

Leonora Earls

From: Anne Ferris [a]
Sent: 23 December 2014 15:18
To: Planning - Development Plan Review
Subject: County Development Plan Submission

Administrative Officer,
Planning and Development,
Wicklow County Council,
County Buildings,
Wicklow Town.

December 23rd 2014

Re: County Wicklow Development Plan 2016 – 2022; Submission by Anne Ferris TD.

A Chara,

Thank you for this opportunity to make a submission on the proposed new County Development Plan (CDP) covering the period 2016 – 2022. I have taken note of the direction in the Stage One Consultation Documentation that zoning proposals will not be considered at this stage of the process and that any submission should be strategic in nature.

My comments in relation to the strategic direction of Wicklow’s next County Development Plan are as follows:

1. 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 requires 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. Both 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 (eg 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.

I would be grateful if you could keep me informed and updated as this strategic planning process progresses and as other opportunities for public review and consultation arise.

Yours sincerely,

Anne Ferris TD

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<http://www.oireachtas.ie/parliament/about/oireachtasemailpolicyanddisclaimer/>

Beartas ríomhphoist an Oireachtais agus séanadh.

<http://www.oireachtas.ie/parliament/ga/eolas/beartasriomhphoistanoireachtaisagusseanadh/>

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Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 22 December 2014 15:34
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 15:33 Submitted by anonymous user: [78.18.61.127]
Submitted values are:

Name: Cllr Nicola Lawless
Organisation, Group, Company, etc : County Councillor
Address: 25 Rivendell Grove , Greystones Co Wicklow
Email: nicola.lawless.sf@gmail.com

--Topics--

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- : Housing
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- : Tourism
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- : Social_Community_and_Cultural_Development
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Submission - If you wish to make comments on a topic, please fill in the box below:

Alternatively you can attach your submission (10MB limit on attached files):

<http://www.wicklow.ie/sites/default/files/webform/CDP.docx>

Attachment No.2 (10MB limit on attached files):

Attachment No.3 (10MB limit on attached files):

--Town / Settlement Plans--

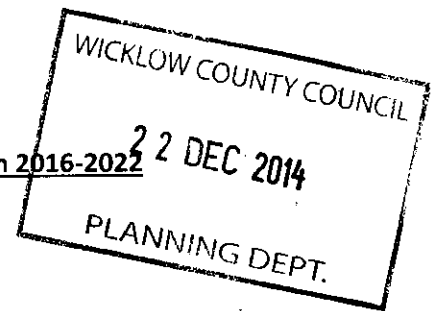
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Attachment No.2 TP's (10MB limit on attached files):

Attachment No.3 TP's (10MB limit on attached files):



Submission to Wicklow County Council Development Plan 2016-2022

Dear Sir/Madam

I would like to refer to section of 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.

Planning:

Under land zoning and planning I would like to see restriction of fast food chains or similar outlets getting planning or been 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 strongly feel this should be part of our CDP.

Housing:

There is a question you ask in the CDP: 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 taking into consideration when planning for a development is submitted.

Social Community & Cultural Development:

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.

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 we do have a community room which is base in Shoreline but 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 this 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 our area as it works with social inclusion, community development and family support. It is

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Email: nicola.lawless.sf@gmail.com

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.

Youth: Synergy supports for children and young people: Presently we have some very good facilities for our children, playgrounds, skate parks, sports. The one thing we don't have for Greystones 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.

Are the needs of everyone in your community being met?

This is something that 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 approached 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 maintain 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 Wexford Gold star task and also Tipperary Town and Cashel.

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CLlr Nicola Lawless

25 Rivendell Grove , Greystones , Co Wicklow

Tel: 0861607686

Email: nicola.lawless.sf@gmail.com

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 22 December 2014 10:21
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 10:21 Submitted by anonymous user:
[79.97.134.209] Submitted values are:

Name: Steven Matthews
Organisation, Group, Company, etc : Wicklow Green Party
Address: 12 Sydenham Mews Sidmonton Road Bray
Email: stevensgreenbray@gmail.com

--Topics--

- : Vision_and_Core_Strategy
- : Housing
- : Enterprise_and_Employment
- : Tourism
- : Retail
- : Rural_Development
- :

Strategic_Environmental_Assessment_Appropriate_Assessment_and_Strategic_Flood_Risk_Assessment

- : Social_Community_and_Cultural_Development
- : Built_and_Natural_Heritage_including_Landscape
- : Infrastructure
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Submission - If you wish to make comments on a topic, please fill in the box below:

Alternatively you can attach your submission (10MB limit on attached files):

<http://www.wicklow.ie/sites/default/files/webform/CDP%20Pre%20draft%20submission%20Dec%202014.docx>

Attachment No.2 (10MB limit on attached files):

Attachment No.3 (10MB limit on attached files):

--Town / Settlement Plans--

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Attachment No.3 TP's (10MB limit on attached files):

The results of this submission may be viewed at:
<http://www.wicklow.ie/node/810/submission/45>

Wicklow County Council
Planning Services
22/12/2014

Re: County Development Plan, Pre Draft Submission

Please consider the following submission outlining policies that may be adopted in the Wicklow County Development Plan

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.

Assist/promote/incentivise the forestry industry to grow, to create local rural employment and promote woodchip industry, (short rotation willow planting industry etc)

Assess existing town centre buildings for adaptation to encourage commercially viable investment (retaining facade and architectural heritage when possible).

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

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.

Implement a policy that addresses the issue of surface water run-off from private lands on to public lands

Develop 'safe routes' to schools in urban areas, prioritising linked walkways and cycle-ways to schools.

Develop locations to facilitate urban school bus service drop off/pick up points

Plan a long term strategy for public transport interchanges and hubs in larger urban areas

Set a limit for proximity of development to motorway and national road interchanges / roundabouts

Plan a long term strategy for public transport interchanges and hubs in larger urban areas

Rezone lands within SFRA areas as recreational open space

Promote the Register of Protected Structures

Promote TPOs.

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

Actively encourage community groups; coastcare / tidy towns / neighbourhood watch etc to grow 'sense of space and place'.

Promote coastal / sea recreation, sea sports based tourism and training facilities on East coast

Carry out an audit of sports and arts facilities to allow assessment of needs and levels of provision in each town or area

Set a minimum BER rating of 'B' for controlled development

Implement a policy that requires that a commercial rate is charged for the use of public open space for commercial events

Regards

Steven Matthews

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 23 December 2014 10:55
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 23, 2014 - 10:55 Submitted by anonymous user:
[193.120.235.122] Submitted values are:

Name: Cllr Gráinne Mc Loughlin
Organisation, Group, Company, etc : Greystones Municipal District and Wickow County Council
Address: Wilfield, Leabeg Middle, Newcastle, Co Wicklow
Email: mcloughlingrainne@gmail.com

- Topics--
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- : Retail
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Submission - If you wish to make comments on a topic, please fill in the box below: That Wicklow County Council adopts an exclusion zone for new fast-food restaurants around schools and playgrounds in Wicklow of .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.

Alternatively you can attach your submission (10MB limit on attached files):
Attachment No.2 (10MB limit on attached files):
Attachment No.3 (10MB limit on attached files):

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Attachment No.3 TP's (10MB limit on attached files):

The results of this submission may be viewed at:

<http://www.wicklow.ie/node/810/submission/60>

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 23 December 2014 10:29
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submisson - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 23, 2014 - 10:29 Submitted by anonymous user:
[193.120.235.122] Submitted values are:

Name: Cllr Gráinne Mc Loughlin
Organisation, Group, Company, etc : Greystones Municipal District and Wickow County Council
Address: Wilfield, Leabeg Middle, Newcastle, Co Wicklow
Email: mcloughlingrainne@gmail.com

--Topics--

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- : Built_and Natural_Heritage_including_Landscape
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Submission - If you wish to make comments on a topic, please fill in the box below:

That Wicklow County Council, as part of their open space policy includes in their open space policy 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.

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

Alternatively you can attach your submission (10MB limit on attached files):
Attachment No.2 (10MB limit on attached files):
Attachment No.3 (10MB limit on attached files):

--Town / Settlement Plans--
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Attachment No.2 TP's (10MB limit on attached files):

Attachment No.3 TP's (10MB limit on attached files):

The results of this submission may be viewed at:

<http://www.wicklow.ie/node/810/submission/59>

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Sorcha Walsh

From: Derek Mitchell [mitchelld@eircom.net]
Sent: 23 December 2014 16:33
To: Planning - Development Plan Review
Subject: submission attached
Attachments: DevelopmentPI12-14.docx

Councillor Derek Mitchell, member of Wicklow County Council.
"Turning Vision into Reality"



Kiltoorish,
Manor Avenue,
Greystones,
Co. Wicklow

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Ph: 01 287 4115
Mob: 0872574969

www.derekmitchell.ie; www.facebook.com/CllrDMitchell; www.twitter.com/CllrDMitchell

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Councillor Derek Mitchell (FG), Member Wicklow County Council,
C/o Kiltoorish, Manor Avenue, Greystones, Co. Wicklow.
Phone/Fax 01-2874115(H), 087-2574969, 23rd December 2014. mitchelld@eircom.net.
www.derekmitchell.ie

Review of Wicklow Development Plan to 2022

There are a number of items which should be incorporated;

- The importance of improving the M50/N11 road from the merge to Kilpeddar 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.
- 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.
- The Plan should include linking Greystones to the N11 Glenview interchange as a written and mapped objective.
- Fast food restaurants should not be allowed within a KM of schools.
- 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.
- 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.
- Delgany should be given Heritage Status.

Sincerely
Derek Mitchell

23 DEC 2014

PLANNING DEPT.

(b)

Submission by Cllr. J Whitmore to the County Development Plan (23/12/14)

Thank you for the opportunity to make comments on the 2016-2022 Wicklow County Development Plan. I understand input at this stage of consultation is to be strategic in nature. Accordingly, please find below some broad comments on the overall future development of our county.

I have also included submissions from constituents of mine that were keen to input into the CDP – they are included at the end of my submission.

Key principles

In order to create strong and resilient communities, I believe it is important that the principles of localism, sustainability and bottom-up community development are encouraged. Small, indigenous enterprise and industry should be promoted, including local food and energy production.

Our neighbourhoods should be easily and safely accessed on foot or by bicycle but should also be accessible to those with limited mobility or in wheelchairs. Wicklow should be an inclusive county – to be enjoyed by all.

'Community building' (ie 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.

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: Housing developments should contain an appropriate mix of housing including social, housing suitable for elderly / disabled persons, young families etc. Each housing development should have a community space, eg green space with play area, or communal buildings, where these different groups can interact and 'build communities'. There will be a particular need for one and two bedroom homes as our population ages.

If possible, social housing should be built to be adaptable, allowing it to be easily modified with changing demographics eg the simple division of a 4 bed family home into 2-bed apartments. In addition, housing developments should include an appropriate mix of complementary design types.

Both energy and water efficiency should be promoted and encouraged. Social housing should take the lead in this regard.

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: 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 (eg Irish Water) should include conduit for fibre.

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: 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: 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.

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 (ie open and communal) required per head of population.

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.

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).

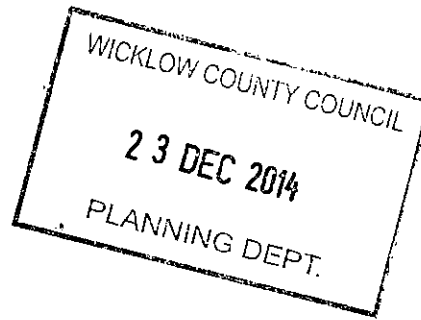
ENDS.....



An Taisce
The National Trust for Ireland

20141223-27-CDP

Administrative Officer
Wicklow County Council
Station Road
Wicklow Town
Co Wicklow



planreview@wicklowcoco.ie

23rd December 2014

Re: Review of the Wicklow County Development Plan 2010-2016

Sir/Madam,

An Taisce welcomes the review County Development Plan (CDP) and would like to make the following comments which we request the Planning Authority (PA) take into consideration in the finalisation and adoption of the CDP, including the accompanying Strategic Environmental Assessment (SEA) and Article 6 Habitats Directive Assessment (HDA).

We would also request that the PA make An Taisce known of any further consultation periods regarding the making of this CDP and issue An Taisce with notification of any future proposed amendments to the Draft CDP and notification of the final adopted CDP.

Yours sincerely,

Tomás Bradley
Planning & Environmental Policy Officer
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Working for a Better Quality of Life – For Now and For Future Generations

Review of the Wicklow County Development Plan 2010-2016

Join Us

An Taisce, the National Trust for Ireland, is a membership-based charitable organisation committed to enhancing our quality of life, heritage and environment.

www.antisce.org/membership

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1.0 Executive Summary

The new CDP will provide a key policy document of central importance for a critical period in Irish society and will form a contract between the PA and the local community embodying a promise to regulate land use in accordance with its policies and objectives¹. It is now two decades since the 1992 Earth Summit in Rio de Janeiro when scientists warned humanity that 'no more than a few decades remain before the chance to avert the threats we now confront will be lost and the prospects for humanity immeasurably diminished'. The worldwide response to these messages from those in a position to bring about change has been almost nil. It is now, therefore, imperative that the new CDP set out a clear, rational, evidence based and plan-led strategy for the future spatial development of the locality to address critical emerging global challenges, **most importantly energy scarcity and climate change**, and is grounded in the principles of sustainable development.

1.1 General

- The objective for those preparing the new CDP should be conciseness, clarity and simplicity in use of language, and that planning terms be explained in an appending glossary. The excessive flexibility inherent in many CDPs is a key factor in the long delays experienced in the planning process. This flexibility is evidenced both vagueness and by 'let-out' clauses which causes interpretation problems for the developer, the Councillors, the public, and even the officials.
- Since the adoption of the previous CDP for the area a plethora of new long overdue environmental regulations have been brought into force which places strict new legal obligations on the PA. Regardless of the scale of the CDP, compliance with these new regulations cannot be ensured in the absence of undertaking a full Strategic Environmental Assessment (SEA) and Habitats Directive Assessment (HDA) in parallel with the preparation of the CDP.
- The CDP must be informed by a high level of transparency, democratic participation, community empowerment, and local decision-making and ownership. The Julianstown Village Design Statement prepared by the Heritage Council is useful example of how this can be achieved.
- The PA has a duty and obligation to protect and secure the value of the multi-billion asset loan portfolio which has been transferred to the tax-payer via the National Asset Management Agency (NAMA). The excessive zoning of land and the granting of planning permission for development on unzoned land (including multiple one-off housing) will have the effective of diluting this asset portfolio and undermine a successful return to the tax-payer.

1.2 Strategic Planning & Zoning

- In accordance with provisions of the Planning & Development (Amendment) Act (PDA) 2010 it is now a mandatory legal requirement that the CDP must 'be consistent with' with the relevant Regional Planning Guidelines and the National Spatial Strategy.

¹ See McCarthy J. In Attorney General (McGarry) v. Sligo County Council [1991]

- The CDP must comply with the new methodical and evidence-based approach to land-use zoning and settlement planning included under the PDA 2010 which requires a demonstrated rational 'joined up' assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance published by the DoECLG.
- The PA must only apply considerations of proper planning and sustainable development (i.e. sequential approach, flooding etc) in zoning, phasing, de-zoning or downzoning land and disregard all other considerations including private interests or potential commercial or rate generating revenue.
- The PA must issue the draft CDP and any proposed amendments to the draft CDP to the Regional Planning Authority (RPA) (and/or the National Transport Authority (NTA) to test compliance with the RPGs (and/or the GDA Transport Strategy) and the response from the RPA must be made available to the public.
- The PA must not include any new zoning objective, local objective or delist a protected structure without providing the public and all prescribed bodies with an opportunity for scrutiny and comment.

1.3 Fossil Fuels and Climate Change

- Climate change is the defining challenge of our time. The primary objective of the CDP must be to break the locality's dependence on oil, stopping the locality's contributions to global warming and preparing the locality with the resilience to thrive in a time of energy and climate uncertainty.
- The PA should refer to the following critical reports which should be foremost in the consideration by the PA in the preparation of the CDP:
 1. Intergovernmental Panel on Climate Change (2013) - Fifth Assessment Report (AR5).
 2. A Baseline Assessment of Ireland's Oil Dependence - Key Policy Considerations, Forfas, 2006
 3. IMF World Economic Outlook, April 2011: Oil Scarcity, Growth and Global Imbalances
 4. IMF, The Future of Oil Versus Technology, 2012
 5. Tipping Point: Near Term Systemic Implications of a Peak in Global Oil Production: An Outline Review; Feasta, 2010
 6. Sustainable Energy Security – Strategic Risks and Opportunities for Business (White Paper), Lloyds/Chatham House, 2010
 7. The Oil Crunch - UK Industry Task Force on Peak Oil and Energy Security (2010)
 8. Growth Isn't Possible – Why We Need A New Economic Direction, New Economics Foundation/Schumacker College, 2010
- The CDP should discontinue any objectives which provide for investment in oil dependent infrastructure (e.g. new roads, airports etc).
- The PA must prepare a strategy which would see the electrical generation needs of the locality primarily met by renewable sources by 2020, and entirely by 2030, including major use of local renewable energy sources, district heating and combined heat and power, and energy demand measures.

- Prepare and adopt a local Climate Change strategy in parallel with the preparation of the CDP – See Appendix 3

1.4 Sustainable Transport & Land Use Patterns

- A local transport plan must be prepared alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action.
- The CDP must have the overall objective of significantly reducing transport demand by creating compact walkable settlement patterns and include detailed policies on walking and cycling. This must include permeability and way-finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria in selecting all land zoned for new development.
- The CDP must be carefully aligned with the regional transport strategies of the NTA, particularly with respect to rail infrastructure and bus services.
- Major new road objectives in the CDP must be discontinued. Investing further public monies on oil dependent transport infrastructure is wasteful.
- The sequential approach must be applied to the zoning of all land and the review of zoning in accordance with the PDA 2010 (including the phasing, de-zoning or down-zoning land).
- Land zoned for residential development must be located in close proximity and/or be well connected by public transport corridors (rail or bus) to existing and/or proposed services (e.g. schools, retail, community/health centres, sports/amenity facilities etc) and employment sites.
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.
- Mobility Management Plans must be made mandatory through the development management process for all planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of the national Smarter Travel policy will be achieved through the development proposal.
- In accordance with the Sustainable Residential Development Guidelines in Urban Areas Guidelines the CDP must include policies to prohibit large-scale suburban type development proposals. Only development proposals commensurate with local physical infrastructure and social capital carrying capacity should be permitted.
- S.48 development contribution levies in lieu of off-street car parking in town centres should be dis-applied to counteract vacancy and revitalise traditional town centres
- Out-of-town commercial and/or retail development must be strictly prohibited. Where it has been permitted historically, car parking charges must be made mandatory to level the playing field and the unfair competitive advantage accruing to 'big box' out-of-town retailers from free car parking and publicly subsidised road infrastructure.
- The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off housing, including, for example, a serviced site policy (see Limerick County Council's Serviced Site Policy).
- A greenbelt policy should be implemented in peri-urban areas in the vicinity of the CDP boundary with strict restrictions on urban-generated one-off housing to prevent ribbon development and uncontrolled sprawl (See Cork County Development Plan 2009-2015).

1.5 Economic & Employment Development

- Given the impacts of energy scarcity continued GDP economic growth in the Irish economy is unlikely and, in any event, is unsustainable in the long-term. It is prudent to plan now for a different economic future including low-growth, no-growth or contraction scenarios.
- The CDP must include policies which support the development of a vibrant local manufacturing base that is based on the sustainable use of local indigenous resources and local markets which will make the locality more resilient in long run e.g. food processing, basic manufacturing etc
- In light of peak oil, the CDP must plan for higher and more volatile energy prices (and high material costs too) over the period of the CDP and to use this window of opportunity to transition the CDP area into a post-carbon, low energy, low consumption and resilient locality.
- The CDP must set out a carefully crafted strategy and form a binding contract between the PA and the community based on proper planning principles. The current economic climate must not be used as a short-sighted opportunity to loosen proper planning regulation for short-run economic return.
- Ireland's principle resource is our abundant availability of fertile agricultural land. The CDP must include policies to promote the sustainable local exploitation of natural resources for local markets.
- The CDP should include a policy for the promotion of local farmers markets and identify locations where farmers markets can take place.
- The CDP must include policies for the prohibition of out-of-centre retail development. The PA must take an active role in site assembly for new retail development on brownfield and infill sites, including using CPO powers where necessary to provide for the sensitive revitalisation of town centres.
- The PA must require the introduction of car parking charges for out-of-centre retail development and introduce a corresponding S.48 waiver for development contribution levies in lieu of off-street car parking for new retail development in town centre locations.
- The CDP must include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.
- The CDP should include a policy which restricts large floor-plate multiples, which are dependent on complex oil-dependent supply chains, in favour of smaller floor-plate local shops and businesses.
- The CDP must include a detailed audit of all physical infrastructure (i.e. wastewater, potable water, ICT, transport, electricity etc) including location and capacity, to be used as a key criteria in determining the appropriate quantum and location of future new development.
- The CDP must include a clear programme of implementation which links the delivery of key pieces of social, physical and environmental infrastructure with the sequential and phases development of zoned land. It must clearly and transparently inform the citizen and manages expectations about the future development of an area. The CDP should not include policies and objectives unless the PA is confident of their successful implementation.
- The physical infrastructure audit should include an "Oil Vulnerability & Carbon Price Impact Assessment" to explore the threats from inflated and volatile oil prices

together with the future (shadow) price of carbon. This should be undertaken for both capital and operational municipal functions (e.g. sewage treatment, water supply, road developments, road repair, flood defences etc)

- The CDP must include an Employment Land Survey to determine the quantum of employment land and where employment land should be located in the context of sustainable transport objectives and the existing and future carrying capacity of physical infrastructure.
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.

1.6 Water

- The CDP must include a suite of integrated policy measures to ensure that the PA's legal obligations under the Water Framework Directive and the operable River Basin Management Plan are achieved.
- The quantum of land zoned in the CDP must be carefully matched and phased with the existing and/or planned Population Equivalent (PE) capacity of the local waste-water treatment plan. Where there is no commitment in the Water Services Investment Programme (WSIP) to fund additional waste-water treatment capacity surplus zoned land should be dezoned in accordance with the sequential approach.
- The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off housing, including, for example, a serviced site policy (see Limerick County Council's Serviced Site Policy).
- The CDP must de-zone or down-zone lands categorized in 'Flood Zone A' or 'Flood Zone B' applying the sequential approach. Where the zoning of recognised flood prone areas is retained a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out.
- The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be made mandatory for all new development proposals.
- The CDP should seek to implement a Green Roofs policy through the development management process. It should be a mandatory requirement for all new developments to include an element of green roof technologies.
- The PA should explore the use of Integrated Constructed Wetlands (ICW) as a low-cost and environmentally sustainable alternative to heavy engineered and energy intensive waste water treatment facilities.

1.7 Natural Capital & Ecosystem Services

- In order to prevent potential legal action the CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law.
- Achieving adherence to the PA's legal obligations under the Habitats Directive and other environmental legislation cannot be achieved without the preparation in tandem with the CDP of a full SEA and HDA.
- The policy recommendations of the National Biodiversity Plan 2010 – 2015 should be fully incorporated into the CDP and a Local Biodiversity Action Plan prepared.

- The CDP should adopt a Green Infrastructure approach and include a section entitled Green Infrastructure modelled on the content of the Fingal County Development Plan 2010 – 2016 (Chapter 8)

1.8 Social Capital & Public Participation

- Bridging the gap between strategic planning, environmental requirements and the wider interests of the common good with local interests can be a process fraught with difficulty and conflict. The PA should appoint an independent facilitator to manage the public participation and consultation process².
- The CDP should implement the policies included in the recent report prepared by the Irish Heart Foundation – Building Young Hearts: Physical Activity, Young People and the Physical Environment, 2010.
- The CDP must designate suitable locations for allotments/community gardens and include a requirement that a designated area for allotment space be required in each new residential/mixed-use developments.

1.9 Cultural & Built Heritage

- The CDP should seek to designate more Architectural Conservation Areas (ACA's) and Special Planning Control Schemes.
- S.48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation.
- Important views and prospects must be protected.
- The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.

