	McLoughlin	Grainne	54
5	Mitchell	Derek	55
6	Whitmore	Jennifer	57

Group 2: Prescribed bodies

No.	Name	Representative	Page
7	An Taisce	Tomas Bradley	63
8	Dept of Arts, Heritage & Gaeltachta	Michael Murphy	70
9	Dept of Communications, Energy & Natural Resources	Mary Brady	72
10	Dept of Education & Skills	Lorraine Brennan	74
11	Eirgrid	Gael Gibson	75
12	EPA	Cian O'Mahony	77
13	Failte Ireland	Paddy Matthews	79
14	Fisheries Ireland	Greta Hannigan	80
15	IAA	Deirdre Forrest	85
16	Irish Water	John Casey	86
17	Meath County Council	Patrick Gallagher	88
18	NRA	Michael McCormack	89
19	SERA	Stephen Blair	94
92	National Transport Authority	Hugh Creegan	102

Group 3: Public groups

No.	Group name	Representative	Page
20	Age Friendly Ireland	Pat Doherty	106
21	Bray Head Residents Association	Clare O'Connor	107
22	Delgany Community Council	T.W. Scott Golden	108
23	Disability Action Greystones Together	Catherine Dollard	110
24	Enniskerry Forum	Kieran Conlon	111
25	Glendalough & District Devt Association		113
26	Greystones Tidy Towns	John Harrington	113
27	Irish Heart Foundation	Cliona Loughnane	114
28	Keep Ireland Open	Roger Garland	117
29	Roundwood & District Community Council	Monica Byrne	138

30	Vale of Avoca Development Company	Bernie Ivers	140
31	Wicklow Town & District Chamber of Commerce		140
32	Wicklow Uplands Council	Cara Heraty	144
93	Wicklow County Tourism	Fred Verdier	147

Group 4: Individual public submissions

No.	Surname	Forename / Rep	Page
33	Alphaplan Design	Eugene Copeland	173,176,181,202,209
34	Ashford Property Services	Pat O'Connor	157,176,202
35	Ashford Studios	Shelley O'Connell	153,157,169,181,183,186 192,194,213,229
36	Barry	Noel	214
37	Battye	Elizabeth	157
38	Baynes	Michael J	202
39	Blackditch Ltd	Hughes Planning & Development	157,165,181,186,192,221
40	Bluetone Properties Ltd	John Spain & Assoc	157,165,214
41	Campbell	Joan	192,206,207,209
42	Carey	Michael	192,221
43	Clune	Frank Catherine	194
44	Coleman Eamonn	Hendrik van der Kamp	157,165,206,214
45	Colley	Mark	165,214
46	Colman	Eoin Dr	206
47	Cowan	Karen	183,202
48	Craig	Mary Rose	153,157,165,169,176,192 205,206,215
49	Cunnane Stratton Reynolds	Prenter Eamonn	153
50	Daly	Denis Catriona	202
51	Daly	Frank	194
52	Darker	Heather	192,209
53	de Buitlear	Lailli	153,157
54	Donnelly	Francis	176,195
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60	Irish Wind Energy Association	Brian Dawson	195
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62	Kinsella	McAuley Rice Architects	158
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65	Luisne Centre for Spirituality	Sr. Miriam	209
66	McGahon	Ian	202

67	McGiollapadraig	Sean	166,217
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69	O'Brien	Clodagh	153,158,166,170,173,176 192,205,206,207,217
70	O'Donnell	Mary	209,229
71	O'Duill	Padraig	181,183,192,209,213,229
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73	Owens	Sean	173,177,181,209
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79	Roe	Gerard	153,158,170,173,177,181, 183,229
80	Sexton	Senan	183,205
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85	Stokes	Bernadette	202
86	Stokes Brian	Kieran O'Malley & Co	165
87	Strickland	Julia	165,192,216
88	Tesco Irl Ltd	GVA	188
89	Walker	Mike	229
90	Walker	Patricia	158,166,217,229
91	Walsh	David J	154,158,181,183