1.10 Implementation & Monitoring

- The CDP must include a detailed implementation and monitoring schedule which outlines the manner in which the CDP envisages the future development of the area with particular focus on the phased and sequential development of the locality – See Appendix 1.
- A designated implementation officer must be appointed to oversee the implementation of the CDP and ensure joined up thinking between development management, forward planning, environment, service, infrastructure provision etc.
- The concept of a 'Sustainability Matrix' is now well developed throughout the UK and increasingly in Ireland and we recommend the PA include a requirement for all development proposals to be required to submit a Sustainability Statement with all planning applications. An excellent exemplar of a Sustainability Matrix is included the Clonburris Strategic Development Zone (SDZ) strategy prepared by South Dublin County Council.

² See for example www.partnerships.org.uk

2.0 Strategic Planning & Zoning

CDPs are an important part of the planning system. However, many CDPs have very often been little more than zoning vehicles for vested interests capitalising on the significant legislative and oversight loopholes that formerly existed. With the introduction of the Planning & Development (Amendment) Act (PDA) 2010 these loopholes have now been closed. The adopted CDP must therefore strictly adhere to the new legal framework which now exists.

2.1 Core Strategy & Settlement Strategy

A range of provisions of the PDA 2010 require that the land-use zoning and other provisions of all CDPs must **'be consistent with'** the National Spatial Strategy, the relevant Regional Planning Guidelines and S.28 Ministerial Guidelines issued under the Planning Acts 2000 - 2010. **Consistency is now a mandatory legal requirement and it would be unlawful for the PA to deviate from these higher level plans and policies.**

Recommendation:

- The CDP must comply with the new methodical and evidence-based approach to land-use zoning and settlement planning included under the PDA 2010 which requires a demonstrated rational assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance published by the DoECLG.

2.2 Land-Use Zoning

The zoning of land for appropriate and sustainable uses is at the heart of planning and if this departs from proper principles the whole system is in difficulty and this extends to the property and land market and the construction industry. Where land is zoned there is a presumption in principle that development will be permitted and to refuse could mean the PA being faced with claims for compensation by landowners.

Box 5.2 Housing Location in Urban Areas	Evaluation Considerations
The Area Test	Are the zoning and community resources such as schools etc. within the zoning?
The Capacity Test	Is the zoning in a zoning capable of absorbing development in terms of capacity?
The Transport Test	Is there potential for an alternative mode of public transport, walking and cycling?
The Economic Backdrop Test	Is the zoning likely to create a synergy between the location of housing and employment?
The Character Test	Will the proposed zoning be in a zone of high and character?
The Community Test	Will the zoning be in a zone of high and character of the local community and services that can be provided?
The Integration Test	Will the proposed zoning be in a zone of high and character of the local community and services that can be provided?

Figure 1 - The 7-Point Test for Zoning Land – National Spatial Strategy 2002

The PA must be mindful of the very significant contribution that the over-zoning and the ad hoc approach to zoning played in the inflation of the largest property bubble in the history of the world and ultimate the catastrophic consequences this has had on Irish society (See A Haunted Landscape – Housing & Ghost Estates in Post-Celtic Tiger Ireland). The PA must also recognise that its own interest is only effectually achieved through integration with its region and surrounding area. It would be inappropriate of any individual authority to be motivated in the zoning of land, particularly for commercial development, by the realisation of development contributions or rates income. Such a consideration is not provided for under planning legislation and it would be ultra vires of any PA to be motivated by such an interest, whether overtly or otherwise.

The inappropriateness of zoning objectives in many instances becomes a reality at appeal to An Bord Pleanála. The Board routinely disregards zoning objectives which are not in accordance with the principles of proper planning and sustainable development and refuses planning permission. **This undermines confidence in the planning system and leads to misplaced investment decisions by private investors, significant costs, conflict with local communities and is ultimately counterproductive.**

The former Chairman of An Bord Pleanála in his 2007 report stated that stronger account needed to be taken of important new realities such as climate change, energy costs and the need to minimise heritage loss. He stated:

'It is incumbent on planning authorities and An Bord Pleanála when making decisions on planning applications, to interpret Development Plans in a way that reflects these realities. In dealing with planning appeals the Board is constantly coming across zoned sites that are too far removed from developed areas, too remote from public facilities such as piped services, footpaths, lighting and with no prospect of public transport.'

The Board has recently refused planning permission for development where there was significant over-zoning (PL27.238851). Due to the legacy of significant over-zoning the implications of the PDA 2010 will most likely necessitate the de-zoning, down-zoning or phasing of significant amount of zoned land and a careful reprioritisation (phasing) of future new development towards efficient, compact and walkable serviced locations in accordance with the sequential approach and infrastructure capacity.

The principle of de-zoning and down-zoning of land has been established and the planning legislation is very clear from planning legislation that there is no legal or constitutional prohibition on altering or discontinuing the zoning of land³.

Recommendation:

- Following an evidence-based assessment of the quantum of zoned land within the CDP area, where there is surplus supply an appropriate quantum of land must be de-zoned, down-zoned or phased in accordance with the provisions of the PDA 2010.
- The PA must only apply considerations of proper planning and sustainable development (i.e. sequential approach, flooding etc) in zoning, phasing, de-zoning or downzoning land and disregard all other considerations including private interests or potential commercial or rate generating revenue.
- Following any future precedential decision from An Bord Pleanála which overturns a

³ See: Regional Authorities - Regional Planning Guidelines Implementation Annual Report 2011

PA decision, a review should be undertaken to examine the basis on which the decision was made, and a report presented to Councillors on required amendments to the CDP required. This is a key conclusion of the recently published DoECLG Planning Review Report.

2.3 Oversight

The PA must be mindful of its obligations towards national and regional development and not narrow local issues. The State continues to invest billions of taxpayers' money in infrastructure and services (e.g. waste water treatment) and it is essential that the PA aligns the CDP to maximise the efficacy of public investment for the common good of society as a whole.

The PDA 2010 now provides that the relevant RPA has a specific remit in vetting local authority CDPs to ensure they are consistent with higher level plans and policies. The Minister can also intervene through the revised S.31 procedure of the PDA to require a local authority to ensure CDP objectives are consistent with the proper planning and sustainable development of the area.

The Draft CDP must now be issued to the RPA for an assessment of consistency at each stage prior to adoption (See Implementation of Regional Planning Guidelines – Best Practice Guidelines (DoECLG 2010)). In the Dublin Region, the Dublin Transportation Authority Act 2008 further provides that the DTA can intervene in the CDP to ensure compliance with transportation strategy objectives for the Greater Dublin Area.

Recommendation:

- The PA must issue the draft CDP and any proposed amendments to the draft CDP to the RPA (and/or the NTA) to test compliance with the RPGs (and/or the GDA Transport Strategy) and the response from the RPA must be made available to the public.
- The CDP should require appropriate sewage treatments plants are provided for all nucleated settlements before any further residential development proceeds.

2.4 Last – Minute Zoning Amendments

Previously the practice developed throughout Ireland of land-use zoning and other amendments being included immediately before the adoption of the CDP without giving any opportunity for prior public scrutiny of comment. This practice is now unlawful and must not be entertained by the PA.

Recommendation:

- The PA must not include any new zoning objective, local objective or delist a protected structure without providing the public and all prescribed bodies with an opportunity for scrutiny and comment.

3.0 Fossil Fuel & Climate Change

3.1 Challenge

Fossil Fuel and climate change are the interrelated biggest and defining challenges of our time. We are currently experiencing an environmental and resource crisis that places human development at a crossroads. The implications of climate change, and fossil fuel extraction and combustion are becoming increasingly visible and are being exacerbated by economic recession.

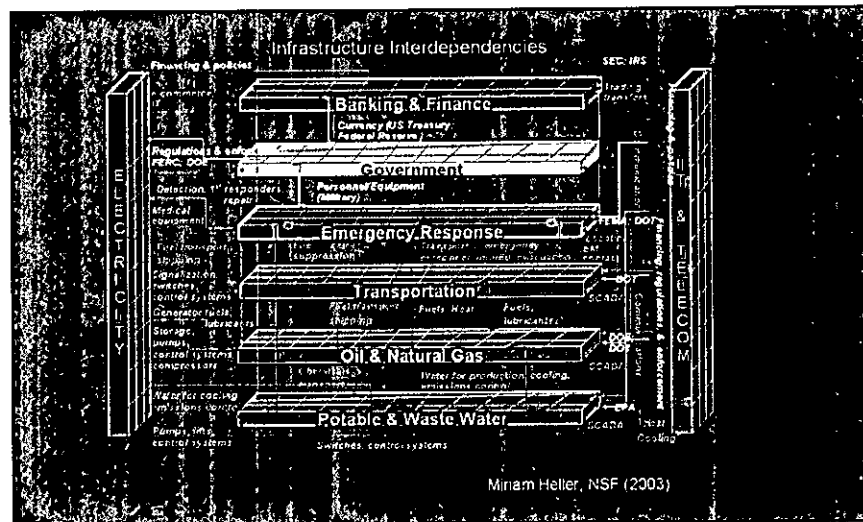


Figure 2 - Irish Society is complex and extremely vulnerable to energy scarcity.

The effects of these challenges are, and will continue to be, multi-faceted and systemic. Effects include energy price inflation, increased flooding; increases in the cost of resource dependent production; food shortages and other scarcities. These challenges, and the necessary development of policies to address them, are becoming a reality with which society has to learn to live by becoming more localised and resilient.

Recommendation:

- The primary objective of the CDP must be to break the locality's dependence on oil, stopping the locality's contributions to global warming and preparing the locality with the resilience to thrive in a time of energy and climate uncertainty.

3.2 Fossil Fuel

During the last decade the extraction of oil from conventional well sources peaked. Ireland is the seventh most oil dependent economy in the world where energy usage increased by 67% between 1990 and 2006. Further, demand for fossil fuels is increasing, not decreasing.

Ireland is 99% dependent on oil for transport and is amongst the most private car dependent countries in the world. Ireland is also highly dependent on road haulage for freight with only an extremely marginal rail freight infrastructure. The amount of oil used

for transportation in Ireland tripled between 1972 and 2002, leaving Ireland consuming at least 50 per cent more per capita than the average of the EU-25 by the end of the period.

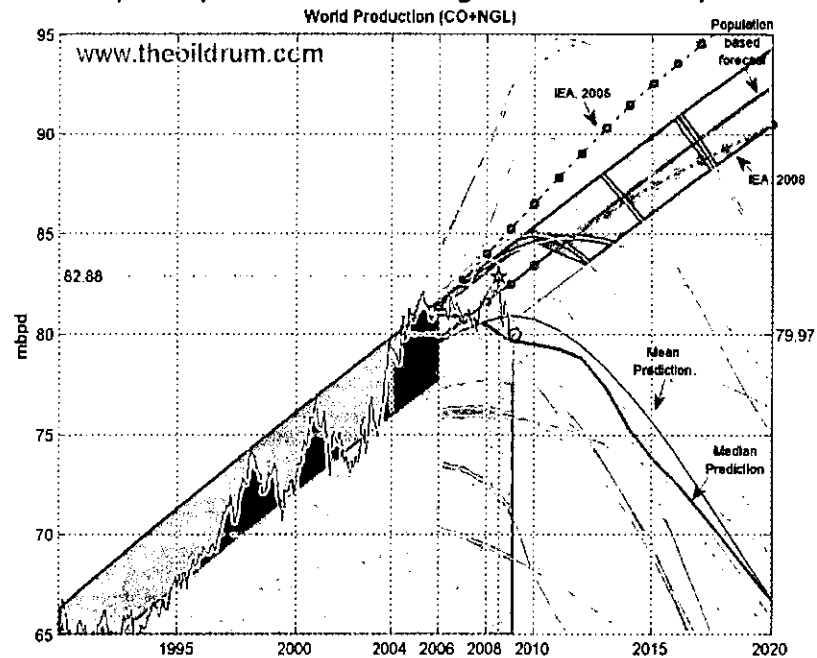


Figure 3 - The IEA has confirmed that the production of conventional oil peaked in 2006.

The Chief Economist of the International Energy Agency, Fatih Birol, recently confirmed that peak conventional oil production occurred in 2006. There is growing international consensus, as expressed by Macquarie Bank, Goldman Sachs, McKinsey Consultants, the UK Industry Task Force on Peak Oil and Energy Security, the UK Energy Research Council, IHS Herold, OFGEM, ASPO, Global Witness, the International Energy Agency and the Saudi Oil Ministry together with, most recently, Lloyds Bank that the 'era of cheap oil is over' and that serious supply constraints and an oil supply crunch is likely in the short-to-medium term. The Hirsch Report commissioned by the US Department of Energy in 2005 highlights very clearly that the era of plentiful, low-cost petroleum is approaching an end. World demand for oil is predicted to increase by 50% over the period up to 2025 at a time when the world oil reserves are diminishing rapidly and will lead to rapid price inflation and scarcity. According to the IEA, in order to sustain projected global energy demand the world will need to discover 'four new Saudi Arabias'.

The key issue with peak conventional oil is that it is not an energy crisis so much as a 'liquid fuels' crisis, which will have immediate consequences for the main categories of oil usage, in particular transportation. As Ireland is particularly and increasingly dependent (for exports) on oil for transportation, we are particularly vulnerable to oil price inflation and it is important to start preparing and contingency planning for such an event. The Hirsch Report states:

"The peaking of world oil production presents the U.S. and the world with an unprecedented risk management problem. As peaking is approached, liquid fuel prices and price volatility will increase dramatically, and, without timely mitigation, the economic, social, and political costs will be unprecedented. Viable mitigation options exist on both the supply and demand sides, but to

have substantial impact, they must be initiated more than a decade in advance of peaking."

More recently, the International Energy Agency - World Energy Outlook published in November 2009 and again in November 2010 confirmed that oil prices are likely to inflate significantly through to 2030 and the continuation of current energy use trends would have dire consequences for climate change together with huge systemic implications for the economy, society and environment. They would also exacerbate ambient air quality concerns, thus causing serious public health and environmental effects, particularly in developing countries. The current economic recession is likely to further exacerbate oil price inflation due to lack of current investment in boosting capacity.

As confirmed in the Hirsch Report there is no ready alternative to oil for private vehicle use. In this context, debates over substituting oil with renewable, gas or nuclear energy are irrelevant. The widespread replacement of the current vehicle stock with electric powered vehicles is economically and environmentally impractical. The mass production of battery or hydrogen technology capable of the propulsion of electric vehicles, particularly HGVs, is at the very least several decades off and it is most probable that there is no technological solution to this problem.

The preferred raw material for the production of batteries, Lithium, is itself severely resource constrained and found largely in highly environmentally sensitive and politically unstable regions of the world. In any event, the mass production of electric vehicles is wholly resource inefficient and the use of increasingly scarce energy for unproductive uses, such as electric vehicles, would be imprudent. Bio-fuels are not a solution as it competes with food for land and drives up food prices. For example, the grain required to fill the tank of a modern car could feed one person for a year.

Accordingly, any rational analysis of future available oil resources and energy resources would result in an inevitable conclusion that further public investment in oil dependent transport infrastructure is short-sighted, ill-conceived and an inefficient use of public funds. While we recognise that there remains a considerable straightforward connection in the minds of policy makers and elected members as to the economic benefits of road and air infrastructure, the overwhelming international evidence clearly indicates that past trends must not be used as a guide to likely future outcomes. Further investment in Ireland in road infrastructure (outside of road infrastructure maintenance) and the shaping of our society and economy around oil based transport (i.e. dispersed settlement patterns, suburban sprawl, export growth) will inevitably increase and 'lock-in' our exposure to oil price inflation and undermine the resilience of our economy and society in an era of peak oil.

Recommendation:

- The PA should refer to the following critical reports which should be foremost in their consideration in the preparation of the CDP:
 1. Intergovernmental Panel on Climate Change (2013) - Fifth Assessment Report (AR5).
 2. A Baseline Assessment of Irelands Oil Dependence - Key Policy Considerations, Forfas, 2006
 3. Tipping Point: Near Term Systemic Implications of a Peak in Global Oil

Production: An Outline Review; Feasta, 2010

4. Sustainable Energy Security – Strategic Risks and Opportunities for Business (White Paper), Lloyds/Chatham House, 2010
 5. The Oil Crunch - UK Industry Task Force on Peak Oil and Energy Security
 6. **Growth Isn't Possible – Why We Need A New Economic Direction, New Economics Foundation/Schumacker College, 2010**
- The CDP should discontinue any objectives which provide for investment in oil dependent infrastructure (e.g. new roads).
 - The PA must prepare a strategy which would see the electrical generation needs of the locality primarily met by renewable sources by 2020, and entirely by 2030, including major use of local renewable energy sources, district heating and combined heat and power, and energy demand measures.

3.3 Why most Fossil Fuels must be left in the Ground

Instead of investing in energy use conservation and renewable alternatives, the global trend has been to increase the extraction rate of large scale open case coal mining and extend oil and gas exploration into new areas and with problematic new technologies.

This has resulted in new explorations ranging from the Arctic wilderness to Central Africa. Russia is promoting drilling in the Arctic with the 2010 Deepwater Horizon spill showing the risks involved. The increased level of extraction from Canadian Tar Sands and the Niger Delta is devastating in environmental impact and generates much high level of emissions that conventional wells. Fracking in the US has created new environmental risks and has significant impact in climate emissions for the extraction process. Globally energy companies are in an exploration race to secure a level of fossil fuel extraction which is incompatible with the level of decarbonisation required to stabilise global climate at 2 degrees above pre industrial levels.

In 2012 if the Grantham Institute for Climate Change (based in Imperial College London) and the Carbon Tracker Initiative (An International NGO monitoring carbon emissions) published 'Unburnable Carbon 2013: Wasted Capital and Stranded Assets'. This reveals that total fossil fuel reserves already far exceed the global atmosphere capacity to absorb the emissions generated if temperatures are to be stabilised at 2^oc above preindustrial levels.

Between 60-80% of coal oil and gas reserves of publically listed companies are unburnable if the world is to have chance of not exceeding global warming of 2^oc. The issue is now to achieve an effective global climate agreement and carbon tax regime which will secure this.

Mary Robinson is now taking leadership stating in September 2013

'There is a global limit on a safe level of emissions. That means major fossil fuel reserves must be left in the ground. That has huge implications for economic and social development.'

3.4 Greenhouse Gas Emission Reduction Targets

Ireland has signed up to the 20:20:20 EU agreement whereby we have a legally binding pledge to reduce greenhouse gas emissions by 20% below 1990 levels and increase energy efficiency by 20% by 2020. The scale of change needed to meet Ireland's commitments is enormous. Ireland's national Greenhouse Gas (GHG) emissions reduction target equates to approximately 2.5% per year until 2020. Greenhouse gas emissions from the transport sector have risen 170% over 1990 levels primarily due to spatial sprawl.

Accordingly further infrastructure investment in roads to serve energy inefficient and emission generating private motorised vehicles is untenable. Further investment in Ireland in road infrastructure (outside of road infrastructure maintenance) and the shaping of our society and economy around oil based transport (i.e. dispersed settlement patterns, suburban sprawl, export growth) will inevitably increase and 'lock-in' our exposure to oil price inflation and undermine the resilience of our economy and society in an era of peak oil.

The Environmental Protection Agency (EPA) has estimated that in the non Emissions Trading Scheme (ETS) sectors, Ireland will exceed its EU Effort Sharing Directive (ESD) target by 2017 and may have a cumulative excess emissions of 2-20Mt by 2020 in agriculture, transport and home heating. In effect, Ireland is not bothering to co-ordinate any concerted effort to reduce emissions and embrace low carbon development. Furthermore, Ireland has no strategic planning in place to play its part, if the overall EU target is to be stepped up to 30% in the context of a global agreement on climate change. The EU Emissions Trading Scheme (ETS) has collapsed by failing to put the climate pollution impact price on carbon.

The PDA 2010 includes a new mandatory objective for development plans⁴ as follows:

"The promotion of sustainable settlement and transportation strategies 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 gas emissions, and*
- iii. address the necessity of adaptation to climate change*

in particular, having regard to location, layout and design of new development."

The PA has an obligation to respond now to the challenges of climate change through development which reduces the need for energy use, support sustainable modes of transport which will reduce the locality's carbon footprint in order to minimise the locality's greenhouse gas emissions and adapt to the effects of climate change, with particular reference to the areas of land use, energy, transport, water resources, flooding, waste management and biodiversity.

Recommendation:

- Prepare and adopt a local Climate Change strategy in parallel with the preparation of the CDP – See Appendix 3

⁴ Section 10(2) of the 2000 Act as amended by section 7 of the Planning and Development (Amendment) Act 2010

4.0 Sustainable Transport & Land Use Patterns

4.1 Achieving Smarter Travel

The Government launched '*Smarter Travel – A Sustainable Transport Future*' in February 2009. The document, which was the subject of extensive public consultation, includes five key goals – (i) to reduce overall travel demand, (ii) to maximise efficiency of the transport network, (iii) to reduce reliance on fossil fuels, (iv) to reduce transport emissions and (v) to improve accessibility to transport.

The targets included in the Smarter Travel policy to significantly increase sustainable modal choices and reverse car dependency are challenging but urgently required. The CDP must include specific policies, objectives and measures to translate national policy into tangible local action.

The PDA 2010 includes a new mandatory objective for development plans⁵ as follows:

"The promotion of sustainable settlement and transportation strategies 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 gas emissions, and*
- iii. address the necessity of adaptation to climate change*

in particular, having regard to location, layout and design of new development."

Circular PSSP-4-2010 to all planning authorities and has determined that the following national policy documents relate to proper planning and sustainable development under Section 9(6) of the Planning & Development Act 2000:

- Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2012 (Department of Transport)

The requirements of this new provision will require a considerable shift in emphasis away from dispersed settlement patterns towards consolidation and compact urban forms. As a subsidiary to the county/city development plan, the CDP has a pivotal role in ensuring that spatial and transport planning are aligned to avoid unsustainable travel patterns and to ensure the objectives of Smarter Travel are achieved locally.

In the context of land use planning, the most effective means to achieve these objectives is to prevent inefficient and unsustainable car-based development sprawl i.e. planning for the best use of land to benefit from investment of public funds in physical infrastructure, including public transport infrastructure.

⁵ Section 10(2) of the 2000 Act as amended by section 7 of the Planning and Development (Amendment) Act 2010

Recommendation:

- A local transport plan must be prepared alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action.
- The CDP must have the overall objective of significantly reducing transport demand by creating compact walkable settlement patterns and include detailed policies on walking and cycling. This must include permeability and way-finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria in selecting all land zoned for new development.
- The CDP must be carefully aligned with the regional transport strategies of the National Transport Authority (NTA), particularly with respect to rail infrastructure and bus services.
- New road objectives in the CDP must be discontinued. Investing further public monies on oil dependent transport infrastructure is wasteful.
- The sequential approach must be applied to the zoning of all land and the review of zoning in accordance with the PDA 2010 (including the phasing, de-zoning or down-zoning land).
- Land zoned for residential development must be located in close proximity and/or be well connected by public transport corridors (rail or bus) to existing and/or proposed services (e.g. schools, retail, community/health centres, sports/amenity facilities etc) and employment sites.
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.
- Mobility Management Plans must be made mandatory through the development management process for all planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of Smarter Travel will be achieved through the development proposal.
- In accordance with the Sustainable Residential Development Guidelines in Urban Areas Guidelines the CDP must include policies to prohibit large-scale suburban type development proposals. Only development proposals commensurate with local physical infrastructure and social capital carrying capacity should be permitted.
- S.48 development contribution levies in lieu of off-street car parking in town centres should be dis-applied to counteract vacancy and revitalise traditional town centres
- Out-of-town commercial and/or retail development must be strictly prohibited. Where it has been permitted historically, car parking charges must be made mandatory to level the playing field and the unfair competitive advantage accruing to 'big box' out-of-town retailers from free car parking and publicly subsidised road infrastructure.
- The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off housing, including, for example, a serviced site policy (see Limerick County Council's Serviced Site Policy).

4.2 Population Dispersal

Ireland's dominant socio-cultural narrative continues to drive policies favouring the profligate dispersal of settlement towards one-off rural dwellings. Notwithstanding the fact

that this pattern of development is socially, economically and environmental unsustainable, particularly with respect to oil dependence, greenhouse gas emissions, water quality, social equity, human health, and, critically, efficient Exchequer investment in infrastructure and services, it is likely that it will continue at least in the short-term. Only when oil prices inflate significantly further in the future will the true cost of this settlement pattern become apparent⁶.

The PA must ensure that proactive measures are included in the CDP to promote nucleation and protect rural areas from a proliferation of car-dependent dispersed urban-generated settlement. Ireland's rural areas will be critical resource within the new energy constrained era and the prudent protection and sustainable exploitation of natural resources for agriculture, forestry and renewable energy will be key.

We would refer the PA to the recent report prepared by the Environmental Protection Agency (EPA) – Sustainable Rural Development: Managing Housing in the Countryside 2010. The recommendations of this report should be incorporated directly into the CDP.

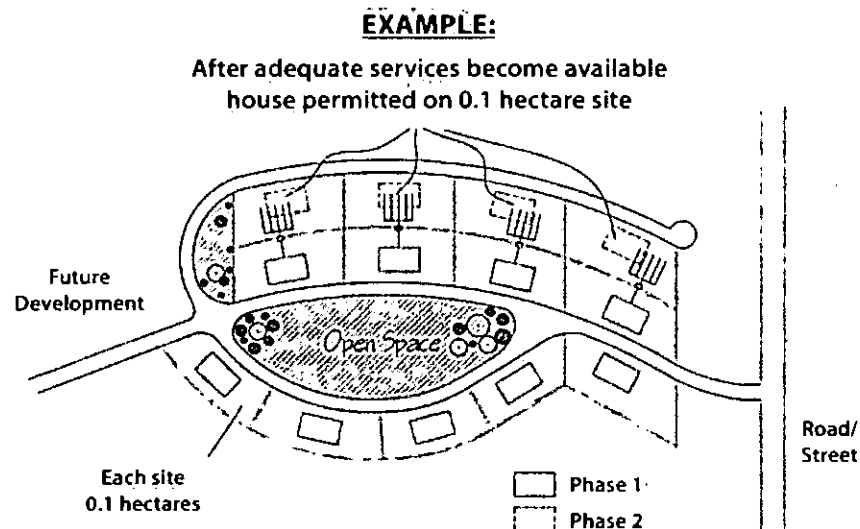


Figure 4 - The Planning Authority should implement a serviced sites initiative.

We would also direct the PA's attention to the most recent Forfas Statement on Energy which states:

'Ireland has opted for a policy of land-use planning which has resulted in the sprawl of low-density housing developments. This approach, while socially popular, is not sustainable from an energy, environmental, climate change or quality-of-life perspective'

The only truly sustainable form of rural housing development is the village/small town cluster, which allows for the efficient delivery of services and infrastructure; enhances social capital, provides a compact walkable community; and the protection of the natural environment.

⁶ See Fingal County Development Plan 2011-2017 (Chapter 8) for an overview of the rural housing challenge.

An Taisce's considered opinion on this issue is that, with over 410,000 one-off houses in Ireland and with a highly inequitable method of allocation together with major competing legal water quality obligations, serious consideration must now be given to a moratorium on a net increase in one-off housing units.

Limerick County Council has issued a policy statement on promoting nucleated settlements and serviced-sites in villages. The PA should adopt a similar approach in framing the CDP. It remains to be seen how effective these policies will be in practice.

Recommendation:

- The CDP has a key role to play in providing a suitable housing choice and alternative to one-off housing. It should be specific objective of the CDP to deliver suitable locations for serviced sites with access to piped infrastructure for those wishing to build their own dwelling houses.
- A greenbelt policy should be implemented in peri-urban areas in the vicinity of the CDP boundary with strict restrictions on urban-generated one-off housing to prevent ribbon development and uncontrolled sprawl.

4.3 Walking & Cycling

The CDP needs to place an emphasis on slow modes of transport. The National Cycle Policy Framework includes practical measures to help achieve the key objectives of this policy. The framework takes a methodical approach to investment and has an unquestioned research base. Better catering for cyclists and pedestrians must follow the hierarchy of provision, which starts with cutting speed and traffic levels as follows:

1. Reduce traffic speed and enforce the law.
2. Reduce traffic volume, particularly HGVs.
3. Redesign poorly-configured junctions, and better manage traffic.
4. Increase road space for cyclists and pedestrians (with wider inside lanes for example)
5. Consider dedicating hard shoulders to cyclists.
6. Having considered and, where feasible, undertaken all of the above, are there roads or streets that would benefit from the installation of on-road cycle lanes? Are there alignments which can be considered for off road cycle lanes?

Recommendation:

The CDP must include permeability and way-finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria in selecting all land zoned for new development connecting with key services and amenities such as schools, shops, parks etc (See Green Infrastructure approach below)

5.0 Economic Development & Employment

5.1 Approach to Economic Development

The economy is a wholly owned subsidiary of the environment. An unhealthy environment will result in an unhealthy society and economy. Although the link between sustainable economic development and natural resources has been widely ignored and eschewed by conventional economic policy makers, the onset of Peak Oil and Climate Change is precipitating a long overdue reappraisal of this costly misjudgement.

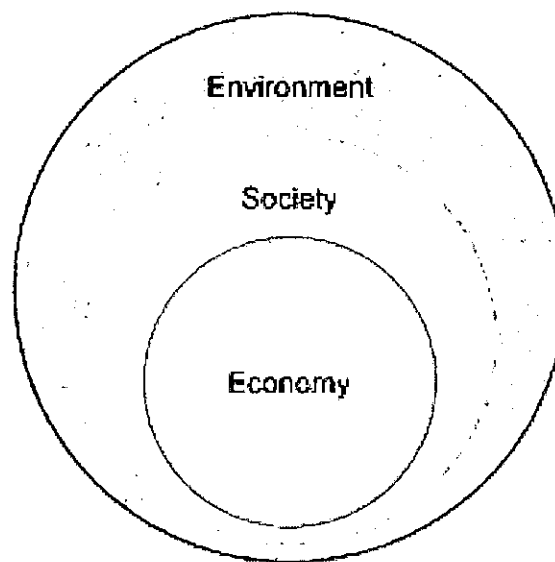


Figure 5 - The Economy is a subset of the Environment and Society

Understandably much of the current national political and media focus is on promoting economic development and employment. All mainstream commentators and politicians eulogize the accepted wisdom of the virtues of a return to economic growth (GDP/GNP) as the conventional solution to our current economic, unemployment and fiscal difficulties. However, it should be borne in mind that there is an inherent contradiction between the current model of economic growth and environmental and resource sustainability. Our society is currently locked into an economic system that has a GDP growth imperative and, as a consequence, increased energy demand, increased greenhouse gas emissions and increased resource throughput and depletion. Our ecological debts are as unstable as our financial debts. Neither is properly accounted for in the relentless pursuit of consumption growth. This contradiction is placing further pressure on the carrying capacity of the environment to support society and the economy.

Furthermore, GDP economic growth is a highly imperfect and counter-productive measure of human progress as it only measures income and does not account for the consumption of natural capital (resources), social inequality or the significant costs of anthropogenic pollution⁷. The Stern Report noted that Climate change is the greatest and widest-ranging market failure ever seen. As can be seen from the very high prices in Brent Crude Oil, the

⁷ Prosperity without Growth – The Transition to A Sustainable Economy, UK Sustainable Development Commission, 2009

return of economic growth to the world economy has triggered an energy price spike, reducing consumption demand and further recession.

Recommendation:

- Continued GDP economic growth in the Irish economy is unlikely and, in any event, is unsustainable in the long-term. It is prudent to plan now for a different economic future including low-growth, no-growth or contraction scenarios.

For example, a 2 per cent per annum growth in GDP would mean the carbon occasioned by each unit of economic output would have to be 130 times lower in 2050 than it is today otherwise we cross a threshold in terms of carbon emissions that future generations are unable to recover from. Economic growth is therefore inconsistent with the requirement to abate greenhouse gas emissions or reduce oil dependency. In any event, 2% GDP growth would mean the total size of the Irish economy with double every 35 years. **This is not physically possible in finite world and we should therefore not be planning for it.**

Current Government policy is to promote the Smart Economy and a return to an export-led economy. While this strategy has many virtues it is based on the premise that Ireland cannot compete with manufacturing industries in low-cost developing nations in a globalised economy. As a consequence, the structure of modern developed economies such as Ireland have typically tended to move progressively away from domestic manufacturing resulting in more and more finished and semi-finished goods needed to be imported from abroad and expanding the financial and services sector to pay for it. Of course, this strategy is extremely vulnerable to global economic instability, oil price inflation (for transport) and outsources environmental degradation to less regulated countries.

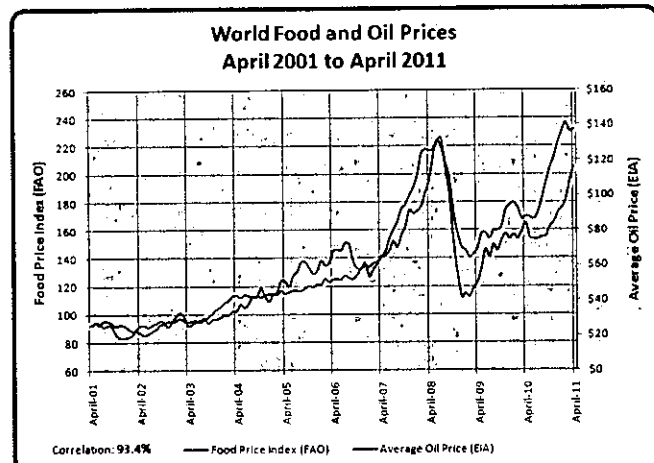


Figure 6 - Food prices will inflate with energy prices. Food security demands we produce more at home for local consumption

Current national economic development policies demonstrate a long-term blindness to the limitations of the physical world. Responses to the crisis which aim to restore the status quo are misguided and doomed to failure. Income today means nothing if it undermines the conditions upon which the prosperity of tomorrow depends.

Recommendation:

- The CDP must include policies which support the development of a vibrant local manufacturing base that is based on the sustainable use of local indigenous resources and local markets will make the locality more resilient in long run e.g. food processing, basic manufacturing etc.
- In light of peak oil, the CDP must plan for higher and more volatile energy prices (and high material costs too) over the period of the CDP and to use this window of opportunity to transition the CDP area into a post-carbon, low energy, low

consumption and resilient locality.

5.2 Critical Mass or 'Development at All Costs'?

The simplistic political response equates spatial development with economic development. Given the extent of the current economic difficulties there will be considerable pressure on the PA to grant planning permission for all development, particularly employment and commercial rate-generating development, over the lifetime of the CDP regardless of the location and infrastructural deficits. This ad-hoc '*All development is good development*' or '*Build/Zone it and they will come*' approach would be a mistake in the long-term.

The CDP must draw up a sensible strategy and agreed vision for physical development of the locality involving difficult choices based on objective planning criteria for the public good and then the PA must insist on rigorous adherence to this plan. Failure to do so, despite the short-term pressures, will simply serve to store up significant social, environmental, economic problems and costs in the years to come (as is currently the occurring from past laissez faire regulation).

A key factor for the future economic, social and environmental prosperity of the locality is the creation of an appropriate **critical mass** of population in the targeted settlement centres. The key locational criteria for new employment generating enterprises are urban centres with sufficient **agglomerations of scale** to support a range of vital support services and infrastructure (e.g. broadband, water services, social capital etc) for both the enterprise and individual employees. The non-strategic, ad-hoc and malleable approach of the past has failed. Accordingly, it stands that any diminution of the settlement strategy, while maybe socially and politically opportunistic in the short-term, will not in any way assist the enhancement of the local employment profile.

Recommendation:

- The CDP must set out a carefully crafted strategy and form a binding contract between the PA and the community based on proper planning principles. The current economic climate must not be used as a short-sighted opportunity to loosen proper planning regulation.
- Following any future precedential decision from An Bord Pleanála which overturns a PA decision, a review should be undertaken to examine the basis on which the decision was made, and a report presented to Councillors on required amendments to the CDP required.

5.3 Rural Enterprise

Recent OECD⁸ and Western Development Commission research shows that opportunities for development exist in all regions, including lagging rural regions, and that greater development occurs when regions are able to mobilise their own local assets and

⁸ How Regions Grow: Trends and Analysis, OECD 2009 & Regions Matter: Economic Recovery, Innovation and Sustainable Growth, OECD 2009

indigenous resources to capitalise on their specific comparative advantages, rather than depending on national transfers and subsidies.

An Taisce strongly supports local and rural enterprise which serves local population catchments. As oil prices inflate small-scale enterprises and employment opportunities based on the sustainable use of indigenous local resources, particularly agriculture, bio-energy, agri-business and forestry will become ever more important in building local community resilience.

Globalisation and the Single Farm Payment have undermined the viability of local agriculture in Ireland. Food security is now a major threat. Less than 40% of food consumed in Ireland is produced in Ireland – 60% is imported. Our entire agricultural production system is geared towards costly exports. Again, as oil prices inflate the **transition** to renewed reliance on local agriculture and indigenously produced and marketed food will become increasingly important.

Recommendation:

- Ireland's principle resource is our abundant availability of fertile agricultural land. The CDP must include policies to promote the sustainable local exploitation of natural resources for local markets.
- The CDP should include a policy for the promotion of local farmers markets and identify locations where farmers markets can take place.

5.3 Retail Development

Over the past decade there has been sustained pressure from multiple retail operators for out-of-town big box retailing and to circumvent the 'Sequential Approach'. The key driver of this trend is convenient access to publicly subsidised road networks, increased price competition and the ability to provide significant amounts of free surface car-parking. With the onset of the recession the profligate approach to permitting out-of-town retailing throughout Ireland has resulted in the decimation of historic town centres and the loss of many long-established local retailers. This in turn has had a knock-on impact for built heritage, social capital and quality of life.

In the short-term availability of free car-parking will provide out-of-town locations with a strong comparative advantage over town centre locations which is destroying traditional business models and their sustainable connection with the wider local economy. In the longer term the predominance of out-of-centre big box multiple retailers locks our society into complex 'just in time' supply chains and heightens our vulnerability to oil price inflation and reduces food security.

Recommendation:

- The CDP must include policies for the prohibition of out-of-centre retail development. The PA must take an active role in site assembly for new retail development on brownfield and infill sites, including using CPO powers where necessary to provide for the sensitive revitalisation of town centres.
- The PA must require the introduction of car parking charges for out-of-centre retail development and introduce a corresponding S.48 waiver for development contribution levies in lieu of off-street car parking for new retail development in

town centre locations.

- The CDP must include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.
- The CDP should include a policy which restricts large floor-plate multiples, which are dependent on complex oil-dependent supply chains, in favour of smaller floor-plate local shops.

5.4 Physical Infrastructure

Ireland has significant physical infrastructural deficits, particularly in transport and waste water infrastructure. The former is largely a result of our laissez faire and malleable land-use regulation and permissive approach to market-driven car dependent dispersed development patterns that were not aligned with appropriate infrastructure investment. The latter is as a consequence of a complete absence of any understanding of environmental carrying capacity and the short-term prioritisation of new development over other public health and environmental interests.

Planning has a vital part to play in ensuring the most efficient use of existing infrastructure and that new infrastructure is provided in the most effective and efficient manner possible. This will require that development be directed to places where infrastructure already exists or can be efficiently and cost-effectively expanded. This principle should apply whether the infrastructure is provided by public bodies or private companies. The future operational costs of infrastructure e.g. the long term costs of pumping water services must also be factored in. The need to maximise the return from long-term public investment in infrastructure must be the overriding priority. **Current economic difficulties should not dictate a return to an unsustainable spread of low density development.**

In order to address these deficits, the Exchequer is investing heavily through the Capital Investment Programme 2010 - 2016, Transport 21 and the Water Services Investment Programme. However, much of this infrastructure is being designed for a now departed era of energy abundance with no consideration given to the future price of oil or carbon. For example, the current energy bill for a large modern waste water treatment plan can be in the order of €2.5 million per annum. No assessment is being undertaken to ascertain whether this huge Exchequer investment is entrenching deep structural vulnerabilities in our society and storing up major problems for the future.

Recommendation:

- The CDP must include a detailed audit of all physical infrastructure (i.e. waste-water, potable water, ICT, transport, electricity etc) including location and capacity, to be used as a key criteria in determining the appropriate quantum and location of future new development.
- Develop an Infrastructure Delivery Plan - The CDP must include a clear programme of implementation which links the delivery of key pieces of social, physical and environmental infrastructure with the sequential and phases development of zoned land. It must clearly and transparently inform the citizen and manages expectations about the future development of an area. It does not include policies and objectives unless the PA is confident of their successful implementation.
- The Physical Infrastructure Audit should include an "Oil Vulnerability & Carbon Price

Impact Assessment" to explore the threats from inflated and volatile oil prices together with the future (shadow) price of carbon. This should be undertaken for both capital and operational municipal functions (e.g. sewage treatment, water supply, road developments, road repair, flood defences etc)

- New road objectives in the CDP must be discontinued. Investing further public monies on oil dependent transport infrastructure is wasteful.

5.5 Employment Land

The PDA 2010 includes strict new provisions to ensure that the CDP is consistent with national, regional and local settlement planning policy. The new 'Core Strategy' approach is primarily with concerned with population and housing but also includes specific provisions on economic and social development. It is vital that the profligate approach to residential and retail zoning which was prevalent in the past is not now replaced with a profligate approach to industrial and commercial zoning particularly in the current economic climate. An evidence-based approach must equally be applied to industrial and commercial development.

Recommendation:

- The CDP must include an Employment Land Survey to determine the quantum of employment land and where employment land should be located in the context of sustainable transport objectives and the existing and future carrying capacity of physical infrastructure.
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.

6.0 Water

6.1 Legal Obligations

The management of surface, ground and coastal water resources in accordance with the provisions of the EU Water Framework Directive will be one of the most crucial overarching challenges for the PA in this CDP. Human activities have led to deterioration in water quality over many years. Ireland faces an immense challenge in achieving 'good' status in all water bodies by 2015. The achievement of our Water Framework Directive obligations will have linked benefits in the protection and enhancement of biodiversity, combating climate change, improving human health, protecting landscape and creating more sustainable settlement patterns. **Irish legislation now provides that local authorities can be sued for failing to meet water quality standards.**

The most recent report by the Environmental Protection Agency published in December 2009 (Water Quality in Ireland 2007 – 2008) together with recent publication of the statutory River Basin Management Plans has clearly highlighted the immense scale of the challenge facing Ireland in meeting our binding commitments under the EU Water Framework Directive. This report documents that at least 50% of the water bodies in the country require restoration and that there has been a dramatically high deterioration in Irish water bodies in the last 20 years. The PDA 2010 includes specific mandatory objectives to ensure the **integration of water quality management requirements into the physical planning process.**

Recommendation:

- The CDP must include a suite of integrated policy measures to ensure that the PA's legal obligations under the Water Framework Directive and the operable River Basin Management Plan are achieved.

6.2 Municipal Waste Water Treatment

The CDP must be fully consistent with the PA's legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007).

Circular Letter PD7/09 issued by the Department of Environment, Heritage and Local Government sets out the 'Combined Approach' and requires that planning permission should not be granted to development proposals where there is insufficient cumulative capacity within the relevant Waste Water Treatment Plant. This further underlines the imperative for new development to be channelled to targeted development centres where the appropriate physical infrastructure is planned or present. Given the new era of resource scarcity (including financial resources), it is very unlikely that the waste-water treatment capacity will ever be present to service over-zoned land. As a consequence there is little point retaining a zoning objective for surplus zoned land. This land should be simply de-zoned as planning permission is unlikely ever to be achievable. Retaining a zoning objective in the face of landowner pressure will be counterproductive in the long run.

Recommendation:

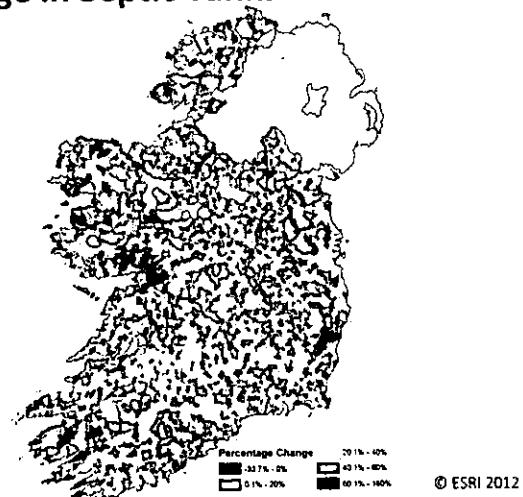
- The quantum of land zoned in the CDP must be carefully matched and phased with the existing and/or planned Population Equivalent (PE) capacity of the local waste-water treatment plan. Where there is no commitment in the Water Services Investment Programme (WSIP) to fund additional waste-water treatment capacity, surplus zoned land should be dezoned in accordance with the sequential approach.

6.3 Private Waste Water Treatment

Despite the proliferation of dispersed settlement, much of the soil conditions throughout Ireland are unsuited to private on-site waste water disposal. The legacy of this inappropriate development will be a significant challenge for the achievement of our binding Water Framework Directive targets by 2015.

The PA has binding legal obligations under the European Communities Environmental Objectives (Groundwater) Regulations 2010 and European Communities Environmental Objectives (Surfacewater) Regulations 2009. The EPA have issued a new Code of Practice for private waste water treatment and PA is being forced to implement a new very stringent compliance regime with respect to all on-site private waste water treatment facilities. These new requirements coupled with other environmental regulations will mean that achieving planning permission for one-off dwellings will be increasingly more difficult. The CDP must deliver appropriate alternative locations for those wishing to live in self-build properties.

Change in Septic Tanks 1991-2006



Recommendation:

- The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off, including, for example, a serviced site policy (see Limerick County Council's Serviced Site Policy).

6.4 Surface Water

The Intergovernmental Panel for Climate Change (IPCC) has predicted that Ireland will experience more intense and prolonged rainfall events. This has been evidenced by the recent serious rainfall events and flooding throughout Ireland. The OPW is currently undertaking a Catchment Flood Risk Assessment & Management Plans (CFRAMS) for all major river systems in Ireland.

The Department of the Environment, Heritage & Local Government has also issued the Flood Risk Assessment and Management Guidelines under Section 28 of the Planning & Development Acts on the management of flood risks and the planning system. This allows

for the de-zoning or down-zoning of lands where their development would comprise an unacceptable flood risk.

Conventional hard-engineered storm water management systems to drain surface run-off from asphalt, concrete and roof tiles are costly to implement and maintain. They also frequently fail causing urban flooding and a degradation of water quality. Sustainable Urban Drainage Systems are now becoming the norm throughout Ireland and are mandatory in the Greater Dublin Area. These systems aim to replicate greenfield run-off rates and include measures such as permeable paving, soft detention basins (Swales), rainwater harvesting and green/brown roofs.

Recommendation:

- The CDP must de-zone or down-zone lands categorized in 'Flood Zone A' or 'Flood Zone B' applying the sequential approach. Where the zoning of recognised flood prone areas is retained a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out.
- The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be made mandatory for all new development proposals.

6.5 Green Roofs

Green roof policies have significant benefits in terms of storm-water management, sustainable drainage, water quality, biodiversity, climate change mitigation and adaption, air quality, amenity and economics. Many European countries have been effectively using green building technologies for decades.

Recommendation:

- The CDP should seek to implement a Green Roofs policy through the development management process. It should be a mandatory requirement for all new developments to include an element of green roof technologies.

6.6 Integrated Constructed Wetlands

Restricted capital budgets in the future may prohibit investment in water services in small towns and villages. These settlements are key to developing a more nucleated settlement structure and it is vital, if a continued trend towards dispersal is to be abated, that innovative ways of ensuring that these settlements achieve their potential are implemented.

Integrated Constructed Wetlands (ICW) provides a proven and innovative mechanism to address waste-water capacity issues in rural villages, small urban centres and for one-off development. Constructing such systems is extremely cost effective (a fraction of conventional systems), have almost neutral ongoing running and energy costs and provide biodiversity and recreational benefits. These systems can provide local solutions to treat wastewater where it arises avoiding the need for significant public investment in physical infrastructure.

Constructed wetlands are increasingly been used in water and land management. They address the ever more apparent need for joined-up approaches to land and water management, with this need having International, European and National support i.e. the United Nations Environmental Programme (UNEP) and its Convention on Biological Diversity

(CBD) and the Ramsar 1971 Convention for the protection of wetlands and European Union Directives, particularly that of the Water Framework, Nitrates, Bathing Water, and Ground Water Directives.

There are a number of different types of constructed wetland in use in Ireland over the past 50 years or so. Notwithstanding this, it is only in the past 20 years that a wider application of this approach to water management been integrated into the needs of natural resource management, culminating in the development of the Integrated Constructed Wetlands (ICW) concept. This more holistic approach places emphasis on the need for explicit integration of water management with landscape-fit and associated improved site values, and the facilitation of habitat and biological diversity. This purposeful integration enhances processing synergies, robustness and sustainability that are not generally available in most other single-focused constructed wetland designs. Integration benefits are primarily due to relatively larger scaling patterns and the greater biological complexity. This robust, sustainable and multi-benefit yield from ICW systems has been successfully applied throughout the country to a range of effluent types in different situations when appropriate assessment, design and construction are conducted. ICW should be considered as a possible solution for the following situations;

- Treatment of agricultural runoff and wash waters;
- Treatment of industrial runoff and wash waters, e.g. recycling facilities, meat processing facilities etc;
- Treatment of sewage waters for single houses, hotels, guesthouses, schools, villages, towns, housing developments, industrial and commercial developments;
- Treatment of in-stream waters;
- Treatment of storm water, including roads, housing developments, commercial/industrial developments, golf courses; and,
- Creation and enhancement of habitats and biodiversity.

Thanks to the pioneering work by the NPWS and others, Ireland is amongst the global leaders in developing ICW systems. A test system has been operational at Castle Leslie Estate, Glasslough, Co. Monaghan (P.E. 1,750) which very successfully treats the effluent from the entire village^{9 10 11}. Further systems are operational in the Anne Valley, Co. Wexford and in Finglas, Co. Dublin.

The recently published code of practice for private waste water treatment plants for single dwellings has also recognised the effectiveness of these systems. An Bord Pleanála has also in the past granted planning permission for these systems for farm effluent. SEPA (The Scottish Environmental Protection Agency) recently published the Constructed Farm Wetlands Design Manual. This can be accessed on the SEPA website at http://www.sepa.org.uk/land/land_publications.aspx.

Recommendation:

- The PA should explore the use of Integrated Constructed Wetlands (ICW) as a low-cost and environmentally sustainable alternative to heavy engineered and energy intensive waste water treatment facilities.

⁹ <http://www.monaghan.ie/websitev2/waterservices/glasloughICWintroduction.html>

¹⁰ <http://www.engineersireland.ie/media/engineersireland/community/whitepapers/ICE-Integrated%20Constructed%20Wetland-%20Glaslough%20ICW%20Paper%20Nov08.pdf>

¹¹ http://www.dublincity.ie/WaterWasteEnvironment/WasteWater/Documents/Glaslough_ICW_Dan_Doddy_et_al_-_Feb_09_.pdf

7.0 Natural Capital & Ecosystem Services

7.1 Importance & Legal Obligations

The PA will be fully aware of its important legal obligations under the EU Habitats Directive and EU Birds Directive¹² as brought to light in a number of recent judgments of the European Court of Justice¹³ and now fully incorporated into the PDA 2010.

Ireland has an extremely negative record in complying with EU Environmental Directives. There are currently 21 ongoing cases against Ireland which could result in significant financial penalties¹⁴. **Stringent adherence to our statutory obligations is an absolute imperative in all development management decisions (regardless of scale).**

Biodiversity is a critical ecosystem resource that provides a free service to human wellbeing, our society and our economy, which is not inexhaustible and is under consistent and sustained pressure. Nearly two-thirds of the services provided by nature to humankind are in decline worldwide and the global ecosystem is close to collapse. Ireland's ecosystem services in terms of their productive output and human utility are estimated to be over €2.6 billion per year. This very conservative estimate omits other significant services for example waste assimilation provided by aquatic biodiversity and benefits to human health, social health and environmental benefits. Similar to all critical resources they must be carefully managed to ensure it is sustained as a renewable resource into the future¹⁵.

Ireland has committed to halting any further reduction in biological diversity under the International Convention on Biodiversity. A new National Biodiversity Plan 2010 – 2015 has recently been published and should be fully incorporated into the CDP.

Recommendation:

- In order to prevent potential legal action the CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law.
- Achieving adherence to the PA's legal obligations under the Habitats Directive and other environmental legislation cannot be achieved without the preparation in tandem with the CDP of a full Strategic Environmental Assessment and Habitats Directive Assessment.
- The policy recommendations of the National Biodiversity Plan 2010 – 2015 should be fully incorporated into the CDP and a Local Biodiversity Action Plan prepared.

7.2 Green Infrastructure

Green infrastructure (GI) is rapidly becoming a very important concept in land use planning. Specific reference to GI is included in the Regional Planning Guidelines for the

¹² Circular Letter SEA 1/08 & NPWS 1/08

¹³ Case 418/04 EC Commission v Ireland

¹⁴ e.g. in 2005 France was fined a lump sum of €20m, plus €57.7m for each 6 months of continuing non-compliance with the ECJ's judgment (C-304/02).

¹⁵ The Economic and Social Aspects of Biodiversity – Benefits & Costs of Biodiversity in Ireland, DoECLG, 2008

Greater Dublin Area and the Fingal County Development Plan. Comhar SDC have recently produced a report entitled 'Creating Green Infrastructure for Ireland'. The PA will note that a new provision is included within the PDA 2010 (s.7(b)(i) (Amendment to s.10) as follows:

"the encouragement, pursuant to Article 10 of the Habitats Directive, of the management of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species;"

The GI approach will increasingly be incorporated into the planning and development process and will become the accepted way to plan and manage urban spaces, reversing the trend of urban societies becoming disconnected from the natural environment on which they ultimately depend for survival.

GI can be defined as the physical environment within and between our cities, towns and villages. It is a network of multi-functional open spaces, including formal parks, gardens, woodlands, green corridors, waterways, street trees and open countryside. It comprises all environmental resources and thus a green infrastructure approach also contributes towards sustainable resource management. This includes a holistic approach to developing the landscape inclusive of other influences such as ecological development, improving air, water and soil quality, flood protection, access provisions and linkages, climate change/amelioration, pollution control and quality of life issues, in a sustainable and ongoing manner. GI is important in informing the decision making process on promoting interaction between local government departments on the direction and focus of future development.

GI can also play an important part in fulfilling Ireland's obligations under the EU Habitats Directive to ensure provision is made to adequate linkages between Natura 2000 sites arresting habitat fragmentation.

Recommendation:

- The CDP should adopt a Green Infrastructure approach and include a section entitled Green Infrastructure modelled on the content of the Fingal County Development Plan 2010 – 2016 (Chapter 3)

8.0 Social Capital & Public Participation

8.1 Effective Community Participation

It is absolutely essential for the CDP to be effective that it is prepared in a transparent manner in partnership with the local community (including children) and stakeholders and is aimed at building consensus. Far too often in the past CDPs have been developer led and there has been no meaningful engagement with local communities. The consequences have generally been deleterious to community integration and social capital. The Heritage Council through the Julianstown Village Design Statement pilot projects have been developing new techniques on fostering local community involvement in local planning based on local empowerment and ownership.

Recommendation:

- The CDP must be informed by a high level of transparency, democratic participation, local empowerment, decision-making and ownership. The Julianstown Village Design Statement prepared by the Heritage Council is useful example of how this can be achieved.
- Bridging the gap between strategic planning, environmental requirements and the wider interests of the common good with local interests can be a process fraught with difficulty and conflict. The PA should appoint an independent facilitator to manage the public participation and consultation process [see <http://www.partnerships.org.uk/>]

8.2 Human Health

Obesity is now a major public health epidemic in Ireland. The Institute of Public Health, in its report titled Health Impacts of the Built Environment, together with the National Obesity Taskforce¹⁶ found that there is substantial evidence to suggest that urban sprawl is contributing to an 'obesogenic' environment with increasing obesity levels as increased car dependency, few opportunities for spontaneous involuntary exercise, longer commuting times and less time for physical exercise become a feature of life for many people.

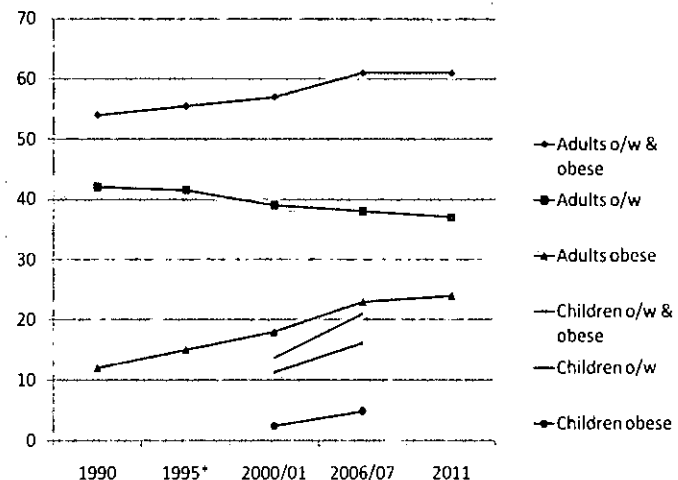


Figure 7 - Obesity is now an epidemic in Ireland due to our 'Obesogenic' environment

Ireland's adult obesity rate (24%) is now higher than in 18 states in the US. Obesity is costing the Irish health service and then Irish tax payer tens of millions of euros each year. Communities that are planned and developed with regard to the health impact of the

¹⁶ Obesity: The Policy Challenges – The Report of the National Taskforce on Obesity 2005

built environment could enjoy lower levels of obesity, cardiovascular disease, asthma and psychological stress.

Recommendation:

- The CDP should implement the policies included in the recent report prepared by the Irish Heart Foundation – Building Young Hearts: Physical Activity, Young People and the Physical Environment, 2010.

With regard the Department of the Environment, Community and Local Government Draft Local Area Plan Guidelines 2012, it should be noted that Page thirty-two of the guidelines state that:

...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.

It is asked the council include a policy within the plan to ensure that zonings in proximity to schools are reviewed in this light, and the zoning matrix amended appropriately. An Taisce has witnessed several instances in relation to fast-food developments where there has been significant conflict between local residents, school management and developers over the proposed use, most notably in Co Meath (Ref: NT/120082) and Co Wicklow (Ref: 13/8028). Some clarity of this issue in the plan might avoid this conflict from arising.

8.3 Allotments & Community Gardens

Allotments have become increasingly popular in recent years and will continue to do so with inflation in energy prices and general public consciousness with respect to food quality, food security, promoting local resilience and fostering community interaction. The PDA 2010 introduces a new definition of allotments into the planning code and new provisions to allow objectives to be included in development plans for the development of allotments.

Recommendation:

- The CDP must designate suitable locations for allotments/community gardens and include a requirement that a designated area for allotment space be required in each new residential/mixed-use developments.

9.0 Cultural & Built Heritage

Ireland's unique built and cultural heritage is increasingly threatened with destruction. Ireland is a signatory to UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage ratified by Ireland in 1991 and to the Granda Convention ratified in Ireland in 1985. These conventions provide the basis for our national commitment to the protection of the architectural heritage the importance of 'handing down to future generations a system of cultural references'. It relies for its effectiveness on its signatory countries implementing their own national protective regimes.

Despite the vital economic importance of cultural and built heritage to tourism, Ireland has a very lax record in protecting our unique built and cultural heritage.

Recommendation:

- **The CDP should seek to designate more Architectural Conservation Areas (ACA's) and Special Planning Control Schemes.**
- **S.48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation**
- **Important views and prospects must be protected**
- **The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.**

10.0 Implementation & Monitoring

10.1 Overview

Over the past fifteen years there has been no shortage of very well intentioned policy statement documents published in Ireland by Government, Quasi-Government and Non-Governmental Organisations with respect to the promotion of sustainable development. *'Sustainable Development – A Strategy for Ireland'* was published as far back as 1997 by the Government and included prescient policy objectives with respect to the promotion of sustainable land use planning policies. In the intervening period further important policy documents were published by the Government including the *Residential Density Guidelines for Planning Authorities (1999)*; *Towards Sustainable Local Communities – Local Agenda 21 (2001)*, the *National Spatial Strategy (2002)*; the *Sustainable Residential Development in Urban Areas Guidelines (2008)* and the recently published *Smarter Travel – A New Transport Strategy for Ireland (2009)* all of which include detailed policy guidance on the achievement of sustainable land use patterns.

However, the reality has been (and remains) a widespread absence of implementation and an almost complete **divergence between policy and practice**. Policy guidance documents such as those described above have been heretofore habitually ignored in favour of pressing short-term economic requirements, the requirement to promote commercial rate revenue development and lobbying from special interest groups. As a result and it must be recognised, the direct legacy of the recent 'Celtic Tiger' era and associated expansion in construction activity is that Ireland now has one of the most unsustainable, economically inefficient, structurally weak and spatially dispersed settlement patterns anywhere in Europe. **In the current economic circumstances within which Ireland finds itself, there is a very real danger that we will revert to the failed and near-sighted 'all development is good development' mantra of the past without paying adequate attention to the long-term consequences and costs.**

We therefore submit that it is now, more than ever, of paramount importance that the PA moves beyond the mere rhetoric of commendable policy objectives within the text of the forthcoming CDP and towards **robust targets, actions and measures** to achieve the tangible implementation and a transition to a low-carbon, low-energy and sustainable society. Implementation has been the achilles heel of the achievement of sustainable development and land-use planning in Ireland and must therefore now at this critical juncture be the focus of the CDP. We set out below two ways in which the effective implementation of the sustainable objective targets can be achieved.

10.2 Targets & Monitoring

The CDP is a subsidiary policy document to the development plan. Section 15 of the Planning & Development Act 2000 imposes a general duty on the PA to secure the objectives of a Development Plan. Section 15(2) requires that not more than two years after the making of a Development Plan the Manager must provide a report to the Elected Members on the progress achieved in securing the objectives of the plan. Section 6 of the Development Plan Guidelines for Planning Authorities 2007 sets out guidance as to how

the implementation of the policies and objectives of a development plan can be achieved. The Guidelines state that policies and objectives (1) must be capable of implementation and (2) must be possible to monitor and evaluate the effectiveness or otherwise of achieving stated aims. Monitoring involves the collation and analysis of performance data which must be linked to an evaluation process so that effectiveness can be measured against stated criteria.

It is not possible to monitor the effectiveness of the policies and objectives of the CDP without the inclusion of quantifiable targets. Many recent best-practice statutory land use plans now include implementation measures¹⁷. We have included in Appendix 1 a sample schedule of Targets, Indicators and Monitoring Measures and we recommend a similar schedule should be included in the CDP.

In many cases the policies and objectives of the CDP will be general, non-specific and therefore unquantifiable. Indeed a major criticism of many CDPs is that they are far too long and unwieldy due to the breadth of information which must be included within the document. The purpose of the schedule included in Appendix 1 is to distill the core policies of the CDP into their key sustainability objectives so that they can be measured against benchmark criteria during subsequent reviews. This is not a complex task as the SEA Directive already requires that that monitoring measures be included and, in many cases, these measures are directly transferable to the CDP document.

Recommendation:

- The CDP must include a detailed implementation and monitoring schedule which outlines the manner in which the CDP envisages the future development of the area with particular focus on the phased and sequential development of the locality – See Appendix 1.
- A designated implementation officer must be appointed to oversee the implementation of the CDP and ensure joined up thinking between development management, forward planning, environment, service, infrastructure provision etc.

10.3 Sustainability Matrix

A key challenge for the implementation of the policies and objectives of the CDP is the convergence of national, regional and local sustainable development policy with actual development management decisions made by the PA in practice. For the most part, the achievement of the objectives of the CDP can only be achieved through private sector action together with, to a lesser extent, public spending in infrastructural capacity.

We therefore recommend that the PA, in addition to the normal development management criteria, include a **'Sustainability Matrix'** in the CDP setting out the range of sustainability criteria which should be intrinsic to all planning applications for development. This would act as both a guide to prospective applicants and PA staff in distilling the core sustainability, community and social infrastructure requirements of the CDP into a schedule of convenient assessment criteria.

¹⁷ See for example the [Draft Limerick County Development Plan 2010 - 2016](#), [Draft Wicklow County Development Plan 2010 - 2016](#) and the [Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022](#).

Recommendation:

- The concept of a 'Sustainability Matrix' is now well developed throughout the UK and increasingly in Ireland¹⁸ and we recommend the PA including a requirement for all development proposals to be required to submit a Sustainability Statement with all planning applications. An excellent exemplar of a Sustainability Matrix is included the Clonburris Strategic Development Zone (SDZ)¹⁹ strategy prepared by South Dublin County Council.

10.4 Accountability

In recent years the Irish planning system has been brought into disrepute. Corrupt zoning decisions, bad planning and the link between developers and politicians has brought calamitous consequences. More than ever the planning system is required to address the major challenges of our time. It must be reclaimed with transparent democratic decision making. The PDA 2010 has made significant legislative changes to the forward planning process and these must be adhered to by the PA to ensure the CDP is not subject to legal challenge or intervention.

Spatial planning is amongst the most important function of the PA and it's elected members. We refer the PA to the Judgment of the High Court in respect of Farrell & Forde v Limerick County Council [2008 No. 1398 J.R.]. In this case Mr. Justice McGovern found that the Manager only had to give effect to the lawful resolutions of the elected members. The Manager has the power to treat a resolution as invalid where the Elected Members have ignored the local authority's expert advice to the effect that the proposal would be unlawful or contrary to the proper planning and development of the area and where they fail to outline any proper planning – based reason for rejecting that advice. Mr. Justice McGovern goes on to state:

'The planning process involves taking into account many considerations which may involve competing claims. The process exists for the benefit of the community at large and not for sectional interests, whether they be landowners, private individuals or developers, although there may be cases where these interests coincide'

We request that the Manager and Elected Members have full regard to their legal obligations in the consideration of the CDP.

¹⁸ See For Example: http://www.lcc.ie/Planning/County_Development_Plans/Draft_Dev_Plan2010-2016/English/

¹⁹ [http://www.clonburris.ie/images/stories/clonburris_approved_scheme/SectionG_Sustainability_Toolkit_and_Design_Standards.p
df](http://www.clonburris.ie/images/stories/clonburris_approved_scheme/SectionG_Sustainability_Toolkit_and_Design_Standards.pdf)

11.0 Conclusion

The key priority of the CDP must be transition to a low-carbon society and economy and to mitigate the significant risks associated with rising energy costs and climate change adaptation. **Business as usual is no longer an option, we can no longer afford to continue the pursuit of the failed short-sighted policy approaches of the past and that our collective future must be different.**

The international and national economic recession has provided a narrow window of opportunity to take action to concentrate investment and focus policy on the **transition** to a post-oil low-carbon locally resilient society. This is the major challenge of our time and will require urgent understanding of the nature of the challenges; no shortage of decisive political leadership, a radical change of direction together with robust and, in some instances, policy implementation which will be politically unpopular in the short-term. The statutory planning system, through the regulation of physical development and land use, has the most critical role to play in facilitating this **transition**. We have included in **Appendix 2** a series of transition measures which should be used as a guide in the preparation of the CDP.

The success or otherwise of the forthcoming CDP can only be judged against verifiable and implementable criteria which are subject to ongoing monitoring. We look forward to making further submissions to the CDP in due course.

12.0 Appendices

Appendix 1 - Suggested Implementation & Monitoring Measures

** Note – This list is not exhaustive and can be added to and amended as appropriate.*

Theme	Strategic Policy Objective	Indicator	Source of Data/Information	Target
Settlement Patterns	Strategic Settlement Policy	Percentage of new population growth directed to designated upper tiers (Gateways, Hubs, Large Towns) of NSS/RPG settlement hierarchy	Local Authority, CSO (SAPS), NTA, DoECLG	60% of all new population growth to NSS/RPG upper tier designated centres
	Residential Density	Average housing densities in new development areas	Local Authority, CSO (SAPS), NTA, DoECLG	Average 50 per hectare
	Population Density	Population density in designated settlements	Local Authority, CSO (SAPS), NTA, DoECLG	To Increase
	Sequential Development	Total new development built on brownfield and/or urban infill land	Local Authority, CSO (SAPS), NTA, DoECLG	To increase
	Urban Consolidation	Total new development built on greenfield land	Local Authority, CSO (SAPS), NTA, DoECLG	To reduce
	Sequential Development	Percentage of new out-of-centre retail development permitted	Local Authority	No new out-of-centre retail development permitted
	Travel Demand Management	Mean Travel Times to Work/School/College etc	Local Authority, CSO (SAPS), NTA, DoECLG; Centrality Index	To reduce
	Waste Water Capacity	WWTP capacity (Population Equivalent to Population Ratio)	Local Authority, CSO, DoECLG;	100% of all new development to match with PE discharge license
	Modal Shift	Percentage of population/employment locations within 400 m of public transport	Local Authority, CSO, NTA, DoECLG	To increase
	Sustainable Communities	Percentage of new developments which comply with S.28 Design Guidance	Local Authority	100% of new developments to comply.

Theme	Strategic Policy Objective	Indicator	Source of Data/Information	Target
	Rural Housing	Numbers of new one-off rural housing units	CSO, Local Authority	Maximum 5% of increase in new housing units.
	Rural Villages	Number of new residential developments in rural villages	CSO, Local Authority	To increase
	Rural Design	% of new one-off rural dwellings which comply with Rural Housing Design Guide	Local Authority	100% of new developments to comply
Energy & Climate Change	Reduced Private Car Use	Total kilometres travelled by car fleet	NTA, CSO, DoT	To reduce by 20% (2020)
	Reduced Private Car Use	Number of car trips (morning peak)	NTA, CSO, DoT	To reduce from 65% to 45% (2020)
	Reduced GHG Emissions from Transport	National GHG Emissions for Transport	EPA, NTA, DoT, DoECLG, SEAI	Reduce by 20% per annum (200% in 2020)
	Reduced Energy Consumption from Transport	Total Final Energy Consumption from Transport	SEAI, DoT	To reduce by 20% (2020)
	Promote Public Transport	Transport Modal Split - Percentage use of public transport	NTA, CSO, DoT	55% of all commuter journeys (2020)
	Promote Public Transport	Extent of new bus corridors (Km)	Local Authority	To increase by 50%
	Promote Cycling & Walking	Cycling & walking as a transport mode	CSO Modal Split	10% of all trips by bicycle (2020)
	Promote Cycling & Walking	Extent of new walking & cycling routes ('Green Routes') (Km)	Local Authority	To increase by 50% (2020)
	Energy Descent	Per Capita demand for energy/Energy demand by Sector	Eirgrid, ESB Networks, DoECLG, CER, SEAI	To reduce by 20% (2020)
	Renewable Energy	Percentage of national renewable energy penetration	SEAI, DECNR	To increase by 20%(2020)
GHG Reduction	National CO ² Emissions per capita	EPA, DoECLG	To decrease by 20%(2020)	

Theme	Strategic Policy Objective	Indicator	Source of Data/Information	Target
	Energy Efficiency	Percentage of New Homes achieving BER A-B	SEAI	100% of new homes achieving BER A-B (2020)
	Energy Efficiency	Percentage of New Homes achieving BER A-B	SEAI	100% of new homes achieving BER A-B (2020)
Water	Surface Water Quality	% of Water Bodies achieving WFD 'Good' Status	Quality of receiving waters – RBD/EPA Data	100% of water bodies achieving 'Good' Status by 2015
	Surface Water Quality	Scale of existing and new development to match EPA Discharge License	Local Authority, EPA	100% of new development to match EPA Discharge License
	Groundwater Quality	% of groundwater complying with WFD 'Good' Status	Local Authority, RBD, EPA	100% of groundwater achieving 'Good' Status by 2015
	Water Conservation	At plant level water supply energy demand requirements per annum as KWh/annum	Local Authority, EPA	To reduce by 25% (2020)
	Foul Effluent	At plant level effluent treatment energy demand requirements per annum as KWh/annum	Local Authority, EPA	To reduce by 25% (2020)
	Water Conservation	% of new homes/businesses with water conservation/demand management measures installed	Local Authority	100% of new homes/businesses with installed water conservation/demand management measures installed. (2015)
	Water Demand Management	% of installed water meters	Local Authority, CSO	100% of new homes/businesses with installed water meter (2015)

Theme	Strategic Policy Objective	Indicator	Source of Data/Information	Target
	Surface Water Management	% of new development with greenfield run of rates	Local Authority	100% of new developments with greenfield surface water run-off rates (2015)
	Flooding	Occurrence of Flood Events/Annual cost of flooding	OPW, EPA, Local Authority	To reduce.
	Flooding	% of land-use zoning / permitted development which complies with S.28 Guidance with respect to flood risk management & assessment/	Local Authority	100% of all land-use zoning/permitted development to comply.
Quality of Life	Social Infrastructure	% of Social & Affordable Housing provided in New Developments	Local Authority	Average 20% of Social & Affordable Housing in all new developments
	Integrated Communities	Distance to Community Facilities & Services	Local Authority, CSO, Centrality Index	100% of all new developments within 1km of services.
	Connected Communities	Distance to Public Transport	Local Authority, CSO, Centrality Index	100% of new developments within 400m of public transport.
	Access to Education	Primary & Secondary Schools per 10,000 population	DoES, CSO - Education Mapping; - Demographic/Age Dependency Ratios	100% of all new residential development with convenient access to education facilities
	Healthcare Facilities	Healthcare Infrastructure per 10,000 population	HSE Health Atlas, Local Authority, Trustz Haase	100% of all new residential development with convenient access to healthcare facilities
	Childcare Facilities	Childcare facilities per 1,000 population	Local Authority	100% of new residential development with convenient access to childcare facilities

Theme	Strategic Policy Objective	Indicator	Source of Data/Information	Target
	Recreation	Number of Children's Playgrounds directly provided per 1000 population	Local Authority	To Increase
	Recreation	Number of Swimming Pools per 1000 population	Local Authority	To Increase
	Universal Access	% new developments with disability access	Local Authority	To Increase
	ICT	Extend of Broadband Penetration	Forfas, DECNR	100% of new developments with disability access 100% of new development with broadband access
Environment & Heritage	Green Open Space	Number of green open space amenity areas per 1,000 population	Local Authority	To Increase
	Forests	Forests within 10km of designated settlement patterns	NPWS, FIPS	To Increase
	Trees	Number of Tree Protection Orders	Local Authority	To Increase
	Water	Alignment between plan policies & RBMPs	Local Authority, RBD, EPA	To Increase
	Built Heritage	Number of Protected Structures	Local Authority, NIAH	100% alignment (2015)
	Built Heritage	Number of Architectural Conservation Areas	Local Authority	To Increase
	Green Infrastructure	Extent of Green Infrastructure (Approximate Areas)	Local Authority	To Increase
	Landscape Conservation	% of new development comply with Landscape Conservation Assessment	Local Authority	To Increase
	Biodiversity	% decline of biodiversity & habitats	Local Authority, Local Biodiversity Action Plan, NPWS. Biodiversity Maps, I-WEBS Etc	100% of new development comply with LCA No decline(2015)
	Habitat Protection	Number of sites of importance for nature conservation adversely affected by development.	Local Authority, Local Biodiversity Action Plan, NPWS. Biodiversity Maps, I-WEBS Etc	No sites adversely affected

Theme	Strategic Policy Objective	Indicator	Source of Data/Information	Target
	Water	Alignment between plan policies & RBMP	Local Authority, RBD, EPA	100% alignment
	Built Heritage	Number of Protected Structures	Local Authority, NIAH	To Increase
	Built Heritage	Number of Architectural Conservation Areas	Local Authority	To Increase
Waste	Recycling	Number of bring banks per 1,000 population & Recycling Rates	Local Authority	To Increase
	Waste Minimisation	Use of Home Composting & brown bins	Local Authority, EPA	To Increase
	Waste Diversions	% of waste to landfill	Local Authority, EPA	To reduce
Economy & Employment	Green Economy	No. of planning permissions which have a specific focus on green business	Local Authority, IDA, Enterprise Ireland	To Increase
	Retail	Retail floorspace permitted in out-of-centre locations	Local Authority	No new retail floorspace permitted in out-of-centre locations
	Commuting	Travel to work times	Local Authority, NTA, CSO	To decrease
	Employment	New Employment Opportunities	CSO, POWCAR, QNHS, IDA, Enterprise Ireland, FAS	To increase

Appendix 2 – Transition Measures

Positive Visioning

We can only create what we can first vision:

- If we can't imagine a positive future we won't be able to create it.
- A positive message helps people engage with the challenges of these times.
- Change is happening – our choice is between a future we want and one which happens to us.
- Transition Initiatives are based on a dedication to the creation of tangible, clearly expressed and practical visions of the community in question beyond its present-day dependence on fossil fuels.
- Our primary focus is not campaigning against things, but rather on positive, empowering possibilities and opportunities.
- The generation of new stories and myths are central to this visioning work.

1. Help People Access Good Information and Trust Them to Make Good Decisions

- Transition Initiatives dedicate themselves, through all aspects of their work, to raising awareness of peak oil and climate change and related issues such as critiquing economic growth. In doing so they recognise the responsibility to present this information in ways which are playful, articulate, accessible and engaging, and which enable people to feel enthused and empowered rather than powerless.
- Transition Initiatives focus on telling people the closest version of the truth that we know in times when the information available is deeply contradictory.
- The messages are non-directive, respecting each person's ability to make a response that is appropriate to their situation.

2. Inclusion and Openness

- Successful Transition Initiatives need an unprecedented coming together of the broad diversity of society. They dedicate themselves to ensuring that their decision making processes and their working groups embody principles of openness and inclusion.
- This principle also refers to the principle of each initiative reaching the community in its entirety, and endeavouring, from an early stage, to engage their local business community, the diversity of community groups and local authorities.
- It makes explicit the principle that there is, in the challenge of energy descent, no room for 'them and us' thinking.
- In a successful transition project every skill is valuable because there is so much happening.
- We need good listeners, gardeners, people who like to make and fix everything, good parties, discussions, energy engineers, inspiring art and music, builders, planners, project managers.
- Bring your passion and make that their contribution – if there isn't a project working in the area you are passionate about, create one!!

3. Enable Sharing and Networking

- Transition Initiatives dedicate themselves to sharing their successes, failures, insights and connections at the various scales across the Transition network, so as to more widely build up a collective body of experience.

4. Build Resilience

- This stresses the fundamental importance of building resilience, that is, the capacity of our businesses, communities and settlements to deal as well as possible with shock.
- Transition initiatives commit to building resilience across a wide range of areas (food, economics, energy etc) and also on a range of scales (from the local to the national) as seems appropriate - and to setting them within an overall context of the need to do all we can to ensure general environmental resilience.
- Most communities in the past had – a generation or two ago – the basic skills needed for life such as growing and preserving food, making clothes, and building with local materials.

6. Inner and Outer Transition

- The challenges we face are not just caused by a mistake in our technologies but as a direct result of our world view and belief system.
- The impact of the information about the state of our planet can generate fear and grief - which may underlie the state of denial that many people are caught in.
- Psychological models can help us understand what is really happening and avoid unconscious processes sabotaging change, e.g. addictions models, models for behavioural change.
- This principle also honours the fact that Transition thrives because it enables and supports people to do what they are passionate about, what they feel called to do.

7. Transition makes sense - the solution is the same size as the problem

- Many films or books who suggest that changing light bulbs, recycling and driving smaller cars may be enough. This causes a state called "Cognitive Dissonance" – a trance where you have been given an answer, but know that it is not going to solve the problem you've just been given.
- We look at the whole system not just one issue because we are facing a systems failure not a single problem failure.
- We work with complexity, mimicking nature in solutions based problem solving.

8. Subsidiary: self-organisation and decision making at the appropriate level

- This final principle enshrines the idea that the intention of the Transition model is not to centralise or control decision making, but rather to work with everyone so that it is practiced at the most appropriate, practical and empowering level, and in such a way that it models the ability of natural systems to self organise.
- We create ways of working that are easy to copy and spread quickly.

Appendix 3 - Local Climate Change & Energy Strategy

Introduction

This Strategy is to provide for the coordinated measures necessary and achievable at the local level to achieve the long term strategic action needed to reduce climate emissions.

Climate change is consequence of unsustainable resource use by society, particularly energy use. Abating greenhouse gas emissions and reducing energy demand are therefore two sides of the same coin. Addressing climate change and must be seen as an integral part of addressing energy scarcity. By migrating to a carbon neutral society and economy earlier, resilience in the face of inflating energy costs builds resilience.

The Science of Climate Change

The advice of the UN Intergovernmental Panel on Climate Change IPCC scientific consensus should be accepted. Global average temperature must be contained at no more than 2° above pre-Industrial Revolution levels, and atmospheric CO² and other warming gases stabilised at 450 parts per million CO² equivalent (Co2 Eq), to avoid a catastrophic tipping point generating 6° rise in global temperature by the end of the 21st century and resulting sea level rise, desertification and global population displacement and resource conflict.

The Irish Context

The United States is the highest per capita Greenhouse gas emitter at 25 tonnes per person. Ireland ranks sixth at 17 tonnes per capita. By contrast, the UK per capita is 11 tonnes. Irish national emissions, i.e. those calculated only within the Kyoto-defined headings within Ireland, are at a level of 69 million tonnes, which is about equivalent to the total emissions of Sweden, which has a population more than twice that of Ireland.

The CO² Equivalent Targets Needed

There is currently a complete mismatch between the science of Global Warming and the public awareness, let alone political initiative, to take the action required. CO² Eq atmospheric stabilisation requires a reduction in current levels of anthropogenic (human caused) CO² Eq Emissions by a level in excess of 80% by 2050. This is conservative advice based on a long drawn-out process of achieving scientific consensus through the UN Intergovernmental Panel on Climate Change (IPCC) process, which published its fourth report in 2007. This means bringing Irish per capita emissions to a level of under 2 tonnes, if not less. On top of this, the externalities generated by air and shipping and import of food, fertilizer, steel, and carbon-intensive goods, particularly from Asia, requires reduction at the same level.

Immediate Global Warming Projections for Ireland

Extensive ongoing multi-disciplinary research is being carried out in Ireland by the EPA, Met Eireann and the Irish universities and third level institutions, linked to colleagues all across the globe.

Even if effective international action is taken to stabilise CO² Eq. emissions at 450ppm, temperatures are still project to rise to up to 2° over pre-industrial levels. A number of conclusions are gaining consensus among the scientific community of the impact of this irreversible rise in Ireland including:

- (i) Projection of higher rainfalls in the north and west, with lower rainfall in the south and east to a level of 10-15% per annum
 - (ii) More concentrated periods of higher rainfall
 - (iii) More exposure to flood risk
 - (iv) Increasing coastal erosion pressure, particularly on east coast
 - (v) Lower river flows, possibly to a level of 50% during lower rainfall periods potentially affecting fish spawning and water supply
- More variable water saturation levels in upland blanket bogs, particularly more variation between dry periods and saturation, raising combined risks of peat slides in high rainfall and drying out with Greenhouse gas emission and biodiversity loss in low rainfall periods.

Current Irish Targets and Policy

The 1997 Kyoto Protocol represented the important first step in global cooperation to confront climate change. Ireland successfully lobbied for an increase in its emission allowance which was set at 13 over 1990 levels. National Climate Change Strategy Ireland 2000 set out the practical measures required. However, because of non implementation, emissions grew to the same level as would have occurred if there had been no strategy and are 26% above 1990 levels by 2008, twice that of the 13% cap. With the impact of the economic recession emissions have fallen back somewhat.

In January 2008 the EU Commission announced a target of achieving a 20% reduction on EU levels by 2020, to be increased to 30% in the event of the 2007 Bali Roadmap leading a new global agreement being resolved. This is still way below the reductions required by science. The January 2008 national allocation targets proposed by the Commission are based primarily on GDP and propose a new Irish target of 20% reduction below 1990 levels.

What Role Can Local Authorities Take?

There is major opportunity for local authorities to adopt progressive Climate Change strategies. Local authorities can take inspiration from the increasing number of regions across the world that are taking action both complementary to or additional to national governments against Climate Change²⁰.

While it must be recognised that there is a hierarchy of achievability of measures that can only be advanced at international or national level, there is an enormous scope for initiative and action by individual localities. This can then be more effectively linked to action at regional level and national level.

Local Climate Strategy

The overall aim is for the local authority s to adopt a Climate Change Strategy that would define:

- (i) A statement under all of the relevant categories and headings of what is required to reduce emissions to under 2 tonnes per capita.
- (ii) Immediate and practical steps for direct action by the local authority, with timetables and targets.
- (iii) A regional strategy to be adopted through negotiation to incorporate other local authorities.

²⁰ <http://www.climateneutral.unep.org/>

Positive Additional Impacts

The measures contained in this Strategy, while specifically designed to reduce greenhouse gas emissions, will have a range of significant parallel benefits for energy consumption, wellbeing, quality of life and health, the fostering of neighbourhoods, and specific effect in eliminating air pollution particle emissions, including PM10, traffic noise and congestion.

Food

General Indicators

- To enhance national and regional food security and supply.
- To maximise fruit, vegetables and other food produced within the hinterland.
- To reduce the ecological and carbon footprint of the food needs of the locality.

Action Taken in Conjunction with the Regional Authority

- To promote and maximise the level of local need food production and distribution in the locality area.

Direct Actions taken by Local Authority

- To identify and provide the support structure for produce markets in key locations around the locality.
- To identify land in local authority ownership suitable for development of allotments and to promote the use of allotments by individuals, groups and local communities.
- To develop and promote in conjunction with the VEC and other bodies, training courses in the start up use and management of allotments, urban gardens and communal spaces for fruit and vegetable production.
- To initiate schools fruit and vegetable awareness programme, with funding, training and support structure provided for schools to develop allotment plots or raised beds, and fruit trees within school grounds.
- To provide the support structure for diversion of all organic waste into a local distribution network of composting centres to produce compost for local gardening and horticultural use.

Targets

- The local authority will set specific targets for increase in fruit and vegetable production and a reduction of ecological and carbon footprint of food uses.
- Elimination of all biomass waste from the waste stream and re-use for locally distributed compost.

Energy

General Indicator

- To promote a strategy which would see the electrical generation needs be primarily met by renewable sources by 2020, and entirely by 2030, including major use of local renewable energy sources.

Specific Additional Actions taken by the Local Authority

- To identify specific locations suitable for CHP and district heating development, both in conjunction with new developments and opportunities to retrofit existing major industrial users or hospitals in conjunction with CHP District Heating Schemes in adjoining areas.
- To provide in conjunction with Sustainable Energy Ireland, a promotional and support scheme for group housing retrofitting, including advice and assistance to individual property owners on financing and contract management.
- To investigate potential, particularly through major new developments potential for geothermal energy.
- To promote, in conjunction with Sustainable Energy Ireland, timezone heating and lighting use management, particularly to the office and retail sector to reduce unnecessary heat and light use outside office and trading hours.

Target

- To reduce energy consumption in the locality to time-tabled target

Spatial Planning

General Indicator

- To develop, in conjunction with the Regional Authority and the National Transport Authority, the integration of and land use planning with public transport provision.
- To fully implement the provisions of the Regional Planning Guidelines and relevant provisions of National Spatial Strategy, Ireland, 2002, including location of all further residential, retail and office development on public transport corridors and public transport accessible locations; and orderly and sequential development set out in the overriding planning policy provisions of National Spatial Strategy, Ireland, 2002, Section 1.1 (iv), which states *"Ireland needs to renew, consolidate and develop its existing towns and villages, i.e. keeping them as physically compact and public transport friendly as possible and minimising urban sprawl, while also achieving a high quality of design in new development and refurbishment. Urban land needs to be used carefully, sensitively and efficiently -with the aim of reducing dereliction and under-utilisation. Where greenfield development is necessary, it should take place through the logical extension of existing cities, towns and villages."*

Specific Actions Taken by the Local Authority

- To amend all planning policy documents to incorporate specific provisions, defining as an overriding objective, the creation of neighbourhoods and communities with walkable access to local services and public transport.
- To define six storeys as the general maximum building height to reflect the primary needs of human scale-orientated, neighbourhood-orientated planning and energy conservation with highest densities on public transport corridors.

Target

- To define measurable targets for enhancing walkable neighbourhoods and communities.

Transport

General Indicator

- To decarbonise transport in the locality with the overriding policy for a walkable, cycling friendly, public transport accessible, neighbourhood-orientated region.

- To adopt electric energy powered primarily by renewable sources, as the predominant transport generator by 2020 and complete source by 2030.
- To recognise the unsustainability of bio-fuel import and limited capacity of Irish bio-fuel to contribute to transportation use.

Actions taken by the Local Authority in conjunction with the Regional Authority

- To revise all transport expenditure policies and strategies with the primary aim of decarbonising transport; and inter-regional and intra-regional connection
- To shift the predominant fuel for buses from diesel to electric by 2020.
- To introduce a price charging structure for all private car and road vehicle use based on journey length, entry within particular cordons, size of vehicle, emissions and peak and off-peak time.
- To introduce a car parking structure and levy on all off street car parking spaces with the income generated used for funding sustainable transport

Specific Actions Taken by the Local Authority

- To define local towns as primarily a walkable areas
- To adopt and support the further development of the schools transportation project
- To reduce car travel to schools through a range of measures including walking buses, development of safe cycling routes, and, for families with no alternative public transport, walking or cycling option, car pooling rotas
- To develop a strategy for reducing HGV traffic, reviving the use of the rail freight links.
- To develop a network of safe cycling routes; on all of the arterial routes; on routes to district and neighbourhood centres and larger school and third level institutions and other nodal points, maximising safety and separating and minimising conflict or interface with road vehicles.
- To promote and provide support structures to third level institutions and businesses for cycling use; and incentive schemes linked to the progressive reduction of surface and other carparking space provision.
- To promote "cycle and ride" rather than "park and ride" to public transport routes.
- To control the excessive use of taxis along public transport routes, with amended fare structures, to dis-incentivise taxi use on public transport routes, and incentivise taxi and public transport modal sharing, e.g. use of taxi to nearest airport bus stop, rail stop or Luas stop.
- To require all new development generating more than 100 person movements per day, to provide a Mobility Strategy maximising walking, cycling and public transport use; and minimising private car use.
- To ensure effective charge structure on all off street parking.

Waste Management

General Indicator

- To adopt as a primary principle, the reduction of waste generation and the treating of each element of the waste stream with the optimum appropriate reuse or recycling methodology, minimising the transport and energy generated.

Specific Action by the Local Authority

- To ensure that all organic waste biomass material is diverted from the waste stream into compost for use in the locality.

- To initiate a range of measures to reduce the level and disposal of beverage and take away food containers, and packaging waste generally.

Targets

- To provide measurable timetables and targets for reduction of all individual elements of current waste stream, and specific sectoral reuse and recycle markets.

Biodiversity

General Indicator

- To enhance all sectors of Biodiversity in the locality.

Action Taken by the Local Authority in Conjunction with the Regional Authority

- Ensure Water Framework Targets are achieved for 2015.

Specific Actions Taken by the Local Authority

- To develop a planting and management strategy to enhance biodiversity in all Parks and green areas controlled by the Local Authority.
- To initiate a native tree planting campaign in conjunction with schools and communities, with school classes as they rise in age been guardians of individual or groups of trees.
- To identify locations suitable for and create wetland areas for invertebrates and as wildlife refuges.

Targets

- To provide measurable timetables and targets for biodiversity.

Leonora Earls

From: Manager Dau [Manager.Dau@ahg.gov.ie]
Sent: 23 December 2014 16:43
To: Catherine McDonald; Planning - Development Plan Review
Subject: Review of Wicklow County Development Plan (CDP) 2010-2016 and preparation of New County Development Plan 2016-2022
Attachments: FP2014-115 Wklw resp.pdf; ATT631453.txt; ATT631454.htm

I refer to the notice in relation to the above review of the Wicklow CDP 2010-2016 and preparation of the new CDP 2016-2022. Attached are the nature conservation recommendations of the Department of Arts, Heritage and the Gaeltacht.

Regards,

Michael Murphy,
Development Applications Unit
Dept. Of Arts, Heritage & the Gaeltacht
Newtown Road,
Wexford

t: (053) 911 7516



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

23 December 2014

Ref: FP2014/115

Planning & Development
Wicklow County Council
County Buildings
Wicklow

Review of Wicklow County Development Plan (CDP) 2010-2016 and preparation of New County Development Plan 2016-2022

A Chara,

I refer to the notice in relation to the above review of the Wicklow CDP 2010-2016 and preparation of the new CDP 2016-2022. Outlined below are the nature conservation recommendations of the Department of Arts, Heritage and the Gaeltacht.

Plan

Legislation

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. The Planning Authority should also refer to the relevant circular letters which have been circulated to Local Authorities and which are available at <http://www.npws.ie/planning/appropriateassessment/>.

Designated sites

The Plan should include a natural heritage section. All designated sites within or adjoining the Plan area should be listed and mapped, including, if applicable, candidate Special Areas of Conservation (cSAC) designated under the Habitats Directive, Special Protection Areas (SPA) designated under the Birds Directive, Natural Heritage Areas (NHA), Proposed Natural Heritage Areas (pNHA), Nature Reserves, and Refuges for Fauna, designated under the Wildlife Acts. Details of these sites are available on www.npws.ie. All such sites should be zoned appropriately and policies and objectives should be devised to ensure their protection. The Plan should take cognisance of boundary changes to sites made during the lifetime of the Plan. For information on Geological and Geomorphological NHAs the Geological Survey of Ireland should be consulted. Where designated sites are within more than one Planning Authority area the relevant Planning Authorities should ensure they do not have conflicting policies for such a site.

Protected species

The proposed 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. Examples of protected species include protected plants listed in SI 94 of 1999, mammals such as badgers (*Meles meles*) and the Irish Hare (*Lepus timidus hibernicus*), protected under the Wildlife Acts and listed on Appendix III of the Berne Convention, and bat species and otters, protected under the Wildlife Acts and listed on Annex IV of the Habitats Directive. All birds are protected under the Wildlife Acts and some, such as the peregrine falcon (*Falco peregrinus*) and kingfisher (*Alcedo atthis*), are listed on annex I of the Birds Directive.

Article 10 of Habitats Directive

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. This includes linear landscape features which act as ecological corridors, such

as watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, hedgerows and road and railway margins, and features which act as stepping stones, which include marshes and woodlands. These provide pathways for the dispersal and genetic exchange of wild species and can help improve the coherence of the Natura 2000 network. Such features should be maintained and, where possible, enhanced.

Hedgerows, bats and other protected species

Hedgerows form important wildlife corridors and provide areas for birds to nest in. In addition badger setts may be present. If suitable trees are present bats may roost there and they use hedgerows as flight routes. Hedgerows also provide a habitat for woodland flora. Where a hedgerow forms a townland or other historical boundary it generally is an old hedgerow. Such hedgerows will contain more biodiversity than a younger hedgerow. 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 nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 and 2000.

Bat roosts may be present in trees, buildings and bridges. 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.

Rivers and wetlands

Wetland habitats such as rivers are an important source of biodiversity and contain species such as otters (*Lutra lutra*), Salmon in freshwater (*Salmo salar*), kingfishers (*Alcedo atthis*), crayfish (*Austropotamobius pallipes*) and Lamprey species, all protected under the Wildlife Acts of 1976 to 2010 and/or listed on the annexes of the EC Habitats Directive and Birds Directive. It is important that the proposed Plan should recognise the importance of wetland habitats and ensure that such sites are protected.

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" and published by the Department of the Environment, Heritage and Local Government in November 2009.

IFI should be consulted with regard to impacts on fish species and the Local Authority may find it useful to consult their publication entitled "Planning for watercourses in the urban environment" which can be downloaded from their web site at <http://www.fisheriesireland.ie/fisheries-management-1/86-planning-for-watercourses-in-the-urban-environment-1>.

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. Copies of the draft sub basin plans and Programmes of Measures for Freshwater Pearl Mussels can be downloaded from http://www.wfdireland.ie/docs/5_FreshwaterPearlMusselPlans/ or through www.environ.ie.

Water

Ground and surface waters should be protected from pollution and the Planning Authority should ensure that adequate sewage treatment facilities are or will be in place prior to any development proposed in the Plan. The Planning Authority should also ensure that adequate water supplies are present prior to development. Care should be taken to ensure that any proposed water abstractions or waste water discharges do not negatively impact on Natura 2000 sites.

Roads

Where roads are listed for improvement and upgrading the opportunity should be taken to address inadequate existing mitigation measures (e.g. include mammal underpasses or dry ledges) or impeded passage (e.g. by poor culvert design). In making provision at plan level for transport, including reserving lands and integrating or upgrading routes, this should be based on information on ecological constraints, and should allow sufficient flexibility for impacts to be avoided or mitigated

Alien invasive species

Alien invasive species such as Japanese Knotweed and Giant Hogweed can be damaging to local biodiversity. The Plan should have a policy to protect against the accidental introduction of such species during development. Information on alien invasive species in Ireland can be found at <http://invasives.biodiversityireland.ie/> and at <http://invasivespeciesireland.com/>.

Amenity developments

Negative impacts on biodiversity and designated sites, particularly in the mountains, by the coast and along rivers, can occur as a result of development such as walking routes, cycleways, seating, lighting, loss of riparian zone and mowing of riparian zone, and can lead to erosion and added disturbance by humans and dogs. Such developments along waterways for example could impact on species such as otters and bats which are strictly protected under the Habitats Directive and Kingfishers listed on Annex I of the Birds Directive. Otter habitat is considered to be 10m either side of a watercourse. Any proposed walkways, cycletracks or greenways marked on the Plan maps along rivers should therefore be a suitable distance from the waters edge. In general, 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. Otherwise their development may not be consistent with nature conservation objectives and legal compliance requirements

SEA

Integrated assessment

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.

Legislation

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.

Baseline data

With regard to the scope of baseline data, details of designated sites can be found at www.npws.ie. For flora and fauna in the SEA, the data of the National Parks and Wildlife Service (NPWS) should be consulted at www.npws.ie. Where further detail is required on any information on the website www.npws.ie, a data request form should be submitted. This can be found at <http://www.npws.ie/media/npws/publications/Data%20request%20form.doc>. Other sources of information relating to habitats and species include that of the National Biodiversity Data Centre (www.biodiversityireland.ie), Inland Fisheries Ireland (www.fisheriesireland.ie), BirdWatch Ireland (www.birdwatchireland.ie) and Bat Conservation Ireland

(www.batconservationireland.org). Data may also exist at a County level within the Planning Authority.

SEOs

It is recommended that the Biodiversity SEOs in the SEA cover habitats and species both within and outside of designated sites as below where applicable;

- Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas designated under the EC Birds Directive (Directive 2009/147 EC),
- Other designated sites, or sites proposed for designation, such as Natural Heritage Areas and proposed Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora, designated under the Wildlife Acts 1976 to 2010,
- Species protected under the Wildlife Acts including protected flora,
- '*Protected species and natural habitats*', as defined in the Environmental 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),
- Important bird areas such as those as identified by Birdlife International,
- Features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive.
- Other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans).
- Red data book species,
- and biodiversity in general.

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.

Water issues and wetland habitats

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.

Indicators, targets and monitoring

Indicators, targets and monitoring should be realistic, measurable and achievable.

Appropriate Assessment

Guidance

The draft Plan should be screened for appropriate assessment (AA) and if necessary a Natura Impact Report (NIR) produced. Some guidance documents are referred to below which may help. However CJEU case law has to some extent clarified certain issues and should be consulted. In particular case C-258/2011- N6 Galway City Outer Bypass is relevant as is the recent opinion on the Briels case, C-521/12.

Guidance on AA is available in the Departmental guidance document on Appropriate Assessment, which is available on the NPWS web site at <http://www.npws.ie/media/npws/publications/codesofpractice/AA%20Guidance%2010-12-09.pdf> and in the EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

Conservation objectives

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 www.npws.ie. Site-specific, as opposed to generic, conservation objectives are now available on the web site for some sites. Each conservation objective is defined by a list of attributes and targets and accompanied by supporting documents. Where these are not available for a site it is recommended to look at the detailed conservation objectives for other sites which have the same qualifying interests. For example if a site without detailed conservation objectives has otters as a qualifying interest one could refer to the River Barrow and River Nore SAC detailed conservation objectives to see how otters are treated. It is now advised, as per the notes and guidelines in the detailed conservation objectives, that any reports quoting conservation objectives should give the version number and date. This will allow statutory consultees and others assessing reports to be confident that the correct and most up to date version of the conservation objectives are used at the time of writing any report.

Integrated assessment

It is particularly important that the appropriate assessment procedure, commencing with stage 1 screening, should take place in consultation with the teams working on the draft Plan and SEA as each process can help inform the other to ensure that the objectives and policies in the draft Plan will have no significant effects on any Natura 2000 site. The appropriate assessment should examine the effects of policies, objectives and any indicative maps or zonings, as well as cumulative impacts with other plans and projects both within and outside of the Plan area.

Cumulative and ex-situ impacts

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 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.

Additional Comments

- 1) Policies to increase employment, tourism and recreation in Wicklow must be screened for their impact on the environment. In particular, requests to hold "events" like races, walking challenges, fundraising events etc. which involve 100+ participants should have an Appropriate Assessment (Habitats Directive) to ensure that they will have no significant impact on any Natura Site or species.
- 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

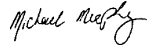
- 3) Community Development (Open Spaces)
Dog owners need to exercise their dogs and with 1 in 3 homes having at least one dog that is a considerable amount in Wicklow. There is considerable disturbance to SPA, SAC and Nature reserves near urban areas. Nature reserves such as Knocksink in Enniskerry and 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.

Kindly forward any further correspondence to the following address as soon as it issues:

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

Preferably, documentation associated with the above can be referred electronically to the DAU at the following address: manager.dau@ahg.gov.ie

Is mise le meas,



Michael Murphy,
Development Applications Unit
Tel: (053) 911 7516



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

23 December 2014

Ref: FP2014/123

Planning & Development
Wicklow County Council
County Buildings
Wicklow

SEA Scoping for Wicklow CDP 2016-2022

A Chara,

I refer to the notice in relation to the above SEA for the Wicklow CDP 2016-2022. Outlined below are the nature conservation and architectural heritage recommendations of the Department of Arts, Heritage and the Gaeltacht.

Please note that comments also issued separately as part of the Department's response to the review of the Development Plan, our ref FP2014/115, and that response should be taken into account where applicable.

Architectural Heritage

In **Section 3: 8 Cultural heritage** it states that the CDP '*will set out the vision and strategy for the future sustainable development of a number of towns across the county, including Ashford, Aghrim, Avoca, Baltinglass, Carnew, Donard, Dunlavin, Enniskerry, Kilmacanogue, Laragh-Glendalough, Newcastle, Roundwood, Shillelagh and Tinahely*'.

Recommendation:

1. In setting out this strategy and vision for the future development of a number of towns across the county this Department would advise that a strong statement of intent be given to **protect the historic core of these towns**. For instance, the case of Kilmacanogue and its early medieval foundation as a monastic site of '*Cell Mothenod*'; Baltinglass and the crucial role of its medieval Cistercian abbey and monastic estate on the development of the town; Dunlavin was a medieval borough and episcopal manor; Newcastle, a medieval royal manor with its impressive castle. In the case of Avoca, consideration should be given in particular to the industrial archaeological heritage of the area and the links of this settlement with a long-mining tradition. There is a crucial need to provide additional protection to a physical legacy that includes open pits, shafts and mine buildings.

In section **3.8.1 Archaeological Heritage** it states that 'Wicklow's archaeological heritage is protected under the National Monuments Acts (1930-2004), Natural Cultural Institutions Act 1997 and the Planning Acts'.

Recommendations:

1. The conservation of the archaeological heritage of County Wicklow should be considered in the broader context of the European Convention on the Protection of the Archaeological Heritage (Valetta, 1992) ratified by Ireland in 1997. It relates to the protection of archaeological heritage and includes the setting and context of archaeological sites.
2. *The Framework and Principles for the Protection of the Archaeological Heritage (1999)* published by the Department of Heritage, Gaeltacht and the Islands outlines guiding policies for the protection of the archaeological heritage of Ireland. *The National Heritage Plan* and also provide a clear and coherent strategy and framework for the protection archaeological heritage.

3. The County Wicklow Development Plan 2016-2022 should contain a statement of its aim 'to conserve the archaeological heritage of the county and to encourage sensitive sustainable development so as to ensure its survival for future generations'.

Nature Conservation

SEA - Integrated assessment

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.

Legislation

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.

Baseline data

With regard to the scope of baseline data, details of designated sites can be found at www.npws.ie. For flora and fauna in the SEA, the data of the National Parks and Wildlife Service (NPWS) should be consulted at www.npws.ie. Where further detail is required on any information on the website www.npws.ie, a data request form should be submitted. This can be found at <http://www.npws.ie/media/npws/publications/Data%20request%20form.doc>. Other sources of information relating to habitats and species include that of the National Biodiversity Data Centre (www.biodiversityireland.ie), Inland Fisheries Ireland (www.fisheriesireland.ie), BirdWatch Ireland (www.birdwatchireland.ie) and Bat Conservation Ireland (www.batconservationireland.org). Data may also exist at a County level within the Planning Authority.

SEOs

It is recommended that the Biodiversity SEOs in the SEA cover habitats and species both within and outside of designated sites as below where applicable;

- Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas designated under the EC Birds Directive (Directive 2009/147 EC),
- Other designated sites, or sites proposed for designation, such as Natural Heritage Areas and proposed Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora, designated under the Wildlife Acts 1976 to 2010,
- Species protected under the Wildlife Acts including protected flora,
- 'Protected species and natural habitats', as defined in the Environmental 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),
- Important bird areas such as those as identified by Birdlife International,
- Features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive,
- Other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans),
- Red data book species,

- and biodiversity in general.

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.

Water issues and wetland habitats

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.

Indicators, targets and monitoring

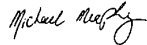
Indicators, targets and monitoring should be realistic, measurable and achievable.

Kindly forward any further correspondence to the following address as soon as it issues:

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

Preferably, documentation associated with the above can be referred electronically to the DAU at the following address: manager.dau@ahg.gov.ie

Is mise le meas,



Michael Murphy,
Development Applications Unit
Tel: (053) 911 7516

Aisling Mac Namara

From: Ray Treacy [Ray.Treacy@dcenr.gov.ie]
Sent: 23 December 2014 16:51
To: Planning - Development Plan Review
Cc: Mary Brady; Eileen Walsh
Subject: Observations from DCENR WCC GDP 23122014
Attachments: Observations on WCC CDP by DCENR 23122014.pdf

23rd December 2014

Ms Leonora Earls,
Planning and Development,
Wicklow County Council,
County Buildings,
Whitegates,
Wicklow.

Re: Wicklow County Development Plan 2010 - 2016 – Preparation of Wicklow County Development Plan 2016-2022

Dear Ms Earls,

I refer to correspondence dated 24th October 2014 in the above regard.

The Department of Communications, Energy and Natural Resources on behalf of the Geological Survey of Ireland and the Exploration and Mining Division wish to bring to your attention the following comments at this time.

Please see attached letter.

The above is without prejudice to any further comments that may be received from any other areas within the Department.

Regards,

Mary Brady,
Corporate Support Unit,
Department of Communications, Energy and Natural Resources
Elm House,
Earlsvale Road,
Cavan,
Tel: 01 6782058.

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Observations, as statutory consultee, to Wicklow County Council on the review of the County Development Plan 2016 – 2022

This submission responds to the invitation to prescribed bodies for written submissions and observations regarding the overall strategy and a number of objectives as stated in the County Wicklow Development Plan 2016 – 2022 - Issues Booklet - Stage One Public Consultation. The Minister for Communications, Energy and Natural Resources is also a land owner, on behalf of the State, in the Avoca former mines area.

The planning authority's commitment to take account of relevant policies or objectives of the Minister is recognised in its delivery of an overall strategy for the proper planning and sustainable development of the County and in the 'Core Strategy' for its spatial organisation over the plan period, as expanded upon with the strategic goals, policies and objectives of the plan.

The Irish Geological Heritage & Planning (IGH) Programme in the Geological Survey of Ireland of the Department of Communications, Energy & Natural Resources aims to ensure that due consideration is given to geological heritage in the planning process, in order to promote and protect its scientific, educational or tourism potential, as appropriate. This has been partially fulfilled by GSI's recent documentation of County Geological Sites, in an audit of the Geological heritage of County Wicklow, in partnership with Wicklow County Council and the Heritage Council. The report will be available from the GSI and Wicklow County Council websites in early 2015.

The Minister is committed to the long-term remediation of the Avoca former mine site, the scale and cost of which was identified in the feasibility study published in 2008 – Feasibility Study for Management and Remediation of the Avoca Mine Site – CDM. In the short term, however, the Government has allocated funds to address prioritised public health and safety hazards and to do so without compromising the environmental, heritage or future tourism potential of the area.

It is noted that an environmental assessment of the Wicklow County Development Plan (CDP) 2016-2022 will be carried out under the processes required under Strategic Environmental Assessment (SEA). On page 25 it states that: *'Strategic Environmental Assessment (SEA) aims to provide a high level of protection to the environment and to promote sustainable development by contributing to the integration of environmental considerations into the preparation and adoption of the CDP'*.

In that context, the Minister would like to outline environmental issues and objectives that should be assessed in advance of the next iteration of the County Wicklow Development Plan.

Vision

The vision statement continues to be relevant as was applied to the 2010 – 2016 plan and the associated goals where they are compatible with that vision. The particular challenge to which the Minister brings attention is the extent to which the goal 'to protect and enhance the diversity of the county's natural and built heritage' can be achieved within the vision for County Wicklow to be a place 'where opportunities abound to live and work in a safe atmosphere ... and a healthy environment'.

The challenges facing Wicklow's tourism and recreational package

A question posed on page 14 asks how to achieve the correct balance in terms of exploiting the county's assets through the promotion of tourism activity, whilst protecting the natural and built environment of the county.

The 2008 Feasibility Study contained a Health & Safety Audit of the former mining area which identified many areas of attention. The Department is presently addressing the most urgent of these through a 3 year programme of safety works, in addition to ongoing monitoring of the site.

The Department considers that until the risk of these hazards identified in the Health & Safety Audit are reduced or eliminated, the Avoca mining area is unsafe for access by the public. While the Department supports Wicklow County Councils vision for the Avoca mining area to facilitate access and promote the site as a tourist attraction, there remains a considerable amount of work to be done.

Built and Natural Heritage, Including Landscape

In response to the question whether all existing structures in the Record of Protected Structures merit protection (page 21), the Minister would draw attention to the current record of protected structures which contains a number of sites at Avoca that 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.

Spoils are mining waste material. The spoils at Avoca Mines are contaminated with heavy metals and arsenic that pose a risk to human health. This information has been documented in a detailed study of the mine site conducted by the Department and published in 2008 (Feasibility Study for Management and Remediation of the Avoca Mine Site – CDM). The Feasibility Study shows that rainfall interacts with these spoil heaps producing acid mine drainage, dissolving heavy metals and transporting the metal load to the river and groundwater. It also demonstrates that this is resulting in contamination of the Avoca River and the groundwater. The contaminants within the Tigroney Spoil are considered to be in environmentally significant concentrations that supports the capping of the Tigroney Spoil Area to prevent exposure to humans, plants and animals and to prevent contaminated surface runoff and infiltration into the groundwater, that both ultimately discharge to the Avoca River. The continuing designation of these spoil heaps (mine waste) as protected structures, delays and limits their essential remediation, and will result in the continuation of a negative environmental impact on the environment.

There are also physical risks with some of the features on the Record of Protected Structures namely at East Avoca Pit and Cronebane Pit where the risk ranges from medium to high. The key risks are identified as the steep sides which have the potential for slab slides, failures and rock fall. Cronebane Pit has numerous boulders on the pit floor resulting from collapse of the rock faces. The south eastern face of the East Avoca Pit has been identified the most hazardous in the entire site.

I attach a submission from the Department as landowners on the original designations dated February 1999. The work carried out by and on behalf of the Department since then, particularly in the conduct of the study referred to, only reinforces the view held at that time.

Town Plans and Settlement Plans

The vision and strategy for the local Avoca area (page 35) poses the question ‘What can be done to improve the tourism product in Avoca?’ It is noted that ‘The untapped potential of Avoca Mines as an attraction could bring significant investment and resources into the area.’ The Minister supports this vision, however, it can only be developed if the Avoca Mine site is safe for access by the general public. Exposed spoil piles/contaminated mine waste and mine openings will make such access unsafe and therefore not feasible for development for public use. It is envisaged in the IGH Programme that parts of the Avoca Mine Site area can be made safe for public access and that the mining heritage and tourism potential may then be developed on a phased basis.

The plan for Avoca also includes objectives for the protection and enhancement of natural and built heritage, which includes archaeological sites, natural habitats and protected structures. It is proposed that a review will be undertaken of these objectives.

Management and promotional recommendations have been made in the IGH Programme for the Avoca mine sites, within the parameters of the current project for the reduction or elimination of identified public health and safety hazards and the mitigation of their effects on the heritage value.

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 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.

19 February, 1999

**Mr. Brian Doyle,
Secretary,
Wicklow County Council,
County Buildings,
Wicklow**

**Local Government (Planning and Development Acts, 1963 - 1993)
Proposed Amended Draft Development Plan for County Wicklow 1999
Proposed Listing of Former Mine Structures at Avoca**

Dear Mr. Doyle,

Please refer to yours of 25 January 1999 regarding the above County Development Plan. The Minister for the Marine and Natural Resources is a land owner in the Avoca Mines Area. In addition to these the Minister will receiver further lands from the cessation of the Receivership of Avoca Mines Ltd. Further former mine lands at Avoca will be vested in the Minister for Finance with the completion of the dissolution of St. Patrick's Copper Mines Ltd.

This current and future block of State lands concerns parts of Nos 43, 44, 45 and 48 on Schedule 13. A large portion of the lands in No. 13 is currently occupied by Wicklow County Council which acquired this land from the Receiver, Avoca Mines Ltd. The Minister is not the owner occupier of lands at Ballymoneen or Castlemacadam (No. 42 on your schedule).

The Minister would be concerned that the inclusion of items such as "spoil heaps and associated disturbed ground" and "associated undisturbed ground" under Nos 43-45 and 48 would prejudice or interfere with the carrying out of any remedial, environmental or safety related works in these areas. In relation to the open pits at Cronebane (No. 48) preservation of the exposed rock faces may not be possible indefinitely as there may be stability problems.

In general the Minister would not object to the listing of the building structures but would seek the assurance of the County Council that nothing would prevent the undertaking of any emergency actions within State lands should requirements of public safety, or prevention of pollution require them.

Yours sincerely,

BRIAN BRESLIN,
Assistant Principal,
Exploration and Mining Division

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

Leonora Earls

From: Brennan, Lorraine [Lorraine_Brennan@education.gov.ie]
Sent: 18 December 2014 13:16
To: Planning - Development Plan Review
Subject: County Development Plan 2016-2022
Attachments: CDP Dec14.doc

**Lorraine Brennan
Executive Officer
Forward Planning Section
Department of Education & Skills
Portlaoise Road
Tullamore
Co. Offaly**

**Telephone: 057 9324392
Email: Lorraine_Brennan@education.gov.ie**

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Ms. Catherine McDonald
Forward Planning Section
Wicklow County Council
County Buildings
Station Road
Wicklow
Co. Wicklow

18th December, 2014

Re: Review of County Development Plan 2016-2022

Dear Ms. McDonald,

Thank you for your email dated 23rd October 2014 in relation to the above. The Department of Education and Skills wishes to make the following submission.

Information used to calculate educational infrastructural requirements

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

- 12% of the population at any given time is of primary school going age.
- 8.5% of the population at any given time is of post primary school going age.
- At primary level, school accommodation is calculated on the basis of a Pupil Teacher Ratio of 28:1 meaning each individual classroom in a school will have 28 pupils.
- New primary school buildings are generally provided in multiples of 8 classrooms. This is because there are eight individual class groupings between junior infants and 6th class. A 16 classroom school would mean that there are 2 junior infants' classes, 2 senior infant classes etc. with a 24 classroom school having 3 junior infant classes etc.
- A new school ranging in size from 4 - 8 classrooms, as a guide, requires 0.77 hectares (1.9 acres)
- A new school ranging in size from 8 - 16 classrooms, as a guide, requires 1.14 hectares (2.8 acres)
- A new school ranging in size from 16 - 24 classrooms, as a guide, requires 1.6 hectares (4 acres)
- A new school ranging in size from 24 - 32 classrooms, as a guide, requires 2.2 hectares (5.47 acres)

- At post primary level, the Department refers to the size of a building by the number of pupils it will cater for because the number of pupils, together with the curriculum to be delivered (which is school specific), will dictate the range and extent of specialist facilities to be provided.
- Generally, the Department will not build a post primary school with greater than 1,000 pupil places.
- 4.57 hectares (12 acres approximately), as a guide, are required for a new post primary school.

Some other general points worth making at this stage are:

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

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

Site Suitability

This Department has prepared two documents that provide guidance in relation to site suitability for educational provision. Technical Guidance Document - 025 – Identification and Suitability Assessment of Sites for Primary Schools & Technical Guidance Document - 027 – Identification and Suitability Assessment of Sites for Post Primary Schools. Both of these documents are available, for download, from this Department's website www.education.ie.

Your attention is also drawn to the Department of Environment, Community and Local Government guidelines titled "**Sustainable Residential Development in Urban Areas**" published in May 2009 which provides that no significant residential development should take place without an assessment on the impact of school provision (refer to Chapter 4: Page 25). Please refer to Department of Environment, Community and Local Government website www.environ.ie.

In addition the Department of Education & Skills draws your attention to the published (July, 2008) Code of Practice for Planning Authorities and the provision of schools; in particular Item 2 and the need for consulting with this Department regarding the assessment of specific sites. This document is available on both the Department of Education & Skills and Department of Environment, Community and Local Government websites.

Furthermore, you might note following on from the publication of the Code of Practice in 2008, that a Memorandum of Understanding between the Department of Education & Skills and the City & County Managers' Association on the acquisition of sites for school planning purposes has been agreed.

This Memorandum of Understanding is designed to codify practice in relation to cooperation between this Department and local authorities in relation to the acquisition of sites suitable for the construction and development of buildings for educational purposes.

In relation to additional educational needs identified for this plan, subject to the availability of resources and on foot of a formal request to the Manager of your local authority, it would be this Department's intention to request, at the appropriate time, that your local authority would take the lead on behalf of this Department in relation to the identification/acquisition of suitable school sites as required.

The Memorandum of Understanding document is available, for download, from this Department's website www.education.ie.

Existing Educational Sites

The Department wishes to state that lands adjacent to existing schools should be where possible protected for possible future educational use to allow for expansion of these schools, if required, subject to site suitability and agreement of the various stakeholders.

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

Yours sincerely,

Lorraine Brennan
Executive Officer,
Forward Planning Section.

Tel. No: 057-9324447
Email: Lorraine_Brennan@education.gov.ie

Leonora Earls

From: Gael.Gibson@Eirgrid.com
Sent: 19 December 2014 13:18
To: Planning - Development Plan Review
Subject: Review of Wicklow County Development Plan 2010-2016
Attachments: Grid 25 Strategy.pdf; GRID25 Implementation Programme 2011-2016.pdf; Wicklow_Submission_Predraft-Dec14_Final.pdf; ATT480039.txt

Dear Ms. L Earls,

Please find attached, our submission to preparation of the Draft Wicklow County Development Plan .

Please advise should you have any difficulty opening the attached.

Kind Regards,
Gael Gibson,
Principal Planner, Public Planning,
Grid Development Services & Policy Team



Tel: +353 (0)1 2370743
Fax: +353 (0)1 661 5375
Mob: +353 (0)87 7413313
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Services & Policy : providing planning, environment and land expertise to Grid Development.





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www.eirgrid.com

The Forward Planning Unit,
County Buildings,
Wicklow,
Co Wicklow;

19th December 2014

By E-mail: planview@wicklowcoco.ie

RE: Review of Wicklow County Development Plan 2010-2016

Dear Sir/Madam,

EirGrid is grateful for the opportunity to provide input into the review of Wicklow County Development Plan 2010-2016.

EirGrid plc. is the national electricity Transmission System Operator (TSO). Statutory Instrument No.445 of 2000 sets out the role and responsibilities of the TSO; in particular, Article 8(1) (a) grants EirGrid, as TSO, the exclusive statutory function:

"To operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical, and efficient electricity transmission system, and to explore and develop opportunities for interconnection of its system with other systems, in all cases with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment."

EirGrid has the statutory obligation to plan, maintain and operate a safe, secure, reliable, economic and efficient transmission system while having due regard for the environment. The national electricity transmission grid plays a vital role in the supply of electricity, ensuring that power is transported around the country, from where it is generated to where is needed i.e. demand centres. Via the National Control Centre (NCC), EirGrid ensures that supply is balanced with demand, at all times, 365 days of the year.



Directors: John D Connor (Chairman), Eithne Fíne (Chief Executive), Eoinín Barry, Dr Gerry Healy, Rosalind McLean, Liam O'Neil, John Brada-Rosney, Dr John Conboy (Resident Secretary)

Registered Office: The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4. Ireland. Registration Number: 333522. VAT No: IE 63562274

1.0 EIRGRID'S STRATEGIC CONTEXT:

We note that Local Authorities and An Bord Pleanála are required to have regard to the "Government Policy Statement on Strategic Importance of Transmission and Other Energy Infrastructure" (July 2012). A copy of the document is attached to this submission. The conclusion of this policy states, inter alia:

"The major investment underway in the high voltage electricity transmission system under EirGrid's Grid25 Programme is the most important such investment in Ireland's transmission system for several generations. While the Government does not seek to direct infrastructure developers to particular sites or routes or technologies, the Government endorses, supports and promotes the strategic programmes of the energy infrastructure providers, particularly EirGrid's Grid25 investment programme across the regions and reaffirms that it is Government policy and in the national interest, not least in the current economic circumstances, that these investment programmes are delivered in the most cost efficient and timely way possible, on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions."

Grid25 is EirGrid's strategy for the development of the national transmission grid over the next decade. This strategy identifies requirements to develop and upgrade the transmission network up to 2025. A copy of Grid25 is attached to this submission.

The Grid25 Implementation Plan 2011-2016 (IP) is a practical strategic overview of how the early stages of Grid25 are intended to be implemented. A copy of the IP is also attached to this submission. The IP has been subject to Strategic Environmental Assessment (SEA).

Of particular relevance to County Wicklow (and the wider south-east region as set out in Grid25) is Section 2.5.3 of the IP, which refers to *Reinforcement of the Transmission System in the South-East Region*.

This section identifies, in the longer term the requirement for significant strengthening and reinforcement of current infrastructure. In doing this, EirGrid will seek to maximise the use of existing corridors where possible, through upgrading the existing 110 kV and 220 kV circuits.

2.0 GRID LINK PROJECT

The Grid Link Project represents the single largest project in the Grid25 strategy. It is required to reinforce the transmission network in the south-east of Ireland and to address a number of key drivers for the transmission network in that region, namely the integration of new renewable and conventional generation,

ensuring security of supply in the south-east in order to support demand growth in the region and facilitating possible future interconnection with either Great Britain or France.

Stage 1 of EirGrid's Project Development Road Map.

As per the EirGrid Project Development Road Map, EirGrid launched the third round of consultation focusing on the Stage 1 Report in September 2013. This Report set out a number of 1km feasible route corridors in which an overhead line could be routed.

During our last round of consultation, EirGrid received in excess 38,000 submissions we received from the public including many individuals, elected representatives and concerned groups in Wicklow. In response to this feedback, EirGrid published a number of commitments, including the identification of a fully underground option for the Grid Link project to be compared with an overhead option.

To provide the public with assurance that the comparison of both options carried out in a fair and objective manner, the then Minister for Communications, Energy and Natural Resources, Mr. Pat Rabbitte T.D., appointed an independent panel of experts, chaired by former Supreme Court Justice Catherine McGuinness.

The Independent Expert Panel will conduct a review of the overhead and underground options, with both options set out side-by-side in objective and comparable terms. EirGrid welcomes the establishment of the Panel to ensure the analysis we are carrying out is done in an objective way and provides that reassurance to the general public.

2.1 Next Steps

EirGrid is currently working to identify both an underground and overhead routes for the project, before we proceed to the next stage of project development. These proposals will include an assessment of underground options both onshore and offshore.

An offshore option will require the identification of a suitable landing point along the eastern coast to facilitate a connection to the substation at Dunstown in Kildare. The routing of an on-shore cable will typically take place in the existing road network. EirGrid intends to work with County Councils and the NRA throughout the region in 2015 in seeking to identify the most suitable roads to accommodate for underground cables.

We do not anticipate making an application to An Bord Pleanála prior to 2016, as such; any future application is likely to occur in the context of the forthcoming County Development Plan.

It would therefore be beneficial, not least from a public participation and clarity perspective, for the forthcoming Plan to specifically reference the Grid Link project, as well as general matters relating to transmission infrastructure development in the county. This is addressed in the next section of the submission.

3.0 SUGGESTED TEXT FOR INCLUSION IN DRAFT COUNTY DEVELOPMENT PLAN 2016-2022:

3.1 Context of Grid Development:

In this context, EirGrid requests the following text to be incorporated in the Draft Development Plan:

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.

3.2 Transmission Objectives In Current County Development Plan:

EirGrid requests Objectives **GE1- GE3**, included under Section 14.3.2 of Chapter 14 of current Wicklow County Development Plan 2010-2016 are retain in the Draft County Development Plan 2016-2022. These objectives are consistent with the policy and objectives of the **Regional Planning Guidelines for the South-East Region 2010-2022**. We request that they be retained in the revised energy chapter of Draft County Development Plan 2016-2022:

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 110 kV/220 kV transmission lines*

GE3: *To support and facilitate the development of landing locations for any cross channel power interconnectors and/ or offshore cables.*

I would welcome an opportunity to discuss these or any other points in relation to the Draft County Development Plan 2016-2022 that pertain to the electricity transmission system.

Yours faithfully,

Sent by email, bears no signature

Des Cox,
Senior Co-Ordinator,
Public Planning,
Grid Development Services & Policy Team
EirGrid plc



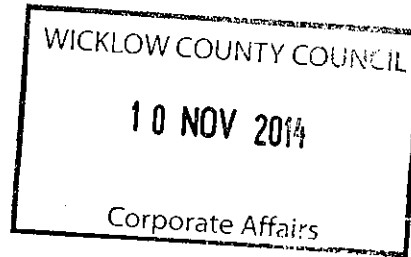
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160 Shelbourne Road,
Ballsbridge,
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160 Bóthar Shíol Bhroin,
Droichead na Dothra,
Baile Átha Cliath 4.

TELEPHONE +353 (0)1 677 1700
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www.eirgrid.com

Leonora Earls
Administrative Officer
Planning Department
Wicklow County Council
County Offices
Whitegates
Wicklow



Our Ref: GDC/2014/NC/123a

6th November 2014

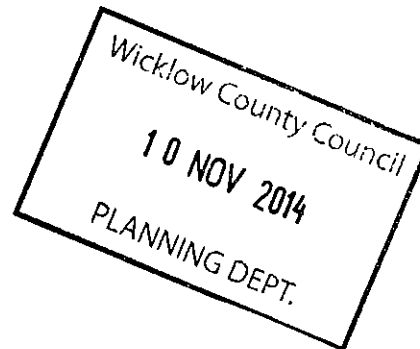
Re: Review of Wicklow County Development Plan 2010-2016 and preparation of Wicklow County Development Plan 2016-2022

Dear Leonora,

I acknowledge receipt of your letter of 24th October 2014 in relation to the above matter and I have referred your notification to Gael Gibson, Planner, who deals with these matters.

Yours sincerely,

Niamh Cahill
Company Secretary
EirGrid plc



cc: Deirdre Nagle
Des Cox



Directors: John O'Connor (Chairperson), Fintan Siye (Chief Executive), Doireann Barry, Dr Gary Healy, Regina Moran, Liam O'Halloran, Bride Rosney, Dr Joan Smyth, Richard Sterling

Registered Office: The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4, Ireland. Registered in Ireland No. 338522 V.A.T. No. IE 6358522H

Leonora Earls

From: Cian O'Mahony [c.omahony@epa.ie]
Sent: 11 December 2014 15:37
To: Planning - Development Plan Review
Subject: EPA Submission Re: Review of the Wicklow CDP 2010-2016 and Preparation of Wicklow CDP 2016-2022.
Attachments: SCP141007 1 EPA Scoping Submission WicklowCDP 2016-22_Issued.pdf

12
WICKLOW COUNTY COUNCIL
14 DEC 2014

Re: Review of the Wicklow County Development Plan 2010-2016 and Preparation of Wicklow County Development Plan 2016-2022.

Dear Sir/Madam,

I refer to and acknowledge your correspondence, dated 24th October, in relation to the Strategic Environmental Assessment Scoping for the review of the Wicklow County Development Plan 2010-2016 and the preparation of a new County Development Plan 2016-2022.

○ This submission includes specific comments to be taken into account. In addition to these specific comments, SEA scoping guidance, including an SEA Process Checklist, SEA Pack and list of SEA Spatial Information Sources are available at <http://www.epa.ie/pubs/advice/ea/> to assist you in the preparation of the Plan.

SEA WebGIS Search and Reporting Tool

The Environmental Protection Agency (EPA) has launched a new application for the purposes of Strategic Environmental Assessment (SEA) for public authorities. This is a 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. These reports are indicative and will provide an overview of key aspects of the environment within a specific plan area. This may be used to inform the SEA screening and scoping stages for Plans and Programmes with particular reference in the first instance to the land use sector, though it is also applicable to other sector plans. It may be accessed via www.edenireland.ie

Specific Comments to be considered

In addition to the the *EPA Scoping-Integration of Environmental Considerations* document the following should be taken into account by Wicklow County Council in the preparation of the Plan and in undertaking SEA:

Water Framework Directive

○ The Plan should include a strong commitment to protect and improve the status of water resources within the Plan area in accordance with the requirements of the Water Framework Directive. The Plan should consider the inclusion of a commitment to integrate the update to the River Basin Management Plans and associated Programme of Measures as relevant to the Plan area. The Plan should 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).

Provision of Adequate and Appropriate Critical Infrastructure

Development proposals and associated population increases should be linked to the ability to provide adequate and appropriate critical service infrastructure. Several supplies (including Arklow Public Supply, Bray Direct and Greystones) are on the Agency's Remedial Action Plan List (RAL) Q3 2014 with respect to 'Treatment and Management Issues'. You should ensure that a commitment is 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.

Potential for Cumulative Effects

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.

Adequate & Appropriate Objectives and where needed Mitigation Measures to address Environmental Sensitivities
Mitigation measures to address significant negative environmental effects environmental sensitivities should also address relevant aspects of adjacent plans and programmes.

Monitoring

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.

Flood Risk Assessment and Management

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

Designated Sites

Among the Conservation Areas included in and within 15km of the Plan Area include the Wicklow Mountains (SAC/SPA), Murrough SPA/SAC/NHA, Slaney River Balley (SAC/NHA), Red Bog (SAC/NHA), The SEA should consider the potential effects 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.

The protection of and possible enhancement of Undesignated Biodiversity

Wider biodiversity outside of designated areas such as ecological corridors/linkages, hedgerows and wetlands 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. Where wetland sites are involved, which is the case for most of these sites, consideration should be given to the potential impact on water quality and hydrological/ hydrogeological regime which maintains these sites.

Further comment on the Plan may be provided on receipt of the Draft Environmental Report and Plan and associated documents.

Environmental Authorities

Under the SEA Regulations (*S.I. No.436 of 2004*), as amended by *S.I. No. 200 of 2011*, notice should also be given to the following:

- 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.

Should you have any queries or require further information in relation to the above please contact the undersigned.

I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours Sincerely,



Cian O'Mahony
Scientific Officer
SEA Section
Office of Environmental Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork

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Administrative Officer
Wicklow County Council
Station Road
Wicklow Town
Co. Wicklow

11th December 2014

Our Ref: SCP141007.1

Re: Review of the Wicklow County Development Plan 2010-2016 and Preparation of Wicklow County Development Plan 2016-2022.

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Mitigation measures to address significant negative environmental effects environmental sensitivities should also address relevant aspects of adjacent plans and programmes.

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- 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.

Should you have any queries or require further information in relation to the above please contact the undersigned.

I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours Sincerely,

A handwritten signature in cursive script, appearing to read 'Cian O'Mahony'.

Cian O'Mahony
SEA Section
Office of Environmental Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork



Appendix 1:

Plans and Programmes to be taken into consideration include the following:

National

- National Development Plan / National Spatial Strategy (to be replaced by the National Planning Framework)
- Draft National Landscape Strategy (DECLG)
- Transport 21
- National Climate Change Adaptation Framework (DECLG) and climate adaptation review of LA plans/programmes
- Grid 25 Implementation Programme
- Strategic Framework for Integrated Land use and Transport (SFILT) – DTTAS
- Ireland's National Biodiversity Action Plan (NPWS)
- Draft National Forestry Policy Review
- Draft National Forestry Programme
- Draft National Peatland Strategy, Draft SAC Raised Bog SAC Management Plan, and Draft Raised Bog NHA Review.

EPA Reports - Drinking Water, Bathing Water Quality, Water Quality, Urban Waste Water Discharges, Air Quality

- Preparation of second round of the River Basin Management Plans and associated Programme of Measures.

Regional

- Regional Planning Guidelines + Local Authority Core Strategy (Population Targets, zoning / rezoning/dezoning/phased development of lands)
- Draft Eastern-Midlands Regional Waste Management Plan
- Renewable/ Wind Energy Strategy (for adjoining Local Authorities)
- Greater Dublin Area Draft Transport Strategy (NTA)
- Cycle Draft Greater Dublin Area Cycle Network Plan (NTA)
- Eastern CFRAMS
- Adjoining local authority CDPs
- Local Authority Green Infrastructure Plans/Strategies both within the County and adjoining Local Authorities
- Renewable Energy Action Plan/Strategy (for Wicklow County/ adjoining Local Authorities)

Local

- Local Authority Biodiversity /Heritage Plans

Leonora Earls

From: Eoin McDonnell [Eoin.McDonnell@failteireland.ie]
Sent: 23 December 2014 15:45
To: Planning - Development Plan Review
Subject: Fáilte Ireland Submission to Wicklow County Development Plan Review

Dear Madam \ Sir,

Fáilte Ireland refers to the Issues Document for the review of the Wicklow County Development Plan which was recently published, and is grateful for the opportunity to make a submission in relation to this review.

This submission is short and addresses the key strategic points that relate to the development of tourism in Co. Wicklow. Fáilte Ireland looks forward to an opportunity to make a more detailed submission once the draft County Development Plan has been published in due course.

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.

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.

Fáilte Ireland would be delighted to meet with representatives of Wicklow County Council to discuss the tourism content of the Draft County Development Plan further at your convenience.

Best regards,

Paddy Mathews.

Paddy Mathews

Manager, Experience Development | Fáilte Ireland | Áras Fáilte | 88-95 Amiens St | Dublin 1
T: 01 884 7223 | M: 086 854 2209
W: www.failteireland.ie



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Leonora Earls

From: Gretta Hannigan [Gretta.Hannigan@fisheriesireland.ie]
Sent: 19 December 2014 10:39
To: Planning - Development Plan Review
Cc: corporatesupport.unit@dceenr.gov.ie; Brian Beckett; Donnachadh Byrne
Subject: County Wicklow Development Plan 2016 - 2022, Stage One Public Consultation

Re: County Wicklow Development Plan 2016 - 2022, Stage One Public Consultation

Dear Sir,

County Wicklow is traversed by some of the most productive salmonid rivers (i.e. containing Atlantic salmon and Brown trout) on the East coast. 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 including the Slaney, Liffey Avoca, Potters are exceptional in the area in supporting Atlantic Salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout (*Salmo trutta*) in addition to resident Brown trout (*Salmo trutta*) populations. Recent data also confirms the presence of a spawning population of Sea lamprey (*Lampetra marinus* - ANNEX II of the EU's Habitats Directive) in the County with populations of Freshwater Pearl Mussel (*Margaritifera margaritifera*) recorded in the Avonmore, Aughrim, Ow and Derry. The Redcross and Three Mile Water support Brown trout (*Salmo trutta*) and Sea Trout (*Salmo trutta*) throughout (in addition to other fish species, including lamprey all three species of which listed under Annex II of the Habitats Directive).

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. Protection of the aquatic environment must imply a greater commitment than merely to prevent fish mortality or protect water quality. The insidious effects of creeping/chronic pollution are often more serious than dramatic discharges which result in instantaneous fish kills, because sub-lethal pollution may reduce growth, inhibit reproduction or so alter the habitat as to render it uninhabitable for certain more desirable species. Maintenance of habitat is a particularly important objective of fisheries authorities. It entails a greater knowledge of the environmental responses of aquatic life to pollution/environmental degradation and tends towards more stringent habitat and water quality objectives. An important aspect in the maintenance of habitat is the protection of the food chain. The protection of each stage of the food chain is the very basis of aquatic habitat protection. Destruction of habitat or contamination of the food chain at any level may eliminate any other form of life depending on it.

Water Quality, Targeted Population Projections and Waste Water Infrastructure

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. Should a particular WWTPs fail to provide expected capacities during the life of the plan, IFI would highlight the risk of associated significant environmental impacts which may result from local development. The issues booklet sets out the population growth rates for each town to 2022/2028. In the majority of cases (Aughrim, Avoca, Donard, Enniskerry, Laragh – Glendalough, Newcastle, Tinahealy, Shillelagh, Kilmacanogue) it concludes that the wastewater infrastructure is deficient. Although not covered by this Plan there are serious ongoing water quality issues with Blessington, Kilcoole, Thomastown and Arklow, 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.

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.

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. 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 principle cause of AMD to the Avoca.

<http://www.dcenr.gov.ie/Natural/Exploration+and+Mining+Division/Environmental+Considerations/Mine+Rehabilitation.htm>

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.

Aquatic Habitat Protection

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.

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.

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.

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.

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.



Diagram illustrating riparian buffer sub zones (from IFI guidance document - Planning for watercourses in the urban environment - <http://www.fisheriesireland.ie/Download-document/86-Planning-for-Watercourses-in-the-Urban-Environment.html>)

River Crossing Structures

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.

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 crossing (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.

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.

Management Policies

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 which provide for the protection and development of the aquatic environment (particularly within towns and cities).
- Special Preservation Orders provided for specific habitats in need of protection e.g. an Aquatic Protection Order.
- Special Amenity Areas, identified for their potential as Linear Parklands along waterways.

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.

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:

- 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
- Amenity and recreational areas

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.

Yours sincerely,

Gretta Hannigan

Gretta Hannigan
Senior Fisheries Environmental Officer

Inland Fisheries Ireland- Dublin

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13th November 2014

Leonora Earls
Planning & Development
Wicklow County Council
Station Road
Wicklow Town
Co Wicklow



Re: Re: Review of the Wicklow County Development Plan

Dear Leonora

I refer to the request concerning the above development, details of which were received by the Irish Aviation Authority.

I wish to advise that the Irish Aviation Authority are not planning any major new infrastructure in County Wicklow in the next 8 years, but will comment on the draft **Wicklow Development Plan** before its adoption in 2016.

Thank you for bring this matter to our attention.

bringing

Yours sincerely

pp Deirdre O'Donoghue

Deirdre Forrest
Corporate Affairs

Bord Stiúrthóirí/Board of Directors

Anne Nolan (Cathaoirleach/Chairman),
Eamonn Brennan (Príomhfheidhmeannach/Chief Executive),
Marie Bradley, Ernie Donnelly, Pascal Fitzgerald,
Basil Geoghegan, Michael Norton, Geoffrey O'Byrne-White,
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23rd December 2014

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***Review of Wicklow County Development Plan 2010-2016
Preparation of Wicklow County Development Plan 2016-2022***

Dear Sirs,

Irish Water acknowledges receipt of your letter of 24th October 2014 in relation to the above and welcomes the opportunity to contribute to the preparation of the development plan.

We have reviewed the Issues Booklet and make the following submission in relation to the overall proposed strategy for proper planning and sustainable development of the county. Our observations relate to the provision of sustainable, cost effective water services and the protection of water sources used for public supply. We acknowledge that the Council will have many interests to "balance" when selection development strategies for the county.

Vision and Core Strategy & Population

Irish Water acknowledges the legislative requirement to comply with current national and regional planning documents in relation to core strategies and growth targets. We 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 Irish Water's forward planning of our water and wastewater services to meet the needs of realistic growth where and when it occurs.

Land Zoning

We suggest that the feasibility of providing sustainable infrastructure (including water/wastewater) 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. We 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

With regard to the location of new housing, Irish Water would encourage the adoption of a compact spatial strategy with the use of brownfield site (where appropriate), to ensure that existing service can be utilised and new services can be provided in a cost effective manner.

In relation to housing in the countryside, Irish Water 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 waste water treatment where these houses are not connected to a public collection network.

With respect to the development of design standards, Irish Water would encourage the inclusion of standards in relation to water efficient design, water conservation principles and surface water management.

Enterprise and Employment

We 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 infrastructure to service these lands.

Tourism

Irish Water notes the importance of the Wicklow uplands in terms of water resources which supply water not only to County Wicklow but to the GDA. The preservation of the uplands and the protection of water resources must be a key consideration in relation to any tourism objectives for the area.

Rural Development

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

Within Wicklow County there are a number of River Catchments which are of importance from a drinking water point of view. Some are of local importance within the county and others, namely those at Roundwood (Varty) and Blessington (Poulaphuca), 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. Irish Water will work with Wicklow County Council 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 Irish Waters objective to manage our water services facilities to facilitate Wicklow County Council to achieve the quality objectives for water bodies in the county as identified in the Water Framework Directive.

Infrastructure

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. Irish Water 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 Irish Water 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.

Irish Water will engage with Wicklow County Council on a more detailed level on any of the above issues if required.

Yours sincerely,

PP. Suzanne Dempsey
John Casey

Asset Strategy and Sustainability Manager

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Forward Planning Section

Our Ref: FWD/File 47

18th December, 2014.

Ms. Leonora Earls,
Administrative Officer,
Planning and Development,
Wicklow County Council,
Station Road,
Wicklow Town.

***Re: Review of Wicklow County Development Plan 2010 - 2016;
Preparation of Wicklow Development Plan 2016 – 2022.***

Dear Ms. Earls,

Meath County Council wish to acknowledge receipt of your letter dated 24th October 2014 with regard to the above mentioned. Having reviewed the Issues Paper Meath County Council has no comments/observations to make at this time.

Yours sincerely,

Patrick Gallagher,
Senior Planner.



Administrative Officer
Planning & Development
Wicklow County Council
County Buildings
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Dáta | Date
19 December, 2014

Ár dTag | Our Ref.
NRA14-91182

Bhur dTag | Your Ref.

**Re. Review of Wicklow County Development Plan, 2010 – 2016
Preparation of Wicklow County Development Plan, 2016 – 2022**

Dear Sir/Madam,

The Authority welcomes consultation on the review of the Council's Development Plan and the preparation of a new County Development Plan and submits the following observations for the Councils consideration having reviewed the Consultation Documentation:

MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T regulations target a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). The TEN-T regulations define the objective of increasing 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 currently consists of the route from Northern Ireland via Dublin to both Cork/Ringskiddy and Limerick/Foynes. The Council will be aware that the N/M11/N25 Dublin to Rosslare route is identified as part of the TEN-T Comprehensive Network.

The M11/N11 is a highly important national road. The M11/N11 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 Euro-port and via the M50 through Dublin Port and Airport. The M50 also provides onward connection from the M11 to other national road radial routes.

The Council will also be aware that 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 town.

It is of particular importance that policies and objectives are 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 competitiveness by providing faster, more efficient and safer access to and from our 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 provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

Taking the aforementioned into consideration the following studies are considered highly relevant to the review of the County Development Plan;

M50/M11/N11 Corridor

As the Council is aware, the '*M50/M11/N11 Corridor Study*' January 2012 prepared by AECOM/ROD for the NRA set out a strategy to the year 2030 to manage the strategic function of the M50/M11/N11 between Sandyford in Dun Laoghaire Rathdown and Fasseroe in Wicklow. The "*M50/M11/N11 Corridor Study*", having examined the M50 over the period from 2008 to 2011, shows that there has been constant and consistent growth in monthly traffic volumes, with increases of over 25% recorded over a 3 year period. This is in contrast to traffic volumes across much of the rural road network, where reductions of up to 20% have been recorded in individual areas since 2008. This conclusion suggests that the additional road capacity on strategically important routes still remains under threat despite the economic slowdown, and that such growth will likely continue as the economy returns to growth.

Therefore, it is critical that development envisaged by Wicklow County Council in the town plans and settlements along the M11/N11 is planned and delivered in a manner that is consistent with safeguarding the strategic role of the route in the future.

M11/N11 Merging Study and M11/N11 Traffic Management Measures – Killarney Road and Fasseroe Interchange Improvements Part VIII Report

The above studies were carried out in 2010 on parts of the N11 to address traffic flow issues. The objective of the M11/N11 Merging Study was to determine the cause of existing flow disruption on the southbound carriageway of the M11 during the peak pm period and to propose appropriate mitigation measures to enhance existing mainline capacity, and to manage traffic volumes that are expected to result from future increases in demand.

N11 Corridor Review Fasseroe Junction to Kilmacanogue

The study examines existing conditions at Fasseroe Junction, Kilcronee Junction and Kilmacanogue Village and identifies potential upgrade measures.

M50 Demand Management Study

Although outside the jurisdiction of Wicklow County Council, the M50 is the most heavily trafficked road in the country with in excess of 130,000 vehicles per day using several sections. The road was originally envisaged as a bypass route for strategic traffic around Dublin and now provides a range of functions over and above that expected of a strategic corridor. Traffic flows on the M50 have continued to grow since moving to free-flow tolling in August 2008 and the completion of the upgrade in stages between 2008 and 2010 with increases of up to 25% experienced on some sections of the M50 since 2010.

In 2012 the National Roads Authority convened a Steering Group with a view to undertaking a study to identify a scheme of indicative Demand Management Measures for the M50 corridor with the objective of reducing demand on the M50, such that it operates without congestion for longer and improving the safety and reliability of the M50 by reducing congestion.

The M50 Demand Management Report published in April 2014, provides a summary of the work undertaken and describes an indicative package of demand management measures which best address the objectives.

The Council may wish to have regard to the M50 Demand Management Study when preparing the County Development Plan, 2016 – 2022, having regard to the inter-relationship of the M50/M11/N11.

Proposed Motorway Declarations

The Council will also be aware of the current application being considered by the Minister for Transport, Tourism and Sport for orders declaring as motorway the completed sections of N11 upgrade and the under construction section of N11 between Arklow and Rathnew. Details are available on the Departments website, www.dttas.ie, and on the Authority's website, www.nra.ie.

DEVELOPMENT AND CORE STRATEGY

As demonstrated in this submission, the Authority seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in County Wicklow are protected and that the relevant policies/objectives included in the County Development Plan are developed to reflect this.

In particular, having reviewed the Consultation Document, the Authority requests that the Council consider the implications of land use policies 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.

As noted in the consultation document prepared for the Development Plan Review, a number of settlements identified for growth adjoin or are in close proximity to the N/M11. Other settlements subject to local area plans, including Bray, Greystones, Newtownmountkennedy, Wicklow/Rathnew and Arklow are also heavily reliant on the N/M11 for access. Baltinglass and Blessington are served by, and are similarly reliant on the N81, national secondary road.

In view of the location of these areas, the Authority respectively points out that although a requirement has been identified for the development of lands in these settlements, this local demand cannot be developed to the detriment of the investment in national infrastructure, by eroding or undermining that investment, which is required to service the Country's major inter-urban and inter-regional transport requirements that underpins Ireland's competitiveness.

Policies and objectives in identified settlements and growth areas can be developed and adopted 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 Development Plan is the policy document to set this framework at county level.

In accordance with Government policy, the Authority supports practices 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 extent and location of industry, employment and other commercial type land uses to prepare a co-ordinated and integrated land use pattern; the Guidance Note on Core Strategies published by the DoECLG (2010) contains advice on this requirement, page 8 refers.

The Authority 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. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by 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.

As indicated in Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including major junctions and interchanges, development plans should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future by:

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

The Council is also advised 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 contributions schemes.

The Council will be aware that the strategic recommendations outlined in the Regional Planning Guidelines for the Greater Dublin Area, 2010 – 2022, include the objective that plans and policies should identify and protect strategic road corridors and their principle function as arterial routes for the movement of goods, services and people between settlement areas within and outside the GDA. Long term junction capacity and carrying capacity should not be adversely affected by inappropriate and dispersed development. Plans and policies need to be cognisant of the challenges and needs where such roads bisect urban areas identified for growth in the RPG's and the need for strong connectivity within the urban fabric.

In addition, the DoECLG Spatial Planning and National Roads Guidelines also advise, Section 2.5 refers, that development plans should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply. This provision, it is stated, applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant. In addition, the Guidelines state that planning authorities should avoid a proliferation of accesses to national roads subject to a 60kph speed limit. There is also, therefore, a requirement to co-ordinate proposed zoning designations and/or access strategies in settlement plans with speed limits on national roads in the Draft Plan.

Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be plan led, done in consultation with and subject to the agreement of the NRA in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines.

The Authority advises that it is available to discuss proposals in relation to Section 2.6 of the Guidelines with the Executive of Wicklow County Council. Where the Council proposes to identify 'exceptional circumstances' for agreement a sufficient and robust evidence base will need to be established in consultation with the Authority.

Development at national road junctions

In addition to the Core Strategy and general development strategy safeguarding the strategic inter-urban and inter-regional function of national roads, as outlined above, it will be important for the Council to exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users. Such proposals should be considered in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

As outlined, Draft Development Plan policies should reflect and safeguard the strategic role of the national road network and associated junctions in catering for the safe and efficient movement of inter-urban and inter-regional traffic. Planning authorities, in considering proposals for zonings adjacent or

close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres.

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

Thus, it is the Authority's opinion that the Council should give consideration 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 road network. Section 1.4 of the NRA Traffic and Transport Assessment Guidelines (2014) refers.

Related to the foregoing, the Authority still awaits a copy of the Junction Upgrade Strategy for the Ballyronan Junction as previously committed to by the Council. The Authority also recommends that previous correspondence between the Council and the Authority on this matter is taken into consideration in the development of any zoning strategy for Newtownmountkennedy.

NATIONAL ROAD SCHEMES

As you are aware the Authority is developing/progressing road schemes and improvements within the County, details of which should be considered for incorporation into the review of the Development Plan and include:

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

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

The Council may also consider it appropriate to identify any local improvements to national roads planned by the Council over the term of the Development Plan that may be incorporated into the adopted plan. The Authority 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 Council will be aware that the NRA may not be responsible for the funding of any such schemes or improvements.

Related to the foregoing, the Authority requests the inclusion of policies and objectives in the Development Plan that provide for 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 routes, 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 resource available to the Authority. In these circumstances and taking account of the difficult Exchequer financial position which we are currently experiencing, the relative priority or timeframe for national road schemes may be subject to alteration.

OTHER SPECIFIC POLICIES AND OBJECTIVES

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

The Authority recommends that planning applications for significant development proposals should be accompanied with TTA and RSA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring and other planned/proposed developments on the road network. The Council should reference the NRA Traffic & Transport Assessment Guidelines (2014) for development with implications for the national road network. Thresholds advised in the NRA TTA Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads and differ from the thresholds outlined in the Traffic Management Guidelines. The Authority would welcome their inclusion in the Plan.

In addition, further guidance in relation to TTA is given in the *Traffic Management Guidelines* and with respect to RSA in NRA DMRB HD19/12 Road Safety Audit.

Service Areas

The planning authority will be aware that Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines indicates the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and also addresses road side service facilities on non-motorway national roads and their junctions. Comments, above, in relation to development at national road junctions may also be pertinent in the case of such development proposals.

The Council will be aware that the Authority has recently updated and issued the NRA Policy on Service Areas (August, 2014). Section 1.4 of the Policy outlines the roles of the Authority and planning authorities in relation to the provision of service areas. The Council will also note the requirement for provision of Service Areas on the M11 is addressed in Section 3.4. The Authority would welcome the provisions of the Service Area Policy being reflected in the Draft Plan.

Signage

The NRA has issued the Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011). The purpose of this document is to outline the National Roads Authority's policy on the provision of tourist and leisure information signs on national primary and national secondary roads in Ireland. With respect to the new Development Plan, the Planning Authority is also referred to Section 3.8 of the DoECLG's Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. The Authority would welcome the provisions of the NRA Policy and the DoECLG Guidelines incorporated into the new Development Plan.

Noise

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

CONCLUSION

Having regard to the foregoing, the Authority recommends that the development objectives that may be included in the Draft Development Plan would reflect the provisions of the DoECLG's 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.

In summary, the Planning Authority is advised to ensure in the review of the Development Plan:

- The protection of the safety, carrying capacity and efficiency of the existing and future national roads network is maintained, and:
- 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 (i.e. non-national) road network.

The Authority is willing to meet to further discuss the issues raised in this correspondence at your earliest convenience as an aid to devising an appropriate and sustainable development strategy for Wicklow County Council.

Yours sincerely,



Michael McCormack
Policy Adviser (Planning)

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Dáta | Date
19 December, 2014

Ár dTag | Our Ref.
NRA14-91182

Bhur dTag | Your Ref.

**Re. Review of Wicklow County Development Plan, 2010 – 2016
Preparation of Wicklow County Development Plan, 2016 – 2022**

Dear Sir/Madam,

The Authority welcomes consultation on the review of the Council's Development Plan and the preparation of a new County Development Plan and submits the following observations for the Councils consideration having reviewed the Consultation Documentation:

MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T regulations target a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). The TEN-T regulations define the objective of increasing 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 currently consists of the route from Northern Ireland via Dublin to both Cork/Ringskiddy and Limerick/Foynes. The Council will be aware that the N/M11/N25 Dublin to Rosslare route is identified as part of the TEN-T Comprehensive Network.

The M11/N11 is a highly important national road. The M11/N11 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 Euro-port and via the M50 through Dublin Port and Airport. The M50 also provides onward connection from the M11 to other national road radial routes.

The Council will also be aware that 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 town.

It is of particular importance that policies and objectives are 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 competitiveness by providing faster, more efficient and safer access to and from our 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 provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

Taking the aforementioned into consideration the following studies are considered highly relevant to the review of the County Development Plan;

M50/M11/N11 Corridor

As the Council is aware, the '*M50/M11/N11 Corridor Study*' January 2012 prepared by AECOM/ROD for the NRA set out a strategy to the year 2030 to manage the strategic function of the M50/M11/N11 between Sandyford in Dun Laoghaire Rathdown and Fasseroe in Wicklow. The '*M50/M11/N11 Corridor Study*', having examined the M50 over the period from 2008 to 2011, shows that there has been constant and consistent growth in monthly traffic volumes, with increases of over 25% recorded over a 3 year period. This is in contrast to traffic volumes across much of the rural road network, where reductions of up to 20% have been recorded in individual areas since 2008. This conclusion suggests that the additional road capacity on strategically important routes still remains under threat despite the economic slowdown, and that such growth will likely continue as the economy returns to growth.

Therefore, it is critical that development envisaged by Wicklow County Council in the town plans and settlements along the M11/N11 is planned and delivered in a manner that is consistent with safeguarding the strategic role of the route in the future.

M11/N11 Merging Study and M11/N11 Traffic Management Measures – Killarney Road and Fasseroe Interchange Improvements Part VIII Report

The above studies were carried out in 2010 on parts of the N11 to address traffic flow issues. The objective of the M11/N11 Merging Study was to determine the cause of existing flow disruption on the southbound carriageway of the M11 during the peak pm period and to propose appropriate mitigation measures to enhance existing mainline capacity, and to manage traffic volumes that are expected to result from future increases in demand.

N11 Corridor Review Fasseroe Junction to Kilmacanogue

The study examines existing conditions at Fasseroe Junction, Kilcronee Junction and Kilmacanogue Village and identifies potential upgrade measures.

M50 Demand Management Study

Although outside the jurisdiction of Wicklow County Council, the M50 is the most heavily trafficked road in the country with in excess of 130,000 vehicles per day using several sections. The road was originally envisaged as a bypass route for strategic traffic around Dublin and now provides a range of functions over and above that expected of a strategic corridor. Traffic flows on the M50 have continued to grow since moving to free-flow tolling in August 2008 and the completion of the upgrade in stages between 2008 and 2010 with increases of up to 25% experienced on some sections of the M50 since 2010.

In 2012 the National Roads Authority convened a Steering Group with a view to undertaking a study to identify a scheme of indicative Demand Management Measures for the M50 corridor with the objective of reducing demand on the M50, such that it operates without congestion for longer and improving the safety and reliability of the M50 by reducing congestion.

The M50 Demand Management Report published in April 2014, provides a summary of the work undertaken and describes an indicative package of demand management measures which best address the objectives.

The Council may wish to have regard to the M50 Demand Management Study when preparing the County Development Plan, 2016 – 2022, having regard to the inter-relationship of the M50/M11/N11.

Proposed Motorway Declarations

The Council will also be aware of the current application being considered by the Minister for Transport, Tourism and Sport for orders declaring as motorway the completed sections of N11 upgrade and the under construction section of N11 between Arklow and Rathnew. Details are available on the Departments website, www.dttas.ie, and on the Authority's website, www.nra.ie.

DEVELOPMENT AND CORE STRATEGY

As demonstrated in this submission, the Authority seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in County Wicklow are protected and that the relevant policies/objectives included in the County Development Plan are developed to reflect this.

In particular, having reviewed the Consultation Document, the Authority requests that the Council consider the implications of land use policies 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.

As noted in the consultation document prepared for the Development Plan Review, a number of settlements identified for growth adjoin or are in close proximity to the N/M11. Other settlements subject to local area plans, including Bray, Greystones, Newtownmountkennedy, Wicklow/Rathnew and Arklow are also heavily reliant on the N/M11 for access. Baltinglass and Blessington are served by, and are similarly reliant on the N81, national secondary road.

In view of the location of these areas, the Authority respectively points out that although a requirement has been identified for the development of lands in these settlements, this local demand cannot be developed to the detriment of the investment in national infrastructure, by eroding or undermining that investment, which is required to service the Country's major inter-urban and inter-regional transport requirements that underpins Ireland's competitiveness.

Policies and objectives in identified settlements and growth areas can be developed and adopted 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 Development Plan is the policy document to set this framework at county level.

In accordance with Government policy, the Authority supports practices 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 extent and location of industry, employment and other commercial type land uses to prepare a co-ordinated and integrated land use pattern; the Guidance Note on Core Strategies published by the DoECLG (2010) contains advice on this requirement, page 8 refers.

The Authority 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. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by 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.

As indicated in Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including major junctions and interchanges, development plans should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future by:

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

The Council is also advised 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 contributions schemes.

The Council will be aware that the strategic recommendations outlined in the Regional Planning Guidelines for the Greater Dublin Area, 2010 – 2022, include the objective that plans and policies should identify and protect strategic road corridors and their principle function as arterial routes for the movement of goods, services and people between settlement areas within and outside the GDA. Long term junction capacity and carrying capacity should not be adversely affected by inappropriate and dispersed development. Plans and policies need to be cognisant of the challenges and needs where such roads bisect urban areas identified for growth in the RPG's and the need for strong connectivity within the urban fabric.

In addition, the DoECLG Spatial Planning and National Roads Guidelines also advise, Section 2.5 refers, that development plans should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply. This provision, it is stated, applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant. In addition, the Guidelines state that planning authorities should avoid a proliferation of accesses to national roads subject to a 60kph speed limit. There is also, therefore, a requirement to co-ordinate proposed zoning designations and/or access strategies in settlement plans with speed limits on national roads in the Draft Plan.

Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be plan led, done in consultation with and subject to the agreement of the NRA in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines.

The Authority advises that it is available to discuss proposals in relation to Section 2.6 of the Guidelines with the Executive of Wicklow County Council. Where the Council proposes to identify 'exceptional circumstances' for agreement a sufficient and robust evidence base will need to be established in consultation with the Authority.

Development at national road junctions

In addition to the Core Strategy and general development strategy safeguarding the strategic inter-urban and inter-regional function of national roads, as outlined above, it will be important for the Council to exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users. Such proposals should be considered in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

As outlined, Draft Development Plan policies should reflect and safeguard the strategic role of the national road network and associated junctions in catering for the safe and efficient movement of inter-urban and inter-regional traffic. Planning authorities, in considering proposals for zoning adjacent or

close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres.

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

Thus, it is the Authority's opinion that the Council should give consideration 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 road network. Section 1.4 of the NRA Traffic and Transport Assessment Guidelines (2014) refers.

Related to the foregoing, the Authority still awaits a copy of the Junction Upgrade Strategy for the Ballyronan Junction as previously committed to by the Council. The Authority also recommends that previous correspondence between the Council and the Authority on this matter is taken into consideration in the development of any zoning strategy for Newtownmountkennedy.

NATIONAL ROAD SCHEMES

As you are aware the Authority is developing/progressing road schemes and improvements within the County, details of which should be considered for incorporation into the review of the Development Plan and include:

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

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

The Council may also consider it appropriate to identify any local improvements to national roads planned by the Council over the term of the Development Plan that may be incorporated into the adopted plan. The Authority 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 Council will be aware that the NRA may not be responsible for the funding of any such schemes or improvements.

Related to the foregoing, the Authority requests the inclusion of policies and objectives in the Development Plan that provide for 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 routes, 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 resource available to the Authority. In these circumstances and taking account of the difficult Exchequer financial position which we are currently experiencing, the relative priority or timeframe for national road schemes may be subject to alteration.

OTHER SPECIFIC POLICIES AND OBJECTIVES

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

The Authority recommends that planning applications for significant development proposals should be accompanied with TTA and RSA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring and other planned/proposed developments on the road network. The Council should reference the NRA Traffic & Transport Assessment Guidelines (2014) for development with implications for the national road network. Thresholds advised in the NRA TTA Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads and differ from the thresholds outlined in the Traffic Management Guidelines. The Authority would welcome their inclusion in the Plan.

In addition, further guidance in relation to TTA is given in the *Traffic Management Guidelines* and with respect to RSA in NRA DMRB HD19/12 Road Safety Audit.

Service Areas

The planning authority will be aware that Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines indicates the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and also addresses road side service facilities on non-motorway national roads and their junctions. Comments, above, in relation to development at national road junctions may also be pertinent in the case of such development proposals.

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CONCLUSION

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development plan stage for proposals with implications for the on-going safe and efficient operation of national roads.

In summary, the Planning Authority is advised to ensure in the review of the Development Plan:

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The Authority is willing to meet to further discuss the issues raised in this correspondence at your earliest convenience as an aid to devising an appropriate and sustainable development strategy for Wicklow County Council.

Yours sincerely,



Michael McCormack
Policy Adviser (Planning)

An Deiscirt & An Oirthir
Tionól Réigiúnach

Cach Tionól
Sráid Uí Chonail
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Wicklow,
Co. Wicklow



17th December, 2014

**Re: Submission of the Southern and Eastern Regional Assembly on the
Review of the Wicklow County Development Plan 2016 – 2022**

Dear Sir/Madam,

I attach for your attention a copy of a submission to the County Development Plan review on behalf of the Regional Assembly.

Please acknowledge receipt of same.

Yours sincerely,

Stephen Blair

Director



Clár Chisti' Struchtúrach AE
na hÉireann 2007-2013

Cómhaoinithe ag Rialtas na hÉireann
agus ag an Aontas Eorpach

'Ag Infheistiú I do Thodhchaí'
'Investing In Your Future'



CISTE FORBRAIÓCHTA
REIGIÚNAI NA HEORPA

Regional Planning Guidelines for the Greater Dublin Area 2010-2022

Treoirlínte Réigiúnacha Pleanála do Mhórcheantar Bhaile Átha Cliath



Submission of the Southern and Eastern Regional Assembly on the Review of the Wicklow County Development Plan 2016 – 2022

Introduction

The Regional Planning Guidelines (RPGs) 2010-2022 aim to direct the future growth of the Greater Dublin Area up to 2022 by implementing the strategic planning framework set out in the National Spatial Strategy (NSS). 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.

Under the Local Government Reform Act 2014 the eight Regional Authorities and two Assemblies will be replaced by three new Regional Assemblies. The Regional Authorities for the Greater Dublin area – The Dublin Region and the Mid-East Region have now been dissolved since the 1st June 2014. There is an interim arrangement in place for the remainder of 2014 where the functions, staff, liabilities, assets etc. of the dissolved Regional Authorities have been transferred to either the Border, Midland and Western Assembly or as in the case with the Greater Dublin Area, the Southern and Eastern Regional Assembly.

On 1st January three new Regional Assemblies will be established their functions are the formulation, adoption and implementation of Regional Spatial and Economic Strategies (which will replace the existing Regional Planning Guidelines), 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. The successor Assembly to the Greater Dublin Area will be the Eastern and Midlands Regional Assembly.

With regard to the Regional Spatial and Economic Strategies which are to replace the RPGs 2010 - 2022, the Local Government Reform Act 2104 Sec.23. (1) states “The objective of regional spatial and economic strategies shall be to support the implementation of the National Spatial Strategy 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 National Spatial Strategy and the economic policies or objectives of the Government.”

Furthermore it should be noted that the current status of the RPGs 2010 - 2022 is enshrined in the Local Government Reform Act 2014 Sec.63. (4) “Notwithstanding any other provision of this Act, the regional planning guidelines prepared by a dissolved regional authority and published in respect of the period 2010 to 2022, shall continue to have effect as if made under



this Part until a regional spatial and economic strategy is prepared and adopted by the regional assembly concerned." During this transition period it is essential that the regional assemblies' statutory role in the process of reviewing and making statutory observations on the development plan process continues.

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 National Spatial Strategy (National Planning Framework) by the Department of Environment, Community and Local Government, which in itself will contain new spatial planning policy, the possible timeframe for commencement of the Regional Spatial and Economic Strategies (RSES) will not coincide with the Development Plan Review process for Wicklow County Council.

Legislative context

Under Section 27A of the Planning & Development Act, 2000 (as inserted by Section 18 of the Planning and Development Act, 2010) the Eastern and Midlands Regional Assembly, as the successor regional assembly of the dissolved Dublin and Mid-East Regional Authorities, 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.

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, policies 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.

Submission

This submission broadly follows the themes contained within the issues booklet for Stage One public consultation under the following headings:

1. Vision and Core Strategy
2. Housing
3. Enterprise and Employment
4. Tourism
5. Retail
6. Rural Development
7. Social, Community and Cultural Development
8. Built and Natural Heritage, including Landscape
9. Infrastructure
10. Strategic Environmental Assessment, Appropriate Assessment and Flood Risk Assessment
11. Local Plans
12. Town Plans



1. VISION AND CORE STRATEGY

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 Guidelines¹.

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,	Greystones, Arklow

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



		economically vibrant with high quality transport links to larger towns/city	
Moderate Growth Towns	Sustainable	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.

2. HOUSING

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.

3. ENTERPRISE AND EMPLOYMENT

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 / Gresystones with Bray including Fassaroe being the primary town. These centres are considered strategic employment centers, 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 LECPs.

4. TOURISM

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.

5. RETAIL

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.

6. RURAL DEVELOPMENT

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.

7. SOCIAL, COMMUNITY AND CULTURAL DEVELOPMENT

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

8. BUILT AND NATURAL HERITAGE, INCLUDING LANDSCAPE



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.

9. INFRASTRUCTURE

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. Policies such as promoting higher densities for employment and residential uses around public transport, should be considered in the County Development Plan. 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 policies 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.

10. STRATEGIC ENVIRONMENTAL ASSESSMENT, APPROPRIATE ASSESSMENT AND FLOOD RISK ASSESSMENT

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

11. LOCAL PLANS

Local Area Plans 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 County Development Plan 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 County Development Plan, 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 Local Area Plans 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 County Development Plan and consistency of timeframes for plans.

12. TOWN PLANS

The 'town plans' in the County Development Plan should follow a clear policy hierarchy from Regional Planning Guidelines to the core strategy of the County Development Plan, 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.



Stephen Blair

Director

Southern and Eastern Regional Assembly



Sorcha Walsh

From: David Clements [David.Clements@nationaltransport.ie]
Sent: 14 January 2015 18:23
To: Planning - Development Plan Review
Cc: Sorcha Walsh
Subject: NTA Submission on Wicklow County Development Plan Issues Paper
Attachments: NTA Submission Wicklow County Development Plan Issues Paper.pdf

To whom it may concern,

Please find attached the NTA's submission on the Wicklow County Development Plan 2016-22 Issues Paper. Can you please confirm, at your earliest convenience, receipt of this email and that this will be taken into account in the making of the draft plan.

Kind Regards,

David Clements
 Land Use & Transport Planner
 Transport Planning and Capital Investment



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x	
x	

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó biodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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13th January 2015

Re: Wicklow County Development Plan 2016-2022 – Issues Paper

To whom it may concern,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Wicklow County Development Plan 2016-2022 – Issues Paper.

Section 31B(1) of the Planning and Development Act 2000¹ 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*
- (d) recommendations on the matters to be addressed in the development plan to ensure the effective integration of transport and land use planning.*

The National Transport Authority (the Authority) therefore submits the following observations on the making of the Draft Wicklow County Development Plan 2016-2022, and on the material presented in the Issues Paper.

Transport Investment Priorities

This section deals with transport investment priorities for the period of the Wicklow County Development Plan. The Authority’s Integrated Implementation Plan sets out an infrastructure

¹ As inserted by Section 95 of the Dublin Transport Authority Act 2008

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.

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.

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.

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 focussed 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.

Further NTA Response to Issues Papers

In addition to the comments above, the Authority submits the following in response to the Background Issues Papers published as part of this pre-draft public consultation exercise.

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.

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.

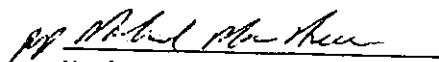
Sustainable Transportation

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.

To conclude, the Authority looks forward to working closely with Wicklow County Council in the completion and publication of the County Development Plan, subsequent Local Area Plans and various transport proposals through the Sustainable Transport Measures Grants programme, the emerging Government Capital investment Programme and GDA Transport Strategy, and trust that the Council will take our views into account in the making of the Draft Wicklow County Development Plan.

Yours sincerely,



Hugh Creegan

Director of Transport Planning and Investment